

OPUS2

Manchester Arena Inquiry

Day 38

November 18, 2020

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

Wednesday, 18 November 2020

1 (9.30 am)

2 (The inquiry sat in a restricted session)

3 (10.05 am)

4 MR HENDERSON: Good morning, sir. Our first witness this morning is Mr Fraser Swift.

5 SIR JOHN SAUNDERS: Thank you very much for coming back.

6 You are already sworn, there's no need to be re-sworn.

7 MR FRASER SWIFT (recalled)

8 Questions from MR HENDERSON

9 MR HENDERSON: Good morning, Mr Swift. As the chairman

10 said, you have already assisted us, thank you for that,

11 back on 6 October, and thank you for coming back now.

12 We've already heard from you about the licensing

13 arrangements for the Manchester Arena in 2017. You're

14 now back to help us deal with a few follow-up matters

15 and then also to explain Manchester City Council's

16 approach to the proposal for Martyn's Law, so we'll go

17 through that in turn.

18 Firstly, in terms of picking up a few things that

19 have arisen on licensing since you last came to assist

20 us. Can I ask you, to begin with, about section 21 of

21 the Licensing Act 2003? This is the provision which

22 makes it a mandatory condition for a premises licence if

23 there are going to be security activities carried out

1

1 that any individual carrying out those security

2 activities needs to have an SIA licence. Is that right?

3 A. Yes, that's right.

4 Q. Can we have a look, please, at the premises licence for

5 the Manchester Arena? I'll ask Mr Lopez to bring it up

6 on the screen. It's {INQ035447/1}.

7 Could we go to {INQ035447/2}. Could you zoom in on

8 annex 1 at the bottom of that page.

9 Mr Swift, can you see under annex 1, "Mandatory

10 conditions", there is a reference to door supervisors

11 and then a condition about door supervisors there?

12 A. Yes.

13 Q. Is that the section 21 mandatory condition in this

14 licence?

15 A. Yes.

16 Q. Who was that intended to cover, if you know, at the

17 arena? So was it just people with the specific title of

18 door supervisor or did it go wider than that? Do you

19 know what the intention was?

20 A. I don't know the specific intention. I suppose the

21 background to the conditions on the arena licence were

22 that they were converted over from the previous regime.

23 I suppose the other point I would make was the practice

24 was to include this condition on licences generally. So

25 in my view, it wouldn't have been attached with

2

1 a specific existing condition in mind.

2 Q. So for instance --

3 SIR JOHN SAUNDERS: I did have some concerns about that --

4 I'm sorry to interrupt. There have been a series of

5 questions which we have asked to you consider.

6 Section 21 is in terms of -- I'm not expecting you

7 to remember it necessarily, but:

8 "Where a premises licence includes a condition that

9 at specified times one or more individuals must be

10 at the premises to carry out a security activity, the

11 licence must include a condition that each such

12 individual must be authorised by the SIA."

13 What I actually wanted to know is: which conditions

14 on the licence was that meant to attach to?

15 For example, there is a condition that there should

16 be stewarding within the arena itself to deal with

17 people who cause disturbance or anything like that.

18 I want to know really whether it is meant to attach to

19 them as well or simply to people who are carrying out

20 searching on the doors.

21 A. I suppose the imposition of this condition -- you know,

22 in my view it wouldn't have been attached specifically

23 to relate to one of those particular conditions.

24 SIR JOHN SAUNDERS: I just wonder, because that's what

25 section 21 says it has to.

3

1 A. All I can go back to is the approach was to include the

2 condition, so it would have been done as a matter of

3 course, but I appreciate what the guidance says. That

4 is the background to the likelihood as to this condition

5 being on this licence.

6 SIR JOHN SAUNDERS: It's quite difficult for the operator,

7 and indeed for anyone who is enforcing it, because if it

8 was meant to attach to people who are actually within

9 the arena dealing with any public order problem there

10 may be, as well as to door supervisors, they really need

11 to know that.

12 A. I take that point.

13 SIR JOHN SAUNDERS: Okay, fair enough.

14 A. I suppose what I would say is these conditions carried

15 over as part of the conversion process, so at that time

16 the requirement on the licensing authority was just to

17 carry them over as they were.

18 SIR JOHN SAUNDERS: Right.

19 A. I don't know how it was dealt with under the previous

20 regime, whether there was any distinction between

21 stewarding, because that's the typical reference in the

22 licence -- and SIA activities, I suspect these

23 conditions may well have pre-dated the start of the

24 Private Security Industry Act and the SIA. But in

25 respect of this licence, I'm afraid I can't sort of

4

1 pinpoint specific conditions that it was attached to.
 2 SIR JOHN SAUNDERS: The SIA licence attaches not just to
 3 people who are searching or the requirement for it, but
 4 also people who are entitled to or do use some degree of
 5 force in order to remove people from premises, which may
 6 conceivably have included the people who were stewarding
 7 actually inside the arena. Anyway, it seems to have
 8 been unclear.

9 Sorry to take over.

10 MR HENDERSON: No, not at all.

11 Mr Swift, if we could go to page 10 of this licence.
 12 We can see here -- sorry, it should be page 9. There we
 13 go.

14 In fact, I'm sorry, I got my references wrong.
 15 Could you back one more page to {INQ035447/8}?

16 We can see there at the bottom the reference to
 17 stewarding and there's a series of conditions relating
 18 to stewarding. I was going to pick up just the first
 19 one and the chairman may want to explore some others
 20 with you. It says:

21 "The minimum number of stewards as agreed by the
 22 local authority shall be provided to perform the
 23 functions and duties specified herein."

24 And then it goes on to say:

25 "To be fit and active and ensure they are capable of

5

1 carrying out their duties and are properly trained to do
 2 so."

3 Do you have any idea if there was a minimum number
 4 of stewards actually agreed between the licensing
 5 authority and the arena under this licence or was that
 6 never actually specified?

7 A. I have checked our records and unfortunately I can't
 8 find a record of what the minimum number agreed with the
 9 local authority is.

10 SIR JOHN SAUNDERS: I'm afraid I find that really quite
 11 unacceptable. If it's put in the -- you tell me, do you
 12 find it unacceptable if it's a condition of the licence
 13 and then there doesn't appear to be an agreed number?

14 A. Yes, you know, it's there and there should be an agreed
 15 number.

16 SIR JOHN SAUNDERS: The committee presumably thought it was
 17 important that there should be an agreed minimum number
 18 and you can understand why they should think that?

19 A. Of course.

20 SIR JOHN SAUNDERS: Okay. It's not a reflection on you,
 21 it's just generally a lack of perhaps good
 22 administration or follow-up. It may have happened
 23 because of the conversion system going on, I understand
 24 that. You were dealing with a whole lot of licences
 25 at the time, but the arena was quite an important one.

6

1 A. Of course.

2 MR HENDERSON: I think it's worth following on when the
 3 conversion of the old licence into the new licence under
 4 the 2003 Act scheme happens. Is it the same general
 5 approach that you have under the Licensing Act as in
 6 it's a permissive approach where unless there's a good
 7 reason to change the conditions or add new ones, the
 8 existing licence and its conditions just rolls over; is
 9 that the approach? Or should there have been more care
 10 and specificity given to each of these conditions?

11 A. It's going back some time. If I recall the conversion
 12 process, I think only the police could object at the
 13 time, but the general proviso was you were expected to
 14 carry over what you currently had as a licence and what
 15 came with that, like the conditions, unless of course
 16 there was a particularly good reason not to, which was
 17 why there was a right to object, in which case there
 18 would have been a hearing. I'm not sure I heard of any
 19 licences not being converted at the time. So the
 20 general matter, of course, was, yes, it was just carried
 21 over.

22 SIR JOHN SAUNDERS: That's not my problem really. My
 23 problem is the fact that it may have never been -- there
 24 may have never been an agreement as to the minimum
 25 number of stewards, which people might regard as being

7

1 quite important.

2 A. I take that point.

3 SIR JOHN SAUNDERS: Okay, thank you.

4 MR HENDERSON: You mentioned the involvement of the police
 5 just there in your last answer, so the police have
 6 a right to object or to be involved in licences,
 7 particularly when they're varied or renewed. Let me
 8 just ask you a little bit about that in more detail. Is
 9 there any particular sort of security aspect to that
 10 police input as a matter of course?

11 A. I guess they look at matters relevant to crime and
 12 disorder generally, so yes, it may well be
 13 security-related, how people access, the controls in
 14 place at that point. It would... Yes, I suppose
 15 obviously then the degree of that varies by the type of
 16 the application, the nature of the premises. But yes,
 17 it would.

18 Q. And more specifically, are you aware if there's any
 19 particular counter-terrorism aspect to that at the
 20 moment? Would the police input involve consideration of
 21 counter-terrorism measures?

22 A. Not in my experience.

23 Q. Have you ever heard of the CTSAs from the police force
 24 being involved, so the counter-terrorism security
 25 advisers, whose particular role is counter-terrorism

8

1 advice?
 2 A. I'm not aware of them participating in a licensing
 3 application --
 4 Q. Thank you.
 5 A. -- in Manchester. I'm sure they may well do in other
 6 areas, but in my experience dealing with applications in
 7 Manchester, I can't recall a specific example, I'm
 8 afraid.
 9 SIR JOHN SAUNDERS: Okay. They're few and far between,
 10 applications for big new licences, particularly perhaps
 11 at the moment when more places are closing than are
 12 actually opening. But perhaps one of the things which
 13 may come out of this inquiry is actually that the design
 14 of premises, the location of premises may affect the
 15 risk of a terrorism outrage taking place. So licensing
 16 committees do take account of designs in premises which
 17 may result in increased crime and disorder. So they
 18 would look to see whether there were places in licensed
 19 premises which can't be observed, so where drug dealing
 20 could go on, or even in certain areas perhaps dealing in
 21 guns and things like that.
 22 So they would look at all that, wouldn't they, and
 23 if the police had concerns, they would raise them?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: It just seems odd, perhaps, that -- and

1 you're not the only authority, it seems everyone's been
 2 like this. Countering terrorist attacks, concerns about
 3 that in the design of premises, just seems to have been
 4 ignored.
 5 A. Yes, I mean... I know you're already aware the
 6 statutory guidance makes no reference to it, which, you
 7 know, I checked that and I found that surprising and I'm
 8 sure that will change. I think you're right, moving
 9 forwards, approaches will change.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR HENDERSON: That brings me then to the third follow-up
 12 issue I was going to deal with, which is you said the
 13 statutory guidance has no reference to
 14 counter-terrorism. But actually, the Manchester Council
 15 licensing policy does.
 16 SIR JOHN SAUNDERS: I'm really sorry. Can we just have the
 17 conditions of the licence back? Because I do want to
 18 look at the next page if that's possible.
 19 MR HENDERSON: Yes, {INQ035447/9}, Mr Lopez.
 20 SIR JOHN SAUNDERS: Thank you.
 21 If we look at -- this is what I was concerned about.
 22 If we look at condition 94 and generally what is
 23 required of stewards who are in the arena, they've got
 24 to:
 25 "Prevent people from climbing on balustrades, walls

1 or other structures [this is (f)], standing in gangways
 2 or seats."
 3 It may be that that was intended to include stewards
 4 who would actually have to use force to prevent people
 5 doing something like that. So they might conceivably --
 6 I'm not saying they do, but it is possible they would
 7 require an SIA licence to do that and I just wonder,
 8 that's what I had in mind as being whether the mandatory
 9 condition was meant to apply to that as well as to
 10 people who are searching. I think you're not in
 11 a position to answer, is really ... I'm just showing
 12 people what the condition is I was concerned about.
 13 A. Yes. I suppose ultimately the requirement for the
 14 mandatory condition beyond the licence should relate to
 15 other conditions on the licence that specify those
 16 security activities being done. So a condition that
 17 requires that, requires guarding the premises against
 18 outbreaks of disorder, damage... Then, yes, you know,
 19 it follows that the SIA requirement applies.
 20 SIR JOHN SAUNDERS: Yes. I'm not saying it does, I'm just
 21 saying it's something which would have to be considered
 22 maybe.
 23 Right, okay, sorry. Let's go to the local policy.
 24 MR HENDERSON: Yes, Mr Lopez, could we bring up
 25 {INQ038589/1}, please.

1 This is the Manchester licensing policy that was in
 2 place from 2016 and you were a step ahead of the
 3 statutory guidance because if we have a look at
 4 {INQ038589/13}, please, and under the heading "Working
 5 to prevent the threat of terrorism", we can see there
 6 that Manchester had included two specific paragraphs
 7 actually to do with terrorism.
 8 Really, Mr Swift, what I wanted to ask you is: what
 9 did that mean in practice? Let me ask a general
 10 question first. What did that mean in practice in terms
 11 of looking at new applications for licences and then
 12 considering existing ones?
 13 A. So this part is in section 2 of the policy, which deals
 14 with strategies that the licensing policy aims to
 15 promote, and I suppose it deals with issues relevant to
 16 the operation of licensed premises. So to put it in
 17 context, it deals with other community safety issues,
 18 there's issues like child sexual exploitation, and this
 19 is intended to recognise that the operation of licensed
 20 premises obviously plays a role in respect of these kind
 21 of issues.
 22 In relation to what this means in practice, it's
 23 included in the policy which (a) recognises that there
 24 is guidance by NaCTSO for all licensed premises, and
 25 I've reflected on this and obviously since the first

1 time I was here, the meaning, I suppose, behind some of
 2 the wordings. We got into the meaning regarding the
 3 wording of the Purple Guide and how that would be
 4 expected to be implemented.
 5 I'm conscious that this part of the policy, where it
 6 says "have regard to the guidance" and we talked about
 7 the Purple Guide, and that's "have reference to". And
 8 I think on reflection, I'm aware that "have regard to"
 9 obviously has legal connotations in respect of that.
 10 What I would say is, I think, it wasn't the
 11 intention of this -- as, I suppose, a local authority
 12 policy document, it wasn't intended necessarily to have
 13 that legal ramification. I suppose when we put things
 14 like in this, it's (a) to make licenced premises --
 15 bring it to the fore, bring it to their attention, but
 16 ultimately, the expectation -- and you know, it does use
 17 "expect" -- is that premises use these documents.
 18 Q. Would it be not just the premises but also the licensing
 19 officers and the licensing committee when they're
 20 considering applications for licences? Would this
 21 essentially tell them they should have a look at the
 22 NaCTSO guidance when they're considering it?
 23 A. Where obviously relevant representations have been
 24 made -- so to put licence applications in context, if
 25 there are no relevant representations or objections made

13

1 against an application, the authority must grant it. So
 2 it has no discretion and that's the licensing officer
 3 level. Where relevant representations are made, then
 4 there would be a hearing to determine the application
 5 and then the licensing committee would consider those
 6 representations and matters relevant to them.
 7 So I suppose if representations were made relevant
 8 to terrorism, counter-terrorism risks, then I would
 9 expect at that point the relevant part of the policy
 10 which would be this, to come into play.
 11 Q. Just to get really practical and concrete about it,
 12 a new venue, let's say a new nightclub, puts in an
 13 application for a licence. If somebody, and I guess the
 14 obvious person that might raise it is the police, raises
 15 a concern about how there might be some
 16 counter-terrorism risk here, we're concerned about this
 17 area of the building or this aspect of the security, but
 18 if that doesn't happen, nobody is actually going to look
 19 at this, are they --
 20 A. No.
 21 Q. -- it's just going to be granted? If it does happen,
 22 this guidance might be looked at. Is that the
 23 situation?
 24 A. I would expect, yes, it would likely come into play at
 25 that point. If there was an objection made about noise

14

1 disturbance, for example, taking your nightclub, would
 2 the committee, although they're going to have a hearing,
 3 factor in this guidance about counter-terrorism? No,
 4 they'd concentrate on the disputed matter.
 5 SIR JOHN SAUNDERS: I understand that. But as a matter of
 6 reality, if a licensing committee, who would be expected
 7 to know the area or some of them, because they're local
 8 councillors, would be knowing the area perhaps where the
 9 licensed premises are, had a concern that there was
 10 a risk facing the premises where they were of terrorist
 11 activity, it wouldn't be unheard of, would it, for the
 12 licensing committee to raise an issue with the police
 13 for them to investigate?
 14 A. No, obviously if a committee member has a particular
 15 matter that they think it's right to consider, then yes,
 16 they would raise that.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR HENDERSON: Thank you, Mr Lopez, that can come down.
 19 Fourthly and finally in terms of follow-up matters,
 20 Mr Swift, we've heard quite a bit of evidence about CCTV
 21 at the arena, and in particular the fact that
 22 a surveillance of public space using CCTV actually
 23 requires an SIA licence. It's not clear that was in
 24 place in fact at the arena. Is that something that
 25 the council's officers or licensing committee would do

15

1 anything to check? In other words, if premises has got
 2 CCTV monitoring public space, would there be any check
 3 on whether or not the requisite licences from the SIA
 4 were in place?
 5 A. I don't know. I'm not aware of it as an issue before
 6 the licensing committee and something that they would,
 7 I suppose, particularly raise as an issue. I suppose
 8 it would come into play if representations were made
 9 about how that would be operated or if it was being done
 10 without the required licence. Whether we would check,
 11 I can't answer that, I'm afraid.
 12 Q. Again, just to make it concrete, if for instance
 13 somebody raised a complaint, they realised they were
 14 being monitored on CCTV and the right licences from the
 15 SIA weren't in place and they raised that as a complaint
 16 with you, you might well investigate and look at the
 17 conditions?
 18 A. Oh yes, of course.
 19 Q. But not proactively, as it were?
 20 A. No, I don't think so. As I say, I have been thinking
 21 about whether the compliance inspections are an approach
 22 but I don't know whether that includes that as a matter
 23 of course, I'm afraid.
 24 Q. Don't worry, we're going to actually pick up the issue
 25 of some enforcement with your colleague Ms Sharkey, so

16

1 we can do that with her.
 2 Finally, let me ask you a few questions about
 3 Martyn's Law, if I may, and this is your statement,
 4 which we didn't get to last time, at paragraphs 61 and
 5 onwards.
 6 SIR JOHN SAUNDERS: Can I just explain? This is
 7 Manchester Council having heard about Martyn's Law in
 8 general, you're going to tell us, but think it's a good
 9 idea?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: And what the licensing committee have
 12 been wondering is whether they can incorporate within
 13 their policies and the way they do their business the
 14 principles of Martyn's Law if it becomes part of the law
 15 of the land?
 16 A. Well...
 17 SIR JOHN SAUNDERS: Is that fair?
 18 A. I think we are sort of going before that, to be honest,
 19 in relation to what the approach was rather than wait
 20 for it to be law...
 21 SIR JOHN SAUNDERS: You'd like to get on with it?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Fair enough. I think there are some
 24 people who support that.
 25 MR HENDERSON: Let's explore what you were doing, Mr Swift,

17

1 to get on with it, as it were, even before any
 2 legislation comes down the track.
 3 As I understand it, you've looked at potentially
 4 including some of the things that would be required by
 5 the Martyn's Law proposal, so training, consideration of
 6 security, as conditions on licences for premises;
 7 is that right?
 8 A. Yes. The conditions that were drafted were intended to
 9 reflect and essentially carry over what Martyn's Law
 10 sets out. I apologise, there was a mistake in my
 11 statement in relation to the proposed conditions.
 12 Q. Shall we bring them up so you can correct it?
 13 {INQ032601/1}, please?
 14 SIR JOHN SAUNDERS: I took it as an indication you thought
 15 it was particularly important that you put it in twice.
 16 MR HENDERSON: If we have a look at {INQ032601/11}, please.
 17 Paragraph 65, the bottom half of the page.
 18 As the chairman has indicated, we can see there that
 19 sub-paragraphs 1 and 2 I think are identical, so clearly
 20 ACT training is considered very, very important?
 21 A. Yes, we obviously do consider training as a particular
 22 issue but that's not why it's in twice. It's my
 23 mistake. I suppose the missing requirement is the
 24 requirement to act upon the risk assessment and take
 25 appropriate measures to address or eliminate the risk.

18

1 So yes, it probably follows on further down, but yes,
 2 that's the missing one.
 3 Q. Actually, if we turn over to the next page, please,
 4 {INQ032601/12}, we can see that two others, items 4 and
 5 5, at the top of the page, there are two further
 6 conditions and again they're essentially replicating the
 7 proposal for Martyn's Law, aren't they?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: I'm sorry to keep intervening, but
 10 again, these would only be under the existing law, you
 11 could only incorporate these as a result of some
 12 representations being made by the police?
 13 A. Well, any party can make representations.
 14 SIR JOHN SAUNDERS: But likely to be the police as being the
 15 people interested in counter-terrorism?
 16 A. I suppose given the subject matter, yes.
 17 SIR JOHN SAUNDERS: Others may do it, I agree. I just
 18 wonder with 4 and 5, why "only happen within 28 days of
 19 the grant"? Wouldn't you want to know what the result
 20 of the vulnerability assessment was before they opened,
 21 particularly if it related to the design of premises?
 22 I'm just slightly concerned about everything being
 23 reactive rather than proactive.
 24 A. Sure. It's a totally valid and fair point. We'll
 25 consider that.

19

1 SIR JOHN SAUNDERS: Okay, thank you.
 2 MR HENDERSON: Just picking up on the chairman's point
 3 there, is there any way -- you said this could be in
 4 response to representations. It presumably also could
 5 be voluntary, so any premises could say, "We're happy to
 6 do this, can you add it to our licence", if they wished
 7 to do so.
 8 A. Yes.
 9 Q. And could be encouraged to do so?
 10 A. Yes.
 11 Q. Is there any way to make it mandatory that you've
 12 explored?
 13 A. Not without legislation. I suppose that the point to
 14 make -- the reality is that in taking this approach
 15 about including licence conditions, obviously you are
 16 limited then by the number of applications for new and
 17 variation licences that you receive. And obviously we
 18 want to get this into place and into practice. So
 19 that is why I think working with the trade, trying to
 20 take a collaborative approach from the discussions I've
 21 had, you know, would support it. Obviously, they have
 22 questions about proportionality -- I appreciate that
 23 word's come up quite a lot -- but yes, you know, we are
 24 keen to sort of get this in place in licensed premises,
 25 not to trickle in with new licence applications,

20

1 especially in the current times when the future of the
 2 licensed trade in general is really up in the air.
 3 It's something that I intended to discuss with Figen
 4 about this approach. I know she met with one of our
 5 strategic directors. We have to finish this process
 6 first, but ultimately the plan is to see how we can do
 7 this most effectively. But obviously, that has its
 8 obvious limitations. The way to do it across the board
 9 is with legislation.

10 SIR JOHN SAUNDERS: The only way you can really deal with
 11 it is primary legislation for Martyn's Law and maybe as
 12 part of it, depending on what people decide, they can
 13 incorporate that as being mandatory conditions, but as
 14 part of making the whole thing work --

15 A. Yes.

16 SIR JOHN SAUNDERS: -- not instead of, which some people
 17 appear to think is being suggested. But you're
 18 definitely working in collaboration with Figen Murray
 19 and other people concerned with Martyn's Law to try and
 20 make it work collaboratively?

21 A. Yes.

22 MR HENDERSON: Thank you, sir. I think that has covered the
 23 topics I would wish to... I think Mr Cooper wanted to
 24 ask questions.

25 MR COOPER: Sir, might I have just a very short moment with

21

1 Ms Murray? We needn't rise.

2 SIR JOHN SAUNDERS: Absolutely.
 3 (Pause)

4 SIR JOHN SAUNDERS: Mr Cooper, I'm sorry to interrupt you,
 5 but I'm concerned that by making you do this, I'm making
 6 you disobey what the government says.

7 MR COOPER: I know. I was whispering social distancing --

8 SIR JOHN SAUNDERS: I am perfectly happy to rise to give you
 9 an opportunity to do it in safety.

10 MR COOPER: I'd only need 5 minutes and I think I was just
 11 about socially distancing, but I'm aware of the problem.

12 SIR JOHN SAUNDERS: I will rise until you're ready.

13 MR COOPER: Thank you, sir.
 14 (10.39 am)
 15 (A short break)
 16 (10.44 am)
 17 Questions from MR COOPER

18 MR COOPER: Sir, I'm very grateful for that opportunity,
 19 thank you.
 20 Mr Swift, you'll understand that I represent
 21 a number of families and, as far as this issue is
 22 concerned, Figen Murray. I would firstly like to
 23 express to you from her, her immense gratitude for the
 24 work you have undertaken and indeed the work that
 25 Manchester is particularly doing in respect of

22

1 Martyn's Law. I hope you will take that back to your
 2 colleagues.

3 A. Indeed.

4 Q. I'll come back to Martyn's Law in a moment, but I just
 5 want to clarify a few other matters. I will take you to
 6 a document you have already seen, {INQ035447/1}, please.
 7 If we can go to {INQ035447/4}, paragraph 6. These
 8 are the general regulated entertainment requirements.
 9 It's clearly laid out there, isn't it, at requirement 6?
 10 "The Manchester Evening News Arena forms part of
 11 a large complex of buildings for which there is an
 12 overall safety policy and a management safety plan. It
 13 shall be the duty of the arena management to ensure that
 14 obligations imposed on them by the management safety
 15 plan for the entire complex are complied with. Any
 16 failure to meet those requirements which expose
 17 spectators to danger will be regarded as a breach of the
 18 licensing conditions and be subject to the same
 19 penalties."

20 That's right, isn't it?

21 A. Yes.

22 Q. Can I go over the page, please, to {INQ035447/5}.
 23 Paragraph 8:
 24 "The licence-holder shall take all such precautions
 25 as may be reasonably necessary to ensure the safety of

23

1 spectators."

2 I want to ask you a general question in relation to
 3 Martyn's Law there. That could include implementing
 4 Martyn's Law, couldn't it?

5 A. It could.

6 Q. "The licence-holder shall take all such precautions as
 7 may be necessary to ensure the safety of spectators."

8 A. Yes, I think it --

9 Q. It's the word "shall" that I'm focusing in on here, the
 10 mandatory aspect of it.

11 A. Right, okay.

12 Q. It is an enquiry, I'm not putting anything to you
 13 whether it can or can't be done, I'm simply asking
 14 whether it might be done to get round this mandatory
 15 discretion issue of Martyn's Law. Is there any reason
 16 why Martyn's Law could not be included as a facet of
 17 paragraph 10, that:
 18 "The licence-holder shall take all precautions as
 19 may be reasonably necessary to ensure the safety of
 20 spectators."
 21 Could that get round the mandatory discretionary
 22 issue that you have understandably raised before the
 23 chairman?

24 A. No, I suppose this condition is one that's been imposed
 25 by the licence. When we talk about mandatory

24

1 conditions, it's one that the legislation requires as
 2 opposed to one that a licensing committee would attach.
 3 SIR JOHN SAUNDERS: I think what is being said, if I may
 4 just — that actually that licence condition which is on
 5 the arena, and would be maybe on other places, would
 6 include or could include the provisions of Martyn's Law
 7 if you said they were reasonably necessary for the
 8 safety of people.
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So as a matter of fact, I think the
 11 practical problem may be having an argument about
 12 "reasonably necessary" in every situation, which may
 13 not —
 14 MR COOPER: I understand it may well get us back to the same
 15 position we're in now.
 16 SIR JOHN SAUNDERS: Indeed.
 17 MR COOPER: Still looking at paragraph 8 there, just moving
 18 away from Martyn's Law just for a brief second,
 19 knowledge of where blind spots are and knowing where
 20 they are as far as CCTV is concerned. The management of
 21 the arena, for instance, should know where they are,
 22 shouldn't they? Is that, if they don't, a breach of
 23 paragraph 8?
 24 A. Um...
 25 (Pause)

25

1 Sorry, I'm...
 2 SIR JOHN SAUNDERS: This may not be a problem. I'm just
 3 trying to think aloud at the moment. There are such
 4 things as the licensed premises and they are prescribed
 5 and the arena itself is what is the licensed premises.
 6 So that may be a possibility — a difficulty with it or
 7 it may come within the previous one that you've said
 8 about obeying the safety precaution, I'm not saying one
 9 way or the other. I'm saying a possible —
 10 MR COOPER: Sir, your knowledge of licensing far, far
 11 exceeds mine. There may be practical and legal
 12 difficulties.
 13 SIR JOHN SAUNDERS: Let's ask the witness. He's the expert.
 14 A. Obviously, the condition is there:
 15 "... take all such precautions as may be reasonably
 16 necessary to ensure the safety."
 17 So I suppose, taking a risk assessment approach
 18 relevant to the premises, you know, effective coverage,
 19 whether that be CCTV or whether it be staffing, then
 20 ultimately it's — I suppose it's a matter for the
 21 premises to address, to comply with that condition to
 22 ensure the safety of spectators. That's the motivation
 23 for it.
 24 MR COOPER: I think I've taken that as far as I can.
 25 Paragraph 11, please. This is an issue which has

26

1 arisen during the course of this inquiry and it may or
 2 may not be that you have a view:
 3 "The safety policy should act in concert with the
 4 safety policy of the management of the Victoria Exchange
 5 Complex."
 6 Just define again, so I am clear, what is the
 7 Victoria Exchange complex? Does that include the
 8 railway station?
 9 A. I don't know specifically, I'm afraid.
 10 Q. I'll put the general question to you. If, for instance,
 11 there's a difference of opinion between what's best for
 12 security between the arena and, say, the
 13 Victoria Exchange Complex, and acting in concert with
 14 them is difficult, is there any resolution as far as
 15 that's concerned from a licensing perspective if you
 16 simply cannot act in concert?
 17 A. Ultimately, if the condition cannot be complied with,
 18 then the matter would need to, I suppose, be raised in
 19 order to seek a change to that condition through the
 20 licensing committee process. Then it would be a matter
 21 for the committee to determine.
 22 Q. So if for instance there is an issue between
 23 Victoria Station and the arena as to whether the
 24 perimeter should be pushed back for security purposes,
 25 and say, for instance, the City Room says, "It'll

27

1 protect our security", and this is the evidence we have,
 2 it'll be good for the City Room but it might not be good
 3 for the Victoria Exchange Complex, and therefore there
 4 seems to be some issue about acting in concert, are you
 5 saying that that issue would have to be decided from
 6 a licensing perspective by the licensing committee?
 7 A. No, sorry, when I said it needed to be decided by the
 8 licensing — that would be around the condition and what
 9 would be the appropriate condition of the licence. If
 10 a licence condition — if the argument by the
 11 premises/licence-holder or the responsible authority was
 12 that that condition couldn't be met and therefore — so
 13 may affect the enforceability of it, then that would
 14 need to be resolved in relation to, I suppose, what the
 15 licence requires.
 16 The licence requires that the two act in concert.
 17 So if you're saying and the position is that they
 18 cannot, for whatever reason that is, then I would say
 19 the approach should be to reconsider the appropriateness
 20 of that condition on the licence.
 21 SIR JOHN SAUNDERS: In practical terms, there should be an
 22 application by someone to review the licence, yes? To
 23 see — I mean, it could be done by the station if they
 24 wanted to if they came to this conflict and then
 25 it would be for the licensing committee to decide:

28

1 actually, is this a real problem, should we say you
 2 can't actually be open any longer, which they could do
 3 if they were concerned enough about the safety, or if it
 4 were possible to alter the condition in some way to make
 5 everyone safe, then they could do that. Would that be
 6 the practical way of dealing with it?
 7 A. Or equally a variation by the premises/licence-holder,
 8 so either of those two mechanisms.
 9 MR COOPER: It's a real problem that seems to be developing
 10 in whether pushing back the perimeter of the security
 11 cordon can be achieved. At the moment we're aware it
 12 has been done, but it's an uneasy truce, for want of
 13 a better expression. I was simply asking the question
 14 to see if there was any influence the licensing
 15 committee could have over this, but I think you've dealt
 16 with that. But be aware, it's a real issue.
 17 A. Yes, thank you.
 18 Q. Could I take you to paragraph 13? I'm not going to go
 19 through the whole of that paragraph but would you agree
 20 that it might be used to have within that paragraph that
 21 licensing take into account the provision of adequate
 22 medical supplies, for instance, an adequate supply of
 23 stretchers?
 24 A. It seems a reasonable suggestion, yes.
 25 Q. I've looked at it on a number of occasions carefully and

29

1 indeed looked at the document. There doesn't seem to
 2 be, and I'll be corrected, anything within the licensing
 3 rules to mandate a proper and adequate supply of medical
 4 supplies at entertainment arenas. I ask in particular
 5 because another family I represent is a family the
 6 family of John Atkinson. I ask in particular about not
 7 just medical supplies but stretchers as well. Would
 8 that be something, subject to the view of the chair,
 9 that you might consider, on behalf of your colleagues,
 10 putting into a licensing term?
 11 A. Of course.
 12 SIR JOHN SAUNDERS: I don't think that's subject to my
 13 views; you can make your own mind up about that.
 14 MR COOPER: As you're aware, obviously, the tragedy around
 15 this incident and the medical supplies that may or may
 16 not have been deficient at the time and available to
 17 people in the arena.
 18 A. Yes. It's something that we can look to ensure. We
 19 pick out in the policy in how we determine the
 20 applications and, yes, certainly take that on board.
 21 Q. Are you aware, for instance, that Victoria Station only
 22 has two stretchers --
 23 A. I wasn't aware of that.
 24 Q. -- to this day? Not at the time, as of now, they only
 25 have two stretchers available to them; did you know

30

1 that?
 2 A. I didn't.
 3 Q. It might be something again worth looking at. A matter
 4 for you.
 5 SIR JOHN SAUNDERS: While we're dealing with conditions,
 6 just an overriding problem for me is unless you have
 7 proper enforcement, and we're going to come to that in
 8 a minute, it will simply be after something happens we
 9 all say, there was a breach of the licence, and
 10 actually, that's not a huge amount of use if no one's
 11 actually going to proactively enforce these things.
 12 Is that fair?
 13 A. I take your point.
 14 SIR JOHN SAUNDERS: We'll see what we hear from the next
 15 witness, thank you.
 16 MR COOPER: And I emphasise again, Mr Swift, these questions
 17 are in the spirit of being positive and helpful and
 18 bringing matters to your attention. Please take them
 19 in that way. But in terms of perhaps auditing or
 20 enquiring of places -- I used the example of the arena
 21 or I just brought to your attention two stretchers
 22 at the railway station -- is there any process in
 23 checking up or auditing -- I don't mean every single
 24 provision -- matters such as medical equipment, checking
 25 to see whether they have it, checking to see whether

31

1 these places are properly protecting people?
 2 A. There's always -- the chair has just referenced
 3 inspection and compliance programmes. Yes, those kind
 4 of matters, I don't see why they couldn't be
 5 incorporated in those.
 6 Q. Is it perhaps -- and it's a fact of life -- a matter of
 7 funding or personnel so far as the licensing committee
 8 or the council is concerned that these things aren't
 9 happening or is it simply a matter of perhaps not having
 10 addressed them and obviously addressing them now?
 11 A. I suppose the evidence you're going to hear will be able
 12 to better sort of ...
 13 Q. All right.
 14 I'm coming on to Martyn's Law next, but I want to
 15 ask you this one final general question. It's
 16 a troubling one. The more we hear about the tragedy of
 17 this event on 22 May 2017, the more many are seeing the
 18 interrelationship between entertainment venues and
 19 a transport hubs are problematic. If it wasn't clear
 20 before, it may or may not be clear now.
 21 Are licensing authorities now becoming alert to the
 22 difficulty of premises, entertainment premises, being
 23 built so close to national or even local transport hubs?
 24 We can all think, and I'm not going to repeat them here,
 25 that would be utterly irresponsible, but we can all

32

1 think of examples where it happens around the country.
 2 Is there an attitude now, as a result of
 3 Manchester Arena and perhaps as a result of the learning
 4 that's already coming out from it, of the particular
 5 dangers of associating shopping centres and
 6 entertainment centres cheek by jowl to transport hubs in
 7 respect of the security problems that it might create?
 8 A. I suppose that's equally a planning issue as much as it
 9 is a licensing issue ... I suppose it's really coming to
 10 my attention through this inquiry, yes, you know,
 11 obviously the difficulties mentioned, this is
 12 highlighting, yes --
 13 Q. Of course, for many of us -- it's not a criticism -- one
 14 tends to see a transport hub next to a shopping centre,
 15 an entertainment hub, and one thinks, how convenient,
 16 one doesn't necessarily think of the security
 17 implications. These are perhaps heightened now amongst
 18 you and your colleagues, are they?
 19 A. Yes, it's obviously something we are aware of.
 20 Q. All right. I won't push that any further.
 21 Martyn's Law, please. You have seen the
 22 Martyn's Law document?
 23 A. Yes.
 24 Q. You've appreciated it. I just want to take you to --
 25 I don't know whether you've got it in front of you or it

33

1 can be provided to you. I don't know whether it has
 2 a reference, if it has I might be assisted. It's the
 3 details of Martyn's Law. I looked carefully, as
 4 Mrs Murray has, in relation to paragraph 65 of your
 5 statement to try and short circuit my questions. Is
 6 Manchester effectively implementing Martyn's Law 100% or
 7 is there anything there of Martyn's Law that's not being
 8 implemented? I'm referring in particular to the five
 9 parts of Martyn's Law. I'll do the headlines.
 10 Part 1:
 11 "A requirement that spaces and places to which the
 12 public have access engage with freely available
 13 counter-terrorism advice and training."
 14 That's part 1. That's being picked up by
 15 Manchester, is it, in full and applied?
 16 A. The intention is to, yes.
 17 Q. Thank you. Keep your voice up, if you will.
 18 A. Yes, the intention is to.
 19 MR HENDERSON: Mr Cooper, just to interrupt, I think it's
 20 {INQ036722/1}.
 21 MR COOPER: Thank you.
 22 I'm trying to, in the nicest possible way, pin you
 23 down as to exactly what Manchester are doing and whether
 24 they are implementing Martyn's Law in full. So:
 25 "A requirement that spaces and places to which the

34

1 public have access engage with freely available
 2 counter-terrorism advice and training."
 3 Is the answer to that simply yes, we are intent on
 4 implementing fully part 1?
 5 A. Yes.
 6 Q. And when I put to you the word "intent", and it's a word
 7 you have used, it's going to be done, is it?
 8 A. Well, it's a matter for the committees. Obviously the
 9 elected members make decisions. But I think one of the
 10 exhibits was a report that went to the executive, which
 11 set out the motivation of the authority in relation to
 12 Martyn's Law.
 13 SIR JOHN SAUNDERS: Mr Cooper, I'm really sorry. As has
 14 been pointed out to me on many occasions, one of the
 15 problems with using the Licensing Act is it only covers
 16 200,000 of the 600,000--odd spaces. I don't think,
 17 without primary legislation for Martyn's Law, that the
 18 council have the power, but I'll be corrected if I'm
 19 wrong, to apply it to all those places which are not
 20 licensed premises. It may be there are other acts which
 21 I don't know. Is that right?
 22 A. Yes. Sorry --
 23 SIR JOHN SAUNDERS: You may like to apply it to everywhere,
 24 but whether you have the power?
 25 A. Sorry, I just have my licensing hat on. The background

35

1 to it was how can we do Martyn's Law for licensing.
 2 MR COOPER: Yes.
 3 A. So yes, I'm aware that Martyn's Law goes much wider than
 4 licensed premises for obvious reasons. I suppose I am
 5 looking at it from implementing it relevant to licensed
 6 premises.
 7 Q. You're here to deal with licensing, after all. I didn't
 8 deliberately mean to take you off piste on that. I'm
 9 trying to establish this: so far as licensing is
 10 concerned, Manchester Licensing Authority is 100% behind
 11 Figen Murray and Martyn's Law?
 12 A. Yes.
 13 Q. And in terms of its implementation, so far as Manchester
 14 can, it will implement Martyn's Law?
 15 A. That's the intention, yes.
 16 Q. And there's a consultation process going on at the
 17 moment, did you say?
 18 A. There was a consultation earlier in the year around the
 19 wording of the conditions. We have included them in the
 20 council's set of model conditions. So we did the
 21 consultation. The process is that returns to the
 22 licensing committee for them to obviously consider and
 23 take any decisions. That was scheduled to have already
 24 taken place, but due to a couple of administrative
 25 reasons, that hasn't, unfortunately. However, I'm just

36

1 awaiting confirmation on a date, but that will happen.
 2 What I would say is the intention at the start of
 3 the year was also to embed it within the licensing
 4 policy as well. Obviously, the licensing policy sets
 5 out the local authority's approach to licensing
 6 premises. I suppose what I would say about that is the
 7 pandemic has affected our ability to effectively review
 8 the policy, so that hasn't taken place.

9 Q. What hasn't taken place precisely?

10 A. The review of the policy.

11 Q. What does the review of the policy entail? What's the
 12 process for review?

13 A. The policy is to essentially fully review and revise
 14 the council's statement of licensing policy, which was
 15 the document referred to earlier with section 2.

16 Q. I don't mean to be rude, I'm just trying to cut to the
 17 nub of it: why hasn't this review taken place?

18 A. Just as a result of the disruption that the pandemic has
 19 caused and the ongoing, I suppose, effect of coronavirus
 20 regulations and the resources needed to react to those
 21 to change our ways of working. It's been really
 22 a resource issue. However, I don't see that as
 23 necessarily a barrier.

24 Like I mentioned, the prime intention is to work
 25 collaboratively with the trade and obviously, subject to

37

1 the decisions of the committee, and I don't want to
 2 pre-empt those as an officer, but I am anticipating
 3 doing that work.

4 Q. And anticipating doing that work pretty quickly?

5 A. Yes.

6 SIR JOHN SAUNDERS: Do you have to go out to consultation on
 7 the new policy?

8 A. On the policy, yes.

9 SIR JOHN SAUNDERS: With whom? Locally or do you have to
 10 pass it through government?

11 A. No, locally.

12 SIR JOHN SAUNDERS: Thank you.

13 MR COOPER: You can understand, Mr Swift, I'll be frank with
 14 you, in the sense that those behind Martyn's Law are
 15 frustrated — and it's not a criticism of you,

16 I emphasise again, because there's a lot of positive
 17 feeling towards you and Manchester from the families —
 18 but having heard evidence from the government about
 19 problems about consultation and whose desk it's
 20 presently sitting on and whether it's been sent out,
 21 they really want to hear from you now, if you can give
 22 it, that this process will happen fast now, please.

23 A. Yes. I fully get why there would be frustrations. The
 24 reality — the impact of coronavirus on licensing
 25 authorities —

38

1 Q. I understand.

2 A. — has been significant. I'm not going to sit here and
 3 make excuses. To be clear, yes, we should have already
 4 been to committee. The intention is Figen will attend
 5 and participate, and yes, we want to do this. We moved
 6 quickly back in the day when we set out to do this, so
 7 yes.

8 Q. Thank you. I wanted to give you the opportunity of
 9 reassuring the families that, despite all the pandemic
 10 problems we have, and we recognise the licensing
 11 industry is going through a very difficult time at the
 12 moment, but given all that, Martyn's Law is not being
 13 pushed down the pile, as it were.

14 A. No, like I said, we have done the consultation.

15 I mentioned the intention was to discuss with Figen
 16 around moving this forward, which, for obvious reasons,
 17 I couldn't participate in. So I need to catch up with
 18 what was discussed at that meeting, but now in my
 19 mind — to the forefront.

20 MR COOPER: That's a good place for me to stop. Thank you.
 21 Thank you, sir.

22 MR HENDERSON: Sir, I don't believe there are any questions
 23 from core participants for this witness.

24 MR WEATHERBY: May I just raise one point?

25 SIR JOHN SAUNDERS: Mr Weatherby.

39

1 Questions from MR WEATHERBY

2 MR WEATHERBY: One very discrete point that has arisen from
 3 this morning's questioning, please.

4 Mr Swift, you were asked questions about
 5 condition 86, the minimum number of stewards as agreed
 6 by the local authority. You've given evidence this
 7 morning that you checked and you can't find that there
 8 was ever any agreement about the numbers of stewards
 9 with the operator. Have I understood that rightly?

10 A. No, not that there was ever an agreed number, just that
 11 I can't find a record of a current agreed number.

12 Q. Right.

13 SIR JOHN SAUNDERS: Have you found a record of any agreed
 14 number ever?

15 A. No.

16 MR WEATHERBY: I misunderstood that. Could you provide some
 17 reassurance to the families that you have rectified that
 18 or you're in the process of rectifying that?

19 A. Yes. Obviously, it's something that we have identified
 20 and — to rectify it — it has to be, it's a licence
 21 condition, it's a legal requirement, so we'll make sure
 22 that it is ...

23 SIR JOHN SAUNDERS: It could be an overstatement to say
 24 you've identified it; I think the inquiry has identified
 25 it, really.

40

1 A. Of course, sorry.
 2 MR WEATHERBY: I was being diplomatic, but now it's been
 3 identified, can you reassure the families that it will
 4 be rectified and rectified quickly?
 5 A. Yes.
 6 MR WEATHERBY: Thank you. That's all I have.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR HENDERSON: Sir, I think now that is all the questions
 9 for this witness, so if we could put the holding slide
 10 and we'll do a quick changeover for the next witness.
 11 Looking at the time, we could probably start the next
 12 witness and then take a break.
 13 SIR JOHN SAUNDERS: I'm grateful for you coming back twice.
 14 I'm sorry to give you quite a lot of work in difficult
 15 times to look at things. I don't think anyone should
 16 underestimate the actual incorporating Martyn's Law,
 17 which no one is saying you shouldn't, into your existing
 18 policy may not be as straightforward, but please do
 19 consider making it proactive rather than reactive and
 20 not to do things 28 days after the licence has been
 21 granted. That just seems to me to be a wrong way round.
 22 Obviously it is a matter for your committee and I am not
 23 trying to dictate in any way, but obviously it is
 24 a consideration, maybe.
 25 A. I'll take that back, thank you.

41

1 SIR JOHN SAUNDERS: Thank you very much, you're free to go.
 2 (The witness withdrew)
 3 (Pause)
 4 MS FIONA SHARKEY (affirmed)
 5 Questions from MR HENDERSON
 6 MR HENDERSON: Good morning, Ms Sharkey. My thanks for
 7 coming. You have provided a very recent witness
 8 statement to the inquiry dated 6 November 2020.
 9 A. Yes. That's correct.
 10 Q. The reference number for the transcript is
 11 {INQ038587/1}.
 12 Is it right you are head of compliance, enforcement
 13 and community safety currently at Manchester City
 14 Council?
 15 A. Yes.
 16 Q. Does that mean that, amongst other things, I'm sure, you
 17 are responsible for the licensing and out of hours team,
 18 and they're the team that carries out compliance and
 19 enforcement under the Licensing Act 2003?
 20 A. That's correct.
 21 Q. Let me ask you a little bit about your team. How many
 22 licensing enforcement officers do you have at full
 23 strength?
 24 A. At full strength we have 42. There's 21 within the city
 25 centre team and 21 within the city-wide team. We also

42

1 have four neighbourhood team leads within the city
 2 centre team and three within the city wide team and
 3 we have a manager in each of those teams as well.
 4 Q. Have you actually in recent years had a full complement
 5 of officers in practice?
 6 A. No, we've never had a full complement of officers in
 7 practice.
 8 Q. Why is that?
 9 A. I think a large part of it is because they're required
 10 to do a fairly onerous shift pattern and we have found
 11 that has meant that, when other opportunities have
 12 arisen, particularly in the council, to move into other
 13 enforcement roles, often staff have taken those roles.
 14 We have also found that we have never been able to
 15 fully recruit to full strength when we've gone out to
 16 advert and we are continuously advertising the posts
 17 because we do see them as very important roles.
 18 Q. Just to put that in context of the amount of work you're
 19 dealing with, if you have your statement in front of you
 20 I'm looking at paragraphs 20 and 22, where you set out
 21 some of the numbers. How many licences are granted in
 22 Manchester each year?
 23 A. I don't have the exact number of how many licences are
 24 granted in Manchester. I think it's probably around
 25 200. But the licensing enforcement officers don't deal

43

1 just with new licences, they obviously deal with all of
 2 the licensed premises across the city and they aren't
 3 just licensing enforcement officers, their title is
 4 "licensing and out of hours" because they have a range
 5 of other functions that they cover, including
 6 noise-related jobs, construction and commercial. They
 7 deal with all sorts of issues in the city centre around
 8 things like managing street trading, dealing with
 9 peddlers and buskers within the city. So they have
 10 a much wider remit than just licensing enforcement.
 11 Q. Sorry, it was a poor question from me I think. Let me
 12 take you to the --
 13 A. Sorry.
 14 Q. That's my genuine apology. Let me take you -- that's a
 15 very helpful background -- to the stats you have in your
 16 statement. Could we have a look at {INQ038587/4}.
 17 Can we zoom in to the bottom, paragraph 20?
 18 You have very helpfully given us the context which is
 19 that your team deals with much wider issues than just
 20 licensed premises and certainly more than just licenced
 21 regulated entertainment premises. But just to put that
 22 particular point in context, can you explain the numbers
 23 here?
 24 A. Yes, in paragraph 20, I was trying to distinguish the
 25 number of licensed premises that actually provide

44

1 regulated entertainment. There are a higher number of
 2 licensed premises than that overall, but not all of them
 3 are licensed to provide regulated entertainment.
 4 I think I was specifically asked to address the numbers
 5 that provided regulated entertainment.
 6 Q. We can see them there. It's over 1,400 each year has
 7 been the number. Over the page, {INQ038587/5}, please,
 8 Mr Lopez.
 9 We can see a bit of a breakdown in the two tables
 10 setting out the very wide range, I think it would be
 11 fair to say, of different entertainment, which is
 12 covered by that; is that right?
 13 A. Correct.
 14 Q. Thank you, Mr Lopez, we can take that down now.
 15 Given the context of that amount of work, how much
 16 resource do you feel your team has to deal with that
 17 level of different venues?
 18 A. It's a difficult question to answer in some respects
 19 because we have the resource that we have. I think in
 20 every enforcement area people could always have more
 21 enforcement officers. It would enable them to do more
 22 enforcement activity.
 23 In terms of the officers that we've got and how we
 24 use them, I think we use them to best effect. We
 25 obviously look at the range of issues that are occurring

1 within licensed premises and we very much take
 2 a targeted approach to trying to address the areas where
 3 we're having the most problems in terms of licensed
 4 premises issues.
 5 SIR JOHN SAUNDERS: Sorry, could you just tell me how many
 6 you actually have? You have told us the numbers you
 7 should have. How many do you actually have?
 8 A. At the moment we've got eight vacancies across both
 9 teams. I think it's eight, around about that number.
 10 I can check and get you the exact number if you'd like.
 11 We've got a reasonably --
 12 SIR JOHN SAUNDERS: So you have 34 rather than 42?
 13 A. Yes, at the moment it's around that number.
 14 MR HENDERSON: I think you started to tell us that given
 15 those resource proportions, you need to be quite
 16 targeted in the way that you carry out enforcement?
 17 A. Yes, we do.
 18 Q. How do you go about doing it? How do you go about
 19 ensuring compliance and enforcement with the licensing
 20 conditions and licences that are in place?
 21 A. Okay. In relation to -- the licensing regime is set up
 22 in such a way that when somebody applies for a licence
 23 obviously they are accepting that they know that there
 24 are conditions on their licence they've to comply with.
 25 So when we are looking at the enforcement activity that

1 we need to take and the -- I mean, when I say
 2 enforcement activity, I'm talking about compliance as
 3 well, because we want to achieve compliance.
 4 We work really closely with our colleagues in
 5 Greater Manchester Police. We have regular meetings and
 6 we look at what sort of intelligence is coming in that
 7 would indicate that there are premises which are causing
 8 problems.
 9 So that could be as a result of police figures, it
 10 could be as a result of intelligence coming from other
 11 responsible authorities, it could be complaints coming
 12 in from members of the public. So a range of different
 13 sources, and we'll look at what that intelligence is
 14 telling us and then that will determine where we need to
 15 target our resources.
 16 We will also -- there's an element of the geography
 17 of the city. You will have particular areas where you
 18 might have a concentration of licensed premises and so
 19 we'll probably do more proactive visits in those areas,
 20 particularly if we've had concerns about, for example,
 21 intelligence to suggest that possibly underage children
 22 are visiting premises. Those sort of things will lead
 23 us to decide how we target our enforcement activity.
 24 Q. So is it right to say you don't generally do random or
 25 routine inspections?

1 A. We don't have a programme of inspections in the same way
 2 that you would have, with, say, food hygiene inspections
 3 where the regime sets out that you do a programme of
 4 inspections. We visit premises based on intelligence,
 5 really, rather than any particular -- well, as I say,
 6 there isn't a programme, so yes, we do it on the basis
 7 of intelligence and complaint and problems.
 8 Q. Do you think that works so it's possible to properly
 9 enforce the conditions and licences without that kind of
 10 random or routine checking?
 11 A. I think it is possible. An effective regulatory regime
 12 really relies on a combination of effective compliance
 13 interventions where they are needed, without placing too
 14 much of a burden on generally compliant premises, but
 15 also having effective sanctions which offer an effective
 16 deterrent. I think within the licensing regime that
 17 does exist because there are quite serious sanctions,
 18 really, for not complying with licence conditions. They
 19 can range from losing your licence to unlimited fines
 20 and even, because if you're sort of prosecuted some
 21 offences, you could go to prison. So the actual
 22 deterrent should be there.
 23 SIR JOHN SAUNDERS: Let's be practical about this, if you
 24 don't mind. We have heard that people doing searches at
 25 SMG -- and I'm not suggesting they knew they were doing

1 something wrong, we'll have to look at that later, but
 2 in fact searches were being carried out which required
 3 an SIA licence, and they were being done by people who
 4 didn't have a licence. That's a breach of condition of
 5 the licence, which carries with it a sentence of
 6 imprisonment or you can lose your licence if that were
 7 to happen. That has been going on for quite a long time
 8 and nobody's found out about it and actually you
 9 wouldn't really expect a member of the public to know
 10 that to report it. So if you don't carry out some sort
 11 of check, who is?
 12 A. Yes, I accept that in that particular instance that
 13 we haven't done that check. That licence was
 14 grandfathered over from the old regime.
 15 SIR JOHN SAUNDERS: That doesn't make a lot of difference,
 16 does it?
 17 A. No, it is something which now that we're aware of and
 18 we will obviously look into. But it wasn't something
 19 that we were aware of and you're right that we don't
 20 visit every single licensed premises. So we wouldn't
 21 pick up on that unless... The onus to comply with that
 22 condition is obviously with SMG to make sure that they
 23 are ensuring that --
 24 SIR JOHN SAUNDERS: Absolutely. But you know, I'm asking
 25 really whether compliance can ever apply without some

49

1 sort of random check. Take another example which has
 2 been thrown up by this inquiry. There is meant to be
 3 a minimum number of stewards who should be on duty
 4 agreed between the local authority and SMG. We've just
 5 heard that no one could even find an agreed number, let
 6 alone comply with it.
 7 A. I accept again that is a failing. I would have expected
 8 Manchester Arena to contact the City Council to say, "We
 9 have this condition on our licence that we need to
 10 comply with, what is the recommended number of stewards
 11 that we should have in this particular event?"
 12 SIR JOHN SAUNDERS: You see, I'm not suggesting that those
 13 have anything to do with what happened on 22 May. But
 14 if they had, it wouldn't be much good saying to people,
 15 "Oh well, this dreadful thing's happened, there was
 16 a breach of licence, we'll now prosecute for it", is
 17 there?
 18 A. No, I accept that. Although I do think that there is
 19 a place for regular inspections, an inspection will only
 20 give you the picture at that point in time as well. So
 21 it could give you, like, a false view that a premises is
 22 compliant when it's compliant at that point in time but
 23 it won't necessarily be compliant at some other point in
 24 time.
 25 SIR JOHN SAUNDERS: I'm really not complaining about

50

1 Manchester. There are some authorities who actually
 2 can't afford to have anyone overnight so they have no
 3 compliance requirements with that, so you are obviously
 4 doing better than some are. But you can only be
 5 reactive in the situation you are at the moment?
 6 A. We're more reactive than proactive, but we try to be
 7 proactive where we have intelligence to indicate there
 8 may be a problem. We didn't have any intelligence to
 9 indicate that there was a problem at Manchester Arena.
 10 SIR JOHN SAUNDERS: Right. You will perhaps not be aware of
 11 this, but when the 2003 Act was brought in by the then
 12 government, they said this is going to be light touch
 13 regulation for the grant of a licence and an iron fist
 14 in a velvet glove, was it, to make sure all the
 15 conditions were followed. It's not a very iron fist is
 16 it, at the moment?
 17 A. Where we know about it, yes.
 18 SIR JOHN SAUNDERS: Right.
 19 MR HENDERSON: You've mentioned, Ms Sharkey, partly in that
 20 conversation with the chairman and also before, that the
 21 police -- you work in partnership with lots of other
 22 bodies, and the police are a key enforcer of licensing
 23 law as well as your officers. How do you decide whether
 24 it's your team or the police who should act in
 25 a particular case? Is it purely fact-specific or are

51

1 there certain things that would go one way or the other?
 2 A. It does tend to be fact-specific. The police would
 3 generally lead more on issues where it was clearly
 4 crime-related. We share an office with the police, so
 5 up until very recently, we can't at the moment because
 6 of COVID restrictions, but the licensing and out of
 7 hours officers worked in the same office as the police
 8 licensing officers and they worked really closely with
 9 them, and they share intelligence about premises and
 10 they do joint, what we call VLPs, visits to licensed
 11 premises.
 12 There are weekly meetings at a managerial level that
 13 look at what the issues are that have arisen. They take
 14 place -- I think it's on a Tuesday morning -- and they
 15 look at what's happened kind of like over the weekend,
 16 which tends to be the busiest time for licensed
 17 premises.
 18 There's also what we call multi-agency meetings
 19 which all the responsible authorities attend where
 20 premises of concern are discussed and we agree action
 21 plans around how those premises should be dealt with in
 22 order to bring them into a compliant mode.
 23 Q. Thank you. Let me deal for completeness with -- you've
 24 helpfully told us about any complaints there have been
 25 about Manchester Arena. Just to cover them off, I want

52

1 to go through them with you.
 2 If you want to refer to it, it's paragraphs 26 and
 3 following of your statement.
 4 You explain there that between January 2010 and
 5 22 May 2017, there have only been six complaints of any
 6 kind in relation to Manchester Arena; is that right?
 7 A. That's correct.
 8 Q. And those include four different complaints about noise
 9 dating back to 2011, a complaint in 2014 about the
 10 handling of someone who was drunk, and a complaint in
 11 2017 about the handling of an alleged sexual assault?
 12 A. Yes.
 13 Q. But none of the issues have related to security
 14 arrangements?
 15 A. No.
 16 Q. And nothing has led to any formal enforcement action
 17 that you're aware of?
 18 A. No.
 19 Q. Thank you.
 20 I want finally to come to the big topic of
 21 Martyn's Law.
 22 SIR JOHN SAUNDERS: Just before you do that, sorry, the
 23 other thing I was interested in. We've heard from the
 24 SIA that they have enforcement officers.
 25 A. I'm aware of an enforcement officer who has attended

1 meetings in Manchester when there have been issues of
 2 concern about door staff. I understand she covers
 3 a very large geographical area, so she isn't a regular
 4 attendee at our multi-agency meetings. When we've had
 5 specific concerns about licensed premises and
 6 SIA-licensed officers, then she has attended meetings.
 7 I understand the relationship is there whereby the
 8 officers would feel comfortable to contact her and have
 9 conversations and when --
 10 SIR JOHN SAUNDERS: And joint visits if necessary?
 11 A. I'm not aware that... I think she may have been
 12 involved in a joint visit when we had a particular
 13 concern about a licensed premises when there had been
 14 issues with violence from some of their door staff. My
 15 staff and the police, when we go to do our visits to
 16 licensed premises, we will check that the door staff
 17 have got their SIA licence badges on, that they're
 18 wearing them correctly, that they are visible, that they
 19 have signed into the book. So we will carry out those
 20 checks and if we find there's any non-compliance,
 21 we will notify that to the SIA.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR HENDERSON: I was going to move on to Martyn's Law. Let
 24 me ask you about that. We've heard of the warm
 25 reception that the Martyn's Law proposals had from

1 Manchester City Council. Mr Swift has just told us of
 2 the way that's being looked at.
 3 I wanted to ask you: if Martyn's Law type
 4 requirements were included into the conditions on
 5 licences, so either new licences going forward or if
 6 a mechanism is found voluntarily or a mandatory
 7 condition is added to existing licences, how realistic
 8 do you think it would be for your team to go about
 9 checking whether those are being complied with?
 10 A. I think it depends to a degree on how licences -- sorry,
 11 the conditions are applied. If there is a change in the
 12 law, I would hope that along with that there would be
 13 a recognition that there would be a need for a greater
 14 enforcement resource to enable officers to be able to
 15 check that in a meaningful way. At the moment with our
 16 current resources, we would check that the conditions
 17 were included on the licence, we would look at what the
 18 actual specification -- sorry, what the licence required
 19 them -- the licence conditions required them to do, and
 20 we would check that there was compliance with that.
 21 My concern would be that because we don't have
 22 a routine inspection that not all premises would be able
 23 to be visited regularly to check that they were
 24 complying with that condition.
 25 Also, I do think that there would be, in order for

1 it to be meaningful, the officers that would be doing
 2 that checking would need to have greater knowledge than
 3 they do at the moment of counter-terrorism measures that
 4 can be put in place. I think it's really important that
 5 when we are able to -- when we take an enforcement
 6 action, we're able to do it in a meaningful way.
 7 When we are able to sort of like introduce
 8 Martyn's Law, the conditions in Manchester ahead of any
 9 statutory requirements, if we can get premises to do it
 10 voluntarily, we would want to work in a very
 11 collaborative way with the premises and hopefully with
 12 colleagues in the Counter-terrorism Policing side to
 13 sort of look at, practically and realistically, what can
 14 we actually achieve here so that it's meaningful.
 15 I think, depending on how many premises voluntarily
 16 took that up, it would make it probably an easier
 17 exercise for us to do. If there wasn't so many we'd be
 18 able to do a much more in-depth and much more robust
 19 exercise, but we would want to do it, we would want to
 20 take a very collaborative approach because it is in the
 21 interests of premises to take these measures, we
 22 absolutely recognise that, and if we can do it in a way
 23 where everybody sees the benefits of it rather than
 24 being something punitive that's being imposed on them,
 25 we think that would be a better approach to take.

1 SIR JOHN SAUNDERS: It's maybe clear already that the amount
 2 of collaboration which goes on between CTASAs,
 3 CT advisers, and licensing officers and the committee at
 4 the moment is minimal, if not non-existent.
 5 A. That's correct.
 6 SIR JOHN SAUNDERS: Okay, thank you.
 7 MR HENDERSON: I just want to follow up on that as well.
 8 You mentioned the fact that the current level of
 9 knowledge or expertise or training of your team in
 10 relation to counter-terrorism is not high.
 11 A. It's not, no.
 12 Q. So some potential conditions that would be applied,
 13 it would make sense you'd be able to deal with, for
 14 instance: does a venue actually have security risk
 15 assessment in place.
 16 A. Yes.
 17 Q. Have they provided some form of training to their staff,
 18 for instance. But anything to do with the specific
 19 security arrangements of that venue and whether they're
 20 enough to sufficiently mitigate against a terror threat,
 21 presumably that is something you just wouldn't have the
 22 training to deal with?
 23 A. No, we wouldn't have the training and I would imagine
 24 that the training required to be qualified to the level
 25 of a counter-terrorism security adviser would be quite

57

1 high. And it's not -- it's certainly not knowledge that
 2 my officers would have at the moment. Obviously
 3 we would want to work with counter-terrorism officers to
 4 almost like sort of establish what level of knowledge
 5 we would need to be able to make those assessments
 6 adequately. But we could absolutely, as you say --
 7 we would check have they done an assessment, was that
 8 assessment done with the help of a qualified
 9 counter-terrorism expert. So we would look at those
 10 sort of things when we were doing inspections.
 11 Q. And let me ask you: what's the current position in terms
 12 of -- we've heard about the training package called ACT,
 13 which is the current standard. What's the current
 14 position in terms of ACT training being rolled out for
 15 your licensing authorities?
 16 A. All my officers have now had that training. There's
 17 only one officer in the team who's on long-term sick who
 18 hasn't had it. When I say had it, I mean the e-learning
 19 package.
 20 Q. That's excellent, but obviously, as you said, that's not
 21 necessarily sufficient to be able to --
 22 A. I don't think it would be. Having done that training
 23 myself, I don't think it would be sufficient to enable
 24 them to make that assessment of whether or not the
 25 security measures put in place were adequate. I think

58

1 that is something where we would need a little bit more
 2 help.
 3 SIR JOHN SAUNDERS: You'd expect to work in cooperation with
 4 CT police officers just as you worked in cooperation
 5 with police officers as to other things --
 6 A. Yes.
 7 SIR JOHN SAUNDERS: -- and you might work with drug officers
 8 where there's a drug problem in a particular licensed
 9 premises for example?
 10 A. GMP would, yes.
 11 SIR JOHN SAUNDERS: Okay, thank you.
 12 MR HENDERSON: I think the final thing I want to touch on
 13 with you is we've talked about the possibility of
 14 applying mandatory conditions to the existing
 15 Licensing Act and you've dealt with this briefly in your
 16 statement. In particular, there's been a proposal or
 17 suggestion that section 19A of the Licensing Act 2003
 18 can be used to apply mandatory conditions, I think up to
 19 nine, and there are currently five. So something could
 20 be put in there in relation to counter-terrorism, but
 21 what would be the limitations of that?
 22 A. Actually, in relation to my statement, in section 34,
 23 I've since had the benefit of the advice that's been
 24 given by the QC who gave advice to the inquiry.
 25 I recognise that that isn't something that could

59

1 actually be applied. I misinterpreted that. I thought
 2 it was relevant to premises who were licensed for the
 3 sale of alcohol and I worked on the basis that a lot of
 4 premises are licensed for the sale of alcohol and it
 5 felt like it would be a more appropriate route to do
 6 something mandatory at a national level than try to do
 7 it through individual reviews of premises licences. But
 8 I accept I was wrong in terms of my interpretation of
 9 that legislation.
 10 SIR JOHN SAUNDERS: Because the conditions have to relate to
 11 the sale of alcohol I think and it's all part of the
 12 division between the Home Office and the Department of
 13 Culture ...
 14 A. Media and Sport.
 15 SIR JOHN SAUNDERS: That's the one, who deal with
 16 entertainment licences?
 17 MR HENDERSON: Just to make it very clear for everyone
 18 following, the suggestion was this might be a route to
 19 introduce a mandatory condition for counter-terrorism
 20 that would cover a lot of venues, but actually it
 21 wouldn't, it would only cover potentially where there's
 22 sale of alcohol?
 23 A. It wouldn't even do that because the mandatory
 24 conditions can only be applied in relation to the supply
 25 of alcohol; they can't be used to impose a condition

60

1 that would require people to have regard to
 2 counter-terrorism measures.
 3 Q. So it's actually quite limited?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: If it's any consolation, the advice we
 6 got got it wrong too to start with, but it corrected
 7 itself .
 8 MR HENDERSON: Sir, I think that covered everything. There
 9 will be some questions from CPs, but just looking at the
 10 time, I wonder if we should take the morning break now
 11 and then come back to Mr Cooper's questions, if that's
 12 all right.
 13 SIR JOHN SAUNDERS: I'm sorry to break your evidence. We'll
 14 have a quarter of an hour break.
 15 (11.45 am)
 16 (A short break)
 17 (12.00 pm)
 18 MR HENDERSON: Thank you, sir. I understand we've got some
 19 questions from Mr Cooper and then Ms Ghahhary has
 20 indicated she may have some questions.
 21 I think that's it .
 22 SIR JOHN SAUNDERS: Thank you.
 23 Questions from MR COOPER
 24 MR COOPER: As you'll realise, I'm sure, I represent some of
 25 the families as far as this tragedy is concerned, and in

1 particular , on this particular issue of Martyn's Law,
 2 I represent Figen Murray.
 3 Can I just -- let me say straightaway, we all
 4 understand the difficulties , this is just trying to
 5 drill down now into how we can together move forward as
 6 far as Martyn's Law is concerned.
 7 I want to ask you just a little about the problem
 8 between voluntary and mandatory as far as Martyn's Law
 9 is concerned. I am sure you will accept as a general
 10 principle , which is so trite it's hardly worth saying,
 11 but I will , that there are a lot of limitations to
 12 voluntary registration because it leaves people with
 13 a choice to make and if they don't make the choice to
 14 register , for instance, or indeed to report faults , then
 15 the regulatory authorities won't know anything about
 16 them. Basic principle .
 17 Can I put another example to you relating to another
 18 atrocity , the Finsbury Mosque attack on 19 June 2017,
 19 just after Manchester. You may or may not know that
 20 that resulted in a voluntary register for anyone to
 21 register who rents out motor vehicles. I don't know
 22 whether you knew that, it doesn't matter whether you did
 23 or didn't, it's not crucial to the question. But as
 24 a result of the Finsbury Mosque attack there was
 25 a voluntary register to anyone renting out vehicles to

1 register , not mandated.
 2 Would you be surprised to hear that the effect of
 3 that registration has been very weak indeed?
 4 A. No, I would not.
 5 Q. And that the numbers of those registering has been
 6 minimal, and although one could no doubt understand the
 7 good intent behind the voluntary register for those
 8 renting out vehicles , some might say it is totally
 9 ineffective . Would you agree, therefore, that it is
 10 imperative, as far as Martyn's Law is concerned, for it
 11 to be mandatory?
 12 A. I think it should be mandatory, yes.
 13 Q. In terms of the policing , if I can use a small P for
 14 that, of any Martyn's Law that is put into operation,
 15 will that require extra funding or would that require
 16 extra funding?
 17 A. In respect of the enforcement of it?
 18 Q. Of the enforcement of it, yes.
 19 A. If we were to do programmed type inspections which meant
 20 that every premises had to be visited , then yes we would
 21 need further resources --
 22 Q. If you can keep your voice up -- I know it's difficult,
 23 but I'm thinking about those who sit at the back and
 24 I can only just about hear you. You have a very quiet
 25 voice.

1 A. Sorry, yes.
 2 If we were required to inspect every premises to
 3 make sure that they were compliant with Martyn's Law,
 4 then, yes, we would need more enforcement resources than
 5 we have at the moment to do that.
 6 Q. But you've read Martyn's Law, haven't you?
 7 A. Yes.
 8 Q. I'm sure you have. There's a section there which says
 9 "The cost impact of Martyn's Law", which says:
 10 "Much of Martyn's Law can be achieved without
 11 significant cost impact. We believe that for many
 12 mitigations there is no cost or low cost, things like
 13 metal detectors, CCTV cameras and security personnel are
 14 available within a reasonable cost of any business'
 15 running costs."
 16 So firstly , so far as that mitigation is concerned,
 17 proposed by Martyn's Law, that's not particularly a cost
 18 to the public purse, is it?
 19 A. No, no, that's not a cost to the public purse. I was
 20 just referring to the enforcement element of it.
 21 Q. It's my fault, my question was predicated around
 22 enforcement and I rather leapt on to other issues .
 23 Mitigation issues and implementation measures, which for
 24 the chair's assistance comes under the cost impact of
 25 Martyn's Law, I'm not going to go through the whole

1 thing, a lot of it is cost neutral to the public purse
 2 anyway, would you agree?
 3 A. I would anticipate so. I'm no expert in that area, but
 4 yes, a number of the measures that would also be
 5 effective in terms of counter-terrorism are measures
 6 that may already be in place in a number of licensed
 7 premises.
 8 Q. In many respects, so far as Martyn's Law is concerned,
 9 one of the imperatives of it is the enforcement of it
 10 and the policing of it?
 11 A. Yes.
 12 Q. Whilst I take your evidence that you can't keep your
 13 finger on the pulse of every single licensed premises,
 14 the general principle of spot-checks still holds firm,
 15 doesn't it, unannounced spot-checks?
 16 A. We do visit a lot of premises unannounced, but it'll
 17 generally be because we have concerns about those
 18 premises. It's not random because we have a reason to
 19 go but we don't tell people we are going.
 20 Q. This has already been trammelled by the chair, so I'll
 21 simply curtail it with one question: would you agree
 22 that that should change, particularly in respect of
 23 Martyn's Law, that there shouldn't need to be complaint
 24 but there should be, if Martyn's Law becomes law or
 25 indeed becomes part of a licensing regime in the

65

1 interim, there should be spot-checks, there shouldn't
 2 need to be complaints?
 3 A. It would be useful for there to be spot-checks, yes.
 4 Q. Can I press you a little: it'd be more than useful,
 5 it would be important, wouldn't it?
 6 A. Yes, it would be important if we wanted to ensure that
 7 every premises was complying with a particular
 8 requirement under Martyn's Law then, yes, we would have
 9 to do that, or we could require them to provide
 10 evidence, that could be -- you could sort of ask that
 11 that be provided to the licensing authority. There
 12 would be a cost involved in that clearly because
 13 we would have to receive that information and have a way
 14 of storing it and checking it. But that would be an
 15 alternative means.
 16 Q. Indeed. There may well be and probably will be cost
 17 implications, but one has to balance the benefits, I'm
 18 sure you'd agree --
 19 A. Yes.
 20 Q. -- of what Martyn's Law presents. So what you're saying
 21 is that given that resources may not allow 100%
 22 checking, certainly an alternative would be spot-checks
 23 or demands -- not requests, demands -- that certain
 24 information is supplied from organisations under your
 25 auspices to provide evidence that they are complying

66

1 with Martyn's Law; would that be right?
 2 A. Yes.
 3 Q. And should they not be complying, either by a spot-check
 4 or indeed by failure to supply information, that would
 5 result in prosecution subject to the law?
 6 A. Whatever the sanction was that was set out in the law,
 7 yes.
 8 Q. Is there a policy generally -- I'm moving on to policy
 9 generally in terms of prosecution decisions -- as to how
 10 that decision is formulated? Let me be clear about
 11 this. Putting another hat on, we know that, for
 12 instance, the Crown Prosecution Service have a procedure
 13 that they undertake, a 50/50 chance of success, as it
 14 were, or in the public interest. It's a sort of formula
 15 which I happen to know of. Is there such a formula when
 16 it comes to the decision-making as far as your
 17 organisation is concerned when it comes to whether or
 18 not to take a prosecution? Is there a formula?
 19 A. I wouldn't say there was a formula. We would consider
 20 every case on the individual merits of that case.
 21 Q. Yes. The individual merits -- well, in many respects
 22 then, if there is a 50/50 chance of success, for
 23 instance, would that be something like that?
 24 A. I don't actually know the answer to that.
 25 Q. All right. Are there many prosecutions that you

67

1 undertake generally in a year?
 2 A. In relation to licensing?
 3 Q. For breaches of licensing.
 4 A. No.
 5 Q. Do you have any figures at all?
 6 A. I don't have any figures but I could get them for the
 7 inquiry if that would help.
 8 Q. A matter for the chair. But do we take it from that
 9 that that's because most organisations in Manchester are
 10 very good and are complying or is it because decisions
 11 are being made not to prosecute for funding reasons or
 12 that your threshold for prosecution is quite high?
 13 A. Well, I don't believe that we would take any decisions
 14 not to prosecute for funding reasons.
 15 We generally -- as is set out within our enforcement
 16 policy, we'll, wherever we can, try to achieve
 17 compliance through working with a business. So we
 18 don't -- it's not our -- generally speaking, it's not
 19 our *raison d'être* to punish, it's to achieve compliance,
 20 so by whatever means we can achieve compliance, we will
 21 use those means. If that means we have to go down an
 22 enforcement route either because the breach was so
 23 serious or we were getting persistent non-compliance,
 24 we would do so, but we would always seek to achieve
 25 compliance by non-formal means first.

68

1 Q. By, I think we have heard the expression before, words
2 of advice and that sort of thing? I'm not downcrying,
3 as sometimes they can be very effective, but that sort
4 of thing?
5 A. Yes.
6 Q. Would you agree, and I'll leave the point here, that for
7 something as important as Martyn's Law for the safety of
8 people, any breach of it — well, any substantial breach
9 of it, let's be sensible about this, any substantial
10 breach of it should receive prosecution, straight to
11 prosecution?
12 A. It would depend very much what the legislation said.
13 But if the legislation said that a breach should result
14 in prosecution, then yes.
15 Q. Can I just ask you a few general questions. You have
16 already told the chair there are no random checks but
17 it's on the basis of intelligence, complaints and
18 problems, and the chair has taken a number of my
19 questions, which I won't repeat, concerning how the
20 public is supposed to know when there's something
21 happening to report it.
22 A lot of these reports need to be made by the
23 organisations and the businesses, not the public, for
24 you to act, in short that's your evidence really, isn't
25 it?

69

1 A. Could you repeat that question?
2 Q. Of course. You're waiting for complaints and reports
3 for you to act, correct?
4 A. Well —
5 Q. I think is what you said.
6 A. We're not just waiting for complaints because there are
7 a number of officers employed in a range of different
8 departments who, if they saw something that caused them
9 to have concern, they could report it and then we would
10 do an inspection then. For example, we could have
11 officers employed in waste management who had concerns
12 about kind of like waste outside a premises, that may be
13 an indicator of general non-compliance, which could then
14 make a report like that would cause us to think, right,
15 we'll go and visit that premises. So it's not random,
16 there's a reason — and we may uncover other things when
17 we do an inspection as a result of that.
18 Q. And of the officers who were the compliance officers who
19 would be assigned, for instance, who are assigned, let
20 me put it like that, to licensing breaches, how many are
21 there in Manchester?
22 A. I think it's in the region of 34.
23 Q. Just a little on collaboration between Manchester City
24 Council compliance officers, police licensing officers
25 and SIA enforcement officers. You've been asked

70

1 questions about your contact with them and we hear that.
2 Is there any formal process between these three bodies
3 of written communications or written briefings to ensure
4 that there is proper, thoughtful and consistent
5 communication between these three bodies, or is it
6 ad hoc on whatever matter that is being dealt with?
7 A. In relation to the police and the council, because we
8 work so closely together, we share an office, we meet
9 regularly, there isn't — in terms of a memorandum of
10 understanding or something like that, no, we don't have
11 something like that in place. I don't think that
12 that is necessary in those cases because we are working
13 hand-in-glove with those officers.
14 With the SIA, I don't know whether or not there's
15 a formal written arrangement with the SIA.
16 Q. The question is really designed around the concern of
17 matters slipping between the cracks, as it were, between
18 the police, the compliance officer and the SIA. We've
19 heard evidence here on another scale of communications
20 between various organisations, and it might be the view
21 of the inquiry, we don't know, that the communications
22 between different bodies was lacking. That's why I'm
23 asking you this question: are there any improvements
24 that in your view could be made to the level of
25 communication between Manchester City Council compliance

71

1 officers, police licensing officers and SIA enforcement
2 officers to make them more of a coherent unit?
3 A. Improvements can always be made —
4 Q. Of course.
5 A. — in any system.
6 Q. I know that.
7 A. There's nothing that immediately strikes me in relation
8 to the communication between licensing officers and
9 police licensing officers.
10 In relation to the relationship with the SIA
11 I really don't know. We definitely have a relationship
12 there, but whether or not there are things that could
13 fall through the cracks, I don't think I'm in a position
14 to say.
15 Q. It may well be that you haven't had chance to think
16 about it and, obviously, through the chair, if I can,
17 invite you to take that final question of mine away with
18 you and consider whether there are any improvements that
19 can be made to ensure that that three-pronged unit, the
20 City Council compliance officer, the police and the SIA
21 enforcement officers, can be made more of a unified
22 tool.
23 A. I will do that, thank you.
24 MR COOPER: I'm grateful, thank you, sir.
25 SIR JOHN SAUNDERS: Thank you very much.

72

1 Questions from MR ATKINSON
 2 MR ATKINSON: If we could have {INQ035447/1} back up,
 3 please. This is the premises licence for the arena and
 4 using this as a more general tool, {INQ035447/8},
 5 please, and paragraph 87, which is right down the
 6 bottom.
 7 The chair earlier in his remarks to you alluded to
 8 paragraph 86 and the degree to which compliance with an
 9 agreement as to the minimum number of stewards would be
 10 something that could be picked up on a spot-check and/or
 11 as a result of a complaint.
 12 In the same vein, paragraph 87 requires those who
 13 are stewarding to:
 14 "... wear conspicuous and identifiable clothing and
 15 to have the necessary equipment in order to comply with
 16 their duties."
 17 In relation to SIA-licensed versus non-SIA-licensed
 18 staff, would that be the kind of thing that would be
 19 checked on a spot-check or that might give rise to
 20 a complaint if you had no one displaying signs that they
 21 were SIA licensed who were doing stewarding?
 22 A. Whether it would be picked up or not I suppose would
 23 depend on the reason why we were visiting the premises.
 24 Q. One presumes that the requirement that people are
 25 identifiable in that way would include being able to

1 identify who is SIA licensed and therefore entitled to
 2 do --
 3 A. Yes --
 4 Q. -- those functions?
 5 A. An SIA licensed officer would have to be displaying an
 6 SIA badge.
 7 Q. Would it be part of your checks to see that was being
 8 done and that there were enough of them?
 9 A. If we were visiting a licensed premises to do an
 10 inspection, the officers would definitely check anyone
 11 who was what we would normally call door staff to
 12 ensure. As a routine matter, in relation to any other
 13 stewarding function, we wouldn't routinely check whether
 14 or not they were wearing conspicuous numbered coats
 15 marked with titles and the rest of that particular
 16 condition.
 17 Q. And just one final question on that. In relation to
 18 equipment, an item of equipment for stewarding staff,
 19 radios. Would you as part of a spot-check be looking to
 20 see whether enough staff had radios?
 21 A. I think we probably would not. I think that that is
 22 something which we would expect the licensee to be
 23 complying with that condition. If we were doing a full
 24 inspection of a premises then we would go through every
 25 condition, but on a spot-check I think it's highly

1 unlikely that we would unless it had been raised as
 2 a concern.
 3 Q. But there would be an expectation that the licensee
 4 would be ensuring compliance --
 5 A. Oh yes, it's a condition of the licence, yes.
 6 Q. And people wearing the right uniform, displaying the
 7 right identifiers and with the right kit?
 8 A. Yes, it's a condition of their licence, so yes,
 9 of course they'd be expected to comply with that.
 10 MR ATKINSON: Thank you.
 11 MR HENDERSON: I just want to check whether Mr Weatherby or
 12 Ms Ghahhary have any questions.
 13 Questions from MS GHAAHARY
 14 MS GHAAHARY: Yes, thank you.
 15 Good afternoon, Ms Sharkey. I represent three of
 16 the families and I have a few questions for you.
 17 First of all, I would like to revisit a point that
 18 was raised with Mr Swift and I'm hoping that we can get
 19 your perspective on this.
 20 Mr Lopez, please could we have up document
 21 {INQ035446/13}.
 22 Ms Sharkey, I'm sure you were watching Mr Swift's
 23 evidence. He was asked about paragraph 2.23 under
 24 the heading:
 25 "Working to prevent the threat of terrorism."

1 Mr Swift told us that section 2 of the policy sets
 2 out the strategies that the policy aims to promote and
 3 it recognises that premises have a role in promoting
 4 those strategies and that, in particular, with regard to
 5 2.23, the wording "have regard to" was not intended to
 6 have any particular legal ramification. I just want to
 7 ask you about that.
 8 I'm sure you will agree that underpinning the
 9 strategies that are set out in this document, indeed the
 10 entire licensing regime, are the licensing objectives.
 11 A. Yes, that's correct.
 12 Q. And we know that two of those objectives are relevant to
 13 this inquiry: the protection of public and the
 14 prevention of crime and disorder.
 15 A. Yes, that's correct.
 16 Q. So is it fair to say that this paragraph and the
 17 entirety of section 2 is not just a strategy that
 18 the council aims to promote, it's actually a strategy
 19 that promotes the licensing objectives; that's the
 20 reason it's there?
 21 A. I think the explanation that Mr Swift gave earlier --
 22 I didn't actually see his evidence, but what you've just
 23 described I think that is correct in terms of what was
 24 intended in relation to the city statement of licensing
 25 policy. I do accept that there are licensing objectives

1 that relate — that it does relate to as well. But
 2 I don't think that the licensing regime as such has ever
 3 taken the... Sorry, I'm trying to think of the words
 4 I want to use here.

5 It's not been something — I don't think that
 6 licensing enforcement officers have ever considered sort
 7 of like the implementation of counter—terrorism as
 8 a particular licensing function. I think the fact that
 9 the section 182 guidance doesn't include any reference
 10 to counter—terrorism in it kind of like supports that as
 11 well.

12 Q. May we just look at that in a little more detail? The
 13 licensing objective is public safety and the prevention
 14 of crime and disorder. I think we can all agree that
 15 terrorism falls under both of those categories.

16 A. Yes, I agree.

17 Q. And whilst specifically counter—terrorism might not have
 18 been a matter of licensing conditions or indeed
 19 licensing enforcement thus far, your policy does
 20 recognise that it is a factor that has to be taken into
 21 account by a premises and by the council when
 22 administering and enforcing the regime. Otherwise, what
 23 is the point of having this paragraph there?

24 A. I think that's fair comment.

25 Q. In terms of the legal ramifications, Mr Lopez, if we can

77

1 turn to {INQ035446/8} of the policy, please. Perhaps if
 2 we can enlarge it so that we can see paragraph 1.15.

3 Ms Sharkey, I don't know if you're able to read that
 4 paragraph, but it says:

5 "Where licensed premises fail to promote the
 6 licensing objectives, we will take appropriate steps to
 7 address any such licence—related issues."

8 I appreciate that you haven't in the past looked at
 9 counter—terrorism measures as a compliance and
 10 enforcement matter — and you're not alone in that, I'm
 11 not being critical, but I understand that most local
 12 authorities, if not all, across the country have taken
 13 the same approach — but would you accept that according
 14 to your policy, as of now, the promotion of the
 15 licensing objectives includes the counter—terrorism
 16 strategy that you have outlined in paragraph 2.23, and
 17 that if a premises fails to promote the licensing
 18 objectives in that way, as one example, it's open to the
 19 council to take appropriate steps to address that?

20 A. Yes, I would accept that.

21 Q. Thank you.

22 The next topic I want to raise again was addressed
 23 in Fraser Swift's evidence and it relates to the
 24 application process. When a premises makes an
 25 application, they have to have regard to the statutory

78

1 guidance and your statement of policy?

2 A. That's correct.

3 Q. Those documents inform the applicant as to what is
 4 expected of them and so what should appear in their
 5 operating schedule?

6 A. Yes.

7 Q. When the application is made, turning back to
 8 paragraph 2.23, the licensing authority can, as part of
 9 its assessment of that application, consider whether the
 10 operating schedule sets out any reference to the
 11 counter—terrorism guidance?

12 A. It could.

13 Q. If it felt that those matters were not adequately
 14 addressed, it could take that up with the applicant;
 15 that normally happens, doesn't it, in a number of
 16 contexts?

17 A. Are you referring to the licensing committee here in
 18 considering the application?

19 Q. I'm referring to the licensing officers. The first
 20 stage of the application process is that the application
 21 is received by the officers, and, as you know, if there
 22 are no representations made about the application, the
 23 application is granted, there's no need for a committee
 24 hearing. That's the way it works.

25 A. That's correct, yes. I deal with enforcement rather

79

1 than licensing, granting licensing applications.

2 Q. Right. If there's anything you can't help me with,
 3 please say so, but assuming you have a working knowledge
 4 of the application process, at that point it is open to
 5 the licensing officer to say to the applicant, "You've
 6 not addressed this particular part of our policy, we
 7 think it's relevant to your premises, would you like to
 8 give us some more information on that because at the
 9 moment we're not satisfied that the application meets
 10 our expectations"?

11 A. I think that could take place, but as I said, I don't
 12 deal with the licensing application process.

13 Q. Yes. And if the applicant responded and said, "Well,
 14 we're quite happy with our application and we don't
 15 think we need to address counter—terrorism as you have
 16 set out at 2.23", the local authority can consult with
 17 the police, who might make a representation on that,
 18 causing the matter to go before a panel, or the
 19 licensing authority, as a responsible authority in its
 20 own right, could raise a representation, thereby causing
 21 the matter to go before a panel for a hearing. Is that
 22 right?

23 A. I think that would be the case.

24 Q. So all things considered, it is possible at the
 25 application stage, from this point forwards, for the

80

1 local authority to take steps to ensure that
 2 counter-terrorism measures have been included as part of
 3 the application process?
 4 A. Yes, I think that would be the case.
 5 Q. Thank you.
 6 The next matter I just want to ask you about is
 7 in relation to the linking of the crowded places
 8 strategy and the Counter-terrorism Policing Network with
 9 the licensing regime. I don't know if you had the
 10 opportunity to watch the evidence of Mr Hipgrave and
 11 Ms D'Orsi of the Home Office, but if I can just recap
 12 for the sake of context.
 13 A number of years ago, the Home Office implemented
 14 the crowded places strategy and, as I'm sure you know,
 15 that involves a tiering process, specifically designed
 16 to prioritise the mitigation of vulnerabilities at
 17 certain crowded places. Are you aware of that strategy?
 18 A. I don't have detailed knowledge of it, no.
 19 Q. Okay, that's fair enough. I'm just going to set it out
 20 in a little more detail. The tiering process --
 21 SIR JOHN SAUNDERS: Sorry. Can I interrupt for a moment?
 22 I'm just wondering whether you'd like to consider
 23 whether, in view of what this witness has said about her
 24 knowledge, whether she's really the person to ask these
 25 questions to. Going forward, I'm not complaining about

1 ones we've had already, but whether it would be better
 2 for Ms D'Orsi to deal with it when she comes back,
 3 unless there's something specific to this witness and
 4 enforcement.
 5 MS GHAAHARY: Yes, sir, there is something specific to this
 6 witness and enforcement. It seems to me that setting
 7 out some of the key aspects of the CTSa regime might
 8 assist the witness in answering the question I have.
 9 SIR JOHN SAUNDERS: Okay.
 10 MS GHAAHARY: I hope, sir, I'm not wrong about that.
 11 SIR JOHN SAUNDERS: I'll tell you at the end.
 12 MS GHAAHARY: Thank you.
 13 Just dealing very briefly with that system, the
 14 tiering process involves designating a tier to
 15 a particular premises because they are deemed to be
 16 particularly vulnerable or at particular risk from
 17 counter-terrorism, and Manchester Arena was one of those
 18 premises. Did you know that?
 19 A. No.
 20 Q. Right. That might be part of the solution in terms of
 21 liaising with counter-terrorism advisers because once
 22 a premises is designated in that way, the
 23 counter-terrorism adviser will go along and have
 24 quarterly meetings with that premises, carry out
 25 a vulnerability assessment, provide what's called a PSIA

1 score, which is a security score in summary, and an
 2 action plan will be created. And as you would imagine,
 3 a bit like your licensing action plans, that action plan
 4 will set out a series of measures that can be
 5 implemented in order to address any of the security
 6 issues.
 7 Once that action plan has been devised, it's then
 8 down to the site to interpret and implement that action
 9 plan. So there's a system in place already that,
 10 providing the premises engages, and as far as we're
 11 aware none of the premises have refused to engage with
 12 counter-terrorism advisers on these issues, an action
 13 plan exists dealing with the types of measures that can
 14 be put in place to ensure counter-terrorism measures.
 15 Bearing that in mind, although it might be said that
 16 the Licensing Act has always allowed for it,
 17 historically licensing authorities and other responsible
 18 authorities haven't used the licensing regime to
 19 implement and enforce counter-terrorism measures.
 20 Again, that's no criticism of Manchester City Council,
 21 that's across the country.
 22 One of the reasons for not using the regime in that
 23 way is what you describe in your statement at
 24 paragraphs 31 to 33 as being:
 25 "A lack of expertise available within the local

1 authority in relation to counter-terrorism measures."
 2 Would you agree that another reason that perhaps
 3 local authorities haven't taken steps to enforce
 4 counter-terrorism measures is that there has been no
 5 joining-up of the counter-terrorism adviser system that
 6 I just described to you, that where there's
 7 a vulnerability assessment and an action plan, that
 8 hasn't been joined up with the licensing regime where
 9 very similar things happen around other aspects of the
 10 licence? Would you agree that that might be another
 11 reason why local authorities haven't been able to take
 12 steps to enforce counter-terrorism measures?
 13 A. I would agree that that isn't joined up at the moment.
 14 Q. Would you also agree that there is nothing in the
 15 licensing legislation, guidance or policy that precludes
 16 counter-terrorism advisers from liaising with and
 17 supporting licensing police officers and local authority
 18 licensing officers for the purposes of promoting the
 19 licensing objectives?
 20 A. Yes, there's nothing that I'm aware of that would
 21 preclude that.
 22 Q. And it's an obvious point, but would you agree that
 23 counter-terrorism advisers and the Counter-terrorism
 24 Policing Network on the whole is in a good, if not the
 25 best, position to provide the right kind of expertise

1 and input into the licensing process?
 2 A. Yes, I would.
 3 Q. Turning back to the counter—terrorism adviser system
 4 that I've just described, the way that might work in
 5 practice is that a counter—terrorism adviser could flag
 6 a number of things up with you as the licensing
 7 authority. For example, if a premises did not engage
 8 with the counter—terrorism adviser, they could flag that
 9 up and say, "I'm getting no engagement and I'm not
 10 satisfied that they're taking adequate steps". That's
 11 one thing that they could do?
 12 A. Yes, they could.
 13 Q. They could also flag up with you the fact that
 14 a premises has been the subject of a vulnerability
 15 assessment but that, following further assessments, they
 16 feel that a premises is not adequately implementing the
 17 action plan or having regard to the NaCTSO guidance.
 18 They could flag that up with you as well, couldn't they?
 19 A. Yes.
 20 Q. There's no reason why the counter—terrorism adviser
 21 could not be consulted as part of the application
 22 process or a variation process or the review process?
 23 A. None that I'm aware of.
 24 Q. So would you agree that insofar as counter—terrorism
 25 measures at licensed premises are concerned, linking the

1 crowded places strategy to the licensing regime would
 2 provide what might be described as an end—to—end
 3 approach consisting of advice and guidance, expertise
 4 and the ability to enforce?
 5 A. Yes.
 6 MS GHAAHARY: I don't have any further questions, thank you,
 7 sir.
 8 SIR JOHN SAUNDERS: Thank you. You've got the record of
 9 asking the longest question in this inquiry and there's
 10 been some stiff competition to achieve that, if I may
 11 say so. Thank you very much.
 12 MR HENDERSON: I believe, sir, that is us in terms of
 13 questions. I think given the time — sorry, unless
 14 you have anything further.
 15 Questions from THE CHAIRMAN
 16 SIR JOHN SAUNDERS: I have two, I hope, very short
 17 questions. This is a hangover licence from before 2003,
 18 so the old conditions were automatically put on the new
 19 licence under what's called the grandfather provisions.
 20 Nowadays, licence conditions are mainly a distillation
 21 of the operating schedule of the licensed premises which
 22 they put forward, so they look different.
 23 A. That's right.
 24 SIR JOHN SAUNDERS: These were actually imposed by a local
 25 authority, these old ones initially ?

1 A. Under the old public entertainment licence provisions,
 2 yes, they would have been.
 3 SIR JOHN SAUNDERS: So do you think they just got largely
 4 ignored because they're the old style conditions rather
 5 than new style conditions?
 6 A. It'd be speculation for me to...
 7 SIR JOHN SAUNDERS: I don't think it would because you're an
 8 enforcement officer so actually it's not speculation for
 9 you.
 10 A. I think that's possible, yes.
 11 SIR JOHN SAUNDERS: Okay. Just finally, this — and again,
 12 could I have a degree of realism that we've had from all
 13 your answers, if I may say so, so far: with your
 14 enforcement officers, do they have a reasonably good
 15 understanding of what activities being carried out by
 16 security operatives or stewards require an SIA licence?
 17 A. I really don't know the answer to that. I know that
 18 they know what a door supervisor in a pub or nightclub
 19 should be doing. But I'm not entirely sure about the
 20 distinction between stewards and SIA licensed, whether
 21 or not they would have that knowledge. That's something
 22 I will follow up.
 23 SIR JOHN SAUNDERS: Thank you. Thank you very much. I'm
 24 really grateful for you coming. That's the end of your
 25 evidence. And we are now breaking for lunch?

1 MR HENDERSON: Yes, that would be sensible, sir.
 2 SIR JOHN SAUNDERS: Thank you, everybody. 1.45.
 3 (12.45 pm)
 4 (Lunch adjournment)
 5 (1.45 pm)
 6 MR DE LA POER: Sir, we are joined this afternoon by
 7 Ms Forster. I wonder, before she is sworn, if I could
 8 just assist you and the core participants and the public
 9 at large about a witness whose name is going to come up
 10 during the course of Ms Forster's evidence, that witness
 11 being Ken Upham, a name that's been mentioned a number
 12 of times.
 13 The position is this, that on the evidence the
 14 inquiry has received, Mr Upham is not fit to give
 15 evidence. As a result of learning of that, Ms Forster
 16 was asked to provide a statement to assist with the
 17 background to CTSA's that would have been covered by
 18 Mr Upham and the inquiry is extremely grateful to
 19 Ms Forster for her statement which is dated 6 November,
 20 so it is extremely recent indeed that that request has
 21 been made of her.
 22 The position with Mr Upham's statements is that they
 23 will be published in full subject to operationally
 24 sensitive redactions on the inquiry website and, as
 25 such, will be taken to be within the evidence that you,

1 sir, will consider for the purpose of your report.
 2 What that means in practical terms is that there are
 3 39 pages of statements, plus appendices, which core
 4 participants will be able to refer to when making
 5 submissions to you, sir, or in the course of any closing
 6 statement.
 7 Furthermore, we will engage with core participants
 8 in relation to the documents that Mr Upham refers to,
 9 with a view to reaching agreement about which parts of
 10 those documents should also be published so that they
 11 too are within the purview of the evidence and can be
 12 the subject of comment later.
 13 So far as Ms Forster is concerned, we hope very
 14 much, and we shall try to bear this in mind as well,
 15 that everyone will bear what I have just said in mind
 16 when framing their questions. There is no need to put
 17 a document to Ms Forster for the purpose of adducing it
 18 into evidence if it is dealt with by Mr Upham. And
 19 of course, everyone will be cognisant of the fact that
 20 Ms Forster is not able to speak to the conversation
 21 Mr Upham had with Miriam Stone at any time. She is here
 22 to assist us with the background of the CTSA scheme and
 23 to the interpretation of documents generally rather than
 24 in their detail.
 25 SIR JOHN SAUNDERS: Thank you. It is obviously regrettable

89

1 that Mr Upham can't give evidence. Bearing that in
 2 mind, are the CPs as happy as they can be with how the
 3 matter is being dealt with?
 4 MR COOPER: Yes, we've been on notice for some time and have
 5 had chance to consider it. Echoing your observations,
 6 sir, it's regrettable, obviously, but we understand that
 7 everything that could have been done has been done.
 8 SIR JOHN SAUNDERS: Thank you.
 9 MR DE LA POER: Sir, with those preliminary remarks out of
 10 the way, can I ask that Ms Forster is sworn?
 11 MS LIZ FORSTER (sworn)
 12 Questions from MR DE LA POER
 13 SIR JOHN SAUNDERS: Thank you. Do sit down, and can I also
 14 join in expressing my gratitude for you dealing with
 15 this matter so rapidly. Thank you.
 16 MR DE LA POER: Can we begin, please, with your full name?
 17 A. Elizabeth Forster.
 18 Q. You have made a statement at the request of the chairman
 19 dated 6 November of this year, is that right?
 20 A. Correct.
 21 Q. For our reference that is {INQ038609/1}.
 22 We are going to begin, please, by introducing you.
 23 We can take that fairly shortly, although as I've
 24 already said to you before you came into the witness
 25 box, if I omit anything important, please draw it to our

90

1 attention.
 2 Your current role is that of principal
 3 counter—terrorism security adviser at GMP; is that
 4 right?
 5 A. Correct, yes.
 6 Q. You have worked for GMP since 1986?
 7 A. Yes.
 8 Q. And you became the principal CTSA in March of 2011?
 9 A. Yes.
 10 Q. By reason of your role, you have been Ken Upham's line
 11 manager since 2011?
 12 A. Yes.
 13 Q. That is you and who you are for the purpose of the
 14 assistance you're able to give us. I'm going to move
 15 next to the role of a CTSA.
 16 Is it correct that a framework is provided by NaCTSO
 17 as to the nature of that role?
 18 A. Yes.
 19 Q. I am going to quote your statement now. Is it right
 20 that:
 21 "The primary role is to provide free advice on
 22 counter—terrorism protective security to publicly and
 23 privately owned sites"?
 24 A. Correct, yes.
 25 Q. You also make another statement which I would like your

91

1 help with. You say:
 2 "The responsibility for the security arrangements at
 3 a site remain with the site."
 4 A. Yes.
 5 Q. You agree with that statement?
 6 A. I do, yes.
 7 Q. What we're going to do in due course is just explore the
 8 way in which you understand a site should deal with
 9 advice that they receive and what it means, but we'll
 10 simply note that statement that you've made for now.
 11 I'm going to move on to CTSA training. Again,
 12 we can take this relatively shortly. Is it right that
 13 there is a three—week foundation course?
 14 A. Yes.
 15 Q. And that there are further courses which are required,
 16 which, in time terms, total approximately 6 weeks?
 17 A. Yes.
 18 Q. Is there then some additional training on top of that?
 19 A. The mandatory training? To actually become a CTSA,
 20 nowadays you have to be accredited; prior to that, when
 21 I joined, I had to pass my licensorship(?) so as well as
 22 the initial training, plus the various mandatory
 23 modules, I also had to submit, or CTSA's still have to
 24 submit, a portfolio of work, which is evidence of the
 25 work they've done whilst in training. So that would

92

1 include surveys, it may include evidence of engaging
 2 with various sites, different types of sites, et cetera.
 3 Q. Is that a scheme of continuing professional development?
 4 A. It is.
 5 Q. And that is required in order to maintain accreditation,
 6 is it?
 7 A. Yes, the CPD sessions, you have to attend one a year in
 8 order to maintain your accreditation or licence and also
 9 there used to be, and it's coming back in, a quality
 10 assurance process by NaCTSO as well.
 11 Q. So have we covered the key points of training?
 12 A. Yes.
 13 Q. We're going to move to my fourth category, which is the
 14 explanation of the crowded places approach of CTSA's.
 15 Here, sir, for your reference, although you don't
 16 need to turn it up, Ms Forster, I'm taking it from your
 17 paragraph 9.
 18 Is it right that there was a new approach launched
 19 by NaCTSO in 2014?
 20 A. Yes.
 21 Q. Did that involve the creation of a priority list of
 22 crowded places?
 23 A. It did indeed, yes.
 24 Q. And by what means were those places selected, speaking
 25 in general terms?

93

1 A. We were tasked by NaCTSO locally to develop a list or
 2 draw up a list of places that should be considered as
 3 crowded places or we would consider as crowded places
 4 and then score them according to a formula they had
 5 submitted, and then issue that back to NaCTSO. So
 6 a long list and that was by region. Send that back and
 7 then NaCTSO and central government would look at that
 8 list and they are the ones that then prioritise them in
 9 tiers.
 10 Q. Was the basis of your scoring -- I don't want to go into
 11 the formula -- known as the attractiveness model?
 12 A. Yes.
 13 Q. So a new scheme in 2014. Was it radically different to
 14 what had gone before or was it simply an amendment of
 15 existing principle?
 16 A. I suppose the initial process of identifying locally
 17 sites that should be considered for the crowded places
 18 engagement was not overly dissimilar, as in that is from
 19 local knowledge, whether it be our own or local police
 20 officers. But the actual scoring methodology, I would
 21 suggest was different, it certainly was different,
 22 because we looked at the attractiveness of a place and
 23 it wasn't just -- I think you have mentioned already
 24 about crowd density. It would be the types of crowds as
 25 well. So there were some other variables that were

94

1 considered.
 2 Q. When you're talking about the scoring system, are you
 3 talking about the scoring system that led to the tiering
 4 of sites --
 5 A. Yes.
 6 Q. -- we're not there talking about the PSIA score?
 7 A. No, we're not on that.
 8 Q. Sticking with the identification of sites, there are
 9 three tiers; is that right --
 10 A. Correct.
 11 Q. -- within the NaCTSO model launched in 2014.
 12 A. Correct.
 13 Q. Tier 1, tier 2 and tier 3?
 14 A. Yes.
 15 Q. And is tier 1 nationally or internationally recognisable
 16 as symbolic of the UK essentially?
 17 A. Yes.
 18 Q. Whereas tier 2, whilst not of national or international
 19 prominence, nevertheless has a profile above local or
 20 have a significant attendance by notable users?
 21 A. Correct, yes.
 22 Q. And within tier 2, is there tier 2A and tier 2B?
 23 A. Yes.
 24 Q. And tier 2A is that defined as sites that have a less
 25 developed current security stance?

95

1 A. Yes.
 2 Q. Whereas tier 2B sites are sites that have a more
 3 developed current security stance?
 4 A. Yes.
 5 Q. So the distinction within tier 2 is how well developed
 6 their security stance is at the point of tiering?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: Everything in tier 2 would be divided
 9 into either A or B?
 10 A. Yes.
 11 MR DE LA POER: And a designation of B is an indication
 12 within the model of already having a more developed
 13 current security system?
 14 A. Yes, correct.
 15 Q. And then just to complete the tiering, tier 3, which we
 16 don't need to concern ourselves beyond its definition,
 17 are they sites that, while having sufficient footfall
 18 and crowd density to merit being classed as crowded
 19 places, have only local recognition and do not have
 20 a widely known, frequent or predictable attendance by
 21 notable users?
 22 A. Correct. That basically covers any other site that we
 23 engage with that isn't in the other two tiers.
 24 SIR JOHN SAUNDERS: Did you have to visit places to do this?
 25 A. To assess whether they should go on to the --

96

1 SIR JOHN SAUNDERS: Yes.
 2 A. We were already engaged. There had been other crowded
 3 places processes in place before. So the larger or the
 4 most crowded places had already been identified in the
 5 past.
 6 SIR JOHN SAUNDERS: So you had a lot of engagement --
 7 A. So we'd had engagement with those already.
 8 MR DE LA POER: We know in the case of Manchester Arena that
 9 you had been engaging with them for some time before
 10 this new model.
 11 A. Yes.
 12 Q. Once the tiering had been applied to any given site, did
 13 tier 1 and tier 2A sites receive proactive engagement
 14 under the NaCTSO model?
 15 A. Yes.
 16 Q. Whereas tier 2B did not have that proactive engagement?
 17 A. Yes, to a degree. It was the tier 1 and 2A which were
 18 the priority initially. So when you say proactive, they
 19 were ones that we engaged with again in the new process
 20 first and then once they were done, we then engaged with
 21 the 2Bs and, depending on their response, that then
 22 depended on how we progressed with them.
 23 Q. So there was a means of prioritising a fresh assessment?
 24 A. Yes.
 25 Q. Was the arena designated as a tier 2B site?

1 A. Correct, yes.
 2 Q. Did that have any effect on the level of engagement from
 3 your department?
 4 A. No, certainly not long term. The initial engagement may
 5 have been delayed for a few months because, obviously,
 6 we were told to prioritise tier 1 and 2A. But then from
 7 then on, no.
 8 Q. So once you were over the initial tiering process, and
 9 that assessment, as you've described it, which followed
 10 in priority order, was there in fact any distinction
 11 drawn between your engagement with Manchester Arena and
 12 other tier 2 sites --
 13 A. No.
 14 Q. -- whether they be A or B?
 15 A. No.
 16 Q. When the new model was launched, was it accompanied by
 17 a new ethos or strapline? What was that, please?
 18 A. "Something is better than nothing."
 19 Q. That might be regarded as being a defeatist way of
 20 looking at things. Is there a more positive way of
 21 looking at that?
 22 A. Yes, far more positive. Traditionally, a CTSA had --
 23 and we still do recommend gold standard, as we would
 24 call them, security measures. So because the advice we
 25 receive or the products we were supposed to -- not

1 supposed to... We would recommend gold standard because
 2 they were sure to stop, let's say, if it was a hostile
 3 vehicle that was being driven into a building,
 4 et cetera, or driven into people, then there are
 5 publicly available security standards that are supposed
 6 to be the -- they're tested and they are proven to work
 7 and withstand certain speeds, certain weights,
 8 et cetera. They were known as gold standard.
 9 However, those sort of security measures, hardware
 10 and hard measures, can cost an awful lot of money.
 11 Therefore, we were found, when we engaged with some
 12 sites, not all, but some sites, it wasn't found to be
 13 proportionate, cost versus benefit. I say that loosely.
 14 It's not... Because everything, obviously --
 15 nobody's got endless pockets. So the ethos, something
 16 is better than nothing, so if we weren't giving
 17 alternatives or recommending you try and stop -- and I'm
 18 using a vehicle because it's easy -- a vehicle accessing
 19 maybe as quickly or as deeply into an area by putting
 20 barriers in, a barrier is better than not having
 21 anything. Does that...
 22 Q. It does. Accompanying that approach, is there a risk
 23 that some organisations will think, "Well, you're only
 24 recommending a barrier here, therefore I can do that,
 25 I don't need to do the gold standard even if I can

1 afford it", or was that managed within the advice you
 2 gave?
 3 A. It's managed within the advice because they are given
 4 options. Certainly if I go to a site, I will say,
 5 "Obviously, we would look at this as being the ideal,
 6 however, if that can't be managed, if you can't get to
 7 that level of security, then the next would be this,
 8 this and this", or, "Go and see if you can engage with
 9 another company", you know, a specialist company, "to
 10 see what they could offer and advise as an alternative".
 11 Q. You've mentioned, and we were going to deal with this in
 12 due course, but now is a convenient moment, advising to
 13 engage with a specialist.
 14 A. Yes.
 15 Q. Was that within the portfolio of options that CTSA had
 16 when they went to see sites?
 17 A. Yes, definitely, for a few areas of work, yes.
 18 Q. So let's just try this scenario: in the event that the
 19 CTSA identified that there was a particularly complex
 20 problem that needed a solution that was more bespoke
 21 than perhaps the CTSA PSIA scoring system permitted,
 22 would it be open to them to advise the site: you need to
 23 get a specialist in here to look at this carefully?
 24 A. When you say with regard to the PSIA...
 25 Q. We're going to come on to the PSIA scoring system, but

1 that identifies a number of different categories,
 2 doesn't it?
 3 A. Yes.
 4 Q. Which have a maximum score against them?
 5 A. Yes.
 6 Q. And there is a methodology or formula that's used to
 7 work out where in relation to any one of those measures
 8 a site is and give them a scoring, but it might not
 9 provide a holistic solution. Do you agree or does it
 10 provide a holistic solution?
 11 A. You're correct in saying that. If I give an example of
 12 when I might suggest that a site engages with
 13 a professional company or individual. We will
 14 identify -- as CTSAs, advisers -- and that's what
 15 we are, we're not specialists in either identifying the
 16 intricacies or indeed fitting security measures. So
 17 if we identified a vulnerability that was to do with
 18 CCTV or hostile vehicle barriers, et cetera, in order to
 19 get the best advice for any of those things it's best to
 20 get somebody to undertake an assessment as to what that
 21 company or -- yes, what that company actually requires.
 22 So you may have different reasons for wanting those
 23 security measures being put in. So you would get
 24 someone who was specialist in those areas to come in and
 25 do an assessment. So it may be asking them specific

1 questions about what they want from that product and
 2 therefore they will get something that is fit for
 3 purpose.
 4 We identify the vulnerability, they will then engage
 5 with someone who is a specialist in the items we would
 6 suggest they look at to mitigate against that
 7 vulnerability.
 8 Q. Is that the way in which your CTSAs were trained to
 9 approach it?
 10 A. Yes, because we're not specialists in every area of
 11 product or security.
 12 Q. In what, if any, way was that communicated to the sites
 13 that you were speaking to that you didn't have that
 14 level of specialist knowledge?
 15 A. It's dependent on what you're talking to the site about.
 16 So not every conversation would be the same. I have
 17 worked with sites that have decided to install new
 18 cameras, let's say. So rather than going and just
 19 saying, "We'll just replace like with like", I would
 20 recommend that they take on, like, a survey to see where
 21 they needed them and what they needed to cover. So it's
 22 known as an operational requirement. They may try and
 23 undertake that themselves because there is guidance out
 24 there and we would point them to that, and there is
 25 guidance on installing most security measures and they

1 could go through it, but most of them would suggest they
 2 undertake an operational requirement and therefore
 3 identify what they actually need, why they need it,
 4 because you can install cameras but you may not be able
 5 to recognise anyone on them, you might not need that.
 6 So as I say, we would advise, we would identify
 7 a vulnerability, we would suggest that you -- we might
 8 say to install cameras or put in barriers, but we
 9 wouldn't necessarily specify what and how and where. We
 10 may come back and advise if they ask us further
 11 questions, but we wouldn't go into specifics.
 12 Q. I'll have some more questions about that in due course,
 13 but I think they might be better posed in the context of
 14 the actual scoring system, which we'll have a look at in
 15 due course.
 16 So we've just dealt with the ethos, "Something is
 17 better than nothing". Let's now turn to the tools
 18 available to a CTSA when dealing with a particular site.
 19 There are two principal tools, is that right, the PSIA
 20 scoring system and the action plan?
 21 A. Yes.
 22 Q. And the two are linked, are they, in some way?
 23 A. Yes.
 24 Q. Help us first with the PSIA scoring system. First, what
 25 does PSIA stand for?

1 A. I always get this wrong: protective security improvement
 2 assessment. I'm that used to PSIA.
 3 Q. We're going to have a look at the document that explains
 4 all of this in due course, so we just need to headline
 5 it at this stage. What is the purpose of the PSIA
 6 scoring system in summary?
 7 A. It is a tool, as you say, to enable an assessment of
 8 that moment -- it's an overview of the security at
 9 a site or a building at that time that it's being
 10 marked.
 11 Q. So it provides you with a snapshot in time, does it --
 12 A. Yes.
 13 Q. -- against particular criteria --
 14 A. Yes.
 15 Q. -- as to where that site is?
 16 A. Yes.
 17 Q. And having taken that snapshot is that the end of it or
 18 does that snapshot form the basis of future
 19 consideration?
 20 A. It's the very beginning, really. That snapshot shows
 21 you on that day, at that time, where you could improve
 22 your security or how -- what's lacking, basically. So
 23 from that, the CTSA together with the site would discuss
 24 how you would improve the security at the site.
 25 Q. When subsequent scoring assessments are undertaken, does

1 it permit an assessment of the degree of progress
 2 against particular criteria?
 3 A. It does, yes.
 4 Q. That in very summary form is the PSIA scoring system.
 5 What about the action plan?
 6 A. The action plan is a spreadsheet that enables you to
 7 record what improvements can be made with a rationale as
 8 to why they should be. So it's literally lifted in many
 9 respects from the PSIA. There's questions on PSIA that
 10 mention training. If they didn't score for training or
 11 CT awareness then an action may come from that saying to
 12 undertake certain CT awareness training.
 13 Q. So the particular area that has been scored may have
 14 some identified areas of improvement --
 15 A. Yes.
 16 Q. -- that would boost that score, thereby indicating that
 17 once they're completed in that area security has been
 18 strengthened?
 19 A. Yes.
 20 Q. Again, that's a summary of the action plan. We are
 21 going to come in due course to look at the
 22 Manchester Arena action plan. You're going to help us
 23 with the interpretation of that document, although
 24 obviously you're not responsible for any given score.
 25 When undertaking the scoring and the action plan,

1 what geographical area is being considered?
 2 A. In 2014, when the crowded places model came out, it was
 3 designed to protect crowds that were within that site.
 4 So the majority of work would -- well, it all relates to
 5 the site, obviously, but it would be within the
 6 perimeter of that site.
 7 Q. So in the case of the Manchester Arena, would you
 8 understand that to be inside the doors of the arena?
 9 A. To a greater degree, yes.
 10 Q. Well, just help me why to a greater degree.
 11 A. There are other things that you can do outside of your
 12 perimeter to improve your security measures. We talked
 13 about CT awareness, so raising awareness with staff in
 14 order that they can recognise hostile reconnaissance,
 15 which actually a lot of the time would take place
 16 outside -- well, it will take place outside of the
 17 site's perimeter. And perhaps CCTV, which might cover
 18 areas outside. That's an example.
 19 Q. Obviously thinking has moved on, but it's important for
 20 us to try and capture what the position was in the minds
 21 of CTSA's in 2014 through to 2017.
 22 A. Yes.
 23 Q. Was the risk of egress or indeed ingress one of the
 24 specific areas that would be within the contemplation of
 25 a CTSA when carrying out this scoring and the action

1 plan?
 2 A. No, I don't think ... I'd have to think back now, and
 3 it's hard because this has happened and the work we do
 4 now is embedded and ingrained in my mind now, but no, it
 5 wouldn't.
 6 Q. What you say in your statement was that:
 7 "Prior to the Manchester Arena attack, there was no
 8 official NaCTSO guidance regarding the risk of an attack
 9 during egress."
 10 A. Correct.
 11 Q. Does that support you in your view that that wasn't
 12 something that CTSA's were actively and consciously
 13 looking at before --
 14 A. Yes, it wasn't a methodology that we had identified
 15 prior to 2017, that had been used, and therefore -- we
 16 actually advise on methodologies that we know are being
 17 used or are emerging.
 18 Q. We know, for example, that there were attack
 19 methodologies actually deployed, thinking of France in
 20 particular, which involved attacks outside the
 21 perimeter, but even though there were those real life
 22 examples of that behaviour, is it your belief that
 23 at the time of the period running up to 2017, that had
 24 not translated into conscious thought with CTSA's when
 25 carrying out the score and action plan?

1 A. No -- are you specifically maybe referring to the
 2 Stade de France?
 3 Q. Yes.
 4 A. At Stade de France, the... The attackers had tried to
 5 access the stadium. So if I revert back to what I was
 6 saying, we protect the crowds within, and it is only
 7 when it's a crowded place, we protect those people
 8 within. So the things we would look at for ingress are
 9 access control, so you stop that threat entering and
 10 therefore an attack taking place in the crowded area.
 11 That actually did occur at the Stade de France, they
 12 didn't manage to get in, and that is, from what my
 13 understanding is, why it was detonated outside and the
 14 crowds weren't there then. So it wasn't the people
 15 queueing to get in that were the target, in that
 16 instance, my belief is that they were trying to get
 17 within the ground to then...
 18 Q. So if anything, an example that reinforced the thinking
 19 of the time?
 20 A. Yes.
 21 Q. Do you agree, and I appreciate you didn't carry any of
 22 the assessments out before May 2017, that it is
 23 immediately obvious that a crowd will form in, among
 24 other places, the City Room?
 25 A. Yes.

1 Q. So that is a crowded place in the sense that it is
2 a place in which crowds form?
3 A. Yes, or as we would maybe — yes, it's not a site, but
4 it is a public or private/public space, yes.
5 Q. And you can only speak for yourself, although you do
6 speak from the position of authority as the principal
7 CTSA at GMP, but the fact that a crowd would form there
8 at ingress and egress, was that something within the
9 contemplation, the conscious contemplation, of CTSA's as
10 something that needed looking at before May 2017?
11 A. I don't think so.
12 Q. We're going to turn now to look at the arena
13 specifically . Mr Upham deals with this in his
14 statements in considerable detail in terms of the dates
15 and times of his visits , so we don't need to do that
16 together because that is now in evidence.
17 But we are going to just look at key moments in that
18 chronology if we can. We're going to start with
19 a counter—terrorism survey carried out by Mr Archibald.
20 If we can bring up, please, Mr Lopez, {INQ023030/1}.
21 This document isn't in fact dated, but Mr Archibald,
22 who is the author, provided a statement indicating that
23 he believes that it would have been prepared in late
24 2008/early 2009. So we'll take that date as our working
25 assumption for the purpose of our discussion.

109

1 Is this type of survey a document with which you are
2 familiar?
3 A. Yes.
4 Q. It pre—dates the change brought about by NaCTSO in 2014?
5 A. Yes.
6 Q. But in substance, is this the sort of document that you
7 are familiar with as being produced when sites are
8 assessed?
9 A. Yes, I am familiar with counter—terrorism security
10 surveys.
11 Q. Is it the practice for such surveys, once they've been
12 completed, to be provided to the site? We're going to
13 pick out some of the things —
14 SIR JOHN SAUNDERS: Sorry, I didn't catch that answer.
15 A. Yes, it is, it's their document in essence. It has
16 their information, it's their document.
17 MR DE LA POER: We will look at some of the things
18 Mr Archibald identified within it .
19 If we go to {INQ023030/2}, we can see towards the
20 bottom that what was being said around the end of 2008
21 in this document was:
22 "It is believed that if Islamic extremists were to
23 consider an attack against such places then their likely
24 methods would be to: (1) [we'll move over that]; (2)
25 deploy an improvised explosive device or devices in or

110

1 around the building; (3) deploy a person—borne
2 improvised explosive device or devices, commonly known
3 as a suicide bomb."
4 Just one phrase here. You're not the author of
5 this, but bearing in mind what you told us about the
6 site and how it's focused on that, we can note, can we,
7 that at (2), what Mr Archibald says is:
8 "Deploy an improvised explosive device or devices in
9 or around the building?"
10 A. Yes.
11 Q. Would you agree that the natural meaning of that does
12 suggest the area in the immediate vicinity of the
13 perimeter?
14 A. It does and it's talking about placed improvised
15 explosive devices rather than person—borne.
16 Q. You're absolutely right because of course we can see
17 from (3) that a distinction is drawn with the
18 person—borne.
19 Next we are going to just look at {INQ023030/4},
20 simply for this reason that we can see when identifying
21 some of the mitigations in relation to vehicle—borne
22 IEDs that we've got a photograph of the steps, the
23 Hunts Bank on the left and, on the right—hand side, we
24 have the pre—refurbishment appearance of the access to
25 what became the City Room —

111

1 A. Yes.
2 Q. — or what we certainly know as the City Room.
3 Next, page, {INQ023030/7}, "Public access". What it
4 says here is:
5 "During events all additional exits and entrances
6 are stewarded. There is a search policy in place and
7 all bags are subject to search. Such searching policy
8 and its implementation presents an effective visual
9 deterrent to a potential attacker. There is a range of
10 search options available and these could involve
11 pat—downs, search lanes and metal detectors. The
12 profile of the event would determine which of the search
13 options were employed."
14 You're not the author of this document, but bearing
15 in mind your familiarity with them, where would you
16 expect that information to come from? Is that going to
17 be something that Mr Archibald has written as a list or
18 would you expect that to emerge from a discussion with
19 the site?
20 A. A discussion with the site .
21 Q. Then at {INQ023030/10}, we can see — perhaps you can
22 help us with this — "Security planning":
23 "There is a comprehensive range of contingency plans
24 in place and they are tested on a regular basis together
25 with the [X] department and A Division within Greater

112

1 Manchester Police."
 2 When that refers to contingency plans, is it your
 3 understanding that's referring to Greater Manchester
 4 Police's contingency plans or the site's contingency
 5 plans? If you don't know, and I appreciate you are not
 6 the author, it's whether it is reference to one or the
 7 other --
 8 A. The way it's worded I would read that as the site's
 9 contingency plans.
 10 Q. And then finally, general comments:
 11 "Comments and recommendations contained within this
 12 report are intended to be a constructive and
 13 proportionate response to areas of potential
 14 vulnerability that have been identified through the
 15 survey process. The advice contained within this report
 16 is free without the intention of creating a contract,
 17 neither does the Greater Manchester Police take any
 18 other legal responsibility for the advice given."
 19 Again, a caveat. You didn't write this. Can you
 20 help us with the meaning of "neither does the Greater
 21 Manchester Police take any other legal responsibility
 22 for the advice given" in terms of your understanding of
 23 that phrase in the context of CTSA work?
 24 A. No, because I wasn't in post when this particular
 25 template was used.

113

1 Q. Is that or anything like it something that you would
 2 convey to sites when you are interacting with them?
 3 A. Within a survey, we have templates provided by NaCTSO
 4 and that are some legal or generic passages that may
 5 refer to that sort of thing. I wouldn't... I don't
 6 recall, me personally, ever having worded something like
 7 that that we're not legally responsible specifically.
 8 Q. I suppose it really just leads into a more general
 9 discussion, perhaps you can help us with, about what
 10 do you regard the status of the advice given by CTSA's to
 11 sites as being.
 12 A. It's purely that, it's advice. We assist by identifying
 13 vulnerabilities at a site that could be utilised or
 14 a dedicated attacker may take advantage of. What they
 15 do following that identification is really up to them.
 16 We can encourage and advise and signpost as to where
 17 they can find further information or have discussions
 18 with them, but we have given a free service to say: this
 19 is a vulnerability, you should look at it. And on the
 20 surveys, it does actually state something around --
 21 similar to those lines, saying -- and it might on this
 22 one as well: because of these vulnerabilities you are at
 23 risk.
 24 SIR JOHN SAUNDERS: Within the context of this sort of
 25 advice being given, free advice, that looks like an

114

1 attempt to say, well, even if we give you the wrong
 2 advice or negligent advice, we're not liable for
 3 anything that goes wrong, legally liable.
 4 A. It might, but as I say, I don't know about...
 5 SIR JOHN SAUNDERS: Do the present ones do the same thing?
 6 A. I think there is similar wording, but off the top of my
 7 head I'm...
 8 SIR JOHN SAUNDERS: You've never had a client say, "What
 9 does this mean"?
 10 A. No, I haven't, no.
 11 SIR JOHN SAUNDERS: Okay.
 12 MR DE LA POER: Obviously the scenario that you've envisaged
 13 there when you say it's up to the site what they do with
 14 the advice, principally contemplates a site that says,
 15 "I'm not going to follow that, I'll just take that risk,
 16 thank you very much, I don't have the money or the
 17 motivation to follow it"?
 18 A. Yes.
 19 Q. What about the site that diligently follows the advice
 20 that's given? Do you recognise that there may be a risk
 21 for that site that having done what you've told them to
 22 do, they think that is all they need to do?
 23 A. Do I recognise that?
 24 Q. Yes. Is that a risk that you recognise or do you think
 25 that that risk doesn't arise?

115

1 A. I recognise the risk. When I've dealt with sites,
 2 I haven't ever -- and I'm not aware of any CTSA's who
 3 have done it -- turned round and said, "You've done
 4 that, now you're safe", because the advice we give, as
 5 I have said right from the beginning, won't necessarily
 6 stop an attack, but it will help to mitigate the outcome
 7 or deter an attacker.
 8 Can you just repeat...
 9 Q. Yes, of course. In the case of a diligent site who
 10 receives your advice and acts upon it to the letter,
 11 it's whether you recognise the risk that once that site
 12 has done everything in accordance with the advice, that
 13 they will think, "That is all we need to do".
 14 A. The other thing is, because the PSIA is a live document
 15 and the action plans are live documents, they will be
 16 revisited at least every quarter -- twice a year,
 17 rather, so quarter 1, quarter 2 we report -- quarter 2,
 18 quarter 4 we report on them. So there will be at least
 19 two visits to that site every year that discuss and
 20 review the PSIA and the action plan.
 21 Within the PSIA there are marks that are awarded for
 22 different attack types and different actions that can be
 23 taken to mitigate against that attack type. Some of
 24 those, it states within it, need refreshing. The sites
 25 I've engaged with as well, obviously because we've

116

1 already mentioned about a change in methodology,
 2 et cetera, so when that particular survey was written,
 3 there wasn't marauding terrorist attacks, which is now
 4 more likely.
 5 So that ongoing engagement would bring up other
 6 things that could be and would be done or there may be
 7 new protective measures that could be... so it's
 8 revisited. Although an action may be closed, the PSIA
 9 would be revisited.
 10 SIR JOHN SAUNDERS: Say I'm a very conscientious person,
 11 running my site. Every time you come and do it, I take
 12 note of exactly what you say, I do everything required
 13 in the action plan each time you do it. As you said,
 14 you can't prevent all attacks taking place, whatever you
 15 do, but something does happen and then if I am sued for
 16 not having taken the necessary steps, is it possible for
 17 me to then turn round to the police and say, "It's not
 18 my fault, it's your fault, I've done everything you said
 19 I should do", or is that liability excluded?
 20 A. I don't know to be honest.
 21 SIR JOHN SAUNDERS: It might be quite helpful for you to
 22 know it as a CTSA going round.
 23 A. I don't know definitively about liability. I do work
 24 with diligent sites and they've undertaken everything
 25 I've asked of them. However, that is... They have

117

1 considered aspects to mitigate against that attack, so
 2 that would lessen their probability of them being sued
 3 and being found to be negligent, because they have done
 4 something.
 5 SIR JOHN SAUNDERS: I understand exactly what you're saying.
 6 The question arises if you haven't given them the right
 7 advice, maybe.
 8 A. We don't give — that's what I was saying about experts
 9 in what is best or appropriate for a particular
 10 vulnerability. We will signpost to either the NaCTSO
 11 website or the CPNI website and we'll sit down and
 12 discuss with them and go through the options and there's
 13 some stuff that we can access and provide them for
 14 discussion and then they may go on to specialists in
 15 that area. That's where perhaps the liability comes in.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR DE LA POER: I suppose we can try and illustrate this
 18 with a specific example, which isn't intended to be
 19 a comment on the evidence because the chairman will
 20 consider Mr Upham's evidence alongside the evidence of
 21 others and identify precisely what was or was not said
 22 about the City Room.
 23 A. Yes.
 24 Q. You have already told us that crowds forming in the
 25 egress/ingress area outside the curtilage of the site

118

1 was not something which was consciously in the
 2 contemplation of you and, you believe, other CTSA's
 3 pre-May 2017. So arguably that's an area of risk which
 4 you are just not addressing with your advice. Do you
 5 agree?
 6 A. We weren't addressing it in some aspects. Others, as
 7 I've just mentioned about hostile reconnaissance,
 8 suspicious behaviour, housekeeping I think comes into
 9 that, things like that. So there are areas that address
 10 it, but it's not necessarily to protect that crowd
 11 entering.
 12 Q. So that particular issue is not sharply in focus?
 13 A. No.
 14 Q. Can we say that?
 15 A. Yes.
 16 Q. The question really is: from the way in which CTSA's are
 17 communicating their advice and the training they have in
 18 terms of what they're saying it means to the sites, are
 19 sites entitled to take comfort from the fact that they
 20 have addressed those matters specified or are they told,
 21 "This isn't the end of it, you need to look at
 22 everything for yourselves"?
 23 A. No. I have never come across a site that has addressed
 24 every single action within one visit, two visits. There
 25 may be operational changes as well, and as I said,

119

1 different methodologies, so that would be a discussion.
 2 I think they can take comfort from the fact that if they
 3 have addressed something as much as is proportionately
 4 within their remit, then they can take some comfort, but
 5 they will know themselves there are still risks if they
 6 have not gone for the gold standard, as I mentioned
 7 before.
 8 Q. History may have taught us, and it will be a matter for
 9 the chairman, that the City Room was sufficiently
 10 complex legally that it required very direct and
 11 particular thought and the input of expertise as well as
 12 consultation with a number of people who had an interest
 13 in it.
 14 A. Yes.
 15 Q. As we understand it, the PSIA scoring system and action
 16 plan, applying the thought process of 2014 through to
 17 2017, wouldn't have brought that into sharp focus, do
 18 you agree?
 19 A. I agree.
 20 Q. It's really whether, because the CTSA hasn't identified
 21 it, that the site can say, "Well, we never had that
 22 drawn to our attention", or whether they have
 23 a free-standing obligation to say, "I know you've helped
 24 us with what you can help us with, but we really need to
 25 do your own independent assessment of everything";

120

1 do you see the distinction I'm drawing?
 2 A. Yes, I do. It wasn't in sharp focus, you're correct in
 3 saying that. I am not saying that it was never
 4 considered by any other CTSA.
 5 Q. Obviously Mr Upham has said what he said and he's the
 6 man who gave advice, but we're talking culturally,
 7 I think.
 8 A. It certainly wasn't as high up on everybody's radar as
 9 other attack methodologies. I -- working as a CTSA and
 10 going back to the fact that we looked at a building and
 11 its perimeter, the City Room in many respects is
 12 a pavement elsewhere or a square elsewhere, and if I --
 13 because it's very, very unusual, that set-up there. So
 14 if I relate it to other sites I have dealt with, then
 15 I would still maintain that it wasn't in sharp focus,
 16 the people going in and certainly not coming out.
 17 Q. I think I have taken that as far as I can. Thank you
 18 very much indeed.
 19 I would like to look at some documents now and you
 20 can just help us with a few parts of it. The first
 21 document is what you describe in your statement as a
 22 document which was sent to the site to introduce the new
 23 system.
 24 A. Yes.
 25 Q. That is {INQ001540/1}. As that is coming up, perhaps

121

1 you can agree this document was circulated in early to
 2 mid-2014 --
 3 A. Yes.
 4 Q. -- as the date suggests? It is provided to sites and
 5 written for them as the audience, isn't it?
 6 A. Yes.
 7 Q. And does it explain the PSIA scoring system?
 8 A. Yes.
 9 Q. If we look at {INQ001540/2}, first -- and we shan't look
 10 at every line in it -- do we see at 2.2 that the sites
 11 are being told that ethos that you've
 12 described: something is better than nothing?
 13 A. Yes.
 14 Q. We'll read it into the record:
 15 "The principle is based upon the premise that
 16 in relation to protective security measures that
 17 something is better than nothing and that collectively
 18 the measures will all add value to building a holistic
 19 integration and proportionate protective security
 20 regime. This will also provide an audit process to
 21 ensure that improvement activity or opportunities are
 22 not missed."
 23 So that's really the nub of it, isn't it?
 24 A. Yes.
 25 Q. If we have a look over the page, please, at 3.1.

122

1 {INQ001540/3}.
 2 Do we see here under the scoring tool guidance, the
 3 sources are identified in that first sentence? It then
 4 says this:
 5 "The user should refer to these when completing the
 6 questionnaire as an aid. Consideration of any security
 7 improvement measures should be proportionate to the site
 8 operation and not all the measures may necessarily have
 9 to be implemented or achieve the specific technical
 10 standard -- 'Something is better than nothing'.
 11 A. Yes.
 12 Q. So sites are being told in terms that even if they are
 13 told, this is what you can do, that they don't
 14 necessarily have to do it?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: There are certainly risks in that sort
 17 of language, don't you think, of a dumbing-down? It's
 18 almost saying: here is what we would like you to do
 19 ideally, but actually, do anything you can. I mean,
 20 I understand something is better than nothing, but it
 21 may be encouraging people to take a less good option?
 22 A. It's NaCTSO, et cetera, that have come up with this
 23 wording. When we had the input on it, I do understand
 24 why it's there, because we were... in the crowded places
 25 model prior to this, one of the major --

123

1 SIR JOHN SAUNDERS: The things that were proposed were very
 2 expensive --
 3 A. And nothing was getting done and there was no way of
 4 measuring it either.
 5 SIR JOHN SAUNDERS: I understand that.
 6 A. So I suppose I could say that, yes, I suppose there is
 7 a risk of that, but then something is better than
 8 nothing.
 9 SIR JOHN SAUNDERS: Yes, okay.
 10 MR DE LA POER: We're going to move forward, please, to
 11 {INQ001540/11} to look at how the scoring system is
 12 structured visually. You can help us with this and
 13 we'll need to look over the page as well.
 14 Do the different colour groups represent different
 15 areas of security as the name in block capitals for each
 16 suggests?
 17 A. Yes.
 18 Q. Is the number in relation to that block capital name,
 19 which is marked in yellow, the aggregate of all of the
 20 sub-categories around it?
 21 A. Yes.
 22 Q. So that for search and screening, that number 61 is the
 23 sum of all of those inputs to it as indicated by those
 24 straight lines?
 25 A. Yes.

124

1 Q. So for all of the sub-categories, if we can call them
 2 that, there is a maximum score, is there, indicated,
 3 which we can illustrate perhaps with the top right-hand
 4 corner, search of person carries a maximum score of 15?
 5 A. Yes.
 6 Q. Is what occurs in the PSIA scoring system that each of
 7 these categories are scored --
 8 A. Yes.
 9 Q. -- in a spreadsheet? And they are scored against
 10 a possible maximum by means of a methodology that we're
 11 not going to go into the detail of?
 12 A. Yes.
 13 Q. And sometimes you go sequentially, don't you, up to the
 14 maximum, 1, 2, 3, for example?
 15 A. Yes.
 16 Q. But sometimes it's in increments depending upon what's
 17 been set by the formula? Is that right?
 18 A. There are some -- I think this has been covered already.
 19 There are some scores which are straight zero or a set
 20 score. There are others that are either/or, and then
 21 there are others that are up to. So dependent on what
 22 level of, let's say, search and screening on each
 23 specific area, you may have a score up to let's say 15,
 24 but there will be others lower.
 25 Q. Is this right, if we were to take the number indicated

125

1 by each of the block capital categories and add them all
 2 up together you'll get the maximum possible score for,
 3 in this case, PBIED mitigation?
 4 A. Yes.
 5 Q. And we're going to come and have a look at that maximum
 6 score in a moment. If we go over the page -- I'm sorry,
 7 before we do, just to pick out one that we will track
 8 through as a worked example in practice. If we look at
 9 the bottom right-hand corner, "Guarding". Right at the
 10 bottom right-hand corner, there is something called:
 11 "Guard Force motivation guidance adopted."
 12 For which there is a maximum score of 5 and we are
 13 going to see what this document says about that and then
 14 we are going to see what that says in practice, so we
 15 will just note that for the time being.
 16 If we go over the page {INQ001540/12}, we'll do
 17 something similar. Again in the bottom right-hand
 18 corner, a maximum of 3 for CCTV. And we have:
 19 "Full coverage, monitored 24/7."
 20 A. I'm missing CCTV -- oh yes.
 21 Q. Bottom right-hand corner.
 22 Would you agree that there is huge variation within
 23 CCTV? You're nodding. So providing only a score of up
 24 to 3 is a pretty crude measure, would you agree?
 25 A. Yes, I would.

126

1 Q. Would this be based on self-reporting? So if a site
 2 said, "Yes, we've got full coverage, yes, we monitor it
 3 24/7", then they score the maximum?
 4 A. Yes.
 5 Q. And that the CTSA isn't investigating whether either of
 6 those is correct in practical terms?
 7 A. Not necessarily.
 8 Q. When you say "not necessarily", does that imply that
 9 sometimes they will?
 10 A. There's no guidance to say that they ask for proof of
 11 that, because it's a trusting relationship. Dependent
 12 on site, and I've worked with some complicated sites
 13 where I have actually spoken to -- because it's such
 14 a large site and let's say the security manager or
 15 a manager of the building hasn't a clue about CCTV,
 16 I have gone and spoken to the control room personnel and
 17 they have given me far more information and it could be
 18 anecdotal information. It's because they're operating
 19 stuff that I have gleaned more from that. There's no
 20 guidance and nothing to specify one should do that.
 21 Q. What about discussing CCTV blind spots? When assessing
 22 this, would there be a discussion? If the site says,
 23 "Yes, we have full coverage", would there be a
 24 discussion saying, "Have you mapped your blind spots,
 25 have you looked at where those are"? Does it descend to

127

1 that level of detail?
 2 A. No, not necessarily.
 3 SIR JOHN SAUNDERS: Isn't full coverage inconsistent with
 4 blind spots?
 5 A. If you are saying have you got full coverage, then that
 6 would infer that there aren't any blind spots. So
 7 it's -- that's why I say that question is not a great
 8 one at all. It's very --
 9 MR DE LA POER: Because literally full coverage means,
 10 presumably, every square inch is covered?
 11 A. Yes.
 12 Q. But equally, someone may think that they have a very,
 13 very comprehensive CCTV system, so they reflexively
 14 answer, "Yes, it's full".
 15 A. Yes, yes.
 16 Q. If they give you that answer, does that, within the
 17 training for CTSA's, provoke a discussion about, "When
 18 I say full, I mean full", or is it, "Thank you very much
 19 indeed, I can see you've got lots of cameras around,
 20 that's fine"?
 21 A. There is a little more context to that. Yes, you're
 22 correct, and I think CTSA's would have a further
 23 discussion.
 24 The particular site we're talking about already had
 25 a survey in place which, as I said, had been reviewed

128

1 before we went through the PSIA to see whether there was
 2 anything that was outstanding from it. Within that
 3 survey, it had already been I think identified that
 4 there was full coverage. So it may not have been the
 5 case that that discussion would have gone on because it
 6 wasn't a change in staff either. I believe it was
 7 Mr Sinnott that was part of the ---
 8 Q. Yes, he's (overspeaking).
 9 A. --- and he took part in the PSIA.
 10 Q. So these are our categories, which we'll see translated
 11 but I mentioned guard force motivation. Is this a PDF
 12 that can be downloaded which can be given though those
 13 undertaking guarding duty and is the purpose of the PDF
 14 to encourage, inspire, them not to become complacent, to
 15 motivate them to become vigilant?
 16 A. Yes.
 17 Q. Is that what the purpose of that is?
 18 A. Yes, the PDF is available and I believe there's a link
 19 in the back of the document. It's on the CPNI website
 20 and it's for the site managers to access and use and
 21 there are various options within it.
 22 Q. If we do go to just one last page within this document,
 23 {INQ001540/24}, please. We see here that listed under
 24 the heading of "PBIED" there are a number of mitigation
 25 options which are identified:

129

1 "Access control, training/awareness."
 2 Then under the heading "IED" there is also "active
 3 search regime":
 4 "This is deterrent and detection activity. Examples
 5 would include regular inspection of bins, foliage and
 6 toilets. Should include all areas and spaces where IED
 7 could be left/placed."
 8 Would a site be given any specific assistance with
 9 what that means bearing in mind what you have told us
 10 about it being focused on the site rather than
 11 necessarily the area around it?
 12 A. Housekeeping, which that could come under, searching and
 13 sweeps, would involve external patrolling, et cetera,
 14 because obviously if there was an IED that was left or
 15 placed near the building, it could impact on the
 16 building and therefore still injure the people in it.
 17 Q. My question was: would the site be given any assistance
 18 with this? Would CTAs be trained to go in and explain
 19 what that meant or say, when we're talking about this,
 20 we're talking about searching around the curtilage of
 21 the building rather than just searching within it?
 22 A. I can speak for me personally. Yes, I would say it was
 23 outside. And I know there have been discussions about
 24 patrols outside, so... Generally, yes, from a CTSA.
 25 Q. Finally, before we look at the PSIA scoring sheets, just

130

1 briefly, Mr Upham describes in his statement
 2 a collaborative process in relation to scoring, albeit
 3 one in which he had the decisive vote in the event that
 4 there was a disagreement.
 5 A. Yes.
 6 Q. Is that the correct approach to scoring in your view or
 7 is it less collaborative than he describes?
 8 A. No, I'd say it was correct.
 9 Q. Let's have a look at the PSIA scoring bearing in mind
 10 very strongly that you are not responsible for any of
 11 these numbers, but just to help the chairman and core
 12 participants and the public interpret them.
 13 {INQ001541/1}, please. We can see that this, in the
 14 top right-hand corner, covers the period 2014/2015 and
 15 2015/2016; is that correct?
 16 A. Yes.
 17 Q. We will be able to see at {INQ001541/4} what is said
 18 about PBIEDs.
 19 If we can zoom in, please, to the top, we'll try and
 20 track this document through. In the left-hand column
 21 there, where we see "Search and screening" and "Security
 22 planning", are those categories that we saw in that
 23 spider diagram previously, each one represented by
 24 a colour?
 25 A. Yes.

131

1 Q. And then to the right of them, do we see the
 2 sub-categories, as I've described them, which form part
 3 of that head category?
 4 A. Yes.
 5 Q. So we see "Search of person", "Search of belongings"?
 6 A. Yes.
 7 Q. Is the score we see in yellow the maximum score as
 8 indicated in that document we've just looked at for each
 9 of those sub-categories?
 10 A. Yes, it is.
 11 Q. So that explains the left-hand side.
 12 But if we track it across do we see entered in
 13 column G the scores for the first assessment in the
 14 period of time that we're concerned with ---
 15 A. Yes.
 16 Q. --- as indicated on the front of the document, 2014/2015?
 17 A. Yes.
 18 Q. So we can see, for example, that for "Search of person",
 19 a 5 is obtained out of a total possibility of 15?
 20 A. Yes.
 21 Q. And the green box at the bottom of that column G, for
 22 that category, 47. Do we interpret it as being that the
 23 site was scored of 47 out of a possible 61 for the
 24 category of search and screening?
 25 A. Correct.

132

1 Q. And then if we move to the left, please, Mr Lopez.
 2 Perhaps we're going to see here an illustration of what
 3 you've described as the sort of snapshot in time
 4 followed by the progress. Do we see in columns H, I and
 5 J subsequent visits where the scores are marked? We can
 6 see there's no change in a number of categories. In
 7 fact I don't think any of those categories change over
 8 the period.
 9 A. For the search and screening, yes, correct.
 10 Q. But there will be other examples within the
 11 spreadsheet -- we don't need to go to them -- that where
 12 improvements have been made, they are marked as such.
 13 If we have a look at what's said for "Guarding",
 14 given that we've picked that one out. I mention the
 15 "Motivation guidance", which we can see is the bottom
 16 category within "Guarding" halfway down the page.
 17 I wonder if you could mark that, Mr Lopez, with your
 18 cursor so everybody is looking in the right place.
 19 In the middle of the page, we have the category for
 20 "Guarding" and the bottom of those sub-categories is the
 21 "Motivation". Do we interpret this document as
 22 indicating that for the first three of the visits,
 23 indicated in the G, H and I columns, there was zero,
 24 suggesting that training hadn't been undertaken?
 25 A. Yes.

1 Q. But a score of 5 out of 5 is obtained in column J,
 2 suggesting that that training was undertaken by the time
 3 of that visit?
 4 A. Yes, or certainly the guidance had been adopted.
 5 Q. By more than 50% of the staff?
 6 A. Yes.
 7 Q. In relation to guarding, we know that a separate company
 8 was brought in for the purpose of events. Presumably
 9 that's not an uncommon occurrence that the site itself
 10 won't necessarily always provide all of the guarding.
 11 A. Yes.
 12 Q. Would this category apply only to the site's guards or
 13 would it apply or be intended to apply to all those that
 14 provide a guarding function at that site?
 15 A. I would suggest it's intended to apply to all.
 16 Q. Would you expect there to be a discussion, where a third
 17 party is brought in to provide a security element,
 18 between the CTSA and the site so that the CTSA could
 19 understand what services that third party is providing?
 20 A. I wouldn't find it unusual.
 21 Q. Would it be a standard question for a CTSA to say, "Are
 22 you subcontracting out any of your security function to
 23 another company?"
 24 A. Again, I'm relating to things that I have done
 25 personally because I don't believe there's any guidance

1 written down.
 2 Q. Yes.
 3 A. I have always been able to identify the sites that I've
 4 visited, large ones included, whether it was at the
 5 stage of going through the PSIA because, as I say, I've
 6 had engagement with them prior... Whether I would
 7 ask... I would hope it would be asked, but I couldn't
 8 honestly say whether it is. I think it should be
 9 expected to be asked, yes, or discussed.
 10 Q. The situation we have at the arena, and I hope I don't
 11 misstate this in a misleading way, I hope I don't
 12 misstate at all the numbers -- the actual number of
 13 guards, if we're going to call them that, provided by
 14 the site numbered fewer than 10, whereas on any given
 15 event day you might have up to 160 --
 16 A. Yes.
 17 Q. -- and were provided by a third party.
 18 A. Yes.
 19 Q. So as a proportion, even if my numbers aren't precisely
 20 accurate, it's a huge number of people who are outside
 21 of this process; do you agree?
 22 A. I agree. I would expect for the contracted guards or
 23 security -- and we are talking security, not necessarily
 24 crowd -- stewards. I would expect that to be based on
 25 all security that is employed, either contractually or

1 by the company, to be included.
 2 Q. An idea that has been floated within the inquiry is the
 3 possibility of a third party participating in this
 4 scoring process and the interaction with the CTSA. From
 5 a CTSA point of view, if that had been suggested in the
 6 period running up to May 2017, is that something that
 7 would have been regarded as appropriate, necessary, to
 8 be discouraged? What would be the CTSA's attitude?
 9 A. If the site wanted -- whoever the site wanted present at
 10 those meetings, it's fine with the CTSA because it's not
 11 our corporate information or sensitive information
 12 that's being discussed, it's the site's. So it's really
 13 up to them who becomes involved.
 14 Q. So would it follow from that, and tell me if I'm wrong
 15 about this, that CTSA's weren't exuding a culture of
 16 exclusivity about this?
 17 A. [no audible answer].
 18 Q. Finally, if we can just scroll to the bottom of this
 19 page before we move on to just one more page to see if
 20 all of these numbers translate --
 21 SIR JOHN SAUNDERS: Apart from anything else, so much of
 22 this is self-reporting.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: And it means that the site owner would
 25 have to go and get all the information from the

1 contractor, unless the contractor was there who could
 2 supply it for themselves.
 3 A. Yes. I can give examples of other sites I have worked
 4 with who have lots of contractors and I would go through
 5 the initial scoring with the site security manager.
 6 They would then say, "I don't know that, I will go and
 7 find out", or we would have separate -- because there is
 8 quite a lot around guarding and there are an awful lot
 9 of the sites that do contract in and we would have
 10 a separate meeting.
 11 (Video link frozen)
 12 Q. If we look at what's being said about CCTV, as we have
 13 identified already, one entry up from the bottom, the
 14 maximum score is 3.
 15 A. Yes.
 16 Q. We can see as at the first grading it was given 3 and it
 17 maintained 3 throughout the period.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: The question there is not actually total
 20 coverage, it covers key areas?
 21 A. Key areas, yes.
 22 MR DE LA POER: Is that a difference you were aware of
 23 between what is being said in the scoring document and
 24 what is being said in the spreadsheet?
 25 A. I have never really noted it before that because when

1 I've done PSIA's, it's been from the PSIA.
 2 Q. So you'd sit here with the spreadsheet in front of
 3 you --
 4 A. Yes.
 5 Q. -- rather than with the overview document that's
 6 circulated in an early stage?
 7 A. I may have sat with a site initially, the very first
 8 visit, and gone through actually the site guidance to
 9 ensure that they understood it, left the PSIA with them,
 10 and then when I return, because sometimes they will fill
 11 in their own scores, and then we'll go back and discuss
 12 them. I would have gone from the PSIA then because
 13 I knew the document.
 14 Q. We'll see how these scores are taken forward if we go,
 15 please, to {INQ001541/7}. In the top right-hand corner
 16 do we see that the various scores and the different
 17 methodologies are effectively extracted from the earlier
 18 pages in this spreadsheet and put into that top
 19 right-hand corner? Have I understood that correctly?
 20 So the column F will correspond with the first visit.
 21 A. I think -- yes, sorry, I thought -- column F may have
 22 been the total that they could have. It says the
 23 achievable score, it's not the actual score, column F.
 24 The heading says "achievable score".
 25 Q. Thank you very much indeed. So what --

1 A. The first one on there is the quarter 2.
 2 Q. The quarter 2. So we need to move four columns to the
 3 right to where it says 140?
 4 A. Yes.
 5 Q. The site is being told that out of a maximum score for
 6 PBIED of 148, 114 has been scored?
 7 A. Yes.
 8 Q. And we can then see, can we, that if we go down
 9 diagonally, we've got "Q4 Return 1 April 2015". Do we
 10 see that 114 is the score for the PBIED?
 11 A. Yes.
 12 Q. So what this document will allow you to track, is it, if
 13 any progress is made against particular attack
 14 methodologies generally?
 15 A. Yes, and it's exactly that, it's progress rather than
 16 a number. It's progress, an increase of progress.
 17 Q. And by 2015, if you go down, we see 119, so an increase
 18 of 5. And by the final quarter covered by this
 19 spreadsheet, we see it's up to 122, four cells to the
 20 right; is that right?
 21 A. Yes.
 22 Q. That's how we interpret this spreadsheet.
 23 If we scroll to the left so we can see that. All of
 24 those numbers which have been distilled on all of those
 25 pages to those sub-tables, we've got a big input arrow

1 which comes down to "Overall assessment of protective
 2 security" and we can see that in the case of PBIED
 3 a score of 2 has been ascribed on a scale of 1 to 4,
 4 which means some further improvement activity is needed
 5 but is in hand and progressing.
 6 A. Correct.
 7 Q. So that's the takeaway headline, is it --
 8 A. Yes.
 9 Q. -- from this in terms of what it all comes down to?
 10 A. Yes.
 11 Q. Before we turn away from this document, Mr Upham has
 12 dealt in detail with errors, numerical errors within the
 13 form. I think that, looking at your statement, you
 14 don't regard any of those errors as being a significant
 15 problem; is that right?
 16 A. Correct.
 17 Q. Save for one potentially?
 18 A. Yes.
 19 Q. The one that you identify as being potentially
 20 problematic is that the overscore in relation to
 21 searching, and that was potentially problematic, if I've
 22 understood your statement correctly, because it may
 23 in the short-term deter that as being an area of focus?
 24 A. Correct.
 25 Q. Because a maximum score's been given, so it looks like

1 everything's being done?
 2 A. Correct.
 3 Q. Your opinion is that in the long-term, that was bound to
 4 be looked at again as part of the review refresh process
 5 and so that error is likely to have been identified as
 6 part of that process?
 7 A. Correct.
 8 Q. I have summarised in very few questions there what
 9 I understand your opinion to be, so do disagree if I've
 10 inaccurately characterised it.
 11 The last area that we're going to look at together,
 12 which I hope we'll be able to complete before our break,
 13 is the action plan. We'll look at the initial arena
 14 action plan and then we'll look at how that document
 15 develops.
 16 Mr Lopez, {INQ001539/1}, please. This is
 17 a spreadsheet, as we can see, with a total of 11 items
 18 identified by row.
 19 A. Yes.
 20 Q. Does this provide us with a way of tracking outstanding
 21 actions? I have picked one and we'll track it through
 22 this. Item 2 is the guard force motivation guidance?
 23 A. Yes.
 24 Q. So initially this was identified in the third column as
 25 being susceptible to some improvement and the specific

141

1 way that might be improved is identified in that third
 2 column; is that right?
 3 A. Yes.
 4 Q. We can see the coloured box in the fifth column gives
 5 a status, "progressing".
 6 A. Yes.
 7 Q. And presumably that's because the site says, "I haven't
 8 done it yet, that does sound like something I want to
 9 do", and therefore it is given a progressing mark.
 10 Is that what "progressing" means?
 11 A. I would say it's already... yes.
 12 Q. If I've mischaracterised it --
 13 A. There is another option which is agreed in the way it
 14 starts, which is in the red there, but that would
 15 indicate to me that they have possibly downloaded it and
 16 are progressing looking through it, because it's
 17 progressing rather than agreed.
 18 Q. I understand. We can see the responsible person is
 19 identified against that as Mr Sinnott and we have
 20 a start date of September 2014 and a review imminently
 21 because we know from Mr Upham that there was a short
 22 review at the beginning of it. What is written in the
 23 comments:
 24 "Although the site have agreed to undertake this
 25 guidance, there is no indication they have done so yet."

142

1 A. Yes.
 2 Q. So 11 items in total, we've tracked through one of them
 3 as a worked example of how they look --
 4 A. Yes.
 5 Q. -- in practice.
 6 Let's have a look at -- in fact before we do,
 7 item 11, "Increase of search of persons". Given that
 8 we've identified that as a potential problem area:
 9 "Currently only randomly targeting is done."
 10 It's then got a green "complete". I think that
 11 that is a reflection of the fact that this is a living
 12 document and therefore, although there was a period of
 13 time when the statement in the third column is correct,
 14 in fact, as we can see from the dates, January 2016 are
 15 the dates given against that, there came a point where
 16 it was indicated that that was complete?
 17 A. Yes.
 18 Q. And in the comments, what "complete" is indicated to
 19 mean:
 20 "100% person and baggage search is undertaken by
 21 event staff. This can be increased subject to
 22 intelligence/threat level increase."
 23 I don't know whether you can help with what might be
 24 thought to be a linguistic contradiction in that. If
 25 it's 100%, can you help with how it might be increased?

143

1 A. I can put an interpretation on it. However, Ken Upham
 2 has in his statement --
 3 Q. All right, we'll leave it for him then and I won't fall
 4 into the error that I've discouraged others from falling
 5 into.
 6 The last document, {INQ023041/1}.
 7 We can see that by the time we are looking at this
 8 version of the document, it's no longer the case that
 9 there are just 11 items on it, but in fact others have
 10 been added. You just scroll to the next page, we'll get
 11 a count {INQ023041/2}. This document now has 22 items
 12 on it. Does that really just reflect the fact that as
 13 new areas are identified, new actions are added to the
 14 action plan?
 15 A. Or refreshers because parts of the PSIA says things have
 16 to be done every so often.
 17 Q. If we go back up to the top of the page and look at that
 18 column 2, again we see that as at the date of this
 19 document, a print or freeze in time, the guarding is
 20 still marked as "progressing". Is that right? That's
 21 row 2.
 22 A. Yes.
 23 Q. And there's a review date indicating September 2019.
 24 Can you help us with, and you may not be able to as
 25 you're not the author of it, but when we looked at the

144

1 scoring it appeared that that was resolved in 2016 and
 2 yet what appears on the action plan suggests that that
 3 hasn't been resolved. Is that really just something
 4 that Mr Upham —
 5 A. Ken again covers that in his statement.
 6 Q. We'll leave it to that then.
 7 I think that we can see that "searching of persons"
 8 is now item number 12 on this version. We can see that
 9 that is, as at the moment of this document, marked as
 10 "complete"?
 11 A. Yes.
 12 Q. Again, as you say, Mr Upham explains in his statement,
 13 doesn't he, where there appears to have been a mismatch?
 14 A. Yes.
 15 Q. So that's the action plan and how one might go about
 16 interpreting it and how it works in practice.
 17 Three short areas to complete. In your witness
 18 statement at paragraph 40, you indicate that there are
 19 other sources of counter—terrorism advice made available
 20 to the arena. You can turn it up if you'd like,
 21 paragraph 40.
 22 A. Yes.
 23 Q. We'll just headline each of them, we don't need to go
 24 into the detail. Many of them will be familiar to
 25 people who have been following the inquiry: firstly, the

145

1 NaCTSO guidance notes; secondly, very familiar,
 2 Project Griffin; thirdly, Project Argus.
 3 A. Yes.
 4 Q. Monthly CTSA Bridge calls.
 5 A. Yes.
 6 Q. What is that?
 7 A. It's a telephone conference that my office hosts on the
 8 first Thursday of every month. It had been adopted
 9 before I started and it originated from something that
 10 the City of London Police took on with Griffin because
 11 it's such a small area. It's hosted by a bank free of
 12 charge and basically when it was first introduced by the
 13 City of London Police, it was for those people who had
 14 attended Griffin because they used them as cordon
 15 officials as well, so they would have updates.
 16 I know in London now they use that for all sorts of
 17 things and it was certainly utilised quite a lot
 18 pre—Olympics. We do quick updates, mention what the
 19 current threat level is, usually — not at this time
 20 because of COVID — give dates of upcoming training
 21 that's being held at force headquarters and then some
 22 recent attacks around the world or sentencing updates on
 23 counter—terrorism aspects.
 24 Q. And for 2016/2017, was a record of participants kept in
 25 those calls?

146

1 A. Yes.
 2 Q. Have you checked that record?
 3 A. Yes.
 4 Q. And is there any record of SMG participating during that
 5 period?
 6 A. No.
 7 Q. Business Sentinel newsletters. Again, the inquiry has
 8 looked at this.
 9 A. Yes.
 10 Q. Were those, as they sound, newsletters sent out on
 11 a regular basis indicating recent events which are of
 12 interest or of importance in the counter—terrorism
 13 arena?
 14 A. Yes. It might be updates on sentencing, it may be
 15 updates on new products that are available. Most of
 16 it is open source, but the key elements really are the
 17 CTSA comments. So it's a reminder of, "Are your staff
 18 aware of hostile reconnaissance?", that sort of thing.
 19 So it's a way of communicating alternative resources as
 20 well as updating people on the current methodologies,
 21 et cetera.
 22 Q. The penultimate topic; a short one I hope.
 23 We know that the Victoria Railway Station Complex
 24 was under a BTP CTSA —
 25 A. Yes.

147

1 Q. — whereas the arena, which is on railway property, as
 2 we know —
 3 A. Yes.
 4 Q. — and closely connected to Victoria Station, even more
 5 so since the redevelopment, was under a GMP CTSA.
 6 A. Yes.
 7 Q. Can you help us understand why that is the case or why
 8 that was the case?
 9 A. No. It pre—dates me starting, really. As I said,
 10 I started in 2011, April 2011. As we've already seen,
 11 there was a survey done by a GMP CTSA in 2009.
 12 Q. Once everything was looked at afresh under the crowded
 13 places model in 2014, is it apparent that that
 14 situation — is that something that should have been
 15 picked up or was that really —
 16 A. I don't think it was on the radar. We've discussed it
 17 since and we do now engage together. The CTSAs, BTP
 18 CTSAs, I don't know whether they engage with any other
 19 crowded places other than stations. That's not a reason
 20 necessarily, but neither of us, as in organisations,
 21 have brought it up with each other. I don't know why.
 22 Q. Is that situation, to your mind, as principal CTSA for
 23 GMP, satisfactory or is it potentially problematic?
 24 A. Which situation?
 25 Q. The situation where you've got two interconnected spaces

148

1 being considered by separate CTSAs, or rather CTSAs from
 2 separate organisations.
 3 A. I don't think it needs to be an issue because you could
 4 argue that different forces — there's always a boundary
 5 in the middle of somewhere. And even within
 6 Greater Manchester, there's districts, different
 7 districts. So I might have CTSAs that are dealing with
 8 different sites that are next door to each other and
 9 yes, I think good practice would be that they would
 10 communicate. I don't think there's anything we can't
 11 overcome with two different forces dealing with
 12 something.
 13 Q. Final topic; we can deal with this shortly, I hope.
 14 Everything that we've been looking at there was
 15 a situation as it subsisted in the period running up to
 16 22 May 2017, wasn't it?
 17 A. Yes.
 18 Q. Since then, has the entire situation been looked at
 19 through the fresh eyes which were a result of this
 20 atrocity?
 21 A. Yes.
 22 Q. So everybody and anybody listening should understand,
 23 should they, that what we've been talking about is, in
 24 a number of regards, historical?
 25 A. Yes, definitely.

149

1 MR DE LA POER: Thank you very much indeed, Ms Forster.
 2 Sir, I took slightly longer than I was hoping, for
 3 which I apologise, but I wonder whether that might be an
 4 appropriate moment for a break.
 5 SIR JOHN SAUNDERS: Would it be all right if we broke until
 6 3.30? Would that give everyone enough time? Thank you.
 7 (3.19 pm)
 8 (A short break)
 9 (3.30 pm)
 10 MR DE LA POER: Sir, may I invite questioning from SMG
 11 first, please.
 12 Questions from MR O'CONNOR
 13 MR O'CONNOR: Ms Forster, I'm going to ask you a series of
 14 questions and I hope to have some sort of chronological
 15 order to those questions.
 16 I'm going to start back with Mr Archibald's security
 17 review, which we have already looked at. Just so we can
 18 sharpen the dates, you have told us that you were in
 19 post since 2011?
 20 A. Yes.
 21 Q. Was Mr Archibald already in post then?
 22 A. Yes.
 23 Q. Did you manage him in the same way that you manage
 24 Mr Upham?
 25 A. Yes.

150

1 Q. This document — perhaps we could have it on up screen,
 2 please, {INQ023030/1}.
 3 We have heard that it's undated, there's no date on
 4 the document itself.
 5 A. Yes.
 6 Q. Precisely when it was written may not matter too much.
 7 We've had some evidence, at least I've seen a reference
 8 to it, having been prepared in 2011. But as we've
 9 heard, Mr Archibald places it rather than earlier than
 10 that, 2008/2009. Did you understand that you could
 11 help, at least to the extent that because it was in some
 12 sort of format that you didn't recognise, therefore it
 13 pre-dated your time or is that not the case?
 14 A. There have been various templates that have been
 15 provided or guidance provided by NaCTSO over time.
 16 I have seen other documents in this format, but not
 17 since — it's not been one that has been used since
 18 I started.
 19 Q. Right. So that would tend to suggest it's before 2011?
 20 A. Yes.
 21 Q. Okay. Can we go to the first page, please? If we just
 22 look at the first paragraph, this reference to the
 23 threat level may help with us the date. I'm not
 24 suggesting the precise date is important, but we see
 25 a reference to the fact that the then current threat

151

1 level was substantial. I think it's right to say that
 2 in fact the threat level was severe from the middle of
 3 2007 to the middle of 2009. So that might suggest that
 4 the 2008 date is wrong. But perhaps it was late 2009,
 5 shortly after the threat level had gone back down.
 6 A. Yes, possibly.
 7 Q. Sticking with that paragraph on another point, and
 8 perhaps a slightly more important point, the threat
 9 level, as that example shows, can vary, cannot it? It
 10 go up and down depending on events?
 11 A. Yes.
 12 Q. So would it be right to say that the threat level that
 13 pertains at the time a report like this is prepared is
 14 not going to affect the content of the report?
 15 A. Not the content, no.
 16 Q. One is looking for vulnerabilities and, regardless of
 17 the risk at the time, this is a document that's supposed
 18 to be useful going forward —
 19 A. Correct.
 20 Q. — and the risk could change?
 21 A. Yes.
 22 Q. As we can see further down the page, whenever this
 23 document was written, let's say late 2009 or shortly
 24 thereafter, what we can say is that the risks from
 25 Islamic extremists was identified; yes?

152

1 A. Yes.
 2 Q. And also a risk from those different attack
 3 methodologies including a suicide bomber?
 4 A. Yes.
 5 Q. You've been taken to some other parts of the document.
 6 I don't want to go back to all of them, but will you
 7 agree that this document did not confine itself to the
 8 curtilage of the arena itself, it examined the
 9 approaches to the arena, the area immediately outside
 10 the arena?
 11 A. Yes. Surveys will, because they will look at the
 12 approach and therefore how susceptible it may be to, as
 13 I've said, vehicle attacks, et cetera. So yes.
 14 Q. Vehicle attacks is one of the attack methodologies
 15 listed there, so is person-borne IEDs?
 16 A. Yes.
 17 Q. So presumably the concern about the approaches, the area
 18 outside the arena, would be looked at in the context of
 19 all of those threat methodologies?
 20 A. Yes, perhaps.
 21 Q. It's right, isn't it, that this document did not raise
 22 any particular security concerns about the security
 23 arrangements in the City Room?
 24 A. Not as far as I can remember, no. No, it doesn't.
 25 Q. Just on one short point, if we can go to {INQ023030/7}.

153

1 This is an area you were taken to under "Public access".
 2 A. Yes.
 3 Q. We see a reference in the second paragraph there to:
 4 "Search methodologies, pat-downs, search lanes and
 5 metal detectors."
 6 That reference to metal detectors is not specific,
 7 is it, to handheld metal detectors or walk-through metal
 8 detectors?
 9 A. It doesn't specify which, no.
 10 Q. No. And I take it you can't help us with which was
 11 intended by --
 12 A. No.
 13 Q. -- the author of the document? Thank you.
 14 I want to move on in time to that area around 2014
 15 and the "something better than nothing" approach and
 16 introduction of PSIA and so on.
 17 In your evidence, you contrasted that new approach
 18 to what you describe as the gold standard --
 19 A. Yes.
 20 Q. -- before it. Can we take it then that this document,
 21 the one we were just looking at, that's from the gold
 22 standard era?
 23 A. That is when gold standard physical security, such as --
 24 and I think it does mention PAS rated in there,
 25 PAS-rated security measures, which would be a gold

154

1 standard.
 2 Q. So we can take it that any gold standard so-called
 3 recommendations that Mr Archibald felt it necessary to
 4 make he would have made in this document?
 5 A. I would have hoped so.
 6 Q. I think it was clear from what you were saying earlier,
 7 but just in terms of explaining the "something better
 8 than nothing" approach, it's not the case, is it, that
 9 gold standard recommendations that might have been made
 10 previously were not made?
 11 A. Correct.
 12 Q. Rather, the position would be that those gold standard
 13 recommendations would still be made but you would then
 14 perhaps make other less intrusive, less expensive, less
 15 demanding recommendations and have a discussion?
 16 A. Yes, correct.
 17 Q. That was the context in which you answered some
 18 questions from Mr de la Poer about specialists --
 19 A. Yes.
 20 Q. -- and referring venues on to specialists.
 21 A. Yes.
 22 Q. I'm going to take you to a document about that in
 23 a moment, but first of all, can we be clear, and I think
 24 you did make this clear, that the CTSA is the expert in
 25 identifying vulnerabilities; yes?

155

1 A. Yes.
 2 Q. That's very much the CTSA's role?
 3 A. I would say so, yes.
 4 Q. And drawing attention not only to the vulnerabilities
 5 but to, in general terms, the methodologies that might
 6 answer those vulnerabilities?
 7 A. Yes.
 8 Q. And as I understood it, what you were saying about
 9 specialism is that it was at that stage that the CTSA
 10 might refer the venue to a specialist for their detailed
 11 knowledge on perhaps a particular type of hardware?
 12 A. Yes, to clarify that we would not refer to a specific
 13 specialist, we would suggest that they seek specialist
 14 advice --
 15 Q. Yes.
 16 A. -- and may give them a link as to where to find those
 17 specialists.
 18 Q. Understood.
 19 Can we just go to {INQ020147/1}? This is a document
 20 I'm sure you're familiar with.
 21 A. Yes.
 22 Q. It's the NaCTSO advice for stadia and arenas. If we
 23 could go within that to {INQ020147/13}.
 24 If we can zoom in on the bottom half of the page.
 25 I think this captures what you were trying to say,

156

1 Ms Forster, because we see what venues are told is that:
 2 "Your CTSA can help you assess the threat both
 3 generally and specifically ..."
 4 A. Yes.
 5 Q. "... and can give some advice on physical security
 6 equipment and particular application to methods used by
 7 terrorists", and so on.
 8 And then I think it's the next bullet point: if
 9 there is an issue, "Who's going to install this?", or,
 10 "What particular type of equipment should I have?" --
 11 A. Yes.
 12 Q. -- that's the point where the CTSA really says, "That's
 13 really not my specialism but I can put you in touch with
 14 so--and--so?"
 15 A. Yes.
 16 Q. You gave the example of vehicle barriers.
 17 A. Yes.
 18 Q. It is the CTSA who can say, "You have a vulnerability to
 19 a vehicle attack, you need some barriers", the CTSA may
 20 or may not be able to give some advice about the type of
 21 barriers or where to put them, but there would come
 22 a point in that conversation where the CTSA would say,
 23 "Here are some people you need to talk to, they can give
 24 you the sort of technical specialist advice about those
 25 matters"?

157

1 A. Correct.
 2 Q. And would you agree the same could be said for
 3 walk-through metal detectors? The CTSA would identify
 4 the vulnerability, say you need to think about having
 5 walk-through metal detectors in this space, but perhaps
 6 wouldn't be involved in procuring them, or definitely
 7 wouldn't be involved in procuring them, but might
 8 suggest a specialist who could advise on precisely which
 9 metal detectors would work in that space?
 10 A. If it was requested by the site.
 11 Q. If the venue said, "Can you point us in the direction of
 12 a supplier or" --
 13 A. Yes.
 14 Q. Thank you. We can take that down, Mr Lopez.
 15 I just want to ask you a few questions now about the
 16 arena and about the exchanges that people at the arena
 17 and in particular Miriam Stone had with Ken Upham.
 18 Of course, I've got in mind that you weren't there
 19 at the meeting, so you can't give evidence about them,
 20 but there are some points I want to ask you about to see
 21 if you can assist with your experience.
 22 A. Okay.
 23 Q. You've mentioned the scoring issue and we can see from
 24 Mr Upham's statement that he accepts that there are
 25 a number of scoring mistakes in the form and you've

158

1 explained that you, perhaps with the exception of one of
 2 them, don't regard them as being significant.
 3 A. Yes.
 4 Q. Do you mean they wouldn't have affected the overall
 5 advice he gave or there's a degree of judgement
 6 involved? Can you expand on that?
 7 A. I think I've outlined two things in the statement.
 8 Short term, it may have caused an issue because it made
 9 the -- that subject matter may not have been revisited
 10 in the short term. However, longer term, the process --
 11 when it is deemed, agreed rather, between the sites and
 12 the CTSA that they have done as much as they can
 13 protecting the site at that period, it may be that the
 14 site -- we don't disengage, but we may not visit as
 15 often because there's not as much work or discussion to
 16 be had. We call that maintenance.
 17 At that stage, if it was going to go to maintenance,
 18 that would be reported on our management returns and
 19 I would inspect and say, "Are we sure we've done
 20 everything we possibly can on that? What have they got
 21 in place?" That's one thing, it would have been picked
 22 up long term.
 23 The other reason I'm not overly concerned is, on the
 24 bottom of the PSIA, and certainly the newer versions,
 25 there is a tab that is called a dashboard, and within

159

1 there, it has a record -- and I think we did actually
 2 look at them -- of professional judgement scores, 1 to
 3 4. If you look at that for PBIED, it actually says 2 --
 4 in fact I think a few of them do -- which means -- the
 5 definition was read out before actually -- there is
 6 still work to do but it's still progressing.
 7 Q. That's the scoring mistakes.
 8 A. Yes.
 9 Q. I want to ask you about another couple of areas where
 10 I will suggest to you there were some shortcomings
 11 in the advice or at least the approach of Mr Upham.
 12 Can we go, please, to {INQ036738/1}. These are some
 13 emails which immediately followed Mr Upham's first visit
 14 to the arena in 2014. I'm sure you've seen these
 15 before.
 16 A. Yes.
 17 Q. As is the way with emails, it helps to go to the second
 18 page first {INQ036738/2}. Here we see an email from
 19 Ken Upham to Lee Sinnott on 16 September 2014;
 20 do you see that?
 21 A. Yes.
 22 Q. Mr Upham is attaching the action plan.
 23 A. Yes.
 24 Q. I think that's clear. He asks if some names can be
 25 supplied for one of the columns of the action plan and

160

1 we may look back at that in due course. But then this:
 2 "As you will see, the majority [and I think it's
 3 clear what he means is the majority of the entries on
 4 the action plan] are [his words] easy wins and we can
 5 discuss start/completion dates", and so on.
 6 A. Yes.
 7 Q. Is that easy win one that you're comfortable with?
 8 A. I have used it. I have used quick wins and it's
 9 certainly terminology that sites -- well, CTAs I'm
 10 aware use. Because you would refer to things that have
 11 no cost, won't take that much time, so it may be we
 12 spoke about the guard force motivation guidance. That
 13 would require someone to go on to the link, click it,
 14 download it, read it and then take it on board.
 15 Similarly, with any CT awareness training, it doesn't
 16 cost -- it may cost in time, but it's not an
 17 extortionate cost. That is the terminology, quick wins.
 18 It's putting your house in order, things you can do to
 19 raise that security level quite easily.
 20 Q. So what he's saying then -- and thank you, that helps us
 21 to understand -- is most of things on the action plan,
 22 in terms of time and expense, something you can do
 23 relatively easily?
 24 A. Yes.
 25 Q. Let's move on if we can to a later email. So back to

161

1 {INQ036738/1}. This is an email from Lee Sinnott to
 2 others within SMG, so not including Ken Upham. But he
 3 relays, doesn't he, what had gone on at the meeting
 4 which led to the action plan?
 5 A. Yes.
 6 Q. He says:
 7 "Hi James. You'll be pleased to know the
 8 vulnerability assessment with the counter-terrorism
 9 adviser went really well and we scored well above all
 10 the other venues he has visited including ..."
 11 And you may have seen what's underneath that, we
 12 won't name them, but there are another couple of names
 13 within Manchester; is that right?
 14 A. I presume so, yes. I have not seen the full email.
 15 Q. Perhaps you can take that from me. What about that, is
 16 that something you're comfortable with?
 17 A. What precisely, sorry?
 18 Q. I think it's clear, isn't it, that Mr Sinnott is
 19 reporting to Mr Allen something that Ken Upham has told
 20 him, which is that the arena's scores on the PSIA sheet
 21 are, to use his words, well above all the other venues
 22 Mr Upham has visited, and then he's given some examples.
 23 A. The thing I wouldn't be comfortable with is the fact
 24 that there was a specific site mentioned.
 25 Q. Is it limited to that?

162

1 A. Yes. Just because a site has improvements to be made
 2 doesn't mean that you can't be pleased with what they've
 3 got in place already.
 4 Q. We've certainly seen how the PSIA scores for
 5 a particular site, as one period follows the next, show
 6 either an improvement or perhaps the other way round.
 7 A. Yes.
 8 Q. But certainly the view of the security experts, and
 9 I thought this followed from something you said, that
 10 what one can't do is compare the scores that one venue
 11 has obtained with the scores of another --
 12 A. No, you shouldn't.
 13 Q. -- because that's not what the system is designed for?
 14 A. No.
 15 Q. And the fact that one venue gets 150 for a particular
 16 type of attack and the other --
 17 A. Yes.
 18 Q. -- venue got 120 doesn't mean to say that the first
 19 venue is safer?
 20 A. No, it doesn't. So yes, you are correct in that
 21 context.
 22 Q. Isn't that quite important, Ms Forster?
 23 A. What exactly? That they had scored better than other
 24 sites?
 25 Q. No.

163

1 SIR JOHN SAUNDERS: That he shouldn't have said it.
 2 A. I wouldn't say it.
 3 SIR JOHN SAUNDERS: You have actually said he shouldn't have
 4 said it, really, in effect, haven't you?
 5 A. Yes. I would have no qualms with him telling the site
 6 they had scored well, but I don't think you should
 7 compare with other sites.
 8 MR O'CONNOR: Because the risk, of course, is that a venue
 9 might understandably get an inaccurate understanding of
 10 the level of its protection from terrorism?
 11 A. Well, there was the action plan which was attached with
 12 the recommendations that hadn't been progressed and
 13 needed progressing. So it wasn't saying, "You cannot do
 14 anything"; it's saying, "You should do this to improve
 15 your security".
 16 Q. I'm just going to press you a little bit further on this
 17 because what we heard from the security experts is that
 18 there was a concern amongst the CTSA community that
 19 individual sites were comparing their scores with each
 20 other and therefore misunderstanding perhaps the process
 21 and perhaps misunderstanding how they were doing in
 22 their own levels of safety.
 23 A. Yes.
 24 Q. And if there's that concern within the CTSA community,
 25 isn't it even more concerning that a CTSA himself at the

164

1 very first meeting he has with a venue is doing
 2 precisely that?
 3 A. Well, obviously I wasn't aware of that until seeing
 4 this, and as I said, I wouldn't do it. I don't think
 5 it's correct necessarily to do it. But telling them
 6 that they have some good measures in place, I don't
 7 think there's anything wrong in that.
 8 Q. You used a term a few minutes ago about maintenance.
 9 A. Yes.
 10 Q. Which, as I understood you, was a formal stage at which
 11 you might, as it were, formally change the level of
 12 interaction with a venue.
 13 A. Yes.
 14 Q. I wonder if it looks to you, both from this document and
 15 perhaps from your review of Mr Upham's documents more
 16 generally --
 17 A. Yes.
 18 Q. -- that right from the start, Mr Upham took the view
 19 that the arrangements at the arena were good and
 20 therefore no major changes were needed and that that was
 21 something he shared with the arena, so even if he didn't
 22 put it into maintenance formally, there may have been
 23 a sort of informal putting into maintenance?
 24 A. I don't agree with that comment, no.
 25 SIR JOHN SAUNDERS: The result of going to maintenance is

165

1 you have less visits?
 2 A. Maintenance means that you have completed all the
 3 actions that are possible to complete at that time,
 4 whether that be due to budgetary constraints,
 5 operational constraints, et cetera. However, yes, you
 6 would still visit them annually because there may be
 7 other methodologies that comes along, although that
 8 would probably be an interim visit anyway.
 9 SIR JOHN SAUNDERS: Annually is less than the norm, which is
 10 biannually?
 11 A. Yes.
 12 MR O'CONNOR: In any event, what we can see from this
 13 is that Mr Upham reported very favourably at the meeting
 14 about the arena's scoring on the PSIA?
 15 A. Yes, and I would say they do have good measures in
 16 place.
 17 Q. I'm going to move on, Ms Forster. I want to ask you
 18 a few questions about the Victoria Station CTSA
 19 arrangements. You've already been asked about the sort
 20 of broader question of whether Victoria Station should
 21 have been -- or Victoria Station should have been dealt
 22 with by BTP and the arena by GMP. I'm not going to go
 23 back over that ground.
 24 I want to ask you a few more specific questions just
 25 looking at the documentation that was generated by the

166

1 CTSA process at the station. There's a sensitive
 2 document I'm going to take you to in a minute. Before
 3 I do that I want to take you to an open document. So
 4 can we have up on the screen, please, {INQ025707/1}.
 5 We have looked at the arena action plan --
 6 A. Yes.
 7 Q. -- and I'm going to come back to it in a few minutes.
 8 This is the station action plan?
 9 A. Yes.
 10 Q. I think you've probably looked at this before. If
 11 we can go within this document, please, to
 12 {INQ025707/3}, and the writing is very small, so if
 13 we can get as close as we can to the bottom half,
 14 please.
 15 "Review site security plan"; do you see that?
 16 A. Yes.
 17 Q. Just below the section that's been removed, you can see
 18 the recommendation that the site review its security
 19 plan and that:
 20 "All security process options available for
 21 consideration are fully documented."
 22 Then there's some examples or a list of particular
 23 points which should be covered.
 24 A. Yes.
 25 Q. "Further options available."

167

1 And one of them is:
 2 "Extending the station checks to areas outside of
 3 the station that may be at risk from a PBIED or
 4 restricting visitor access."
 5 A. Yes.
 6 Q. So what we see there is the BTP CTSA apparently
 7 discussing with the station what we've talked about,
 8 extending its perimeter; do you agree?
 9 A. I do.
 10 Q. Is it right that that's something that you would find
 11 CTSA's discussing with sites?
 12 A. As far as I am aware, that has been discussed with the
 13 arena, because they already undertake patrols around the
 14 outside of the building for that very reason, for
 15 vehicle-borne IEDs.
 16 Q. This is an example, but coming back to your evidence
 17 earlier about at least the PSIA process all hanging on
 18 the inside of the arena --
 19 A. Yes.
 20 Q. -- it's right, and this is an example, isn't it --
 21 A. Yes.
 22 Q. -- that the discussions that venue would have with
 23 a CTSA, perhaps to do with the PSIA or just more general
 24 discussions, would go beyond that, wouldn't they?
 25 A. On occasion, yes.

168

1 Q. And this is an example of that?
 2 A. Yes.
 3 Q. And it's an example of a CTSA not being restricted by
 4 the questions on the PSIA, if they see an issue about
 5 extending a perimeter they raise it?
 6 A. It varies slightly. A vehicle-borne improvised
 7 explosive device can be substantially bigger than
 8 a person-borne IED, hence why that would be a concern
 9 beyond the access control. So you're trying to keep
 10 a person-borne IED from inside the bowl where it can do
 11 most damage, whereas a vehicle-borne IED -- so it could
 12 be parked either encroaching next to the perimeter or
 13 driven into at some sites. That could have an impact on
 14 the structural soundness of a building and therefore --
 15 Q. Sorry, I don't mean to interrupt you rudely, but I don't
 16 think we need to go into the detail of VBIEDs. In fact,
 17 it may not be very wise to do so in an open session.
 18 As far as person-borne IEDs are concerned, suicide
 19 bombers, that's of course one of the attack
 20 methodologies that CTSA's consider; yes?
 21 A. Yes.
 22 Q. And it's not right, is it, that their concern about
 23 PBIEDs would be limited to stopping a suicide bomber
 24 getting into the theatre, the football ground, the
 25 arena?

169

1 A. It wouldn't now, no.
 2 Q. Wouldn't now and wouldn't then, I would suggest.
 3 A. I think I said before it wasn't on the radar for the
 4 queues outside a building to be subject to a ...
 5 We would... The things that we would consider regarding
 6 that would be the hostile reconnaissance and the CCTV
 7 monitoring.
 8 Q. That may be the case in general terms, and we'll come to
 9 look in a little bit of time about what Mr Upham did or
 10 said at the arena.
 11 But it's hard to -- I know that you're talking about
 12 the guidance that NaCTSO gave.
 13 A. Yes.
 14 Q. And one can't point to perhaps a paragraph in NaCTSO
 15 guidance specifically dealing with concern about queues
 16 or egress and so on. But we're talking about people
 17 with great expertise, CTSA's, and great training and
 18 great experience; do you agree?
 19 A. Yes.
 20 Q. Who go to a whole range of different venues, no doubt
 21 each with their special problems; yes?
 22 A. Yes.
 23 Q. It can't be right, can it, that when they go to a venue,
 24 they would, as it were, close their mind to a problem
 25 outside the venue and only focus on problems inside it?

170

1 A. We wouldn't close our minds. At that time, when this
 2 was initially undertaken, it wasn't an attack
 3 methodology that we considered.
 4 Q. All right. I'm not going to pursue that now. I may
 5 come back to it in a few moments.
 6 I said I was asking you about documents relating to
 7 the station. Can I now ask you a few questions about
 8 another document. This is the sensitive document which
 9 I know you've got a hard copy of in front of you and
 10 I think the chairman has one too.
 11 I'm going to ask this witness some questions about
 12 this document, sir. Some fairly tailored questions and
 13 the intention is to avoid needing to have a restricted
 14 session. For these in the room, the document I'm going
 15 to be asking the witness about is to be found in the
 16 sensitive part of Magnum. {INQ025726R/1} and it is
 17 something described as the "PSIA notes for
 18 Manchester Victoria Station".
 19 Just in the same way as the action plan -- and I do
 20 appreciate this is a BTP document, so it's not one that
 21 either you or your team prepared -- I just want to ask
 22 you a few questions about it. I think I understand --
 23 I'm going to ask you some very focused questions and you
 24 might want to answer relatively briefly and certainly
 25 without exploring the content of the document beyond

171

1 what I say.
 2 Sir, just before that, before I do ask the
 3 questions, may I simply invite you to adduce the
 4 entirety of this document as redacted into evidence,
 5 which means we can refer to it in due course? It means
 6 I won't have to go through it in as much detail with the
 7 witness.
 8 SIR JOHN SAUNDERS: Okay, thank you.
 9 MR O'CONNOR: The first question generally about this
 10 document. It's described as PSIA notes?
 11 A. Yes.
 12 Q. And I know you've had a chance to look through it. It
 13 follows, broadly speaking, the same theme as the PSIA
 14 spreadsheet we're familiar with?
 15 A. It appears to, yes.
 16 Q. But it includes some particular queries and if I can ask
 17 you to turn within the document to {INQ025726R/9}. This
 18 is in fact the only page I'm going to ask you to look
 19 at.
 20 We can see there under the "Search and screening"
 21 heading, there are a series of queries, are there not?
 22 A. Yes.
 23 Q. I don't think that GMP prepared a document like this?
 24 A. No.
 25 Q. It wasn't known to the CTSA's.

172

1 A. No, no.
 2 Q. Perhaps if we just take a step back from all of this.
 3 Is it right that there isn't in fact a single set of
 4 documents, perhaps prepared by NaCTSO, which are used by
 5 CTSA's throughout the country, but rather individual
 6 forces or groups of forces prepare their own documents,
 7 which CTSA's use?
 8 A. What documents, sorry?
 9 Q. I'm talking about these documents. I'm trying to
 10 explore the fact that BTP have this document, which is
 11 called "PSIA notes", whereas as I understand it --
 12 A. This is (overspeaking) this isn't a NaCTSO document, no.
 13 Q. One can see that the purpose of the document is to
 14 provide prompts for the CTSA to enquire --
 15 A. Yes.
 16 Q. -- of the venue as they go through the sheet.
 17 A. Yes.
 18 Q. I'm going to ask you about the specifics in a minute,
 19 but, just generally speaking, it seems as though this is
 20 a fairly useful document to have. Would it not be
 21 useful for GMP to have a document like this also?
 22 A. Possibly. I know that when the initial PSIA was done,
 23 Ken has stated in his statement that it was done on
 24 screen and the electronic version does have most of this
 25 in notes on it when you hover over.

173

1 Q. Right. That was what I wanted to explore with the next
 2 question. Perhaps we can do that by reference to these
 3 particular queries.
 4 If one looks at {INQ025726R/9}, we can see a couple
 5 of columns in, there's a "Search and screening" section.
 6 We see that, generally speaking, there are a series of
 7 queries that raise, amongst other things, the possible
 8 use of certain equipment.
 9 A. Yes.
 10 Q. Including walk-through metal detectors and X-ray
 11 machines?
 12 A. Yes.
 13 Q. And also we see a couple of references to this document,
 14 PAS127.
 15 A. Yes.
 16 Q. Miriam Stone gave evidence that Ken Upham never
 17 mentioned walk-through metal detectors or X-ray
 18 machines. Would he have had prompts like this during
 19 the course of his PSIA meetings with her?
 20 A. Yes, on the screen, the notes, when you hover over the
 21 electronic document.
 22 Q. We see here a query about metal detectors, about X-ray
 23 machines, he would have had -- obviously it doesn't
 24 matter if the words were exactly the same, but he would
 25 have had a similar prompt, would he?

174

1 A. Yes, and it's also one of the options that you can score
 2 against.
 3 Q. If that's right and he did have prompts about
 4 walk-through metal detectors and X-ray machines, do you
 5 think that he should have raised those as possibilities
 6 with Ms Stone?
 7 A. I don't know, I wasn't there. I don't know whether he
 8 did and we're going back to 2014 and I think it was Lee
 9 that was possibly, because he was facilities, that may
 10 have been -- I don't know whether it was discussed, full
 11 stop.
 12 Q. Did you watch Miriam Stone's evidence?
 13 A. I did.
 14 Q. You'll remember she said she was there at the meeting in
 15 2014?
 16 A. Yes.
 17 Q. And I think in every other meeting --
 18 A. Yes.
 19 Q. -- with Ken Upham. And she also said that he never
 20 mentioned walk-through metal detectors or X-ray
 21 machines. I appreciate that you, of course, weren't
 22 there --
 23 A. Yes.
 24 Q. -- so you can't help with that factual issue.
 25 A. No.

175

1 Q. Just assuming for the moment that that's right, does
 2 that surprise you?
 3 A. It does because it's one of the options for the scoring,
 4 so I don't quite understand how it could be avoided.
 5 Q. Let's move on to the next point, which is the fact that
 6 this document specifically refers to the PAS127
 7 guidance.
 8 A. Yes.
 9 Q. Is that something that appears on the GMP drop down menu
 10 or --
 11 A. It's a NaCTSO menu, drop down menu, sorry.
 12 Q. So the drop down menu that you use is not a GMP --
 13 A. No.
 14 Q. -- specific --
 15 A. No.
 16 Q. -- function, it's provided --
 17 A. It's on the PSIA, which is a national document, yes.
 18 Q. Does it mention PAS127?
 19 A. I believe it does and it's certainly in the site
 20 guidance, which we looked at before.
 21 Q. Again, Miriam Stone said that Ken Upham never mentioned
 22 PAS127 to her or provided a copy of it to her.
 23 A. No, he probably wouldn't provide a copy. He may provide
 24 a link to it and there was one on the site guidance,
 25 I believe, at the back.

176

1 Q. So should he have provided that link to her?
 2 A. That link was provided with the blank documents when
 3 they initially sent them to Lee.
 4 Q. All right. We'll check that.
 5 What we see here is a fairly specific reference to
 6 PAS127 in the context of these particular activity
 7 improvements, the search of persons and so on. Is it
 8 something that Ken Upham should have drawn her attention
 9 to in the context of those matters, do you think?
 10 A. I think it's something that should have been discussed
 11 as to what search regime they had and what would be --
 12 how they could improve that, so yes, I would have
 13 thought it would have been discussed.
 14 Q. Thank you.
 15 I'm going to move on now, so we can leave that
 16 document you've got in front of you.
 17 Can we look now, please, at the email -- I'm sure
 18 you've seen this before -- Miriam Stone sent to
 19 Ken Upham early in 2015. If we could have on the screen
 20 please, Mr Lopez, {INQ025133/1}.
 21 If we could go to the very bottom of {INQ025133/2},
 22 please. If we zoom in really right at the bottom, it's
 23 the start of the email dated 12 January.
 24 We can see that Miriam Stone is sending a message to
 25 Christopher Smith and also Ken Upham --

177

1 A. Yes.
 2 Q. -- saying Happy New Year and if we go over to the next
 3 page {INQ025133/3}, we see the rest of the email. I'm
 4 sure it's familiar to you --
 5 A. Yes.
 6 Q. -- and we've looked at it before as well.
 7 Just to summarise, Ms Stone is expressing her
 8 concern about the Charlie Hebdo attack, saying they're
 9 already conducting some reviews at the arena.
 10 A. Yes.
 11 Q. She refers to a tabletop exercise, which had taken place
 12 a month or so before. We've heard about it in evidence;
 13 it took place in December 2014.
 14 A. Yes.
 15 Q. She's asking for advice. She wants to:
 16 "... make sure [as she puts it] [they're] doing
 17 everything [they] can, so [they'd] greatly appreciate
 18 anything you can tell us."
 19 Presumably this is just the type of engagement from
 20 a venue that CTSA's welcome?
 21 A. Yes.
 22 Q. We've heard that sometimes you have an uphill task
 23 getting venues to engage or getting them to agree to
 24 take actions you've recommended?
 25 A. Yes.

178

1 Q. Here is a venue actually reaching out asking for further
 2 information or just to check there's anything else
 3 needing to be doing in the light of a relevant terrorist
 4 attack.
 5 We could see if we looked at it, I don't think we
 6 need to, that as a result of this email, a meeting was
 7 arranged, which Ken Upham attended.
 8 A. Yes.
 9 Q. And we have heard from Miriam Stone, her evidence, which
 10 you will recall, that at that meeting they sat down and
 11 discussed the security arrangements at the arena,
 12 including, she said, in the City Room and that Ken Upham
 13 said that there really wasn't anything more for them to
 14 do.
 15 A. Mm--hm.
 16 Q. As before, obviously, I take it you can't comment on
 17 that factual issue, as you weren't there; is that right?
 18 A. Correct.
 19 Q. Obviously. I did want to ask you about Ken Upham's
 20 account of that meeting in his witness statement. If we
 21 could go to {INQ029098/7} and paragraph 29 of this
 22 statement.
 23 I'm sure you've read this statement. I can't
 24 remember the date, but it was prepared for the inquiry.
 25 A. Yes.

179

1 Q. If you could read that through to yourself, Ms Forster,
 2 and then I'll ask you some questions about it.
 3 A. (Pause). Yes.
 4 Q. We're certainly talking about the same meeting because
 5 the email that he refers to about it being arranged is
 6 the email I have just shown you. But his account of
 7 that meeting is very different, isn't it?
 8 A. It mentions different things, yes.
 9 Q. And it would appear, at least in one important respect,
 10 to be inaccurate because he's talking there about
 11 a tabletop meeting that was yet to happen, it was
 12 planned to happen later in the year, whereas, as we've
 13 seen from the email, Miriam Stone had talked about this
 14 same tabletop -- it in fact had already happened.
 15 Do you see that?
 16 A. Yes.
 17 Q. Also, and perhaps more importantly, Mr Upham doesn't
 18 mention at all what, at least on the face of the email,
 19 was the main purpose of the meeting, which is to go back
 20 through the security plans and to tell the arena if
 21 there's anything more they needed to do in light of the
 22 Charlie Hebdo attack.
 23 A. It looks that way, yes.
 24 Q. At the very least, it's a puzzling paragraph. Can you
 25 help us at all why Mr Upham's account is so different?

180

1 A. No, I wasn't there.
 2 SIR JOHN SAUNDERS: I think that's quite a difficult
 3 question for this witness to answer.
 4 MR O'CONNOR: Sir, I'm not going to press any further,
 5 certainly.
 6 Let me ask you some more general questions about
 7 this episode though. I want to pick up on some points
 8 you made earlier. The first point to be clear about,
 9 and in fact if we look at Ken Upham's statement, this is
 10 clear from this part of his statement. This wasn't one
 11 of the regular PSIA meetings, was it?
 12 A. No.
 13 Q. We can see from the rest of his statement, he goes
 14 through the six-monthly meetings, but this was a special
 15 ad hoc meeting?
 16 A. Yes.
 17 Q. And we've seen the email, we know what it was all about,
 18 we know why Miriam Stone wanted to meet him on that day,
 19 don't we?
 20 A. Yes.
 21 Q. As I've said, there's clearly a dispute about what
 22 happened at that meeting. I've already summarised to
 23 you what Miriam Stone said happened and the advice that
 24 she remembers Ken Upham giving on that occasion.
 25 A. Yes.

181

1 Q. We come back to the point that you raised earlier about
 2 the territorial scope, if you like, of the advice that
 3 CTSA's in your view were giving at the time.
 4 A. Yes.
 5 Q. And there's clearly a difference there, isn't there,
 6 between what your understanding of the position was and
 7 what Miriam Stone has said about the advice she got from
 8 Ken Upham on that day; yes?
 9 A. Sorry?
 10 SIR JOHN SAUNDERS: Don't worry. That's just really
 11 basically a comment. I can understand it without the
 12 witness actually answering it. I'm not stopping you.
 13 There's obviously a difference from what you have said
 14 about what she's saying and what Miriam Stone is saying
 15 did happen. I understand that.
 16 MR O'CONNOR: Let me then ask the next question. I'm sorry
 17 if I -- it was simply as a preparatory point to asking
 18 this question.
 19 SIR JOHN SAUNDERS: It's a context question.
 20 MR O'CONNOR: Ms Forster, you've given one understanding of
 21 the way in which CTSA's were advising venues at the time
 22 that this all took place.
 23 A. Yes.
 24 Q. But if in fact a CTSA did something different to that
 25 and gave some advice which went beyond what you

182

1 understood the advice they were giving, there would be
 2 no way for the people at the venue to know that, would
 3 there?
 4 A. I don't quite ...
 5 SIR JOHN SAUNDERS: I'm not sure the witness can really
 6 comment on that.
 7 MR O'CONNOR: Let me put the question a different way.
 8 You've referred to a number of NaCTSO documents in
 9 your witness statement which set out advice provided to
 10 venues; yes?
 11 A. Sorry? I think I'm lost.
 12 Q. You've referred to a number of documents published by
 13 NaCTSO.
 14 A. Resources, yes, by various --
 15 Q. Call them that if you like.
 16 A. Yes.
 17 Q. I have taken you to one, which was in fact entitled,
 18 "Advice prepared for arenas and stadiums".
 19 A. Yes.
 20 Q. And we went to the section which describes the function
 21 of a CTSA.
 22 A. Yes.
 23 Q. What they can do, providing advice about local suppliers
 24 and so on.
 25 There is nothing in that document, for example, that

183

1 says, "By the way, CTSA's won't be advising you about
 2 areas outside the footprint of your venue", is there?
 3 A. No.
 4 Q. Is there anything else that you can point to that might
 5 have informed venues at the time that they were to
 6 understand CTSA's advice as being limited in that way?
 7 A. No. No, I can't point to any other.
 8 Q. We've heard a lot of evidence about the City Room in the
 9 last few weeks. I'm sure you've seen at least some of
 10 it.
 11 A. Yes.
 12 Q. A point that's been repeatedly made by witnesses is that
 13 there were obvious security issues, if I can put it
 14 neutrally, with the City Room. Would you agree that
 15 those issues would have been obvious to Ken Upham at the
 16 time, given his training as part of your team?
 17 A. Um... When you say obvious issues with security, what
 18 I have seen watching this, it appears that you've
 19 discussed blind spots with CCTV, perhaps the reporting
 20 of suspicious activity when reported. I don't think
 21 that would be obvious to a CTSA because it wasn't
 22 obvious to the site.
 23 Q. What about the fact that there were -- it was a place
 24 where large numbers of people would gather in a confined
 25 area close to a train station?

184

1 A. If that was our remit at that time, yes, it would have
 2 been looked at. We can all say, yes, it's obvious,
 3 egress. We've never, ever looked at egress, et cetera.
 4 And hindsight is a great thing and it is obvious now.
 5 Q. I was driving at a different — not at your remit,
 6 Ms Forster, it was at the experience of Mr Upham and
 7 whether that particular problem, frankly whether it
 8 related to ingress or egress, would have been obvious to
 9 him, notwithstanding the limitations of the PSIA form.
 10 A. If we were looking at that, yes, it is obvious. I know
 11 this sounds dreadful, but it wasn't the remit so we
 12 didn't look at crowds outside of that site perimeter.
 13 I know it's short-sighted, but at that time, 2014,
 14 that is not something that was on our radar.
 15 Q. All right. Well, just before I leave this, Ms Forster,
 16 again you say it wasn't on your radar. Of course
 17 we have the evidence of Miriam Stone about what Mr Upham
 18 said to her and I'm not going to press that any further.
 19 I just have, I think, three last points for you.
 20 First of all, can I go back to the arena — sorry,
 21 go to the arena action plan now? I want to ask you
 22 about two short points there. {INQ001539/1}. If we
 23 could have the bottom half, please. The line I want to
 24 ask you about is the one with the red traffic light, the
 25 Secure 2. The column on the right-hand side, as I read

1 it, is completed by Ken Upham; is that right?
 2 A. The notes, "After discussion with the site"? Yes.
 3 Q. Sorry? No, the far right-hand side on the sheet.
 4 There's a series of comments for each action.
 5 A. Yes.
 6 Q. And I think those are Ken Upham's comments?
 7 A. Yes. They would have been comments following the PSIA
 8 and action plan as agreed with the site, yes.
 9 Q. Sorry, that's right. I just wanted to clarify.
 10 There are other parts of it that are completed at
 11 least with information from the site. I wanted to get
 12 your help on what we — how we read this comment about
 13 the Secure 2. He says:
 14 "Not progressed as yet. The use of the tool is an
 15 issue. I am not aware of any sites within GMP or
 16 Merseyside having adopted the use of this."
 17 And there are issues that CTSAs are not familiar
 18 with the product, not easy to gain access to the
 19 programme, you have to order it and then self-install.
 20 A. Yes.
 21 Q. It looks as though what Mr Upham is saying is that
 22 actually that's something that he can't provide or that
 23 there is a problem with that process actually happening
 24 from his end rather than the arena. Is that right?
 25 A. It's a bit of both and whether — what discussions went

1 on I don't know but certainly with — because working
 2 for the police, Counter-terrorism Policing North-west,
 3 we're employees of GMP and our IT doesn't allow us to
 4 download or upload software, so we couldn't actually put
 5 it on our software.
 6 However, the site could if necessary — well, the
 7 site could request it and try it on their IT. However,
 8 it doesn't look like that's been explored and I can't
 9 really comment any further on that.
 10 Q. It does rather look as though Mr Upham has sort of put
 11 it to one side.
 12 A. It doesn't look as though he's pushed it, no.
 13 Q. Just before we leave this, Mr de la Poer asked you about
 14 the last sentence there, the increase in search.
 15 Mr Upham has set out in his statement — essentially he
 16 says that was a misunderstanding; do you agree?
 17 A. Yes.
 18 Q. We can all see what he says in his statement, so I won't
 19 ask you any more about that.
 20 The next point. Just going back to the question of
 21 attendance of security contractors at CTSA meetings.
 22 Mr de la Poer asked you about it. He asked you whether
 23 you or other CTSAs, as it were, excluded people like
 24 ShowSec, and you said no.
 25 A. No.

1 Q. Have you actually ever encouraged security contractors
 2 to attend meetings of this nature?
 3 A. I've spoken to sites, not necessarily the security
 4 contractors, but I've been involved with sites where
 5 we have had specific meetings that have been organised
 6 with the contractors to discuss that specific area.
 7 Because obviously some of the other stuff — there's
 8 a need to know, a lot of it. If the security
 9 contractors don't need to know some of it, then they
 10 wouldn't necessarily be invited to the full PSIA and
 11 action plan review, but we would organise separate
 12 meetings to discuss what would be relevant to them.
 13 Q. I think again the inquiry just wants to get a sense of
 14 this. We've all heard how deeply involved ShowSec were
 15 in provision of security for events at the arena.
 16 A. Yes.
 17 Q. It's not just a question, for example, of them
 18 installing a particular sort of glass or being involved
 19 in some barriers or something like that. As we saw from
 20 the example on the form, on one view their input would
 21 be quite wide-ranging.
 22 A. Yes.
 23 Q. Really, the question is whether people like you, who
 24 must come across this problem frequently, have ever had
 25 any guidance or any training to individual CTSAs about

1 encouraging people like ShowSec to be invited to these
 2 meetings, either now or previously?
 3 A. I personally have never come across that, it has always
 4 been the site that has actually asked whether that could
 5 be the case. The ones I've dealt with have been quite
 6 proactive in involving their contracted personnel
 7 because it's often the contracted personnel that do that
 8 piece of work rather than the site.
 9 Q. Do you think there's at least scope for --
 10 A. Yes, I do.
 11 Q. -- NaCTSO and the CTSA community to --
 12 A. Yes.
 13 Q. -- have an involvement in pushing that (overspeaking) --
 14 A. Certainly in the training it should perhaps be raised
 15 that that should be considered if it is not obvious,
 16 which you're kind of implying that it's not, that that
 17 should be the case.
 18 Q. Yes. Lastly, post-attack. We heard from DAC D'Orsi
 19 a description that the attack at the arena what was she
 20 described as a watershed moment in, amongst other
 21 things, counter-terrorism, security at entertainment
 22 venues and so on. I can see you're nodding, you agree.
 23 Can you expand on your analysis on that?
 24 A. I think I have mentioned a few times that it was
 25 a totally different methodology --

189

1 SIR JOHN SAUNDERS: What was?
 2 A. The attack for egress, so waiting around for people to
 3 come out. It was something we hadn't necessarily
 4 considered and it's now changed the way we operate as
 5 CTSA's --
 6 SIR JOHN SAUNDERS: You're now concerned about what happens
 7 at egress with a large number of people?
 8 A. And in grey spaces, open public spaces, which -- we do
 9 an awful lot of work engaging with lots of people about
 10 that sort of thing now.
 11 MR O'CONNOR: Can we just look at a document, please, where
 12 you do mention this point? I think you do anyway.
 13 I think you're the author of it. It's {INQ023040/1}.
 14 Is that your document?
 15 A. It is part of a document that I wrote, yes.
 16 Q. We see towards the bottom half of the page, you make the
 17 points that you've just made in the sense about
 18 egress --
 19 A. Yes.
 20 Q. -- and questions around egress being added to the PSIA
 21 form and so on.
 22 Actually, sorry, Mr Lopez, if we go to the top half,
 23 I wanted to ask about something that's towards the top
 24 of that page. Can you see the first bullet point there?
 25 A. Yes.

190

1 Q. And this is, is it not, a narrative of things that
 2 happened in the short term after the attack?
 3 A. Yes.
 4 Q. As it were, immediate responses?
 5 A. Yes.
 6 Q. "Work is being undertaken in several areas by CT SECOs,
 7 CTSA's and individual sites."
 8 And there's another reference then to CT SECOs.
 9 A. Yes.
 10 Q. We have heard about CT SECOs from a couple of witnesses
 11 to the inquiry. Counter-terrorism security
 12 coordinators?
 13 A. Correct.
 14 Q. They are, I think, one of the resources that you have in
 15 this area, whether it's Greater Manchester or North-west
 16 Counter-terrorism?
 17 A. Each force has them.
 18 Q. Can you give us a short explanation of what their role
 19 is, in your understanding, in this area?
 20 A. I can give you my understanding of their role.
 21 Q. Yes.
 22 A. Their role certainly complements and now perhaps
 23 overlaps slightly. Their main role is they are
 24 operational police officers -- none of my CTSA's are
 25 police officers for a start.

191

1 They look at or work for -- they are usually
 2 appointed by senior officers for major events and they
 3 will look at the operational safety and running of that
 4 event. So if we think of -- what's a major event?
 5 Q. A royal visit?
 6 A. A royal visit, yes. They may be appointed to that
 7 because it's deemed to be a major event therefore they
 8 need to look at the operational running of that event.
 9 So it could be having protective officers -- so it's
 10 officers -- actual operational officers. They may reach
 11 out to us -- if it was a royal visit and they were
 12 visiting a particular site that we engage with, they may
 13 reach out to us and see if we've undertaken a survey and
 14 had an assessment through the PSIA and action plan for
 15 that site regarding the security stance and a few other
 16 questions. Whereas CTSA's look at a site's lifetime.
 17 Q. They share counter-terrorism expertise but the CT SECOs
 18 are more events-based, CTSA's focus on venues?
 19 A. Yes.
 20 Q. We see here, and I think you mentioned that their role
 21 overlapped to some extent, that -- in the immediate
 22 aftermath of the attack, were CT SECOs deployed to look
 23 at venues as well perhaps events?
 24 A. No. What I'm talking about there -- I'll just check it.
 25 (Pause)

192

1 I don't know whether I understand it... I know what
 2 it means.
 3 Yes. So immediately after the attack, there would
 4 have been more events, et cetera, assessed by CT SECOs
 5 because obviously the threat level has risen. There's
 6 nervousness, risk appetite drops, so there may have been
 7 more requests for CT SECO assessment at events maybe at
 8 a lesser threshold than usual. So that's what I'm
 9 referring to there. Certainly I think I mentioned them
 10 as well working with... So they were looking at egress
 11 specifically as well on that.
 12 Q. Last question on this. Is it right that before the
 13 attack (inaudible) now, occasionally CT SECOs were
 14 actually used as a resource to assist CTAs if
 15 particularly difficult issues arose at venues?
 16 A. No.
 17 Q. They were sometimes used to assist --
 18 A. No, it's usually the other way round. CT SECOs only
 19 deal with operational issues. I wouldn't ask a CT SECO
 20 to come into a site and look at the security at all.
 21 If the site was having a high-profile event, I may
 22 inform the CT SECO or events or the force or local
 23 events that a certain event is going to occur and
 24 therefore they may consider assessing it. But I would
 25 never ask a CT SECO to come in and assist a CTA. We

193

1 don't -- they're different roles and -- no.
 2 MR O'CONNOR: All right. I'm going to leave it there.
 3 Thank you very much.
 4 SIR JOHN SAUNDERS: I just want to raise something you have
 5 raised already and you may want to come back so, just to
 6 give you the opportunity.
 7 MR O'CONNOR: Thank you, sir.
 8 SIR JOHN SAUNDERS: You have described the attitude of CTAs
 9 generally prior to May 2017 as being short-sighted.
 10 You have pointed out that the benefit of hindsight is
 11 a wonderful thing but again it demonstrates perhaps that
 12 when terrorism is concerned, we are reactive rather than
 13 proactive.
 14 A. Yes.
 15 SIR JOHN SAUNDERS: However, let's suppose you hadn't been
 16 short-sighted and that at this time people like Mr Upham
 17 had been considering the safety of egress and
 18 particularly, because that's what we're thinking about,
 19 the City Room.
 20 A. Yes.
 21 SIR JOHN SAUNDERS: How would Mr Upham find out what
 22 security measures were taken in relation to egress by
 23 the particular place? How would he find out what they
 24 have been doing to try and make egress safe?
 25 A. He would ask them.

194

1 SIR JOHN SAUNDERS: Okay. The response that Miriam Stone
 2 would have given is, "Actually, we have a complete
 3 search of the whole of the City Room prior to egress".
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Including where Salman Abedi was
 6 actually hiding.
 7 A. Yes.
 8 SIR JOHN SAUNDERS: If that answer had been given, if you
 9 had been Mr Upham's position, I am not asking you to --
 10 A. Yes.
 11 SIR JOHN SAUNDERS: If you had been in that position, what
 12 would then be your view of the security relating to
 13 egress in the City Room?
 14 A. That they were doing what they could. I would believe
 15 what they told me.
 16 SIR JOHN SAUNDERS: I'm not suggesting you wouldn't believe
 17 it, but that would be sufficient?
 18 A. Not... I would ask them what they were looking for
 19 because often they do and it's for health and safety, as
 20 we've discovered. So it would be: make sure you look
 21 for suspicious packages or people, yes, which we do
 22 recommend anyway and we would have recommended that for
 23 the City Room because, as I said, that is similar to
 24 AN Other site's pavement area outside.
 25 SIR JOHN SAUNDERS: Okay. That was done for balance, but

195

1 I do give you the opportunity to come back.
 2 MR O'CONNOR: I won't ask any more questions.
 3 SIR JOHN SAUNDERS: Okay, thank you.
 4 MR DE LA POER: Sir, we're past 4.30, which is our hoped for
 5 finish time, but we do have some time before we would
 6 ordinarily take a break. Can I, assuming that those who
 7 might be directly affected, members of staff, the
 8 stenographer, don't object, can I propose that we
 9 proceed to our break, which the next set of questioning
 10 should take us to, and then take stock of where we are?
 11 SIR JOHN SAUNDERS: We sit very long hours. It's quite
 12 tiring for all of us, but equally I have a witness
 13 tomorrow who we have given the whole day to and I do not
 14 want anything to interfere with that if at all possible.
 15 So unless anyone has any great objection, we will plough
 16 on. That is not to stop people asking questions they
 17 want to, and if we have to come to an end, I may have to
 18 ask you to come back on a different day, but are people
 19 happy to carry on? In particular, are you happy to
 20 carry on?
 21 A. Yes, more than happy.
 22 SIR JOHN SAUNDERS: Perhaps happy is the wrong word.
 23 MR DE LA POER: Mr Laidlaw has kindly indicated that,
 24 notwithstanding his request, he feels that matters have
 25 been dealt with, so no questions from ShowSec. I ask

196

1 Mr Butt on behalf of Counter—terrorism Policing
2 headquarters, please.
3 Questions from MR BUTT
4 MR BUTT: All CTSA's would understand, or they should
5 understand, the nature of the evolving threat from
6 terrorism, wouldn't they?
7 A. Yes.
8 Q. And they would be familiar with the guidance that NaCTSO
9 provided, for example in Argus and Griffin training
10 packages, wouldn't they?
11 A. Yes.
12 Q. And a clear risk in May 2017 was of an unsophisticated
13 attack by lone attackers with an intent to inflict
14 maximum casualties in soft targets?
15 A. Yes.
16 Q. And in particular, there was a threat to the night—time
17 economy, wasn't there?
18 A. Yes.
19 Q. You mentioned that an attack during egress was not
20 really on your radar, and I think you said in 2014;
21 is that right?
22 A. Yes.
23 Q. It's difficult, isn't it, as we're now in 2020, to look
24 back on the different guidance and the different
25 training that was given. Can I suggest that in 2016, an

197

1 attack at the time of egress would most certainly have
2 been on a CTSA's radar?
3 A. Oh yes.
4 Q. We can look at one example, please, {INQ035521/1}.
5 This is the facilitator manual from the
6 Project Argus stadia presentation; yes?
7 A. Yes.
8 Q. And I think you were present at Old Trafford when this
9 was launched in May 2016; is that right?
10 A. Yes, I helped send out the invites.
11 Q. And if we look at {INQ035521/7} of this document,
12 please.
13 The scenario that was being trained was of an attack
14 at a stadium that occurred at the end of the event when
15 the crowd was egressing from the stadium; yes?
16 A. Yes.
17 Q. And it was a person—borne improvised explosive device
18 attack; yes?
19 A. Yes.
20 Q. And it was a suicide attack; yes?
21 A. Yes.
22 Q. This is the training that was being given to the
23 industry a year before the Manchester Arena attack; yes?
24 A. Yes.
25 Q. And Ken Upham, after the launch, would have been trained

198

1 himself to deliver this training to venues who requested
2 it?
3 A. I don't think there was any specific training in this.
4 It was issued out to us, yes.
5 Q. These are the speaker notes, aren't they?
6 A. Yes. We would have received speaker notes and the
7 media.
8 Q. And you were present at this session?
9 A. Yes.
10 Q. Was Ken Upham present as well?
11 A. I think most of the office were, yes.
12 Q. He certainly would have been aware of the content?
13 A. Yes.
14 Q. Just to be absolutely clear, in 2016 and in 2017,
15 a person—borne IED attack at the point of egress was on
16 CTSA's radar, wasn't it?
17 A. In that respect, yes, it could be... Yes, I suppose so.
18 I mean, this...
19 Q. It might be that you're confusing dates.
20 A. Yes.
21 Q. This is May 2016 when this product was launched.
22 A. Yes.
23 Q. So there was no short—sightedness about the risk of
24 a PBIED attack at egress in 2016, was there?
25 A. No, not — no.

199

1 SIR JOHN SAUNDERS: I'm getting very confused, I'm afraid.
2 It's no doubt my fault. I thought we'd just seen
3 a document you wrote after the attack rather indicating
4 that you hadn't been paying any attention to these risks
5 at egress —
6 A. I would agree with that and NaCTSO did issue something
7 saying something we needed to look at it.
8 SIR JOHN SAUNDERS: Does it mean NaCTSO had given some
9 advice that was not somehow being followed by lot CTSA's?
10 A. In the PSIA process I would suggest that, yes, that is
11 possibly the case.
12 SIR JOHN SAUNDERS: So this planning, this exercise, the
13 effect of it had really not been taken on board, despite
14 having attended it?
15 A. I don't know whether it was discussed after we delivered
16 this and SMG did attend this session as well. Whether
17 it was discussed with them following that, I don't know.
18 SIR JOHN SAUNDERS: I'm not concerned with them at the
19 moment, I'm more concerned with CTSA's, of whom you were
20 in charge, taking it on board.
21 A. I really don't know whether I can answer that.
22 I obviously was there.
23 SIR JOHN SAUNDERS: So you volunteered short—sightedness, no
24 one asked you the question and you have now said there
25 was no short—sightedness; where would you like to land?

200

1 A. I am aware of this, this stadia, because obviously
 2 I attended. But I do not think this was necessarily
 3 taken into account when looking at the PSIA because
 4 it isn't in there.
 5 SIR JOHN SAUNDERS: Okay.
 6 A. We do look beyond, as I said, for hostile reconnaissance
 7 and CCTV, but we weren't necessarily looking for
 8 specific person—borne, I don't think.
 9 MR BUTT: I wanted to be fair to yourself and to GMP.
 10 You have been asked to make a witness statement dealing
 11 with these matters fairly late in the process, haven't
 12 you?
 13 A. Yes.
 14 Q. And I imagine there has been a vast amount of material
 15 that you have had to assimilate and understand to
 16 assist; yes?
 17 A. Yes, definitely .
 18 Q. And also, during the last few months, you've been
 19 assisting CTPNW and NaCTSO in locating material to
 20 assist the inquiry as well, haven't you?
 21 A. I have indeed, yes.
 22 Q. You gave very specific evidence about short—sightedness
 23 in 2014; you mentioned that year.
 24 A. Yes.
 25 Q. We can agree on this, can't we? If there was, and I'm

201

1 saying if, short—sightedness on the part of, say,
 2 Mr Upham or yourself in 2017, it wasn't for want of
 3 appropriate guidance from NaCTSO, was it?
 4 A. If you look at Argus and stadia, no.
 5 Q. This is material that you'd be expected to be familiar
 6 with, isn't it?
 7 A. Yes, and we did deliver it.
 8 SIR JOHN SAUNDERS: Without wishing to put CT police at war
 9 with GMP in any way, who actually devised the PSIA form?
 10 A. NaCTSO.
 11 MR BUTT: The PSIA form addresses six different attack
 12 methodologies, doesn't it?
 13 A. It does indeed.
 14 Q. They are broad attack methodologies, aren't they?
 15 A. They are.
 16 Q. In terms of person—borne improvised explosive device,
 17 the form does not specify any particular manner in which
 18 that could be delivered, does it?
 19 A. No.
 20 Q. Can I have a look at the work of CTSAs, please. It was
 21 well understood, wasn't it, from the beginning of the
 22 relaunched scheme in 2014 that the list of improvement
 23 measures in the PSIA tool were not exhaustive?
 24 A. Yes.
 25 Q. If we look, please, at {INQ032510/10}. We can see here

202

1 at 1.3:
 2 "This scoring guidance is written to assist those
 3 concerned in the assessment of protective security
 4 elements at crowded places and provide an informed view
 5 of how a site's security can be improved through a range
 6 of measures. It is acknowledged the list of improvement
 7 measures are not exhaustive but are deemed as the most
 8 applicable for use within the crowded places
 9 environment"; yes?
 10 A. Yes.
 11 Q. And at paragraph 3.2, same document over the page,
 12 {INQ032510/11}:
 13 "The examples are not prescriptive and exhaustive
 14 and you should use your experience, training and local
 15 good practice to determine criteria eligibility "; yes?
 16 A. Yes.
 17 Q. And if we could look at the 2014 tasking, which is
 18 {INQ020364/4}. It's the first main paragraph:
 19 "As explained at the launch, no single set of
 20 measures can be expected to fit perfectly across a wide
 21 range of site and venue types without becoming overly
 22 complicated or unworkable. The scoring tool lays out a
 23 broad set of PSIA mapped against a set of agreed attack
 24 types. It is appreciated that appropriate measures are
 25 dictated by the type of site being dealt with and that

203

1 each site has its own nuances and particular
 2 requirements, hence the broad nature of the measures."
 3 A. Yes.
 4 Q. So key to the PSIA scheme was clear guidance that it was
 5 not exhaustive?
 6 A. No.
 7 Q. It was not prescriptive?
 8 A. No.
 9 Q. And CTSAs would need to use their training and
 10 professional experience to use it flexibly; yes?
 11 A. Yes.
 12 Q. We've mentioned the six attack methodologies, and you've
 13 looked at some of these with Mr de la Poer and
 14 Mr O'Connor already. One of those methodologies is
 15 non—penetrative vehicle attack?
 16 A. Yes.
 17 Q. By definition, a non—penetrative vehicle attack is going
 18 to be outside the site, isn't it?
 19 A. Yes.
 20 Q. And by definition, many of the measures to mitigate
 21 against a non—penetrative vehicle attack will also be
 22 applied outside the site, won't they?
 23 A. Yes.
 24 Q. So for example, traffic exclusion zones; yes?
 25 A. Yes.

204

1 Q. Which is one of the specific measures that sites are
 2 scored in relation to, and also stand-off. We'll see
 3 that for all of the attack methodologies, one of the
 4 things you're scored for is stand-off, so how physically
 5 far you can keep the threats from the site.
 6 A. Yes.
 7 Q. Obviously at least to that extent we're dealing with
 8 measures external to the physical perimeter of the site;
 9 yes?
 10 A. Yes.
 11 Q. You were taken to {INQ032510/32} by Mr de la Poer. You
 12 were asked about the passage here that talks about PSIA
 13 scoring for:
 14 "Regular inspection of bins, foliage and toilets
 15 should include all areas and places where an IED could
 16 be left or placed."
 17 A. Yes.
 18 Q. And you agreed with Mr de la Poer -- of course, this is
 19 going to as well involve protective security improvement
 20 activity outside the site?
 21 A. Yes.
 22 Q. You were asked if there was any guidance that was
 23 provided, either to CTSA's or to venues, about how they
 24 would implement a search policy in this regard. Do you
 25 recall that? If we look, please, at {INQ020147/1}.

205

1 This is the crowded places stadia and arena guidance.
 2 First of all, {INQ020147/13}. We can see the last
 3 bullet at the bottom of that page:
 4 "Your CTSA can offer advice on search plans"; yes?
 5 A. Yes.
 6 Q. And on {INQ020147/29} there's guidance on searching.
 7 A. Yes.
 8 Q. The second bullet point after saying that plans should
 9 be prepared in advance:
 10 "The conduct of searches depends on local
 11 circumstances and local knowledge, but the overall
 12 objective is to make sure that entire premises and
 13 grounds are searched in a systematic and thorough manner
 14 so that no part is left unchecked."
 15 A. Yes.
 16 Q. And at {INQ020147/30}. Third paragraph:
 17 "Remember to include stadia, clubs, shops, bars,
 18 vending outlets, stairs, corridors and lifts in the
 19 search plan as well as car parks and other areas outside
 20 the building"; yes?
 21 A. Yes.
 22 Q. So you were asked by the chairman, if Mr Upham had
 23 discussed with the site the possibility of post-egress
 24 attack, what advice might have been given. You talked
 25 about searching. Is this the kind of advice that was in

206

1 fact freely available from NaCTSO to sites concerning
 2 searches and how you complete them?
 3 A. Yes.
 4 Q. The potential benefits of extending the security
 5 perimeter beyond the doors of a site were well
 6 understood before of the attack in May 2017, weren't
 7 they?
 8 A. Yes.
 9 Q. And you said that your understanding is that had been
 10 specifically discussed with the arena; is that right?
 11 A. Yes, correct.
 12 Q. And we can look at these documents if necessary, but
 13 there was NaCTSO guidance issued in 2015 about reviewing
 14 your protective security after the Stade de France
 15 attacks; yes?
 16 A. Yes.
 17 Q. And that document specifically said to consider
 18 extending the security perimeter beyond the site?
 19 A. Yes.
 20 Q. That in fact was already in the 2014 crowded places
 21 guidance; were you aware of that?
 22 A. Not specifically, but yes.
 23 Q. It's this document, whilst we have on it the screen,
 24 we can see it at {INQ020147/45}. This is specifically
 25 dealing with suicide attacks in 2014, NaCTSO guidance,

207

1 which was saying to establish your search area at
 2 a distance from the protective site?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Shall we take that down, please?
 5 MR BUTT: I'm so sorry, thank you, sir.
 6 Those matters were raised in 2014, briefed in 2015,
 7 and also covered in the 2017 guidance?
 8 A. Yes.
 9 Q. Of course it would be up to a site having received that
 10 advice, whether from the CTSA or from the freely
 11 available material, to decide whether it was feasible or
 12 whether it was advisable for them to set up an extended
 13 security perimeter, wouldn't it?
 14 A. Correct, yes.
 15 Q. One of the difficulties that a site might have would be
 16 if the perimeter was going to be taking place over areas
 17 they did not have specific control over, wouldn't it?
 18 A. Yes.
 19 Q. One of the key elements of the PSIA tool -- and this
 20 applies across all attack methodologies -- is
 21 partnership working, isn't it?
 22 A. Yes.
 23 Q. CTSA's would and Ken Upham did provide advice to SMG
 24 about how they could work with their neighbours; yes?
 25 A. Yes, correct.

208

1 Q. About how they could work with local authorities; yes?
 2 A. Yes.
 3 Q. And through that partnership working they could, if
 4 possible, solve problems such as extending search areas
 5 into what we now call grey spaces, areas of shared
 6 ownership; yes?
 7 A. Yes.
 8 Q. But ultimately, it would be up to the site to decide
 9 whether they were able to implement those measures and,
 10 if they wanted to, whether it was cost-effective for
 11 them to do so?
 12 A. Correct, yes.
 13 Q. We looked at Argus and Griffin. Just dealing again with
 14 attack methodologies before May 2017, are you familiar
 15 with the Griffin materials and the Griffin training
 16 package?
 17 A. Yes.
 18 Q. Those documents would cover attack methodologies such
 19 as, for example, the attack in Bavaria in 2016, wouldn't
 20 they?
 21 A. Can you tell me which one?
 22 Q. All right. Maybe if we look at the document then, which
 23 is INQ020147/13.
 24 Wrong document. {INQ037070/16}. So 2016 and it
 25 covers a suicide bomb attack outside a concert venue;

209

1 yes?
 2 A. Yes.
 3 Q. And at {INQ020147/22}, further detail about this.
 4 We can take that down from the screen, please.
 5 A. Yes.
 6 Q. So again, in Griffin as well, there was specific
 7 awareness being raised with the industry about the risk
 8 of a suicide attack outside, in this case, a concert
 9 venue?
 10 A. In that version, yes.
 11 Q. Yes.
 12 A. Yes.
 13 Q. Ken Upham did advise SMG about, for example, CCTV in the
 14 City Room, didn't he?
 15 A. He asked -- I do know he's had discussions because it's
 16 been discussed in his statement.
 17 Q. And he scored them in relation to it?
 18 A. Yes.
 19 Q. And security patrols in the City Room?
 20 A. Yes.
 21 Q. And he would have been aware of, one would assume, the
 22 Argus and the Griffin training?
 23 A. Yes.
 24 Q. You were asked about "something is better than nothing".
 25 Just to be clear, the purpose of the refocus of the

210

1 crowded places scheme was in order to assist, for
 2 example, small and medium size enterprises and
 3 not-for-profit organisations who might not be able to
 4 afford the gold standard, wasn't it?
 5 A. I presume it would assist them as well, but I didn't
 6 think it was just for that reason.
 7 SIR JOHN SAUNDERS: I thought it was non-compliance you were
 8 telling us.
 9 A. I've read that -- and I've read that but it was in
 10 order --
 11 SIR JOHN SAUNDERS: I think we've had that before
 12 (overspeaking).
 13 A. It was to assist in ensuring people took something on.
 14 MR BUTT: If you were dealing with a large corporate, your
 15 starting point would not be: they don't need to do
 16 something because it's expensive?
 17 A. No.
 18 Q. You'd provide advice which would improve their
 19 protective security regardless of the cost?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: And do they come back and say that's not
 22 proportionate?
 23 A. Often, yes.
 24 SIR JOHN SAUNDERS: And you say anything is better than
 25 nothing?

211

1 A. Yes, "The other options you could look at are" ...
 2 MR BUTT: If they come back to you and say it's not
 3 cost-effective or we can't afford it, absent the Protect
 4 duty, you as a CTSA can't do anything.
 5 A. No, we have no legislation, no, we can't push it.
 6 Q. And that can be very frustrating for a CTSA, can't it,
 7 if that were to happen, that you can see a way to
 8 improve protective security and a site says, no, it's
 9 not cost-effective, or, we can't afford it?
 10 A. Yes.
 11 Q. The phrase that you used, protecting a crowd within
 12 a site --
 13 A. Yes.
 14 Q. -- that doesn't feature anywhere in any of the PSIA
 15 documents, does it?
 16 A. I don't know.
 17 Q. What the documents say, I suggest, is steps you can take
 18 to improve protective security at your site.
 19 A. Perhaps they do, but the training and certainly all my
 20 staff and people I have spoken to -- our training and
 21 learning was to protect a site when it is crowded and
 22 therefore the people within it.
 23 SIR JOHN SAUNDERS: Okay. If you want to do some research
 24 following this and see if you can find what you think
 25 may be there, then you have that opportunity.

212

1 A. Yes.
 2 MR BUTT: We have looked at together lots of measures that
 3 could and would be advised on that relate to activity
 4 outside a site, haven't we?
 5 A. Yes.
 6 Q. Finally this. You were asked about PAS127 --
 7 A. Yes.
 8 Q. -- and about CTSA notes.
 9 A. Yes.
 10 Q. Have you seen the PSIA documents as they've been
 11 disclosed in this inquiry? That's a difficult question.
 12 The PSIA document we've seen for the arena is a PDF
 13 document; did you know that?
 14 A. Yes.
 15 Q. If you had the Excel document and you hover your mouse
 16 over the boxes, will notes come up?
 17 A. Yes, which is where -- what I was referring to.
 18 Q. And I think what you explained to Mr O'Connor is
 19 in relation to searching, if you hover over the box,
 20 then it will make reference to PAS127 and --
 21 A. It certainly does, yes.
 22 MR BUTT: I have no further questions. Thank you very much.
 23 SIR JOHN SAUNDERS: Thank you very much.
 24 Let's have a review of the situation. We certainly
 25 have to have a break. How much longer have we got?

213

1 MR DE LA POER: Looking at the Rule 10 requests that we've
 2 had in, I think next we would be turning to
 3 Mr Weatherby. The documentation that I have seen
 4 indicates an hour of questioning, but he may be able to
 5 help us, as I see he's appeared on the screen.
 6 MR WEATHERBY: I certainly won't be an hour, but I will be
 7 a little while.
 8 SIR JOHN SAUNDERS: Would you be able to come back tomorrow
 9 afternoon?
 10 A. Yes, I believe so.
 11 SIR JOHN SAUNDERS: If not, we'll arrange a different time.
 12 I can't guarantee that you get heard, but there is at
 13 least a possibility that we would finish the witness,
 14 who we have to start at 9.30 tomorrow, early-ish
 15 afternoon. It may not happen, in which case as soon as
 16 we know that's not going happen, we'll send you away.
 17 A. Okay.
 18 SIR JOHN SAUNDERS: But otherwise, we are going to be here
 19 very late and it's not fair on you, it's certainly not
 20 fair on me, and it's not fair on anybody else either.
 21 So do you mind?
 22 A. No.
 23 SIR JOHN SAUNDERS: And we'll try and keep you informed
 24 during the day.
 25 MR DE LA POER: I should just add that we will, of course,

214

1 have questioning from Greater Manchester Police as well,
 2 so we've got about 30 minutes of that on current
 3 estimates.
 4 SIR JOHN SAUNDERS: Well, I am persuaded. Thank you. I'm
 5 sorry we haven't completed, but it's been evidence we
 6 needed to hear in detail.
 7 Right. 9.30 tomorrow when we will not continue with
 8 this witness. She will be back tomorrow afternoon, if
 9 we have time, but otherwise, if there is not time, she
 10 will go off to another day.
 11 MR COOPER: Sir, we were mooting 9 o'clock, but it's
 12 definitely 9.30 tomorrow?
 13 MR DE LA POER: The 9 o'clock was not on my immediate radar.
 14 MR COOPER: I don't mind either way, I just wanted to make
 15 sure. 9.30 is absolutely fine.
 16 SIR JOHN SAUNDERS: Let's stick to it. People need to have
 17 notice of change of times and I'm afraid there may be an
 18 occasion when we'll need to sit on a Friday, but we will
 19 try to give people advance notice, so if they do have
 20 difficulties with that, they can at least tell us in
 21 advance. Right, okay, 9.30.
 22 (5.02 pm)
 23 (The inquiry adjourned until 9.30 am on
 24 Thursday, 19 November 2020)
 25

215

1 I N D E X
 2
 3 (The inquiry sat in a restricted1
 4 session)
 5
 6 MR FRASER SWIFT (recalled)1
 7 Questions from MR HENDERSON1
 8 Questions from MR COOPER22
 9 Questions from MR WEATHERBY40
 10
 11 MS FIONA SHARKEY (affirmed)42
 12 Questions from MR HENDERSON42
 13 Questions from MR COOPER61
 14 Questions from MR ATKINSON73
 15 Questions from MS GHAAHARY75
 16 Questions from THE CHAIRMAN86
 17
 18 MS LIZ FORSTER (sworn)90
 19 Questions from MR DE LA POER90
 20 Questions from MR O'CONNOR150
 21 Questions from MR BUTT197
 22
 23
 24
 25

216

217

A	
abedi (1) 195:5	add (5) 7:7 20:6 122:18 126:1 214:25
ability (2) 37:7 86:4	added (4) 55:7 144:10,13 190:20
able (27) 32:11 43:14	additional (2) 92:18 112:5
55:14,22 56:5,6,7,18 57:13	address (9) 18:25 26:21 45:4 46:2 78:7,19 80:15 83:5 119:9
58:5,21 73:25 78:3 84:11	addressed (7) 32:10 78:22 79:14 80:6 119:20,23 120:3
89:4,20 91:14 103:4	addresses (1) 202:11
131:17 135:3 141:12	addressing (3) 32:10 119:4,6
144:24 157:20 209:9 211:3 214:4,8	adduce (1) 172:3
above (3) 95:19 162:9,21	adjudging (1) 89:17
absent (1) 212:3	adequate (5) 29:21,22 30:3 58:25 85:10
absolutely (7) 22:2 49:24	adequately (3) 58:6 79:13 85:16
56:22 58:6 111:16 199:14 215:15	adjourned (1) 215:23
accept (8) 49:12 50:7,18	adjournment (1) 88:4
60:8 62:9 76:25 78:13,20	administering (1) 77:22
accepting (1) 46:23	administration (1) 6:22
accepts (1) 158:24	administrative (1) 36:24
access (14) 8:13 34:12 35:1 108:5,9 111:24 112:3 118:13 129:20 130:1 154:1 168:4 169:9 186:18	adopted (4) 126:11 134:4 146:8 186:16
accessing (1) 99:18	advance (3) 206:9 215:19,21
accompanied (1) 98:16	advantage (1) 114:14
accompanying (1) 99:22	advert (1) 43:16
accordance (1) 116:12	advertising (1) 43:16
according (2) 78:13 94:4	advice (57) 9:1 34:13 35:2 59:23,24 61:5 69:2 86:3 91:21 92:9 98:24 100:1,3 101:19 113:15,18,22 114:10,12,25,25 115:2,2,14,19 116:4,10,12 118:7 119:4,17 121:6 145:19 156:14,22 157:5,20,24 159:5 160:11 178:15 181:23 182:2 7,25 183:1,9,18,23 184:6 200:9 206:4,24,25 208:10,23 211:18
account (7) 9:16 29:21 77:21 179:20 180:6,25 201:3	advisable (1) 208:12
accreditation (2) 93:5,8	advise (8) 100:10,22 103:6,10 107:16 114:16 158:8 210:13
accredited (1) 92:20	advised (1) 213:3
accurate (1) 135:20	adviser (9) 57:25 82:23 84:5 85:3,5,8,20 91:3 162:9
achievable (2) 138:23,24	advisers (7) 8:25 57:3 82:21 83:12 84:16,23 101:14
achieve (8) 47:3 56:14 68:16,19,20,24 86:10 123:9	advising (3) 100:12 182:21 184:1
achieved (2) 29:11 64:10	affect (3) 9:14 28:13 152:14
acknowledged (1) 203:6	affected (3) 37:7 159:4 196:7
across (11) 21:8 44:2 46:8 78:12 83:21 119:23 132:12 188:24 189:3 203:20 208:20	affirmed (2) 42:4 216:11
acting (2) 27:13 28:4	afford (5) 51:2 100:1 211:4 212:3,9
action (45) 52:20 53:16 56:6 83:2,3,3,7,8,12 84:7 85:17 103:20 105:5,6,11,20,22,25 106:25 107:25 116:15,20 117:8,13 119:24 120:15 141:13,14 144:14 145:2,15 160:22,25 161:4,21 162:4 164:11 167:5,8 171:19 185:21 186:4,8 188:11 192:14	afraid (8) 4:25 6:10 9:8 16:11,23 27:9 200:1 215:17
actions (5) 116:22 141:21 144:13 166:3 178:24	afresh (1) 148:12
active (2) 5:25 130:2	after (13) 31:8 36:7 41:20 62:19 152:5 186:2 191:2 193:3 198:25 200:13,15 206:8 207:14
actively (1) 107:12	aftermath (1) 192:22
activities (5) 1:25 2:2 4:22 11:16 87:15	afternoon (5) 75:15 88:6 214:9,15 215:8
activity (13) 3:10 15:11 45:22 46:25 47:2,23 122:21 130:4 140:4 177:6 184:20 205:20 213:3	again (28) 16:12 19:6,10 27:6 31:3,16 38:16 50:7 78:22 83:20 87:11 92:11 97:19 105:20 113:19 126:17 134:24 141:4 144:18 145:5,12 147:7 176:21 185:16 188:13 194:11 209:13 210:6
acts (2) 35:20 116:10	against (17) 11:17 14:1 57:20 101:4 102:6 104:13 105:2 110:23 116:23 118:1 125:9 139:13 142:19 143:15 175:2 203:23 204:21
actual (8) 41:16 48:21 55:18 94:20 103:14 135:12 138:23 192:10	aggregate (1) 124:19
actually (64) 3:13 4:8 5:7 6:4,6 9:12,13 10:14 11:4 12:7 14:18 15:22 16:24 19:3 25:4 29:1,2 31:10,11 43:4 44:25 46:6,7 49:8 51:1 56:14 57:14 59:22 60:1,20 61:3 67:24 76:18,22 86:24 87:8 92:19 101:21 103:3 106:15 107:16,19 108:11 114:20 123:19 127:13 137:19 138:8 160:1,3,5 164:3 179:1 182:12 186:22,23 187:4 188:1 189:4 190:22 193:14 195:2,6 202:9	ago (2) 81:13 165:8
ad (2) 71:6 181:15	agree (40) 19:17 29:19 52:20 63:9 65:2,21 66:18 69:6 76:8 77:14,16 84:2,10,13,14,22 85:21 92:5 101:9 108:20 111:11 119:5 120:18,19 122:1 126:22,24 135:21,22 153:7 158:2 165:24 168:8 170:18 178:23 184:14 187:16 189:22 200:6 201:25 189:22 200:6 201:25 178:23 184:14 187:16 189:22 200:6 201:25 agreed (19) 5:21 6:4,8,13,14,17 40:5,10,11,13 50:4,5 142:13,17,24 159:11 186:8 203:23 205:18 agreement (4) 7:24 40:8 73:9 89:9 aims (3) 12:14 76:2,18 air (1) 21:2 albeit (1) 131:2 alcohol (5) 60:3,4,11,22,25 alert (1) 32:21 alleged (1) 53:11 allen (1) 162:19 allow (3) 66:21 139:12 187:3 allowed (1) 83:16 alluded (1) 73:7 almost (2) 58:4 123:18 alone (2) 50:6 78:10 along (3) 55:12 82:23 166:7 alongside (1) 118:20 aloud (1) 26:3 already (39) 1:8,12,14 10:5 23:6 33:4 36:23 39:3 57:1 65:6,20 69:16 82:1 83:9 90:24 94:23 96:12 97:2,4,7 117:1 118:24 125:18 128:24 129:3 137:13 142:11 148:10 150:17,21 163:3 166:19 168:13 178:9 180:14 181:22 194:5 204:14 207:20 also (33) 1:17 5:4 13:18 20:4 37:3 42:25 43:14 47:16 48:15 51:20 52:18 55:25 65:4 84:14 85:13 89:10 90:13 91:25 92:23 93:8 122:20 130:2 153:2 173:21 174:13 175:1,19 177:25 180:17 201:18 204:21 205:2 208:7 alter (1) 29:4 alternative (4) 66:15,22 100:10 147:19 alternatives (1) 99:17 although (12) 15:2 50:18 63:6 83:15 90:23 93:15 105:23 109:5 117:8 142:24 143:12 166:7 always (10) 32:2 45:20 68:24 72:3 83:16 104:1 134:10 135:3 149:4 189:3 amendment (1) 94:14 among (1) 108:23 amongst (5) 33:17 42:16 164:18 174:7 189:20 amount (5) 31:10 43:18 45:15 57:1 201:14 analysis (1) 189:23 and/or (1) 73:10 anecdotal (1) 127:18 annex (2) 2:8,9 annually (2) 166:6,9 another (19) 30:5 50:1 62:17,17 67:11 71:19 84:2,10 91:25 100:9 134:23 142:13 152:7 160:9 162:12 163:11 171:8 191:8 215:10 answer (16) 8:5 11:11 16:11 35:3 45:18 67:24 87:17 110:14 128:14,16 136:17 156:6 171:24 181:3 195:8 200:21
answered (1) 155:17	answering (2) 82:8 182:12
answers (1) 87:13	anticipate (1) 65:3
anticipating (2) 38:2,4	anybody (2) 149:22 214:20
anyone (8) 4:7 41:15 51:2 62:20,25 74:10 103:5 196:15	anything (29) 3:17 16:1 24:12 30:2 34:7 50:13 57:18 62:15 80:2 86:14 90:25 99:21 108:18 114:1 115:3 123:19 129:2 136:21 149:10 164:14 165:7 178:18 179:2,13 180:21 184:4 196:14 211:24 212:4 anyway (5) 5:7 65:2 166:8 190:12 195:22 anywhere (1) 212:14 apart (1) 136:21 apologise (2) 18:10 150:3 apology (1) 44:14 apparent (1) 148:13 apparently (1) 168:6 appear (4) 6:13 21:17 79:4 180:9 appearance (1) 111:24 appeared (2) 145:1 214:5 appears (5) 145:2,13 172:15 176:9 184:18 appendices (1) 89:3 appetite (1) 98:24 applicable (1) 203:8 applicant (4) 79:3,14 80:5,13 application (23) 8:16 9:3 14:1,4,13 28:22 78:24,25 79:7,9,18,20,20,22,23 80:4,9,12,14,25 81:3 85:21 157:6 applications (9) 9:6,10 12:11 13:20,24 20:16,25 30:20 80:1 applied (7) 34:15 55:11 57:12 60:1,24 97:12 204:22 applies (3) 11:19 46:22 208:20 apply (9) 11:9 35:19,23 49:25 59:18 134:12,13,13,15 applying (2) 59:14 120:16 appointed (2) 192:2,6 appreciate (8) 4:3 20:22 78:8 108:21 113:5 171:20 175:21 178:17 appreciated (2) 33:24 203:24 approach (28) 1:18 4:1 7:5,6,9 16:21 17:19 20:14,20 21:4 26:17 28:19 37:5 46:2 56:20,25 78:13 86:3 93:14,18 99:22 102:9 131:6 153:12 154:15,17 155:8 160:11 approaches (3) 10:9 153:9,17 appropriate (10) 18:25 28:9 60:5 78:6,19 118:9 136:7 150:4 202:3 203:24 201:10 205:12,22 206:22 210:15,24 213:6 asking (13) 24:13 29:13 49:24 71:23 86:9 101:25 171:6,15 178:15 179:1 182:17 195:9 196:16 asks (1) 160:24 aspect (4) 8:9,19 14:17 24:10 aspects (5) 82:7 84:9 118:1 119:6 146:23 assault (1) 53:11 assess (2) 96:25 157:2 assessed (2) 110:8 193:4 assessing (2) 127:21 193:24 assessment (25) 18:24 19:20 26:17 57:15 58:7,8,24 79:9
47:17,19 100:17 101:24 105:14 106:18,24 113:13 119:9 124:15 130:6 137:20,21 144:13 145:17 160:9 168:2 184:2 191:6 205:15 206:19 208:16 209:4,5 arena (68) 1:15 2:5,17,21 3:16 4:9 5:7 6:5,25 10:23 15:21,24 23:10,13 25:5,21 26:5 27:12,23 30:17 31:20 33:3 50:8 51:9 52:25 53:6 73:3 82:17 97:8,25 98:11 105:22 106:7,8 107:7 109:12 135:10 141:13 145:20 147:13 148:1 153:8,9,10,18 158:16,16 160:14 165:19,21 166:22 167:5 168:13,18 169:25 170:10 178:9 179:11 180:20 185:20,21 186:24 188:15 189:19 198:23 206:1 207:10 213:12 arenas (5) 30:4 156:22 162:20 166:14 183:18 arent (7) 19:7 32:8 44:2 128:6 135:19 199:5 202:14 arguably (1) 119:3 argue (1) 149:4 argument (2) 25:11 28:10 argus (6) 146:2 197:9 198:6 202:4 209:13 210:22 argue (1) 115:25 arisen (5) 1:21 27:1 40:2 43:12 52:13 arises (1) 118:6 arose (1) 193:15 around (27) 28:8 30:14 33:1 36:18 39:16 43:24 44:7 46:9,13 52:21 64:21 71:16 84:9 110:20 111:1,9 114:10 124:20 128:19 130:11,20 137:8 146:22 154:14 168:13 190:2,20 198:1,13,18,20,23 199:15,24 200:3 202:11,14 203:23 204:12,15,17,21 205:3 206:24 207:6 208:20 209:14,18,19,25 210:8 attacker (3) 112:9 114:14 116:7 attackers (2) 108:4 197:13 attacks (9) 10:2 107:20 117:3,14 146:22 153:13,14 207:15,25 attempt (1) 115:1 attend (5) 39:4 52:19 93:7 188:2 200:16 attendance (3) 95:20 96:20 187:21 attended (6) 53:25 54:6 146:14 179:7 200:14 201:2 attender (1) 54:4 attention (9) 13:15 31:18,21 147:11 33:10 91:1 120:22 156:4 177:8 200:4 attitude (3) 33:2 136:8 194:8 attractiveness (2) 94:11,22 audible (1) 136:17 audience (1) 122:5 audit (1) 122:20 auditing (2) 31:19,23 auspices (1) 66:25 author (7) 109:22 111:4 112:14 113:6 144:25 154:13 190:13 authorised (1) 3:12 authorities (13) 32:21 38:25 47:11 51:1 52:19 58:15 120:7 126:7 129:1 130:25 136:19 137:25 140:11 141:12 143:6 146:9 151:19 154:20 160:5,15 167:2,10 170:3 172:2,2 176:20 177:18 178:6,12 179:16 185:15 187:13 193:12 196:5 198:23 207:6 209:14 211:11 begin (3) 1:22 90:16,22 beginning (4) 104:20 116:5 142:22 202:21 behalf (2) 30:9 197:1 behaviour (2) 107:22 119:8	
82:25 84:7 85:15 97:23 98:9 101:20,25 104:2,7 105:1 120:25 132:13 140:1 162:8 192:14 193:7 203:3 assessments (4) 58:5 85:15 104:25 108:22 assigned (2) 70:19,19 assimilate (1) 201:15 assist (16) 1:21 82:8 88:8,16 89:22 114:12 158:21 193:14,17,25 201:16,20 203:2 211:1,5,13 assistance (4) 64:24 91:14 130:8,17 assisted (2) 1:12 34:2 assisting (1) 201:19 associating (1) 33:5 assume (1) 210:21 assuming (3) 80:3 176:1 196:6 assumption (1) 109:25 assurance (1) 93:10 atkinson (5) 30:6 73:1,2 75:10 216:14 atrocious (2) 62:18 149:20 attach (4) 3:14,18 4:8 25:2 attached (4) 2:25 3:22 5:1 164:11 attaches (1) 5:2 attaching (1) 160:22 attack (54) 62:18,24 107:7,8,18 108:10 110:23 116:6,22,23 118:1 121:9 139:13 153:2,14 157:19 163:16 169:19 171:2 178:8 179:4 180:22 189:19 190:2 191:2 192:22 193:3,13 197:13,19 198:1,13,18,20,23 199:15,24 200:3 202:11,14 203:23 204:12,15,17,21 205:3 206:24 207:6 208:20 209:14,18,19,25 210:8 attacker (3) 112:9 114:14 116:7 attackers (2) 108:4 197:13 attacks (9) 10:2 107:20 117:3,14 146:22 153:13,14 207:15,25 attempt (1) 115:1 attend (5) 39:4 52:19 93:7 188:2 200:16 attendance (3) 95:20 96:20 187:21 attended (6) 53:25 54:6 146:14 179:7 200:14 201:2 attender (1) 54:4 attention (9) 13:15 31:18,21 147:11 33:10 91:1 120:22 156:4 177:8 200:4 attitude (3) 33:2 136:8 194:8 attractiveness (2) 94:11,22 audible (1) 136:17 audience (1) 122:5 audit (1) 122:20 auditing (2) 31:19,23 auspices (1) 66:25 author (7) 109:22 111:4 112:14 113:6 144:25 154:13 190:13 authorised (1) 3:12 authorities (13) 32:21 38:25 47:11 51:1 52:19 58:15 120:7 126:7 129:1 130:25 136:19 137:25 140:11 141:12 143:6 146:9 151:19 154:20 160:5,15 167:2,10 170:3 172:2,2 176:20 177:18 178:6,12 179:16 185:15 187:13 193:12 196:5 198:23 207:6 209:14 211:11 begin (3) 1:22 90:16,22 beginning (4) 104:20 116:5 142:22 202:21 behalf (2) 30:9 197:1 behaviour (2) 107:22 119:8	
145:19 147:15 167:20,25 207:1 208:11 avoid (1) 171:13 avoided (1) 176:4 awaiting (1) 37:1 awarded (1) 116:21 aware (34) 8:18 9:2 10:5 13:8 16:5 22:11 29:11,16 30:14,21,23 33:19 36:3 49:17,19 51:10 53:17,25 54:11 81:17 83:11 84:20 85:23 116:2 137:22 147:18 161:10 165:3 168:12 186:15 199:12 201:1 207:21 210:21 awareness (6) 105:11,12 106:13,13 161:15 210:7 away (4) 25:18 72:17 140:11 214:16 awful (3) 99:10 137:8 190:9	
B	
b (3) 96:9,11 98:14 back (57) 1:7,13,13,16 4:1 5:15 7:11 10:17 23:1,4 25:14 27:24 29:10 39:6 41:13,25 53:9 61:11 63:23 73:2 79:7 82:2 85:3 93:9 94:5,6 103:10 107:2 108:5 121:10 129:19 138:11 144:17 150:16 152:5 153:6 161:1,25 166:23 167:7 168:16 171:5 173:2 175:8 176:25 180:19 182:1 185:20 187:20 194:5 196:1,18 197:24 211:21 212:2 214:8 215:8 background (6) 2:21 4:4 35:25 44:15 88:17 89:22 badge (1) 74:6 badges (1) 54:17 baggage (1) 143:20 bags (1) 112:7 balance (2) 66:17 195:25 balustrades (1) 10:25 bank (2) 111:23 146:11 barrier (3) 37:23 99:20,24 barriers (7) 99:20 101:18 103:8 157:16,19,21 188:19 bars (1) 206:17 based (4) 48:4 122:15 127:1 135:24 basic (1) 62:16 basically (4) 96:22 104:22 146:12 182:11 basis (7) 48:6 60:3 69:17 94:10 104:18 112:24 147:11 bavaria (1) 209:19 bear (2) 89:14,15 bearing (6) 83:15 90:1 111:5 112:14 130:9 131:9 became (2) 91:8 111:25 become (3) 92:19 129:14,15 becomes (4) 17:14 65:24,25 136:13 becoming (2) 32:21 203:21 before (52) 16:5 17:18 18:1 19:20 24:22 32:20 51:20 53:22 69:1 80:18,21 86:17 88:7 90:24 94:14 97:3,9 107:13 108:22 10	

behind (4) 13:1 36:10 38:14 63:7	breach (10) 23:17 25:22 31:9 49:4 50:16 68:22 69:8,8,10,13	carrying (5) 2:1 3:19 6:1 106:25 107:25	32:19,20 39:3 57:1 60:17 67:10 155:6,23,24 160:24 161:3 162:18 181:8,10 197:12 199:14 204:4 210:25	community (5) 12:17 42:13 164:18,24 189:11	conduct (1) 206:10	215:11,14 216:8,13
being (80) 4:5 7:19,25 8:24 11:8,16 16:9,14 19:12,14,22 21:13,17 25:3 31:17 32:22 34:7,14 39:12 41:2 49:2,3 55:9,9 56:24,24 58:14 68:11 71:6 73:25 74:7 78:11 83:24 87:15 88:11 90:3 96:18 98:19 99:3 100:5 101:23 104:9 106:1 107:16 110:7,20 114:11,25 118:2,3 122:11 123:12 126:15 130:10 132:22 136:12 137:12,23,24 139:5 140:14,19,23 141:1,25 146:21 149:1 159:2 169:3 180:5 184:6 188:18 190:20 191:6 194:9 198:13,22 200:9 203:25 210:7	breaches (2) 68:3 70:20	cases (1) 71:12	clearly (6) 18:19 23:9 52:3 66:12 181:21 182:5	company (8) 100:9,9 101:13,21,21 134:7,23 136:1	conducting (1) 178:9	cooperation (2) 59:3,4
belief (2) 107:22 108:16	break (12) 22:15 41:12 61:10,13,14,16 141:12 150:4,8 196:6,9 213:25	casualties (1) 197:14	click (1) 161:13	compare (2) 163:10 164:7	conference (1) 146:7	coopers (1) 61:11
believe (13) 39:22 64:11 68:13 86:12 119:2 129:6,18 134:25 176:19,25 195:14,16 214:10	breakdown (1) 45:9	catch (2) 39:17 110:14	client (1) 115:8	comparing (1) 164:19	confine (1) 153:7	coordinators (1) 191:12
believed (1) 110:22	breaking (1) 87:25	categories (8) 77:15 101:1 125:7 126:1 129:10 131:22 133:6,7	climbing (1) 10:25	competition (1) 86:10	confined (1) 184:24	cordons (2) 29:11 146:14
believes (1) 109:23	bridge (1) 146:4	category (7) 93:13 132:3,22,24 133:16,19 134:12	close (5) 32:23 167:13 170:24 171:1 184:25	complaint (1) 129:14	confirmation (1) 37:1	core (5) 39:23 88:8 89:3,7 131:11
belongings (1) 132:5	brief (1) 25:18	cause (2) 3:17 70:14	closed (1) 117:8	complaining (2) 50:25 81:25	conflict (1) 28:24	corner (8) 125:4 126:9,10,18,21 131:14 138:15,19
below (1) 167:17	briefed (1) 208:6	causing (3) 37:19 70:8 159:8	closely (4) 47:4 52:8 71:8 148:4	complaint (8) 16:13,15 48:7 53:9,10 65:23 73:11,20	confused (1) 200:1	coronavirus (2) 37:19 38:24
benefit (3) 59:23 99:13 194:10	briefings (1) 71:3	caveat (1) 113:19	clothing (1) 73:14	complaints (8) 47:11 52:24 53:5,8 66:2 69:17 70:2,6	conscious (1) 109:19	corporate (2) 136:11 211:14
benefits (3) 56:23 66:17 207:4	briefly (4) 59:15 82:13 131:1 171:24	cctv (20) 15:20,22 16:2,14 25:20 26:19 64:13 101:18 106:17 126:18,20,23 127:15,21 128:13 137:12 170:6 184:19 200:7 210:13	clubs (1) 206:17	complement (2) 43:4,6	consciously (2) 107:12 119:1	correct (50) 18:12 42:9,20 45:13 53:7 57:5 70:3 76:11,15,23 79:2,25 90:20 91:5,16,24 95:10,12,21 96:14,22 98:1 101:11 107:10 121:2 127:6 128:22 131:6,8,15 132:25 133:9 140:6,16,24 141:2,7 143:13 152:19 155:11,16 158:1 163:20 165:5 179:18 191:13 207:11 208:14,25 209:12
bespoke (1) 100:20	bring (8) 2:5 11:24 13:15,15 18:12 52:22 109:20 117:5	central (1) 94:7	clue (1) 127:15	completeness (1) 52:23	consider (21) 3:5 14:5 15:15 18:21 19:25 30:9 36:22 41:19 67:19 72:18 79:9 81:22 89:1 90:5 94:3 110:23 118:20 169:20 170:5 193:24 207:17	corrected (3) 30:2 35:18 61:6
best (6) 27:11 45:24 84:25 101:19,19 118:9	bringings (1) 31:18	centre (4) 33:14 42:25 43:2 44:7	coats (1) 74:14	completing (1) 123:5	considered (14) 11:21 18:20 77:6 80:24 92:4,21 95:1 106:1 118:1 121:4 149:1 171:3 189:15 190:4	correctly (3) 54:18 138:19 140:22
better (20) 29:13 32:12 51:4 56:25 82:1 98:18 99:16,20 103:13,17 122:12,17 123:10,20 124:7 154:15 155:7 163:23 210:24 211:24	brings (1) 10:11	certains (9) 9:20 52:1 66:23 81:17 99:7,7 105:12 174:8 193:23	cognisant (1) 89:19	complex (9) 23:11,15 27:5,7,13 28:3 100:19 120:10 147:23	consistent (1) 71:4	correspond (1) 138:20
between (27) 4:20 6:4 9:9 27:11,12,22 32:18 50:4 53:4 57:2 60:12 62:8 70:23 71:2,5,17,17,20,22,25 72:8 87:20 98:11 134:18 137:23 159:11 182:6	broader (1) 166:20	cetera (12) 93:2 99:4,8 101:18 117:2 123:22 130:13 147:21 153:13 166:5 185:3 193:4	coherent (1) 72:2	compliance (23) 16:21 32:3 42:12,18 46:19 47:2,3 48:12 49:25 51:3 55:20 68:17,19,20,25 70:18,24 71:18,25 72:20 73:8 75:4 78:9	consisting (1) 86:3	corridors (1) 206:18
beyond (9) 11:14 96:16 168:24 169:9 171:25 182:25 201:6 207:5,18	broads (3) 202:14 203:23 204:2	chair (8) 30:8 32:2 65:20 68:8 69:16,18 72:16 73:7	collaboration (3) 21:18 57:2 70:23	compliant (6) 48:14 50:22,22,23 52:22 64:3 203:22	consonation (1) 61:5	cost (18) 64:9,11,12,12,14,17,19,24 65:1 66:12,16 99:10,13 161:11,16,16,17 211:19
biannually (1) 166:10	bullet (4) 157:8 190:24 206:3,8	chairman (13) 1:11 5:19 18:18 24:23 51:20 86:15 90:18 118:19 120:9 131:11 171:10 206:22 216:16	collaborative (5) 20:20 56:11,20 131:2,7	conspicuous (2) 73:14 74:14	consolation (1) 61:5	costly (1) 144:11
big (3) 9:10 53:20 139:25	buildings (1) 23:11	chairs (1) 64:24	colleague (1) 16:25	complicated (2) 127:12 203:22	consolidation (7) 36:16,18,21 38:6 19 39:14 120:12	countering (1) 10:2
bigger (1) 169:7	built (1) 32:23	chance (5) 67:13,22 72:15 90:5 172:12	colleagues (5) 23:2 30:9 33:18 47:4 56:12	complied (3) 23:15 27:17 55:9	consulted (1) 85:21	counterterrorism (62) 8:19,21,24,25 10:14 14:8,16 15:3 19:15 34:13 35:2 56:3,12 57:10,25 58:3,9 59:20 60:19 61:2 65:5 77:7,10,17 78:9,15 79:11 80:15 81:2,8 82:17,21,23 83:12,14,19 84:1,4,5,12,16,23,23 85:3,5,8,20,24 91:3,22 109:19 110:9 145:19
bins (2) 130:5 205:14	bullet (1) 157:8	change (15) 7:7 10:8,9 27:19 37:21 55:11 65:22 110:4 117:1 129:6 133:6,7 152:20 165:11 215:17	coloured (1) 142:4	comprehension (2) 112:23 128:13	contaminated (1) 115:14	council (16) 10:14 17:7 32:8 35:18 42:14 43:12 50:8 55:1 70:24 71:7,25 72:20 76:18 77:21 78:18 83:20
bit (9) 8:8 15:20 42:21 45:9 59:1 83:3 164:16 170:9 186:25	burden (1) 48:14	changed (1) 190:4	column (13) 131:20 132:13,21 134:1 138:20,21,23 141:24 142:2,4 143:13 144:18 185:25	concentrate (1) 15:4	contemplation (4) 106:24 109:9,9 119:2	councillors (1) 15:8
blank (1) 177:2	business (1) 52:16	changeover (1) 41:10	column (13) 131:20 132:13,21 134:1 138:20,21,23 141:24 142:2,4 143:13 144:18 185:25	concentration (1) 47:18	content (4) 152:14,15 171:25 199:12	councils (4) 1:17 15:25 36:20 37:14
blind (6) 25:19 127:21,24 128:4,6 184:19	busiest (4) 17:13 64:14 68:17 147:7	changes (2) 119:25 165:20	colours (5) 133:4,23 139:2 160:25 174:5	concern (17) 14:15 15:9 52:20 54:2,13 55:21 70:9 71:16 75:2 96:16 153:17 164:18,24 169:8,22 170:15 178:8	context (17) 12:17 13:24 43:18 44:18,22 45:15 81:12 103:13 113:23 114:24 128:21 153:18 155:17 163:21 177:6,9 182:19	count (1) 144:11
block (3) 124:15,18 126:1	businesses (1) 69:23	characterised (1) 141:10	colours (5) 133:4,23 139:2 160:25 174:5	concerned (29) 10:21 11:12 14:16 19:22 21:19 22:5,22 25:20 27:15 29:3 32:8 36:10 61:25 62:6,9 63:10 64:16 65:8 67:17 85:25 89:13 132:14 159:23 169:18 190:6 194:12 200:18,19 203:3	contexts (1) 79:16	counters (1) 144:11
board (5) 21:8 30:20 161:14 200:13,20	butts (11) 197:1,3,4 201:9 202:11 208:5 211:14 212:2 213:2,22 216:21	charge (2) 146:12 200:20	comes (10) 18:2 64:24 67:16,17 82:2 118:15 119:8 140:1,9 166:7	concentrated (1) 15:4	contingency (5) 112:23 113:2,4,4,9	country (4) 33:1 78:12 83:21 173:5
bodies (4) 51:22 71:2,5,22	calls (2) 146:4,25	charlie (2) 178:8 180:22	comfort (3) 119:19 120:2,4	concentration (1) 47:18	continuation (1) 93:3	couple (6) 36:24 160:9 162:12 174:4,13 191:10
bomb (2) 111:3 209:25	came (6) 1:21 7:15 28:24 90:24 106:2 143:15	check (19) 16:1,2,10 46:10 49:11,13 50:1 54:16 55:15,16,20,23 58:7 74:10,13 75:11 177:4 179:2 192:24	comfortable (4) 54:8 161:7 162:16,23	concern (17) 14:15 15:9 52:20 54:2,13 55:21 70:9 71:16 75:2 96:16 153:17 164:18,24 169:8,22 170:15 178:8	continue (1) 215:7	course (38) 4:3 6:19 7:1,15,20 8:10 16:18,23 27:1 30:11 33:13 41:1 70:2 72:4 75:9 88:10 89:5,19 92:7,13 100:12 103:12,15 104:4 105:21 111:16 116:9 158:18 161:1 164:8 169:19 172:5 174:19 175:21 185:16 205:18 208:9 214:25
bomber (2) 153:3 169:23	cameras (5) 64:13 102:18 103:4,8 128:19	checking (8) 31:23,24,25 48:10 55:9 56:2 66:14,22	coming (15) 1:7,13 32:14 33:4,9 41:13 42:7 47:6,10,11 87:24 93:9 121:16,25 168:16	concerns (8) 3:3 9:23 10:2 47:20 54:5 65:17 70:11 153:22	continuing (1) 93:3	covered (10) 21:22 45:12 61:8 88:17 93:11 125:18
bombers (1) 169:19	cant (38) 4:25 6:7 9:7,19 90:1 100:6,6 117:14 149:10 154:10 158:19 163:2,10 170:14,23 175:24 179:16,23 184:7 186:22 187:8 201:25 212:3,4,5,6,9 214:12	checks (4) 54:20 69:16 74:7 168:2	comment (9) 77:24 89:12 118:19 165:24 179:16 182:11 183:6 186:12 187:9	concerning (3) 69:19 164:25 207:1	continuous (1) 43:16	
boost (1) 105:16	capable (1) 5:25	check (1) 33:6	comments (8) 113:10,11 142:23 143:18 147:17 186:4,6,7	contract (2) 113:16 137:9	contract (2) 113:16 137:9	
both (5) 46:8 77:15 157:2 165:14 186:25	capital (2) 124:18 126:1	child (1) 12:18	commercial (1) 44:6	contracted (3) 135:22 189:6,7	contractor (2) 137:1,1	
bottom (23) 2:8 5:16 18:17 44:17 73:6 110:20 126:9,10,17,21 132:21 133:15,20 136:18 137:13 156:24 159:24 167:13 177:21,22 185:23 190:16 206:3	captures (1) 156:25	children (1) 47:21	committee (24) 6:16 13:19 14:5 15:2,6,12,14,25 16:6 17:11 25:2 27:20,21 28:6,25 29:15 32:7 36:22 38:1 39:4 41:22 57:3 79:17,23	contract (2) 113:16 137:9	contractors (6) 137:4 187:21 188:1,4,6,9	
bound (1) 141:3	care (1) 7:9	choice (2) 62:13,13	communities (2) 9:16 35:8	contract (2) 113:16 137:9	contractually (1) 135:25	
boundary (1) 149:4	carefully (3) 29:25 34:3 100:23	christopher (1) 177:25	commonly (1) 111:2	contract (2) 113:16 137:9	contradiction (1) 143:24	
bow (1) 169:10	carried (6) 1:25 4:14 7:20 49:2 87:15 109:19	chronological (1) 150:14	communicate (1) 149:10	contract (2) 113:16 137:9	contrasted (1) 154:17	
box (4) 90:25 132:21 142:4 213:19	carries (3) 42:18 49:5 125:4	chronology (1) 109:18	communicated (1) 102:12	contract (2) 113:16 137:9	control (5) 108:9 127:16 130:1 169:9 208:17	
boxes (1) 213:16	carry (11) 3:10 4:17 7:14 18:9 46:16 49:10 54:19 82:24 108:21 196:19,20	circuit (1) 34:5	communicating (2) 119:17 147:19	contract (2) 113:16 137:9	controls (1) 81:3	

128:10 139:18 167:23 208:7	cut (1) 37:16	depended (1) 97:22	directors (1) 21:5	117:15 122:7 127:8,25	dtre (1) 68:19	enforce (6) 31:11 48:9 83:19
covers (7) 35:15 54:2 96:22	D	dependent (3) 102:15	disagree (1) 141:9	128:16 141:20 142:8	due (10) 36:24 92:7 100:12	84:3,12 86:4
131:14 137:20 145:5 209:25	d (1) 216:1	125:21 127:11	disagreement (1) 131:4	144:12 154:24 173:24	103:12,15 104:4 105:21	enforceability (1) 28:13
covid (2) 52:6 146:20	dac (1) 189:18	depending (5) 21:12 56:15	disclosed (1) 213:11	176:1,3,18,19 187:10	161:1 166:4 172:5	enforcement (41) 16:25 31:7
cpd (1) 93:7	damage (2) 11:18 169:11	97:21 125:16 152:10	discouraged (2) 136:8 144:4	200:8 202:13,17,18 212:15	dumbingdown (1) 123:17	42:12,19,22 43:13,25
cpni (2) 118:11 129:19	danger (1) 23:17	deposits (2) 55:10 206:10	discovered (1) 195:20	213:21	during (9) 27:1 88:10 107:9	44:3,10 45:20,21,22
cps (2) 61:9 90:2	dangers (1) 33:5	deploy (3) 110:25 111:1,8	discrete (1) 40:2	33:16 49:15 62:22 65:15	112:5 147:4 174:18 197:19	46:16,19,25 47:2,23
cracks (2) 71:17 72:13	dashboards (1) 159:25	deployed (2) 107:19 192:22	discretion (2) 14:2 24:15	77:9 79:15 101:2 115:25	201:18 214:24	53:16,24,25 55:14 56:5
create (1) 33:7	date (11) 37:1 109:24 122:4	descend (1) 127:25	discretionary (1) 24:21	145:13 153:24 154:9	duties (3) 5:23 6:1 73:16	63:17,18 64:4,20,22 65:9
created (1) 83:2	142:20 144:18,23	describe (3) 83:23 121:21	discuss (9) 21:3 39:15	161:15 162:3 163:2,18,20	duty (4) 23:13 50:3 129:13	68:15,22 70:25 72:1,21
creating (1) 113:16	151:3,23,24 152:4 179:24	154:18	104:23 116:19 118:12	174:23 180:17 187:3,8,12	212:4	77:6,19 78:10 79:25 82:4,6
creation (1) 93:21	dated (5) 42:8 88:19 90:19	described (12) 76:23 84:6	138:11 161:5 188:6,12	202:12 212:14	E	87:8,14
crime (4) 8:11 9:17 76:14	109:21 177:23	85:4 86:2 98:9 122:12	discussed (16) 39:18 52:20	doing (21) 11:5 17:25 22:25	e (1) 216:1	enforcer (1) 51:22
77:14	dates (7) 109:14 143:14,15	132:2 133:3 171:17 172:10	135:9 136:12 148:16	24:13,14 28:23 29:12 35:7	earlier (10) 36:18 37:15 73:7	enforcing (2) 4:7 77:22
crimerelated (1) 52:4	146:20 150:18 161:5	189:20 194:8	168:12 175:10 177:10,13	48:24,25 51:4 56:1 58:10	easier (1) 161:19,23	engage (13) 34:12 35:1
criteria (3) 104:13 105:2	199:19	describes (3) 131:1,7 183:20	179:11 184:19 200:15,17	73:21 74:23 87:19 164:21	76:21 138:17 151:9 155:6	83:11 85:7 89:7 96:23
203:15	dating (1) 53:9	description (1) 189:19	206:23 207:10 210:16	165:1 178:16 179:3 194:24	168:17 181:8 182:1	100:8,13 102:4 148:17,18
critical (1) 78:11	day (10) 30:24 39:6 104:21	design (3) 9:13 10:3 19:21	discussing (3) 127:21	195:14	early (3) 122:1 138:6 177:19	178:23 192:12
criticism (3) 33:13 38:15	135:15 181:18 182:8	designated (2) 82:22 97:25	168:7,11	done (40) 4:2 11:16 16:9	earlyish (1) 214:14	engaged (5) 97:2,19,20
83:20	196:13,18 214:24 215:10	designating (1) 82:14	discussion (15) 109:25	24:13,14 28:23 29:12 35:7	easier (1) 56:16	99:11 116:25
crowd (8) 94:24 96:18	days (2) 19:18 41:20	designation (1) 96:11	112:18,20 114:9 118:14	39:14 49:3,13 58:7,8,22	easily (2) 161:19,23	engagement (12) 85:9 94:18
108:23 109:7 119:10	de (30) 88:6 90:9,12,16	designed (4) 71:16 81:15	120:1 127:22,24 128:17,23	74:8 90:7,7 92:25 97:20	easy (4) 99:18 161:4,7	97:6,7,13,16 98:2,4,11
135:24 198:15 212:11	96:11 97:8 108:2,4,11	106:3 163:13	129:5 134:16 155:15	115:21 116:3,3,12	186:18	117:5 135:6 178:19
crowded (25) 81:7,14,17	110:17 115:12 118:17	designs (1) 9:16	159:15 186:2	117:6,18 118:3 124:3	echoing (1) 90:5	engages (2) 83:10 101:12
86:1 93:14,22 94:3,3,17	124:10 128:9 137:22	despite (2) 39:9 200:13	discussions (7) 20:20 114:17	134:24 138:1 141:1	economy (1) 197:17	engaging (3) 93:1 97:9 190:9
96:18 97:2,4 106:2	150:1,10 155:18 187:13,22	detail (13) 8:8 77:12 81:20	130:23 168:22,24 186:25	142:8,25 143:9 144:16	effect (6) 37:19 45:24 63:2	enlarge (1) 78:2
108:7,10 109:1 123:24	196:4,23 204:13 205:11,18	89:24 109:14 125:11 128:1	210:15	148:11 159:12,19	98:2 164:4 200:13	enough (8) 4:13 17:23 29:3
148:12,19 203:4,8 206:1	207:14 214:1,25 215:13	140:12 145:24 169:16	disengage (1) 159:14	173:22,23 195:25	effective (8) 26:18	57:20 74:8,20 81:19 150:6
207:20 211:1 212:21	216:19	172:6 210:3 215:6	disobey (1) 22:6	dont (116) 2:20 4:19	48:11,12,15,15 65:5 69:3	enquire (1) 173:14
crowds (7) 94:24 106:3	deal (20) 1:16 3:16 10:12	detailed (2) 81:18 156:10	disorder (5) 8:12 9:17 11:18	16:5,20,22,24 25:22 27:9	112:8	enquiry (1) 31:20
108:6,14 109:2 118:24	21:10 36:7 43:25 44:1,7	details (1) 34:3	76:14 77:14	30:12 31:23 32:4 33:25	effectively (4) 21:7 34:6 37:7	enquiry (1) 24:12
185:12	45:16 52:23 57:13,22	detection (1) 130:4	displaying (3) 73:20 74:5	34:1 35:16,21 37:16,22	138:17	ensure (16) 5:25 23:13,25
crowns (1) 67:12	60:15 79:25 80:12 82:2	detectors (14) 64:13 112:11	75:6	38:1 39:22 41:15 43:23,25	egress (22) 106:23 107:9	24:7,19 26:16,22 30:18
crucial (1) 62:23	92:8 100:11 149:13 193:19	154:5,6,7,8 158:3,5,9	dispute (1) 181:21	47:24 48:1,24 49:10,19	109:8 170:16 185:3,3,8	66:6 71:3 72:19 74:12 81:1
crude (1) 126:24	dealing (21) 4:9 6:24	174:10,17,22 175:4,20	disputed (1) 15:4	55:21 58:22,23 62:13,21	190:2,7,18,20 193:10	83:14 122:21 138:9
ct (19) 57:3 59:4 105:11,12	9:6,19,20 29:6 31:5 43:19	30:19 47:14 112:12 203:15	disruption (1) 37:18	65:19 67:24 68:6,13,18	194:17,22,24 195:3,13	ensuring (4) 46:19 49:23
106:13 161:15 191:6,8,10	44:8 82:13 83:13 90:14	deterrent (4) 48:16,22 112:9	dissimilar (1) 94:18	71:10,11,14,21 72:11,13	197:19 198:1 199:15,24	75:4 211:13
192:17,22	103:18 149:7,11 170:15	130:4	distance (1) 208:2	77:2,5 78:3 80:11,14	200:5	entail (1) 37:11
193:4,7,13,18,19,22,25	201:10 205:7 207:25	detonated (1) 108:13	dancing (2) 22:7,11	81:9,18 86:6 87:7,17 93:15	egressing (1) 198:15	entered (1) 132:12
202:8	209:13 211:14	develop (1) 94:1	distillation (1) 86:20	94:10 96:16 99:25 107:2	egress (1) 118:25	entering (2) 108:9 119:11
ctpnw (1) 201:19	deals (5) 12:13,15,17 44:19	96:3,5,12	distilled (1) 139:24	109:11,15 113:5 114:5	eight (2) 46:8,9	enterprises (1) 211:2
ctsa (61) 82:7 89:22 91:8,15	109:13	developed (4) 95:25	distinction (6) 4:20 87:20	115:4,16 117:20,23 118:8	either (18) 29:8 55:5 67:3	entertainment (14) 23:8
92:11,19 98:22 100:19,21	dealt (15) 4:19 29:15 52:21	96:3,5,12	96:5 98:10 111:17 121:1	123:13,17 125:13 133:7,11	68:22 96:9 101:15 118:10	30:4 32:18,22 33:6,15
103:18 104:23 106:25	59:15 71:6 89:18 90:3	developing (1) 29:9	distinguish (1) 44:24	134:25 135:10,11 137:6	124:4 127:5 129:6 135:25	44:21 45:1,3,5,11 60:16
109:7 113:23 117:22	103:16 116:1 121:14	development (1) 93:3	76:9 89:17 104:3 105:23	140:14 143:23 145:23	163:6 169:12 171:21 189:2	87:1 189:21
120:20 121:4,9 127:5	140:12 166:21 189:5	develops (1) 141:15	109:21 110:1,6,15,16,21	148:16,18,21 149:3,10	205:23 214:20 215:14	entire (4) 23:15 76:10
130:24 134:18,18,21	196:25 203:25	device (6) 110:25 111:2,8	112:14 116:14 121:21,22	153:6 159:2,14 164:6	eitheror (1) 125:20	149:18 206:12
136:4,5,10 146:4	december (1) 178:13	169:7 198:17 202:16	112:14 116:14 121:21,22	165:4,6,24 169:15,15	electioning (1) 58:18	entirely (1) 87:19
147:17,24 148:5,11,22	decide (6) 21:12 28:25 47:23	96:3,5,12	140:11 141:14 143:12	172:23 175:7,10 176:4	elected (1) 35:9	entirety (2) 76:17 172:4
155:24 156:9	51:23 208:11 209:8	developing (1) 29:9	144:6,8,11,19 145:9	179:5 181:19 182:10 183:4	electronic (2) 173:24 174:21	entitled (4) 5:4 74:1 119:19
157:2,12,18,19,22 158:3	decided (3) 28:5,7 102:17	development (1) 93:3	151:5,4 152:17,23	184:20 187:1 188:9 193:1	134:17	183:17
159:12 164:18,24,25	decision (1) 67:10	develops (1) 141:15	153:1,5,7,21 154:13,20	194:1 196:8 199:3	elements (3) 147:16 203:4	entrances (1) 112:5
166:18 167:1 168:6,23	decisionmaking (1) 67:16	device (6) 110:25 111:2,8	155:4,22 156:19 165:14	199:15,17,21 201:8 211:15	208:19	entries (1) 161:3
169:3 173:14 182:24	decisions (6) 35:9 36:23 38:1	169:7 198:17 202:16	167:2,3,11	212:16 215:14	eight (2) 46:8,9	entry (1) 137:13
183:21 184:21 187:21	67:9 68:10,13	devices (4) 110:25	172:4,10,17,23	door (10) 2:10,11,18 4:10	either (1) 125:20	environment (1) 203:9
189:11 193:25 206:4	decisive (1) 131:3	111:2,8,15	173:10,12,13,20,21	54:2,14,16 74:11 87:18	electioning (1) 58:18	envisaged (1) 181:7
ctsa (208) 10:21 4:6 213:8	dedicated (1) 114:14	devised (2) 83:7 202:9	174:13,21 176:6,17 177:16	149:8	elected (1) 35:9	episode (1) 115:12
208:10 212:4,6 213:8	deemed (4) 82:15 159:11	diagonally (1) 139:9	183:25 190:11,14,15	doors (3) 3:20 106:8 207:5	electronic (2) 173:24 174:21	equally (4) 29:7 33:8 128:12
92:23 93:14 100:15 101:14	192:7 203:7	diagram (1) 131:23	198:11 200:3 203:11	dorsi (3) 81:11 82:2 189:18	134:17	196:12
102:8 106:21 107:12,24	deeply (2) 99:19 188:14	dictate (1) 41:23	200:17,23 209:22,24	doubt (3) 63:6 170:20 200:2	electioning (1) 58:18	equipment (7) 31:24 73:15
109:9 114:10 116:2	defeatist (1) 98:19	dictated (1) 203:25	213:12,13,15	down (28) 15:18 18:2 19:1	162:1,14 177:17,23 178:3	74:18,18 157:6,10 174:8
119:2,16 128:17,22 130:18	deficient (1) 30:16	didnt (18) 17:4 31:2 36:7	documentation (2) 166:25	34:23 39:13 45:14 62:5	179:6 180:5,6,13,18	error (1) 154:22
136:8,15 148:17,18	define (1) 27:6	49:4 51:8 62:23 76:22	214:3	68:21 73:5 83:8 90:13	181:17	error (2) 141:5 144:4
149:1,1,7 156:2 161:9	defined (1) 95:24	102:13 105:10 108:12,21	documented (1) 167:21	118:11 133:16 135:1	emails (2) 160:13,17	errors (3) 140:12,12,14
168:11 169:20 170:17	definitely (8) 21:18 72:11	110:14 113:19 151:12	89:8,10,23 116:15 121:19	139:8,17 140:1,9	embed (1) 37:3	especially (1) 21:1
172:25 173:5,7 178:20	74:10 100:17 149:25 158:6	165:21 185:12 210:14	151:16 165:15 171:6	152:5,10,22 158:14	embedded (1) 107:4	19:6 37:13 95:16 187:15
182:3,21 184:1,6 186:17	201:17 215:12	183:7 185:5 189:25 194:1	173:4,6,8,9 177:2 183:8,12	176:9,11,12 179:10 208:4	emerge (1) 112:18	establish (3) 36:9 58:4 208:1
187:23 188:25 190:5	definition (4) 96:16 160:5	196:18 197:24,24 202:11	207:12 209:18 212:15,17	210:4	emerging (1) 107:17	estimates (1) 215:3
191:7,24 192:16,18 193:14	204:17,20	214:11	213:10 214:20 11			

198:14	expectations (1) 80:10	36:9,13 61:25 62:6,8 63:10	footprint (1) 184:2	gather (1) 184:24	187:20 193:23 194:2	happens (5) 7:4 31:8 33:1
events (11) 112:5 134:8	expected (9) 7:13 13:4 15:6	64:16 65:8 67:16 77:19	force (10) 5:5 8:23 11:4	gave (10) 59:24 76:21 100:2	204:17 205:19 208:16	79:15 190:6
147:11 152:10 188:15	50:7 75:9 79:4 135:9 202:5	83:10 87:13 89:13 98:22	126:11 129:11 141:22	121:6 157:16 159:5 170:12	214:16,18	happy (9) 20:5 22:8 80:14
192:23 193:4,7,22,23	203:20	121:17 127:17 153:24	146:21 161:12 191:17	174:16 182:25 201:22	gold (13) 98:23 99:1,8,25	90:2 178:2
eventsbased (1) 192:18	expecting (1) 3:6	168:12 169:18 186:3 205:5	193:22	general (22) 7:4 13:20 12:9	120:6 154:18 21,23,25	196:19,21,22
ever (12) 8:23 40:8,10,14	expense (1) 161:22	fast (1) 38:22	forces (4) 149:4,11 173:6,6	17:8 21:2 23:8 24:2 27:10	155:2,9,12 211:4	hard (4) 99:10 107:3 170:11
49:25 77:2,6 114:6 116:2	expensive (3) 124:2 155:14	fault (4) 64:21 117:18,18	fore (1) 13:15	32:15 62:9 65:14 69:15	gone (9) 43:15 94:14 120:6	171:9
185:3 188:1,24	211:16	200:2	forefront (1) 39:19	70:13 73:4 93:25 113:10	127:16 154:15 138:8,12	hardly (1) 62:10
every (21) 25:12 31:23 45:20	experience (7) 8:22 9:6	faults (1) 62:14	form (15) 57:17 104:18	114:8 156:5 168:23 170:8	152:5 162:3	hardware (2) 99:9 156:11
49:20 63:20 64:2 65:13	158:21 170:18 185:6	favourably (1) 166:13	105:4 108:23 109:2,7	181:6	good (22) 1:5,11 6:21 7:6,16	hasnt (9) 36:25 37:8,9,17
66:7 67:20 74:24	203:14 204:10	feasible (1) 208:11	132:2 140:13 158:25 185:9	generally (22) 2:24 6:21 8:12	10:22 47:24 48:14 52:3	58:18 84:8 120:20 127:15
102:10,16 116:16,19	expert (4) 26:13 58:9 65:3	feature (1) 212:14	188:20 190:21 202:9,11,17	10:22 47:24 48:14 52:3	65:17 67:8,9 68:1,15,18	145:3
117:11 119:24 122:10	155:24	feel (3) 45:16 54:8 85:16	formal (4) 53:16 71:2,15	89:23 130:24 139:14 157:3	84:24 87:14 123:21 149:9	hat (2) 35:25 67:11
128:10 144:16 146:8	expertise (7) 57:9 83:25	feeling (1) 38:17	165:10	65:19 166:15 203:15	165:6,19 177:15 203:15	havent (16) 49:13 64:6 72:15
175:17	84:25 86:3 120:11 170:17	feels (1) 196:24	formally (2) 165:11,22	165:16 172:9 173:19 174:6	government (5) 22:6	78:8 83:18 84:3,11 115:10
everybody (4) 56:23 88:2	192:17	felt (3) 60:5 79:13 155:3	format (2) 151:12,16	194:9	38:10,18 51:12 94:7	116:2 118:6 142:7 164:4
133:18 149:22	experts (3) 118:8 163:8	few (24) 1:16,20 9:9 17:2	forming (1) 118:24	generated (1) 166:25	grading (1) 137:16	201:11,20 213:4 215:5
everybodies (1) 121:8	164:17	23:5 69:15 75:16 98:5	forms (1) 23:10	generic (1) 114:4	grandfather (1) 86:19	having (23) 17:7 25:11 32:9
everyone (5) 29:5 60:17	explain (6) 1:17 17:6 44:22	100:17 121:20 141:8	formula (8) 67:14,15,18,19	genuine (1) 44:14	grandfathered (1) 49:14	38:18 46:3 48:15 58:22
89:15,19 150:6	53:4 122:7 130:18	158:15 160:4 165:8	94:4,11 101:6 125:17	geographical (2) 54:3 106:1	grant (3) 14:1 19:19 51:13	77:23 85:17 96:12,17
everyones (1) 10:1	explained (3) 159:1 203:19	166:18,24 167:7	formulated (1) 67:10	geography (1) 47:16	granted (5) 14:21 41:21	99:20 104:17 114:6 115:21
everything (15) 19:22 61:8	213:18	171:5,7,22 184:9 189:24	forster (20) 88:7,15,19	get (32) 14:11 17:4,21 18:1	43:21,24 79:23	117:16 151:8 158:4 186:16
90:7 96:8 99:14 116:12	explaining (1) 155:7	192:15 201:18	89:13,17,20 90:10,11,17	20:18,24 24:14,21 25:14	grating (1) 80:1	192:9 193:21 200:14 208:9
117:12,18,24 119:22	explains (3) 104:3 132:11	fewer (1) 135:14	93:16 150:1,13 157:1	38:23 46:10 56:9 68:6	grateful (5) 22:18 41:13	head (3) 42:12 115:7 132:3
120:25 148:12 149:14	145:12	fifth (1) 142:4	163:22 166:17 180:1	75:18 100:6,23	72:24 87:24 88:18	heading (6) 12:4 75:24
159:20 178:17	exploration (3) 76:21 93:14	figen (7) 21:3,18 22:22 36:11	182:20 185:6,15 216:18	101:19,20,23 102:2 104:1	greatitude (2) 22:23 90:14	129:24 130:2 138:24
175:17	191:18	39:4,15 62:2	forsters (1) 88:10	108:12,15,16 126:2 136:25	great (6) 128:7 170:17,17,18	172:21
everythings (1) 141:1	exploitation (1) 12:18	figures (3) 47:9 68:5,6	forward (8) 39:16 55:5 62:5	144:10 164:9 167:13	185:4 196:15	headline (3) 104:4 140:7
everywhere (1) 35:23	exploire (5) 5:19 17:25 92:7	fill (1) 138:10	81:25 86:22 124:10 138:14	186:11 188:13 214:12	greater (12) 47:5 55:13 56:2	145:23
evidence (42) 15:20 28:1	173:10 174:1	final (6) 32:15 59:12 72:17	152:18	152:18	106:9,10 112:25	headlines (1) 34:9
32:11 38:18 40:6 61:13	explored (2) 20:12 187:8	74:17 139:18 149:13	forwards (2) 10:9 80:25	getting (7) 68:23 85:9 124:3	113:3,17,20 149:6 191:15	headquarters (2) 146:21
65:12 66:10,25 69:24	exploring (1) 171:25	finally (8) 15:19 17:2 53:20	found (10) 10:7 40:13	169:24 178:23,23 200:1	215:1	197:2
71:19 75:23 76:22 78:23	explosive (7) 110:25	87:11 113:10 130:25	43:10,14 49:8 55:6	ghahary (9) 61:19	greatly (1) 178:17	health (1) 195:19
81:10 87:25	111:2,8,15 169:7 198:17	136:18 213:6	99:11,12 118:3 171:15	75:12,13,14 82:5,10,12	green (2) 132:21 143:10	hear (8) 31:14 32:11,16
88:10,13,15,25 89:11,18	202:16	find (15) 6:8,10,12 40:7,11	foundation (1) 92:13	86:6 216:15	grey (2) 190:8 209:5	38:21 63:2,24 71:1 215:6
90:1 92:24 93:1 109:16	expose (1) 23:16	50:5 54:20 114:17 134:20	four (4) 43:1 53:8 139:2,19	give (30) 22:8 38:21 39:8	griffin (9) 146:2,10,14 197:9	heard (24) 1:14 7:18 8:23
118:19,20,20 151:7 154:17	express (1) 22:23	137:7 156:16 168:10	fourth (1) 93:13	41:14 50:20,21 73:19 80:8	209:13,15,15 210:6,22	15:20 17:7 38:18 48:24
158:19 168:16 172:4	expressing (2) 90:14 178:7	194:21,23 212:24	fourthly (1) 15:19	88:14 90:1 91:14 101:8,11	ground (3) 108:17 166:23	50:5 53:23 54:24 58:12
174:16 175:12 178:12	expression (2) 29:13 69:1	fine (3) 128:20 136:10	framework (1) 91:16	115:1 116:4 118:8 128:16	169:24	69:1 71:19 151:3,9 164:17
179:9 184:8 185:17 201:22	extended (1) 208:12	215:15	framing (1) 89:16	137:3 146:20 150:6 156:16	grounds (1) 206:13	178:12,22 179:9 184:8
215:5	extending (6) 168:2,8 169:5	fines (1) 48:19	france (5) 107:19 108:2,4,11	157:5,20,23 158:19	groups (2) 124:14 173:6	188:14 189:18 191:10
evolving (1) 197:5	207:4,18 209:4	finger (1) 65:13	207:14	191:18,20 194:6 196:1	guarantee (1) 214:12	214:12
exact (2) 43:23 46:10	extent (3) 151:11 192:21	finish (3) 21:5 196:5 214:13	frank (1) 38:13	215:19	guard (4) 126:11 129:11	hearing (5) 7:18 14:4 15:2
exactly (6) 34:23 117:12	205:7	finsbury (2) 62:18,24	frankly (1) 185:7	given (41) 7:10 19:16 39:12	141:22 161:12	79:24 80:21
118:5 139:15 163:23	external (2) 130:13 205:8	fiona (2) 42:4 216:11	fraser (4) 1:6,9 78:23 216:6	40:6 44:18 45:15 46:14	guarding (11) 11:17 126:9	99:24 80:21
174:24	extortionate (1) 161:17	firm (1) 65:14	free (6) 42:1 91:21 113:16	59:24 66:21 86:13 97:12	129:13 133:13,16,20	hebedo (2) 178:8 180:22
examined (1) 153:8	extra (2) 63:15,16	first (36) 1:5 5:8 12:10,25	114:18,25 146:11	100:3 105:24 113:18,22	134:7,10,14 137:8 144:19	heightened (1) 33:17
example (35) 3:15 9:7 15:1	extracted (1) 138:17	21:6 68:25 75:17 79:19	freely (4) 34:12 35:1 207:1	114:10,18,25 115:20 118:6	123:24 136:22 142:22 153:2	held (1) 146:21
31:20 47:20 50:1 59:9	extremely (2) 88:18,20	97:20 103:24,24 121:20	208:10	127:17 129:12 130:8,17	77:9 79:1,11 84:15 85:17	help (29) 1:16 58:8 59:2 68:7
62:17 70:10 78:18 85:7	extremists (2) 110:22 152:25	122:9 123:3 132:13 133:22	freestanding (1) 120:23	133:14 135:14 137:16	80:2 92:1 103:24 105:22	80:2 92:1 103:24 105:22
101:11 106:18 107:18	exuding (1) 136:15	137:16 138:7,20 139:1	freeze (1) 144:19	140:25 142:9 143:7,15	106:10 112:22 113:20	106:10 112:22 113:20
108:18 118:18 125:14	eyes (1) 149:19	146:8,12 150:11 151:21,22	frequent (1) 96:20	162:22 182:20 184:16	114:9 116:6 120:24 121:20	124:12 131:11 143:23,25
126:8 132:18 143:3 152:9		155:23 160:13,18 163:18	frequently (1) 188:24	195:2,8 196:13 197:25	77:9 79:1,11 84:15 85:17	144:24 148:7 151:11,23
157:16 168:16,20 169:1,3		165:1 172:9 181:8 185:20	fresh (2) 97:23 149:19	198:22 200:8 206:24	86:3 126:11 127:10,20	154:10 157:2 175:24
183:25 188:17,20 197:9		190:24 203:18 206:2	friday (1) 215:18	gives (1) 142:4	133:15 134:4,25 138:8	180:25 186:12 214:5
198:4 204:24 209:19		192:18	front (6) 33:25 43:19 132:16	giving (4) 99:16 181:24	141:22 162:25 146:1	188:14 189:18 191:10
210:13 211:2		145:25	138:2 171:9 177:16	182:3 183:1	151:15 141:12 170:12,15	188:14 189:18 191:10
examples (8) 33:1 107:22		145:25	138:2 171:9 177:16	182:3 183:1	176:7,20,24 188:25	188:14 189:18 191:10
130:4 133:10 137:3 162:22		145:25	138:2 171:9 177:16	182:3 183:1	197:8,24 202:3 203:2	188:14 189:18 191:10
167:22 203:13		145:25	138:2 171:9 177:16	182:3 183:1	204:4 205:22 206:1,6	188:14 189:18 191:10
exceeds (1) 26:11		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
excel (1) 213:15		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
excellent (1) 58:20		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exception (1) 159:1		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exchange (4) 27:4,7,13 28:3		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exchanges (1) 158:16		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
excluded (2) 117:19 187:23		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exclusion (1) 204:24		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exclusivity (1) 136:16		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
excuses (1) 39:3		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
executive (1) 35:10		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exercise (4) 56:17,19 178:11		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
200:12		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exhaustive (4) 202:23		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
203:7,13 204:5		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exhibits (1) 35:10		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
exist (1) 48:17		145:25	138:2 171:9 177:16	182:3 183:1	207:13,21,25 208:7	188:14 189:18 191:10
existing (8) 3:1 7:8 12:12		145:25	138:2 171:9 177:16	182:3 183:		

higher (1) 45:1
 highlighting (1) 33:12
 highly (1) 74:25
 highprofile (1) 193:21
 himself (2) 164:25 199:1
 hindsight (2) 185:4 194:10
 hipgrave (1) 81:10
 historical (1) 149:24
 historically (1) 83:17
 history (1) 120:8
 hoc (2) 71:6 181:15
 holding (1) 41:9
 holds (1) 65:14
 holistic (3) 101:9.10 122:18
 home (3) 60:12 81:11,13
 honest (2) 17:18 117:20
 honestly (1) 135:8
 hope (12) 23:1 55:12 82:10
 86:16 89:13 135:7,10,11
 141:12 147:22 149:13
 150:14
 hoped (2) 155:5 196:4
 hopefully (1) 56:11
 hoping (2) 75:18 150:2
 hosted (1) 146:11
 hostile (7) 99:2 101:18
 106:14 119:7 147:18 170:6
 201:6
 hosts (1) 146:7
 hour (3) 61:14 214:4.6
 hours (4) 42:17 44:4 52:7
 196:11
 house (1) 161:18
 housekeeping (2) 119:8
 130:12
 hover (4) 173:25 174:20
 213:15,19
 however (11) 36:25 37:22
 99:9 100:6 117:25 144:1
 159:10 166:5 187:6,7
 194:15
 hub (2) 33:14,15
 hubs (3) 32:19,23 33:6
 huge (3) 31:10 126:22
 135:20
 hunts (1) 111:23
 hygiene (1) 48:2

I

id (3) 22:10 107:2 131:8
 idea (3) 6:3 17:9 136:2
 ideal (1) 100:5
 ideally (1) 123:19
 identical (1) 18:19
 identifiable (2) 73:14,25
 identification (2) 95:8
 114:15
 identified (24) 40:19,24,24
 41:3 97:4 100:19 101:17
 113:14 120:20 123:3
 129:3,25 137:13
 141:5,18,24 142:1,19
 143:8 144:13 152:25
 identifiers (1) 75:7
 identifies (1) 101:1
 identify (9) 74:1 101:14
 102:4 103:3.6 118:21
 135:3 140:19 158:3
 identifying (5) 94:16 101:15
 111:20 114:12 155:25
 ied (8) 130:2,6,14
 169:8,10,11 199:15 205:15
 ieds (4) 111:22 153:15
 168:15 169:18
 ignored (2) 10:4 87:4
 ill (15) 2:5 23:4 27:10 30:2
 34:9 35:18 38:13 41:25
 65:20 69:6 82:11 103:12
 115:15 180:2 192:24
 illustrate (2) 118:17 125:3
 illustration (1) 133:2
 im (145) 3:4.6 4:25 5:14
 6:10 7:18 9:2,5,7 10:7,16
 11:6,11,20,20 13:5,8
 16:5,11,23 19:9,22

22:4,5,11,18 24:9,12,13
 26:1,2,8,9 27:9 29:18
 32:14,24 34:8,22 35:13,18
 36:3,8,25 37:16 39:2
 41:13,14 42:16 43:20 47:2
 48:25 49:24 50:12,25
 53:25 54:11 61:13,24
 63:23 64:8,25 65:3 66:17
 67:8 69:2 71:22 72:13,24
 75:18,22 76:8 77:3 78:10
 79:19 81:14,19,22,25
 82:10 84:20 85:9,9,23
 87:19,23 91:14 92:11
 93:16 99:17 104:2
 115:7,15 116:2 117:10
 121:1 126:6,20 134:24
 136:14 150:13,16 151:23
 155:22 156:20 159:23
 160:14 161:9 164:16
 166:17,22 167:2,7
 171:4,11,14,23 172:18
 173:9,18 177:15,17
 178:3 179:23 181:4
 182:12,16 183:5,11 184:9
 185:18 192:24 193:8 194:2
 195:16 200:1,1,18,19
 201:25 208:5 215:4,17
 imagine (3) 57:23 83:2
 201:14
 immediate (4) 111:12 191:4
 192:21 215:13
 immediately (5) 72:7 108:23
 153:9 160:13 193:3
 immense (1) 22:23
 imminently (1) 142:20
 impact (6) 38:24 64:9,11,24
 130:15 169:13
 imperative (1) 63:10
 imperatives (1) 65:9
 implement (5) 36:14 83:8,19
 205:24 209:9
 implementation (4) 36:13
 64:23 77:7 112:8
 implemented (5) 13:4 34:8
 81:13 83:5 123:9
 implementing (6) 24:3
 34:6,24 35:4 36:5 85:16
 implications (2) 33:17 66:17
 imply (1) 127:8
 implying (1) 189:16
 importance (1) 147:12
 important (16) 6:17,25 8:1
 18:15,20 43:17 56:4 66:5,6
 69:7 90:25 106:19 151:24
 152:8 163:22 180:9
 importantly (1) 180:17
 impose (1) 60:25
 imposed (4) 23:14 24:24
 56:24 86:24
 imposition (1) 3:21
 imprisonment (1) 49:6
 improve (8) 104:21,24
 106:12 164:14 177:12
 211:18 212:8,18
 improved (2) 142:1 203:5
 improvement (10) 104:1
 105:14 122:21 123:7 140:4
 141:25 163:6 202:22 203:6
 205:19
 improvements (7) 71:23
 72:3,18 105:7 133:12
 163:1 177:7
 improvised (7) 110:25
 111:2,8,10,11 169:6 198:17
 202:16
 inaccurate (2) 164:9 180:10
 inaccurately (1) 141:10
 inaudible (1) 193:13
 inch (1) 128:10
 incident (1) 30:15
 include (17) 2:24 3:11 4:1
 11:3 24:3 25:6,6 27:7 53:8
 73:25 77:9 93:1,1 130:5,6
 205:15 206:17
 included (10) 5:6 12:6,23
 24:16 36:19 55:4,17 81:2

135:4 136:1
 includes (4) 3:8 16:22 78:15
 172:16
 including (9) 18:4 20:15 44:5
 153:3 162:2,10 174:10
 179:12 195:5
 inconsistent (1) 128:3
 incorporate (3) 17:12 19:11
 21:13
 incorporated (1) 32:5
 incorporating (1) 41:16
 increase (5) 139:16,17
 143:7,22 187:14
 increased (3) 9:17 143:21,25
 increments (1) 125:16
 independent (1) 120:25
 indepth (1) 56:18
 indicate (5) 47:7 51:7,9
 142:15 145:18
 indicated (11) 18:18 61:20
 124:23 125:2,25 132:8,16
 133:23 143:16,18 196:23
 indicates (1) 214:4
 indicating (6) 105:16 109:22
 133:22 144:23 147:11
 200:3
 indication (3) 18:14 96:11
 142:25
 indicator (1) 70:13
 individual (10) 2:1 3:12 60:7
 67:20,21 101:13 164:19
 173:5 188:25 191:7
 individuals (1) 3:9
 industry (4) 4:24 39:11
 198:23 210:7
 ineffective (1) 63:9
 infer (1) 128:6
 inflict (1) 197:13
 influence (1) 29:14
 inform (2) 79:3 193:22
 informal (1) 165:23
 information (14) 66:13,24
 67:4 80:8 110:16 112:16
 114:17 127:17,18
 136:11,11,25 179:2 186:11
 informed (3) 184:5 203:4
 214:23
 ingrained (1) 107:4
 ingress (4) 106:23 108:8
 109:8 185:8
 initial (7) 92:22 94:16 98:4,8
 137:5 141:13 173:22
 initially (6) 86:25 97:18
 138:7 141:24 171:2 177:3
 injure (1) 130:16
 input (7) 8:10,20 85:1
 120:11 123:23 139:25
 188:20
 inputs (1) 124:23
 inq0015391 (2) 141:16
 185:22
 inq0015401 (1) 121:25
 inq00154011 (1) 124:11
 inq00154012 (1) 126:16
 inq0015402 (1) 122:9
 inq00154024 (1) 129:23
 inq0015403 (1) 123:1
 inq0015411 (1) 131:13
 inq0015414 (1) 131:17
 inq0015417 (1) 138:15
 inq0201471 (2) 156:19
 205:25
 inq02014713 (3) 156:23
 206:2 209:23
 inq02014722 (1) 210:3
 inq02014729 (1) 206:6
 inq02014730 (1) 206:16
 inq02014745 (1) 207:24
 inq0203644 (1) 203:18
 inq0230301 (2) 109:20 151:2
 inq02303010 (1) 112:25
 inq0230302 (1) 110:19
 inq0230304 (1) 111:19
 inq0230307 (2) 123:15 253:25
 inq0230401 (1) 190:13
 inq0230411 (1) 144:6

inq0230412 (1) 144:11
 inq0251331 (1) 177:20
 inq0251332 (1) 177:21
 inq0251333 (1) 178:3
 inq0257071 (1) 167:4
 inq0257073 (1) 167:12
 inq025726r (1) 171:16
 inq025726r9 (2) 172:17
 174:4
 inq0290987 (1) 179:21
 inq03251010 (1) 202:25
 inq03251011 (1) 203:12
 inq03251032 (1) 205:11
 inq0326011 (1) 18:13
 inq03260111 (1) 18:16
 inq03260112 (1) 19:4
 inq03544613 (1) 75:21
 inq0354468 (1) 78:1
 inq0354471 (3) 2:6 23:6 73:2
 inq0354472 (1) 2:7
 inq0354474 (1) 23:7
 inq0354475 (1) 23:22
 inq0354478 (2) 5:15 73:4
 inq0354479 (1) 10:19
 inq0355211 (1) 198:4
 inq0355217 (1) 198:11
 inq0367221 (1) 34:20
 inq0367381 (2) 160:12 162:1
 inq0367382 (1) 160:18
 inq03707016 (1) 209:24
 inq0385871 (1) 42:11
 inq0385874 (1) 44:16
 inq0385875 (1) 45:7
 inq0385891 (1) 11:25
 inq03858913 (1) 12:4
 inq0386091 (1) 90:21
 inquiry (25) 1:3 9:13 27:1
 33:10 40:24 42:8 50:2
 59:24 68:7 71:21 76:13
 86:9 88:14,18,24 136:2
 145:25 147:7 179:24
 188:13 191:11 201:20
 213:11 215:23 216:3
 inside (5) 5:7 106:8 168:18
 169:10 170:25
 insofar (1) 85:24
 inspect (2) 64:2 159:19
 inspection (9) 32:3 50:19
 55:22 70:10,17 74:10,24
 130:5 205:14
 inspections (8) 16:21 47:25
 48:1,2,4 50:19 58:10 63:19
 inspire (1) 129:14
 install (4) 102:17 103:4,8
 157:9
 installing (2) 102:25 188:18
 instance (16) 3:2 16:12
 25:21 27:10,22,25 29:22
 30:21 49:12 57:14,18
 62:14 67:12,23 70:19
 108:16
 instead (1) 21:16
 integration (1) 122:19
 intelligence (10)
 47:6,10,13,21 48:4,7
 51:7,8 52:9 69:17
 intelligencethreat (1) 143:22
 intended (13) 2:16 11:3
 12:19 13:12 18:8 21:3
 76:5,24 113:12 118:18
 134:13,15 154:11
 intent (4) 35:3,6 63:7 197:13
 intention (12) 2:19,20 13:11
 34:16,18 36:15 37:2,24
 39:4,15 113:16 171:13
 interacting (1) 114:2
 interaction (2) 136:4 165:12
 interconnected (1) 148:25
 interest (3) 67:14 120:12
 147:12
 interested (2) 19:15 53:23
 interests (1) 56:21
 interfere (1) 196:14
 interim (2) 66:1 166:8
 international (1) 95:18
 internationally (1) 95:15

interpret (5) 83:8 131:12
 132:22 133:21 139:22
 interpretation (4) 60:8 89:23
 105:23 144:1
 interpreting (1) 145:16
 interrelationship (1) 32:18
 interrupt (5) 3:4 22:4 34:19
 81:21 169:15
 intervening (1) 19:9
 interventions (1) 48:13
 into (46) 7:3 13:2 14:10,24
 16:8 20:18,18 29:21 30:10
 41:17 43:12 49:18 52:22
 54:19 55:4 62:5 63:14
 77:20 85:1 89:18 90:24
 94:10 96:9 99:3,4,19
 103:11 107:24 114:8 119:8
 120:17 122:14 125:11
 138:18 144:4,5 145:24
 156:22,23 169:13,16,24
 172:4 193:20 201:3 209:5
 intricasies (1) 101:16
 introduce (3) 56:7 60:19
 121:22
 introduced (1) 146:12
 introducing (1) 90:22
 introduction (1) 154:16
 intrusive (1) 155:14
 investigate (2) 15:13 16:16
 investigating (1) 127:5
 invite (3) 72:17 150:10 172:3
 invited (2) 188:10 189:1
 invites (1) 198:10
 involve (5) 8:20 93:21
 112:10 130:13 205:19
 involved (12) 8:6,24 54:12
 66:12 107:20 136:13
 158:6,7 159:6 188:4,14,18
 involvement (2) 8:4 189:13
 involves (2) 81:15 82:14
 involving (1) 189:6
 iron (2) 51:13,15
 irresponsible (1) 32:25
 islamic (2) 110:22 152:25
 isnt (30) 23:9,20 48:6 54:3
 59:25 69:24 71:9 84:13
 96:23 109:21 118:18
 119:21 122:5,23 127:5
 128:3 153:21 162:18
 163:22 164:25 168:20
 173:3,12 180:7 182:5
 197:23 201:4 202:6 204:18
 208:21
 issue (2) 199:4 207:13
 issues (24) 12:15,17,18,21
 39:25 40:13,23 41:7,13
 42:1 46:5,12 48:23
 49:15,24 50:12,25
 51:10,18 53:22 54:10,22
 57:1,6 59:3,7,11 60:10,15
 61:5,13,22 72:25 81:21
 82:9,11 86:8,16,24
 87:3,7,11,23 88:2 89:25
 90:8,13 96:8,24 97:1,6
 110:14 114:24 115:5,8,11
 117:10,21 118:5,16 123:16
 its (229) 2:6 4:6
 6:11,12,14,20,21
 7:2,6,8,11 11:21 12:22
 13:14 14:21 15:15,23 17:8
 18:22,22 19:24 21:3,7 23:9
 24:9 25:1 26:20,20
 29:9,12,16 30:18 32:6,15
 33:9,13,19 34:2,19
 35:6,7,8 36:13 37:21
 38:15,19,20 40:19,20,21
 41:2 43:24 45:6,18 46:9,13
 48:8 50:22 51:15,24 52:14
 53:2 56:4,14 57:1,11
 58:1,1 60:11 61:3,5
 62:10,23 63:22 64:21
 65:18 67:14 68:18,18,19
 69:17 70:15,22 74:25
 75:5,8 76:18,20 77:5 78:18
 79:9 80:7,19 83:7 84:22
 87:8 90:6 93:9 96:16
 99:14,18 100:3 101:19

102:15,21 104:8,9,20
 105:8 106:19 107:3 108:7
 109:3 110:15,16 111:6,14
 112:8 113:6,8 114:12,12
 115:13 116:11 117:17,17,18
 119:10 120:20 121:11,13
 123:17,22,24 125:16
 127:11,13,18 128:7,8,14
 129:19,20 134:15 135:20
 136:10,10,12,12 138:1,23
 139:15 15:16,19 142:11,16
 143:10,25 144:8
 146:7,11,11 147:17,19
 151:3,17,19 152:1 153:21
 155:8 156:22 157:8 160:6
 161:2,8,16,18 162:18
 164:10,14 165:5 167:18
 168:8,20 169:3,22 170:11
 171:20 172:10 175:1
 176:3,11,16,17,19
 177:10,22 178:4 180:24
 182:19 185:2,13 186:25
 188:17 189:7,16 190:4,13
 191:15 192:7,9 193:18
 195:19 196:11 197:23
 200:2 203:18 204:1 207:23
 210:15 211:16 212:2,8
 214:19,19,20 215:5,11
 itself (7) 3:16 26:5 61:7
 134:9 151:4 153:7,8
 ive (32) 12:25 20:20 26:24
 29:25 59:23 85:4 90:23
 116:1,25 117:18,25 119:7
 127:12 132:2 135:3,5
 138:1 140:21 141:9 142:12
 144:4 151:7 153:13 158:18
 159:7 181:21,22 188:3,4
 189:5 211:9,9

J

j (2) 133:5 134:1
 james (1) 162:7
 january (3) 53:4 143:14
 177:23
 jobs (1) 44:6
 john (160) 1:7 3:3,24
 4:6,13,18 5:2 6:10,16,20
 7:22 8:3 9:9,25
 10:10,16,20 11:20 15:5,17
 17:6,11,17,21,23 18:14
 19:9,14,17,20 21:1 21:10,16
 22:2,4,8,12 25:3,10,16
 26:2,13 28:21 30:6,12
 31:5,14 35:13,23 38:6,9,12
 39:25 40:13,23 41:7,13
 42:1 46:5,12 48:23
 49:15,24 50:12,25
 51:10,18 53:22 54:10,22
 57:1,6 59:3,7,11 60:10,15
 61:5,13,22 72:25 81:21
 82:9,11 86:8,16,24
 87:3,7,11,23 88:2 89:25
 90:8,13 96:8,24 97:1,6
 110:14 114:24 115:5,8,11
 117:10,21 118:5,16 123:16
 124:1,5,9 128:3 136:21,24
 137:19 150:5 164:1,3
 165:25 166:9 172:8 181:2
 182:10,19 183:5 190:1,6
 194:4,8,15,21
 195:1,5,8,11,16,25
 196:3,11,22
 200:1,8,12,18,23 201:5
 202:8 208:4
 211:7,11,21,24 212:23
 213:23 214:8,11,18,23
 215:4,16
 join (1) 90:14
 joined (4) 84:8,13 88:6 92:21
 joiningup (1) 84:5
 joint (3) 52:10 54:10,12
 jowl (1) 33:6
 judgement (2) 159:5 160:2
 june (1) 62:18

K

keen (1) 20:24
 keep (7) 19:9 34:17 63:22
 65:12 169:9 205:5 214:23
 ken (28) 88:11 91:10 144:1
 145:5 158:17 160:19
 162:2,19 173:23 174:16
 175:19 176:21 177:8,19,25
 179:7,12,19 181:9,24
 182:8 184:15 186:1,6
 198:25 199:10 208:23
 210:13
 kept (1) 146:24
 key (9) 51:22 82:7 93:11
 109:17 137:20,21 147:16
 204:4 208:19
 kind (11) 12:20 32:3 48:9
 52:15 53:6 70:12 73:18
 77:10 84:25 189:16 206:25
 kindly (1) 196:23
 kit (1) 75:7
 knew (3) 48:25 62:22 138:13
 know (101) 2:16,19,20
 3:13,18,21 4:11,19 6:14
 10:5,7 11:18 13:16 15:7
 16:5,22 19:19 20:21,23
 20:14 22:7 25:21 26:18 27:9
 30:25 33:10,25 34:1 35:21
 46:23 49:9,24 51:17
 62:15,19,21 63:22
 67:11,15,24 69:20
 71:14,21 72:6,11 76:12
 78:3 79:21 81:9,14 82:18
 87:17,17,18 97:8 100:9
 107:16,18 112:2 113:5
 115:4 117:20,22,23
 120:5,13 130:23 134:7
 137:6 142:21 143:2
 146:16 147:23 148:2,18,21
 162:7 170:11 171:9 172:12
 173:22 175:7,10

leapt (1) 64:22
 learning (3) 33:3 88:15
 212:21
 least (15) 116:16,18
 151:7,11 160:11 168:17
 180:9,18,24 184:9 186:11
 189:9 205:7 214:13 215:20
 leave (7) 69:6 144:3 145:6
 177:15 185:15 187:13
 194:2
 leaves (1) 62:12
 led (3) 53:16 95:3 162:4
 lee (4) 160:19 162:1 175:8
 177:3
 left (7) 111:23 130:14 133:1
 138:9 139:23 205:16
 206:14
 lefthand (2) 131:20 132:11
 leftplaced (1) 130:7
 legal (9) 13:9,13 26:11 40:21
 76:6 77:25 113:18,21
 114:4
 legally (3) 114:7 115:3
 120:10
 legislation (11) 18:2 20:13
 21:9,11 25:1 35:17 60:9
 69:12,13 84:15 212:5
 less (8) 95:24 123:21 131:7
 155:14,14,14 166:1:9
 lessen (1) 118:2
 lesser (1) 193:8
 let (16) 8:7 12:9 17:2 42:21
 44:11,14 50:5 52:23 54:23
 58:11 62:3 67:10 70:19
 181:6 182:16 183:7
 lets (21) 11:23 14:12 17:25
 26:13 48:23 69:9 99:2
 100:18 102:18 103:17
 125:22,23 127:14 131:9
 143:6 152:23 161:25 176:5
 194:15 213:24 215:16
 letter (1) 116:10
 level (25) 14:3 45:17 52:12
 57:8,24 58:4 60:6 71:24
 98:2 100:7 102:14 125:22
 128:1 143:22 146:19
 151:23 152:1,2,5,9,12
 161:19 164:10 165:11
 193:5
 levels (1) 164:22
 liability (3) 117:19,23 118:15
 liable (2) 115:2,3
 liaising (2) 82:21 84:16
 licence (67) 1:24 2:2,4,14,21
 3:8,11,14 4:5,22,25 5:2,11
 6:5,12 7:3,3,8,14 10:17
 11:7,14 15:13 14:24 14:13
 15:23 16:10 20:6,15,25
 24:25 25:4
 28:9,10,15,16,20,22 31:9
 40:20 41:20 46:22,24
 48:18,19 49:3,4,5,6,13
 50:9,16 51:13 54:17
 55:17,18,19 73:3 75:5,8
 84:10 86:17,19,20 87:1,16
 93:8
 licenced (2) 13:14 44:20
 licenceholder (3) 23:24
 24:6,18
 licencelated (1) 78:7
 licences (22) 2:24 6:24 7:19
 8:6 9:10 12:11 13:20
 16:3,14 18:6 20:17
 43:21,23 44:1 46:20 48:9
 55:5,7,10 60:7,16
 licensed (39) 9:18
 12:16,19,24 15:9 20:24
 21:2 26:4,5 35:20 36:4,5
 44:2,20,25 45:2,3 46:1,3
 47:18 49:20 52:10,16
 54:5,13,16 59:8 60:2,4
 65:6,13 73:21 74:1,5,9
 78:8 85:25 86:21 87:20
 licensee (2) 74:22 75:3
 licensing (110) 1:14,21,23
 4:16 6:4 7:5 9:2,15 10:15

12:1,14 13:18,19 14:2,5
 15:6,12,25 16:6 17:11
 23:18 25:2 26:10 27:15,20
 28:6,6,8,25 29:14,21
 30:2,10 32:7,21 33:9
 35:15,25 36:1,7,9,10,22
 37:3,4,5,14 38:24 39:10
 42:17,19,22 43:25
 44:3,4,10 46:19,21 48:16
 51:22 52:6,8 57:3 58:15
 59:15,17 65:25 66:11
 68:2,3 70:20,24 72:1,8,9
 76:10,10,19,24,25
 77:2,6,8,13,18,19
 78:6,15,17 79:8,17,19
 80:1,1,5,12,19 81:9
 83:3,16,17,18
 84:8,15,17,18,19 85:1,6
 86:1
 licensership (1) 92:21
 life (2) 32:6 107:21
 lifetime (1) 192:16
 lifted (1) 105:8
 lifts (1) 206:18
 light (4) 51:12 179:3 180:21
 185:24
 like (5) 3:17 7:15 9:21 10:2
 11:5 12:18 13:14 17:21
 22:22 35:23 37:24 39:14
 44:8 46:10 50:21 52:15
 56:7 58:4 60:5 64:12 67:23
 70:12,14,20 71:10,11
 75:17 77:7,10 80:7 81:22
 83:3 91:25 102:19,19,20
 114:1,6,25 119:9 121:19
 123:18 140:25 142:8
 145:20 152:13 172:23
 173:21 174:18 182:2
 183:15 187:8,23 188:19,23
 189:1 194:16 200:25
 likelihood (1) 4:4
 likely (5) 14:24 19:14 110:23
 117:4 141:5
 limitations (4) 21:8 59:21
 62:11 185:9
 limited (5) 20:16 61:3
 162:25 169:23 184:6
 line (3) 91:10 122:10 185:23
 lines (2) 114:21 124:24
 linguistic (1) 143:24
 link (7) 129:18 137:11
 156:16 161:13 176:24
 177:1,2
 linked (1) 103:22
 linking (2) 81:7 85:25
 list (9) 93:21 94:1,2,6,8
 112:17 167:22 202:22
 203:6
 listed (2) 129:23 153:15
 listening (1) 149:22
 literally (2) 105:8 128:9
 little (12) 8:8 42:21 59:1
 62:7 66:4 70:23 77:12
 81:20 128:21 164:16 170:9
 214:7
 live (2) 116:14,15
 living (1) 143:11
 liz (2) 90:11 216:18
 local (27) 5:22 6:9 11:23
 13:11 15:7 32:23 37:5 40:6
 50:4 78:11 80:16 81:1
 83:25 84:3,11,17 86:24
 94:19,19 95:19 96:19
 183:23 193:22 203:14
 206:10,11 209:1
 locally (4) 38:9,11 94:1,16
 locating (1) 201:19
 location (1) 9:14
 london (3) 146:10,13,16
 lone (1) 197:13
 long (5) 49:7 94:6 98:4
 159:22 196:11
 longer (5) 29:2 144:8 150:2
 159:10 213:25
 longest (1) 86:9
 longterm (2) 58:17 141:3

look (94) 2:4 8:11 9:18,22
 10:18,21,22 12:3 13:21
 14:18 16:16 18:16 30:18
 41:15 44:16 45:25 47:6,13
 49:1,18 52:13 15 55:17
 56:13 58:9 77:12 86:22
 94:7 100:5,23 102:6
 103:14 104:3 105:21 108:8
 109:12,17 110:17 111:19
 114:19 119:21 121:19
 122:9,9,25 124:11,13
 126:5,8 130:25 131:9
 133:13 137:12
 141:11,13,14 143:3,6
 144:17 151:22 153:11
 160:2,3 161:1 170:9
 172:12,18 177:17 181:9
 185:12 187:8,10,12 190:11
 192:1,3,8,16,22 193:20
 195:20 197:23 198:4,11
 200:7 201:6 202:4,20,25
 203:17 205:25 207:12
 209:22 212:1
 looked (28) 14:22 18:3 29:25
 30:1 34:3 55:2 78:8 94:22
 121:10 127:25 132:8 141:4
 144:25 147:8 148:12
 149:18 150:17 153:18
 167:5,10 176:20 178:6
 179:5 185:2,3 204:13
 209:13 213:2
 looking (27) 12:11 25:17
 31:3 36:5 41:11 43:20
 46:25 61:9 74:19 98:20,21
 107:13 109:10 133:18
 140:13 142:16 144:7
 149:14 152:16 154:21
 166:25 185:10 193:10
 195:18 201:3,7 214:1
 looks (6) 114:25 140:25
 165:14 174:4 180:23
 186:21
 loosely (1) 99:13
 lopez (15) 2:5 10:19 11:24
 15:18 45:8,14 75:20 77:25
 109:20 133:1,17 141:16
 158:14 177:20 190:22
 lose (1) 49:6
 losing (1) 48:19
 lost (1) 183:11
 lot (21) 6:24 20:23 38:16
 41:14 49:15 60:3,20 62:11
 65:1,16 69:22 97:6 99:10
 106:15 137:8,8 146:17
 184:8 188:8 190:9 200:9
 lots (5) 51:21 128:19 137:4
 190:9 213:2
 low (1) 64:12
 lower (1) 125:24
 lunch (2) 87:25 88:4

manager (5) 43:3 91:11
 127:14,15 137:5
 managerial (1) 52:12
 managers (1) 129:20
 managing (1) 44:8
 manchester (52) 1:15,17 2:5
 9:5,7 10:14 12:1,6 17:7
 22:25 23:10 33:3
 34:6,15,23 36:10,13 38:17
 42:13 43:22,24 47:5 50:8
 51:1,9 52:25 53:6 54:1
 55:1 56:8 62:19 68:9
 70:21,23 71:25 82:17
 83:20 97:8 98:11 105:22
 106:7 107:7 113:1,3,17,21
 149:6 162:13 171:18
 191:15 198:23 215:1
 185:12 187:8,10,12 190:11
 192:1,3,8,16,22 193:20
 195:20 197:23 198:4,11
 200:7 201:6 202:4,20,25
 203:17 205:25 207:12
 209:22 212:1
 looked (28) 14:22 18:3 29:25
 30:1 34:3 55:2 78:8 94:22
 121:10 127:25 132:8 141:4
 144:25 147:8 148:12
 149:18 150:17 153:18
 167:5,10 176:20 178:6
 179:5 185:2,3 204:13
 209:13 213:2
 looking (27) 12:11 25:17
 31:3 36:5 41:11 43:20
 46:25 61:9 74:19 98:20,21
 107:13 109:10 133:18
 140:13 142:16 144:7
 149:14 152:16 154:21
 166:25 185:10 193:10
 195:18 201:3,7 214:1
 looks (6) 114:25 140:25
 165:14 174:4 180:23
 186:21
 loosely (1) 99:13
 lopez (15) 2:5 10:19 11:24
 15:18 45:8,14 75:20 77:25
 109:20 133:1,17 141:16
 158:14 177:20 190:22
 lose (1) 49:6
 losing (1) 48:19
 lost (1) 183:11
 lot (21) 6:24 20:23 38:16
 41:14 49:15 60:3,20 62:11
 65:1,16 69:22 97:6 99:10
 106:15 137:8,8 146:17
 184:8 188:8 190:9 200:9
 lots (5) 51:21 128:19 137:4
 190:9 213:2
 low (1) 64:12
 lower (1) 125:24
 lunch (2) 87:25 88:4

128:9 130:9 136:24 140:4
 142:10 160:4 161:3 166:2
 172:5,5 193:2
 meant (8) 3:14,18 4:8 11:9
 43:11 50:2 63:19 130:19
 measure (1) 126:24
 measurs (47) 8:21 18:25
 22:25 23:10 33:3
 65:4,5 78:9 81:2
 83:4,13,14,19 84:1,4,12
 85:25 98:24 99:9,10
 101:7,16,23 102:25 106:12
 117:7 122:16,18 123:7,8
 154:25 165:6 166:15
 194:22 202:23
 203:6,7,20,24 204:2,20
 205:1,8 209:9 213:2
 measuring (1) 124:4
 mechanism (1) 55:6
 mechanisms (1) 299:8
 media (2) 60:14 199:7
 medical (5) 29:22 30:3,7,15
 31:24
 medium (1) 211:2
 meet (3) 23:16 71:8 181:18
 meeting (17) 39:18 137:10
 158:19 162:3 165:1 166:13
 175:14,17 179:6,10,20
 180:4,7,11,19 181:15,22
 meetings (16) 47:5 52:12,18
 54:1,4,6 82:24 136:10
 174:19 181:11,14 187:21
 188:2,5,12 189:2
 meets (1) 80:9
 member (2) 15:14 49:9
 members (3) 35:9 47:12
 196:7
 memorandum (1) 71:9
 mention (7) 105:10 133:14
 146:18 154:24 176:18
 180:18 190:12
 mentioned (24) 8:4 33:11
 37:24 39:15 51:19 57:8
 88:11 94:23 100:11 117:1
 119:7 120:6 129:11 158:23
 162:24 174:17 175:20
 176:21 189:24 192:20
 193:9 197:19 201:23
 204:12
 mentions (1) 180:8
 menu (4) 176:9,11,11,12
 merit (1) 96:18
 merits (2) 67:20,21
 merseyside (1) 186:16
 message (1) 177:24
 met (2) 21:4 28:12
 metal (14) 64:13 112:11
 154:5,6,7,7 158:3,5,9
 174:10,17,22 175:4,20
 methodologies (22)
 107:16,19 120:1 121:9
 138:17 139:14 147:20
 153:3,14,19 154:4 156:5
 166:7 169:20 202:12,14
 204:12,14 205:3 208:20
 209:14,18
 methodology (7) 94:20
 101:6 107:14 117:1 125:10
 137:14 139:25
 methods (2) 110:24 157:6
 mid2014 (1) 122:2
 middle (4) 133:19 149:5
 152:2,3
 night (60) 7:25 11:5
 14:14,15,22 16:16 21:25
 24:14 28:2 29:20 30:9 31:3
 33:7 34:2 47:18 59:7 60:18
 63:8 71:20 73:19 77:17
 80:17 82:7,20 83:15 84:10
 85:4 86:2 98:19 101:8,12
 103:5,7,13 106:17 114:21
 115:4 117:21 135:15 142:1
 143:23,25 145:15 147:14
 149:7 150:3 152:3 155:9
 156:5,10 158:7 164:9
 165:11 171:24 184:4 196:7

199:19 206:24 208:15
 211:3
 mind (19) 3:1 11:8 30:13
 39:19 48:24 83:15
 89:14,15 90:2 107:4 111:5
 112:15 130:9 131:9 148:22
 158:18 170:24 214:21
 215:14
 minds (2) 106:20 171:1
 mine (2) 26:11 72:17
 minimal (2) 57:4 63:6
 minimum (8) 5:21 6:3,8,17
 7:24 40:5 50:3 73:9
 minute (3) 31:8 167:2
 173:18
 minutes (4) 22:10 165:8
 167:7 215:2
 miriam (15) 89:21 158:17
 174:16 175:12 176:21
 177:18,24 179:9 180:13
 181:18,23 182:7,14 185:17
 195:1
 mischaracterised (1) 142:12
 misinterpreted (1) 60:1
 misleading (1) 135:11
 mismatch (1) 145:13
 missed (1) 122:22
 missing (3) 18:23 19:2
 126:20
 misstate (2) 135:11,12
 mistake (2) 18:10,23
 mistakes (2) 158:25 160:7
 misunderstanding (3)
 164:20,21 187:16
 misunderstood (1) 40:16
 mitigate (6) 57:20 102:6
 116:6,23 118:1 204:20
 mitigation (5) 64:16,23
 81:16 126:3 129:24
 mitigations (2) 64:12 111:21
 mmhm (1) 179:15
 mode (1) 52:22
 model (10) 36:20 94:11
 95:11 96:12 97:10,14
 98:16 106:2 123:25 148:13
 modules (1) 92:23
 moment (30) 8:20 9:11
 21:25 23:4 26:3 29:11
 36:17 39:12 46:8,13
 51:5,16 52:5 55:15 56:3
 57:4 58:2 64:5 80:9 81:21
 84:13 100:12 104:8 126:6
 145:9 150:4 155:23 176:1
 189:20 200:19
 moments (2) 109:17 171:5
 money (2) 99:10 115:16
 monitor (1) 127:2
 monitored (2) 16:14 126:19
 monitoring (2) 16:2 170:7
 month (2) 146:8 178:12
 monthly (1) 146:4
 months (2) 98:5 201:18
 mooring (1) 215:11
 more (56) 3:9 5:15 7:9
 8:8,18 9:11 32:16,17 44:20
 45:20,21 47:19 51:6 52:3
 56:18,18 59:1 60:5 64:4
 66:4 72:2,21 73:4 77:12
 80:8 81:20 96:2,12
 98:20,22 100:20 103:12
 114:8 117:4 127:17,19
 128:21 134:5 136:19 148:4
 152:8 164:25 165:15
 166:24 168:23 179:13
 180:17,21 181:6 187:19
 192:18 193:4,7 196:2,21
 200:19
 morning (7) 1:5,6,11 40:7
 42:6 52:14 61:10
 mornings (1) 40:3
 mosque (2) 62:18,24
 most (14) 21:7 46:3 68:9
 78:11 97:4 102:25 103:1
 147:15 161:21 169:11
 173:24 198:1 199:11 203:7
 motivate (1) 129:15

109:10 140:4 164:13 165:20 180:21 200:7 215:6 needing (2) 171:13 179:3 neednt (1) 22:1 needs (2) 2:2 149:3 negligent (2) 115:2 118:3 neighbourhood (1) 43:1 neighbours (1) 208:24 neither (3) 113:17,20 148:20 nervousness (1) 193:6 network (2) 81:8 84:24 neutral (1) 65:1 neutrally (1) 184:14 never (16) 6:6 7:23,24 43:6,14 115:8 119:23 120:21 121:3 137:25 174:16 175:19 176:21 185:3 189:3 193:25 nevertheless (1) 95:19 newer (1) 159:24 news (1) 23:10 newsletters (2) 147:7,10 next (25) 10:18 19:3 31:14 32:14 33:14 41:10,11 78:22 81:6 91:15 100:7 111:19 112:3 144:10 149:8 157:8 163:5 169:12 174:1 176:5 178:2 182:16 187:20 196:9 214:2 nicest (1) 34:22 nightclub (3) 14:12 15:1 87:18 nighttime (1) 197:16 nine (1) 59:19 nobody (1) 14:18 nobodys (2) 49:8 99:15 nodding (2) 126:23 189:22 noise (2) 14:25 53:8 noisereleated (1) 44:6 noncompliance (4) 54:20 68:23 70:13 211:7 none (4) 53:13 83:11 85:23 191:24 nonexistent (1) 57:4 nonfomal (1) 68:25 nonpenetrative (3) 204:15,17,21 nonselficensed (1) 73:17 norm (1) 166:9 normally (2) 74:11 79:15 northwest (2) 187:2 191:15 notable (2) 95:20 96:21 note (4) 92:10 111:6 117:12 126:15 noted (1) 137:25 notes (11) 146:1 171:17 172:10 173:11,25 174:20 186:2 199:5,6 213:8,16 notforprofit (1) 211:3 nothing (19) 53:16 72:7 84:14,20 98:18 99:16 103:17 122:12,17 123:10,20 124:3,8 127:20 154:15 155:8 183:25 210:24 211:25 notice (3) 90:4 215:17,19 notify (1) 54:21 notwithstanding (2) 185:9 196:24 november (5) 1:1 42:8 88:19 90:19 215:24 nowadays (2) 86:20 92:20 nuances (1) 204:1 nub (2) 37:17 122:23 number (50) 5:21 6:3,8,13,15,17 7:25 20:16 22:21 29:25 40:5,10,11,14 42:10 43:23 44:25 45:1,7 46:9,10,13 50:3,5,10 65:4,6 69:18 70:7 73:9 79:15 81:13 85:6 88:11 101:1 120:12 124:18,22 125:25 129:24 133:6 135:12,20 139:16 145:8 149:24 158:25 183:8,12 190:7	numbered (2) 74:14 135:14 numbers (12) 40:8 43:21 44:22 45:4 46:6 63:5 131:11 135:12,19 136:20 139:24 184:24 numerical (1) 140:12 <hr/> O obeying (1) 26:8 object (4) 7:12,17 8:6 196:8 objection (2) 14:25 196:15 objections (1) 13:25 objective (2) 77:13 206:12 objectives (8) 76:10,12,19,25 78:6,15,18 84:19 obligation (1) 120:23 obligations (1) 23:14 observations (1) 90:5 observed (1) 9:19 obtained (3) 132:19 134:1 163:11 obvious (16) 14:14 21:8 36:4 39:16 84:22 108:23 184:13,15,17,21,22 185:2,4,8,10 189:15 obviously (54) 8:15 12:20,25 13:9,23 15:14 18:21 20:15,17,21 21:7 26:14 30:14 32:10 33:11,19 35:8 36:22 37:4,25 40:19 41:22,23 44:1 45:25 46:23 49:18,22 51:3 58:2,20 72:16 89:25 90:6 98:5 99:14 100:5 105:24 106:5,19 115:12 116:25 121:5 130:14 165:3 174:23 179:16,19 182:13 188:7 193:5 200:22 201:1 205:7 occasion (3) 168:25 181:24 215:18 occasionally (1) 193:13 occasions (2) 29:25 35:14 occur (2) 108:11 193:23 occurred (1) 198:14 occurrence (1) 134:9 occurring (1) 45:25 occurs (1) 125:6 oclock (2) 215:11,13 occnor (16) 150:12,13 164:8 166:12 172:9 181:4 182:16,20 183:7 190:11 194:2,7 196:2 204:14 213:18 216:20 october (1) 1:13 odd (1) 9:25 offences (1) 48:21 offer (3) 48:15 100:10 206:4 office (8) 52:4,7 60:12 71:8 81:11,13 146:7 199:11 officer (9) 14:2 38:2 53:25 58:17 71:18 72:20 74:5 80:5 87:8 officers (52) 13:19 15:25 42:22 43:5,6,25 44:3 45:21,23 51:23 52:7,8 53:24 54:6,8 55:14 56:1 57:3 58:2,3,16 59:4,5,7 70:7,11,18,18,24,24,25 71:13 72:1,1,2,8,9,21 74:10 77:6 79:19,21 84:17,18 87:14 94:20 191:24,25 192:2,9,10,10 official (1) 107:8 officials (1) 146:15 often (6) 43:13 144:16 159:15 189:7 195:19 211:23 oh (5) 16:18 50:15 75:5 126:20 198:3 okay (25) 4:13 6:20 8:3 9:9 11:23 20:1 24:11 46:21 57:6 59:11 81:19 82:9 87:11 115:11 124:9 151:21 158:22 172:8 195:1,25 196:3 201:5 212:23 214:17 215:21	old (7) 7:3 49:14 86:18,25 87:1,4 198:8 omit (1) 90:25 once (9) 82:21 83:7 97:12,20 98:8 105:17 110:11 116:11 148:12 onerous (1) 43:10 ones (10) 7:7 12:12 31:10 82:1 86:25 94:8 97:19 115:5 135:4 189:5 ongoing (2) 37:19 117:5 onus (1) 49:21 onwards (1) 17:5 open (8) 29:2 78:18 80:4 100:22 147:16 167:3 169:17 190:8 opened (1) 19:20 opening (1) 9:12 operate (1) 190:4 operated (1) 16:9 operating (4) 79:5,10 86:21 127:18 operation (4) 12:16,19 63:14 123:8 operational (9) 102:22 103:2 119:25 166:5 191:24 192:3,8,10 193:19 operationally (1) 88:23 operatives (1) 87:16 operator (2) 4:6 40:9 opinion (3) 27:11 141:3,9 opportunities (2) 43:11 122:21 opportunity (7) 22:9,18 39:8 81:10 194:6 196:1 212:25 opposed (1) 25:2 option (2) 123:21 142:13 options (12) 100:4,15 112:10,13 118:12 129:21,25 167:20,25 175:1 176:3 212:1 order (17) 4:9 5:5 27:19 52:22 55:25 73:15 83:5 93:5,8 98:10 101:18 106:14 150:15 161:18 186:19 211:1,10 ordinarily (1) 196:6 organisation (1) 67:17 organisations (8) 66:24 68:9 69:23 71:20 99:23 148:20 149:2 211:3 organise (1) 188:11 organised (1) 188:5 originated (1) 146:9 others (11) 5:19 19:4,17 118:21 119:6 125:20,21,24 144:4,9 162:2 otherwise (3) 77:22 214:18 215:9 ourselves (1) 96:16 outbreaks (1) 11:18 outcome (1) 116:6 outlets (1) 206:18 outlined (2) 78:16 159:7 outrage (1) 9:15 outside (27) 70:12 106:11,16,16,18 107:20 108:13 118:25 130:23,24 135:20 153:9,18 168:2,14 170:4,25 184:2 185:12 195:24 204:18,22 205:20 206:19 209:25 210:8 213:4 outstanding (2) 129:2 141:20 over (32) 2:22 4:15,17 5:9 7:8,14,21 18:9 19:3 23:22 29:15 45:6,7 49:14 52:15 98:8 110:24 122:25 124:13 126:6,16 133:7 151:15 166:23 173:25 174:20 178:2 203:11 208:16,17 213:16,19 overall (5) 23:12 45:2 140:1 159:4 206:11 overcome (1) 149:11 overlapped (1) 192:21	overlaps (1) 191:23 overly (3) 94:18 159:23 203:21 overnight (1) 51:2 overriding (1) 31:6 overscore (1) 140:20 overspeaking (4) 129:8 173:12 189:13 211:12 overstatement (1) 40:23 overview (2) 104:8 138:5 own (8) 30:13 80:20 94:19 120:25 138:11 164:22 173:6 204:1 owned (1) 91:23 owner (1) 136:24 ownership (1) 209:6 <hr/> P p (1) 63:13 package (3) 58:12,19 209:16 packages (2) 195:21 197:10 pages (3) 89:3 138:18 139:25 pandemic (3) 37:7,18 39:9 panel (2) 80:18,21 paragraph (35) 18:17 23:7,23 24:17 25:17,23 26:25 29:18,19,20 34:4 44:17,24 73:5,8,12 75:23 76:16 77:23 78:2,4,16 79:8 93:17 145:18,21 151:22 152:7 154:3 170:14 179:21 180:24 203:11,18 206:16 211:5,16,19 paragraphs (5) 12:6 17:4 43:20 53:2 83:24 parked (1) 169:12 parks (1) 206:19 part (32) 4:15 12:13 13:5 14:9 17:14 21:12,14 23:10 34:10 14 35:4 43:9 60:11 65:25 74:7,19 79:8 80:6 81:2 82:20 85:21 129:7,9 132:2 141:4,6 171:16 181:10 184:16 190:15 202:1 206:14 participants (6) 39:23 88:8 89:4,7 131:12 146:24 participate (2) 39:5,17 participating (3) 9:2 136:3 147:4 particular (61) 3:23 8:9,19,25 15:14,21 18:21 30:4,6 33:4 34:8 44:22 47:17 48:5 49:12 50:11 51:25 54:12 59:8,16 62:1,1 66:7 74:15 76:4,6 77:8 80:6 82:15,16 103:18 104:13 105:2,13 107:20 113:24 117:2 118:9 119:12 120:11 128:24 139:13 153:22 156:11 157:6,10 158:17 163:5,15 167:22 172:16 174:3 177:6 185:7 188:18 192:12 194:23 196:19 197:16 202:17 204:1 particularly (15) 7:16 8:7 9:10 16:7 18:15 19:21 22:25 43:12 47:20 64:17 65:22 82:16 100:19 193:15 194:18 partly (1) 51:19 partnership (3) 51:21 208:21 209:3 parts (6) 34:9 89:9 121:20 144:15 153:5 186:10 party (5) 19:13 134:17,19 135:17 136:3 pas (1) 154:24 pas127 (7) 174:14 176:6,18,22 177:6 213:6,20 pasrated (1) 154:25 pass (2) 38:10 92:21 passage (1) 205:12 passages (1) 114:4 past (3) 78:8 97:5 196:4	patdowns (2) 112:11 154:4 patrolling (1) 130:13 patrols (3) 130:24 168:13 210:19 pattern (1) 43:10 pause (5) 22:3 25:25 42:3 180:3 192:25 pavement (2) 121:12 195:24 paving (1) 200:4 pbied (8) 126:3 129:24 139:6,10 140:2 160:3 168:3 199:24 pbieds (2) 131:18 169:23 pdf (4) 129:11,13,18 213:12 peddlers (1) 44:9 penalties (1) 23:19 penultimate (1) 147:22 people (63) 2:17 3:17,19 4:8 5:3,4,5,6 7:25 8:13 10:25 11:4,10,12 17:24 19:15 21:12,16,19 25:8 30:17 32:1 45:20 48:24 49:3 50:14 61:1 62:12 65:19 69:8 73:24 75:6 99:4 108:7,14 120:12 121:16 123:21 130:16 135:20 145:25 146:13 147:20 157:23 158:16 170:16 183:2 184:24 187:23 188:23 189:1 190:2,7,9 194:16 195:21 196:16,18 211:13 212:20,22 215:16,19 perfectly (2) 22:8 203:20 perform (1) 5:22 perhaps (48) 6:21 9:10,12,20,25 15:8 31:19 32:6,9 33:3,17 51:10 78:1 84:2 100:21 106:17 112:21 114:9 118:15 121:25 125:3 133:2 151:1 152:4,8 153:20 155:14 156:11 158:5 159:1 162:15 163:6 164:20,21 165:15 168:23 170:14 173:2,4 174:2 180:17 184:19 189:14 191:22 192:23 194:11 196:22 212:19 perimeter (17) 27:24 29:10 106:6,12,17 107:21 111:13 121:11 168:8 169:5,12 185:12 205:8 207:5,18 208:13,16 period (11) 107:23 131:14 132:14 133:8 136:6 137:17 143:12 147:5 149:15 159:13 163:5 permissive (1) 7:6 permit (1) 105:1 permitted (1) 100:21 persistent (1) 68:23 person (8) 14:14 81:24 117:10 125:4 132:5,18 142:18 143:20 personally (4) 114:6 130:22 134:25 189:3 personborne (11) 111:1,15,18 153:15 169:8,10,18 198:17 199:15 201:8 202:16 personnel (5) 32:7 64:13 127:16 189:6,7 persons (3) 143:7 145:7 177:7 perspective (3) 27:15 28:6 75:19 persuaded (1) 215:4 pertains (1) 152:13 photograph (1) 111:22 phrase (3) 111:4 113:23 212:11 physical (3) 154:23 157:5 205:8 physically (1) 205:4 pick (7) 5:18 16:24 30:19 49:21 110:13 126:7 181:7	picked (7) 34:14 73:10,22 133:14 141:21 148:15 159:21 picking (2) 1:20 20:2 picture (1) 50:20 piece (1) 189:8 pile (1) 39:13 pin (1) 34:22 pinpoint (1) 5:1 piste (1) 36:8 place (47) 8:14 9:15 12:2 15:24 16:4,15 20:18,24 36:24 37:8,9,17 39:20 46:20 50:19 52:14 56:4 57:15 58:25 65:6 71:11 80:11 83:9,14 94:22 97:3 106:15,16 108:7,10 109:1,2 112:6,24 117:14 128:25 133:18 159:21 163:3 165:6 166:16 178:11,13 182:22 184:23 194:23 208:16 placed (3) 111:14 130:15 205:16 places (36) 9:11,18 25:5 31:20 32:1 34:11,25 35:19 81:7,14,17 86:11 93:14,22,24 94:2,3,3,17 96:19,24 97:3,4 106:2 108:24 110:23 123:24 148:13,19 151:9 203:4,8 205:15 206:1 207:20 211:1 placing (1) 48:13 plan (42) 21:6 23:12,15 83:2,3,7,9,13 84:7 85:17 103:20 105:6,6,20,22,25 107:1,25 116:20 117:13 120:16 141:13,14 144:14 145:2,15 160:22,25 161:4,21 162:4 164:11 167:5,8,15,19 171:19 185:21 186:8 188:11 192:14 206:19 planned (1) 180:12 planning (4) 33:8 112:22 131:22 200:12 plans (11) 52:21 83:3 112:23 113:2,4,5,9 116:15 180:20 206:4,8 play (3) 14:20 24:16 8 plays (1) 12:10 please (53) 2:4 11:25 12:4 18:13,16 19:3 23:6,22 26:25 31:18 33:21 38:22 40:3 41:18 45:7 73:3,5 75:20 78:1 80:3 90:16,22,25 98:17 109:20 122:25 124:10 129:23 131:13,19 133:1 138:15 141:16 150:11 151:2,21 160:12 167:4,11,14 177:17,20,22 185:23 190:11 197:2 198:4,12 202:20,25 205:25 208:4 210:4 pleased (2) 162:7 163:2 plough (1) 196:15 plus (2) 89:3 92:22 pm (6) 61:17 88:3,5 150:7,9 215:22 pockets (1) 99:15 poer (26) 88:6 90:9,12,16 96:11 97:8 110:17 115:12 118:17 124:10 128:9 137:22 150:1,10 155:18 187:13,22 196:4,23 204:13 205:11,18 214:1,25 215:13 216:19 pointed (2) 35:14 194:10 points (7) 93:11 158:20 167:23 181:7 185:19,22 190:17 police (42) 7:12 8:4,5,10,20,23 9:23 14:14 15:12 19:12,14 47:5,9 51:21,22,24 52:8,4,7 54:15	59:4,5 70:24 71:7,18 72:1,9,20 80:17 84:17 94:19 113:1,17,21 117:17 146:10,13 187:2 191:24,25 202:8 215:1 polices (1) 113:4 policies (1) 17:13 policing (7) 56:12 63:13 65:10 81:8 84:24 187:2 197:1 policy (38) 10:15 11:23 12:1,13,14,23 13:5,12 14:9 23:12 27:3,4 30:19 37:4,4,8,10,13,14 38:7,8 41:18 67:8,8 68:16 76:1,2,25 77:19 78:1,14 79:1 80:6 84:15 112:6,7 205:24 poor (1) 44:11 portfolio (2) 92:24 100:15 posed (1) 103:13 position (15) 11:11 25:15 28:17 58:11,14 72:13 84:25 88:13,22 106:20 109:6 155:12 182:6 195:9,11 positive (4) 31:17 38:16 98:20,22 possibilities (1) 175:5 possibility (6) 26:6 59:13 132:19 136:3 206:23 214:13 possible (17) 10:18 11:6 26:9 29:4 34:22 48:8,11 80:24 87:10 117:16 125:10 126:22 132:23 166:3 174:7 196:14 209:4 post (3) 113:24 150:19,21 postattack (1) 189:18 postegress (1) 206:23 posts (1) 43:16 potential (5) 57:12 112:9 113:13 143:8 207:4 potentially (6) 18:3 60:21 140:17,19,21 148:23 power (2) 35:18,24 practical (8) 14:11 25:11 26:11 28:21 29:6 48:23 89:2 127:6 practically (1) 56:13 practice (15) 2:23 12:9,10,22 20:18 43:5,7 85:5 110:11 126:8,14 143:5 145:16 149:9 203:15 precaution (1) 26:8 precautions (4) 23:24 24:6,18 26:15 precise (1) 151:24 precisely (7) 37:9 118:21 135:19 151:6 158:8 162:17 165:2 preclude (1) 84:21 precludes (1) 84:15 predated (2) 4:23 151:13 predates (2) 110:4 148:9 predicated (1) 64:21 predictable (1) 96:20 preempt (1) 38:2 <
---	--	--	--	--	--	---

<p>60:2,4,7 63:20 64:2 65:7,13,16,18 66:7 70:12,15 73:3,23 74:9,24 76:3 77:21 78:5,17,24 80:7 82:15,18,22,24 83:10,11 85:7,14,16,25 86:21 206:12 premiselicenseholder (2) 28:11 29:7 preolympics (1) 146:18 preparatory (1) 182:17 prepare (1) 173:6 prepared (9) 109:23 151:8 152:13 171:21 172:23 173:4 179:24 183:18 206:9 prerefurbishment (1) 111:24 prescribed (1) 26:4 prescription (2) 203:13 204:7 present (5) 115:5 136:9 198:8 199:8,10 presentation (1) 198:6 presently (1) 38:20 presents (2) 66:20 112:8 press (4) 66:4 164:16 181:4 185:18 presumably (8) 6:16 20:4 57:21 128:10 134:8 142:7 153:17 178:19 presume (2) 162:14 211:5 presumes (1) 73:24 pretty (2) 38:4 126:24 prevent (5) 10:25 11:4 12:5 75:25 117:14 prevention (2) 76:14 77:13 previous (3) 2:22 4:19 26:7 previously (3) 131:23 155:10 189:2 primary (3) 21:11 35:17 91:21 prime (1) 37:24 principal (5) 91:2,8 103:19 109:6 148:22 principally (1) 115:14 principle (5) 62:10,16 65:14 94:15 122:15 principles (1) 17:14 print (1) 144:19 prior (7) 92:20 107:7,15 123:25 135:6 194:9 195:3 prioritise (3) 81:16 94:8 98:6 prioritising (1) 97:23 priority (3) 93:21 97:18 98:10 prison (1) 48:21 private (1) 4:24 privately (1) 91:23 privatepublic (1) 109:4 proactive (10) 19:23 41:19 47:19 51:6,7 97:13,16,18 189:6 194:13 proactively (2) 16:19 31:11 probability (1) 118:2 probably (10) 19:1 41:11 43:24 47:19 56:16 66:16 74:21 166:8 167:10 176:23 188:24 problematic (4) 32:19 140:20,21 148:23 problems (11) 33:7 35:15 38:19 39:10 46:3 47:8 48:7 69:18 170:21,25 209:4 procedure (1) 67:12 proceed (1) 196:9 process (43) 4:15 7:12 21:5 27:20 31:22 36:16,21 37:12 38:22 40:18 71:2 78:24 79:20 80:4,12 81:3,15,20 82:14 85:1,22,22,22 93:10 94:16 97:19 98:8 113:15 120:16 122:20 131:2 135:21 136:4</p>	<p>141:4,6 159:10 164:20 167:1,20 168:17 186:23 200:10 201:11 processes (1) 97:3 procuring (2) 158:6,7 produced (1) 110:7 product (4) 102:1,11 186:18 199:21 products (2) 98:25 147:15 professional (4) 93:3 101:13 160:2 204:10 profile (2) 95:19 112:12 programme (4) 48:1,3,6 186:19 programmed (1) 63:19 programmes (1) 32:3 progress (6) 105:1 133:4 139:13,15,16,16 progressed (3) 97:22 164:12 186:14 progressing (9) 140:5 142:5,9,10,16,17 144:20 160:6 164:13 project (3) 146:2,2 198:6 prominence (1) 95:19 promote (5) 12:15 76:2,18 78:5,17 promotes (1) 76:19 promoting (2) 76:3 84:18 promotion (1) 78:14 prompt (1) 174:25 prompts (3) 173:14 174:18 175:3 proof (1) 127:10 proper (3) 30:3 31:7 71:4 properly (3) 6:1 32:1 48:8 property (1) 148:1 proportion (1) 135:19 proportionality (1) 20:22 proportionate (5) 99:13 113:13 122:19 123:7 211:22 proportionately (1) 120:3 proportions (1) 46:15 proposal (4) 1:18 18:5 19:7 59:16 proposals (1) 54:25 proposal (7) 92:20 107:7,15 123:25 135:6 194:9 195:3 proposed (3) 18:11 64:17 124:1 prosecute (3) 50:16 68:11,14 prosecuted (1) 48:20 prosecution (6) 67:5,9,12,18 68:12 69:10,11,14 prosecutions (1) 67:25 protect (7) 28:1 106:3 108:6,7 119:10 212:3,21 protecting (3) 32:1 159:13 212:11 protection (2) 76:13 164:10 protective (14) 91:22 104:1 117:7 122:16,19 140:1 192:9 203:3 205:19 207:14 208:2 211:19 212:8,18 proven (1) 99:6 provide (25) 40:16 44:25 45:3 66:9,25 82:25 84:25 86:2 88:16 91:21 101:9,10 118:13 122:20 134:10,14,17 141:20 173:14 176:23,23 186:22 203:4 208:23 211:18 provided (22) 5:22 34:1 42:7 45:5 57:17 66:11 91:16 109:22 110:12 114:3 122:4 135:13,17 151:15,15 176:16,22 177:1,2 183:9 197:9 205:23 provides (1) 104:11 providing (4) 83:10 126:23 134:19 183:23 provision (4) 1:23 29:21 31:24 188:15 provisions (3) 25:6 86:19 87:1 proviso (1) 7:13</p>	<p>provoked (1) 128:17 psia (62) 82:25 95:6 100:21,24,25 103:19,24,25 104:2,5 105:4,9,9 116:14,20,21 117:8 120:15 122:7 125:6 129:1,9 130:25 131:9 135:5 138:1,9,12 144:15 154:16 159:24 162:20 163:4 166:14 168:17,23 169:4 171:17 172:10,13 173:11,22 174:19 176:17 181:11 185:9 186:7 188:10 190:20 192:14 200:10 201:3 202:9,11,23 203:23 204:4 205:12 208:19 212:14 213:10,12 psias (1) 138:1 pub (1) 87:18 public (22) 4:9 15:22 16:2 34:12 35:1 47:12 49:9 64:18,19 65:1 67:14 69:20,23 76:13 77:13 87:1 88:8 109:4 112:3 131:12 154:1 190:8 publicly (2) 91:22 99:5 published (3) 88:23 89:10 183:12 pulse (1) 65:13 punish (1) 68:19 punitive (1) 56:24 purely (2) 51:25 114:12 purple (2) 13:3,7 purpose (12) 89:1,17 91:13 102:3 104:5 109:25 129:13,17 134:8 173:13 180:19 210:25 purposes (2) 27:24 84:18 purse (3) 64:18,19 65:1 pursue (1) 171:4 purview (1) 89:11 push (2) 33:20 212:5 pushed (3) 27:24 39:13 187:12 pushing (2) 29:10 189:13 puts (2) 14:12 178:16 putting (6) 24:12 30:10 67:11 99:19 161:18 165:23 puzzling (1) 180:24</p>	<p>106:7,10,19,23 107:6,11,18 108:3,18,21 109:1,5,12 110:4,6,11 111:11,16 112:2,21 113:10 114:1,8 115:19,24 116:9 118:24 119:12,14,16 120:8,15,20 121:5,17,25 122:4,7,9,14,25 123:12 124:18,22 125:1,6,9,13,16,25 126:5,21 127:1,5,8,21 128:12,16 129:8,10,17,22 130:17,25 131:6,9,17 132:1,5,7,11,16,18,21 133:1,10 134:1,5,7,12,16,21 135:2,10,17,19 136:2,14,18 137:12,16 138:2,5,14,25 139:2,5,8,12,17,22 140:7,9,11,17,19,25 141:3,8,20,24 142:4,7,12,18 143:2,5,18 144:3,17,23 145:6,12,15,23 146:4,6,24 147:2,4,7,10,22 148:1,4,7,12,22,25 149:13,18,22 150:21,23 151:1,6,19,21 152:7,12,16,20,22 153:2,5,14,17,21,25 154:3,10,13,20 155:2,6,12,17,20,22 156:2,4,8,15,18,22 157:5,12,16,18 158:2,11,14,23 159:4 160:7,9,17,22,24 161:7,20,25 162:6,15,18,25 163:4,8,13,15,18,22,25 164:16,24 165:8,10,14,18 166:17 167:7,10,17,25 168:6,10,16,20,22 169:1,3,15,22 170:2,8,14,20,23 171:4 172:12,16,23,25 173:2,9,13,16,18 174:1,10,13,16,22 175:3,12,14,17,19,24 176:1,5,9,12,14,16,18,21 177:1,4,14 178:2,6,11,15,22 179:1,9,16,19 180:1,4,9,17,24 181:13,17,21 182:1,5,24 183:12,15,17,20,23 184:4,8,12,23 185:5,15 186:3,6,9,21 187:10,13,18 188:1,13,17,23 189:9,11,13,18 190:16,20 191:1,4,6,10,14,18,21 192:5,17,20 193:12,17 197:8,12,16,19,23 198:4,8,11,17,20,22,25 199:5,8,10,12,14,19,21,23 201:14,18,22,25 202:5,14,16,20,25 203:11,17 204:4,7,9,12,17,20,24 205:1,7,11,18,22 206:6,8,16,22 207:4,9,12,17,20,23 208:9,15,19,23 209:1,3,8,13,18,22 210:3,6,11,13,17,19,21,24 211:18 212:6,11,14,17 213:6,8,10,15,18 q4 (1) 139:9 qc (1) 59:24 qualified (2) 57:24 58:8 quality (1) 93:9 qualms (1) 164:5 quarter (9) 61:14 116:16,17,17,17,18 139:1,2,18 quarterly (1) 82:24</p>	<p>queries (4) 172:16,21 174:3,7 query (1) 174:22 question (37) 12:10 24:2 27:10 29:13 32:15 44:11 45:18 62:23 64:21 65:21 70:1 71:16,23 72:17 74:17 82:8 86:9 118:6 119:16 128:7 130:17 134:21 137:19 166:20 172:9 174:2 181:3 182:16,18,19 183:7 187:20 188:17,23 193:12 200:24 213:11 questioning (5) 40:3 150:10 196:9 214:4 215:1 questionnaire (1) 123:6 questions (71) 1:10 3:5 17:2 20:22 21:24 22:17 31:16 34:5 39:22 40:1,4 41:8 42:5 61:9,11,19,20,23 69:15,19 71:1 73:1 75:12,13,16 81:25 86:6,13,15,17 89:16 90:12 102:1 103:11,12 105:9 141:8 150:12,14,15 155:18 158:15 166:18,24 169:4 171:7,11,12,22,23 172:3 180:2 181:6 190:20 192:16 196:2,16,25 197:3 213:22 216:7,8,9,12,13,14,15,16,19,20,21 queuing (1) 108:15 queues (2) 170:4,15 quick (4) 41:10 146:18 161:8,17 quickly (4) 38:4 39:6 41:4 99:19 quiet (1) 63:24 quite (25) 4:6 6:10,25 8:1 15:20 20:23 41:14 46:15 48:17 49:7 57:25 61:3 68:12 80:14 117:21 137:8 146:17 161:19 163:22 176:4 181:2 183:4 188:21 189:5 196:11 quote (1) 91:19</p>	<p>reactive (5) 19:23 41:19 51:5 6 194:12 read (12) 64:6 78:3 113:8 122:14 160:5 161:14 179:23 180:1 185:25 186:12 211:9,9 ready (1) 22:12 real (4) 29:1,9 16 107:21 realise (1) 61:24 realised (1) 16:13 realism (1) 87:12 realistic (1) 55:7 realistically (1) 56:13 reality (3) 15:6 20:14 38:24 really (57) 3:18 4:10 6:10 7:22 10:16 11:11 12:8 14:11 21:2,10 33:9 35:13 37:21 38:21 40:25 47:4 48:5,12,18 49:9,25 50:25 52:8 56:4 69:24 71:16 69:15,19 71:1 73:1 104:20 114:8,15 119:16 120:20,24 122:23 136:12 137:25 144:12 145:3 147:16 148:9,15 157:12,13 162:9 164:4 177:22 179:13 182:10 183:5 187:9 188:23 197:20 200:13,21 reason (17) 7:7,16 24:15 28:18 65:18 70:16 73:23 76:20 84:2,11 85:20 91:10 111:20 148:19 159:23 168:14 211:6 reasonable (2) 29:24 64:14 reasonably (7) 23:25 24:19 25:7,12 26:15 46:11 87:14 reasons (7) 36:4,25 39:16 68:11,14 83:22 101:22 reassurance (1) 40:17 reassure (1) 41:3 reassuring (1) 39:9 recall (5) 7:11 9:7 114:6 179:10 205:25 recalled (2) 1:9 216:6 recap (1) 81:11 receive (6) 20:17 66:13 69:10 92:9 97:13 98:25 received (4) 79:21 88:14 199:6 208:9 receives (1) 116:10 recent (5) 42:7 43:4 88:20 146:22 147:11 recently (1) 52:5 reception (1) 54:25 recognisable (1) 95:15 recognition (13) 12:19 39:10 56:22 59:25 77:20 103:5 106:14 115:20,23,24 116:1,11 151:12 recognises (2) 12:23 76:3 recognition (2) 55:13 96:19 recommended (4) 98:23 99:1 102:20 195:22 recommendation (1) 167:18 recommendations (6) 113:11 155:3,9,13,15 164:12 recommended (3) 50:10 178:24 195:22 recommending (2) 99:17,24 reconnaissance (5) 106:14 119:7 147:18 170:6 201:6 reconsider (1) 28:19 record (10) 6:8 40:11,13 86:8 105:7 122:14 146:24 147:2,4 160:1 records (1) 6:7 recruit (1) 43:15 rectified (3) 40:17 41:4,4 rectify (1) 40:20 rectifying (1) 40:18 red (2) 142:14 185:24 redacted (1) 172:4 redactions (1) 88:24 redevelopment (1) 148:5 refer (8) 53:2 89:4 114:5 123:5 156:10,12 161:10</p>	<p>172:5 reference (22) 2:10 4:21 5:16 10:6,13 13:7 34:2 42:10 77:9 79:10 90:21 93:15 113:6 151:7,22,25 154:3,6 174:2 177:5 191:8 213:20 referenced (1) 32:2 references (2) 5:14 174:13 referred (3) 37:15 183:8,12 referring (9) 34:8 64:20 79:17,19 108:1 113:3 155:20 193:9 213:17 refers (5) 89:8 113:2 176:6 178:11 180:5 reflect (2) 18:9 144:12 reflected (1) 12:25 reflection (3) 6:20 13:8 143:11 reflectively (1) 128:13 refocus (1) 210:25 refresh (1) 141:4 refreshers (1) 144:15 refreshing (1) 116:24 refused (1) 83:11 regard (13) 7:25 13:6,8 61:1 76:4,5 78:25 85:17 100:24 114:10 140:14 159:2 205:24 regarded (3) 23:17 98:19 136:7 regarding (4) 13:2 107:8 170:5 192:15 regardless (2) 152:16 211:19 regards (1) 149:24 regime (20) 2:22 4:20 46:21 48:3,11,16 49:14 65:25 76:10 77:2,22 81:9 82:7 83:18,22 84:8 86:1 122:20 130:3 177:11 region (2) 70:22 94:6 register (6) 62:14,20,21,25 63:1,7 registering (1) 63:5 registration (2) 62:12 63:3 regrettable (2) 89:25 90:6 regular (8) 47:5 50:19 54:3 112:24 130:5 147:11 181:11 205:14 regularly (2) 55:23 71:9 regulated (5) 23:8 44:21 45:1,3,5 regulation (1) 51:13 regulations (1) 37:20 regulatory (2) 48:11 62:15 reinforced (1) 108:18 relate (7) 3:23 11:14 60:10 77:1,11 21:14 213:3 related (3) 19:21 53:13 185:8 relates (2) 78:23 106:4 relating (5) 5:17 62:17 134:24 171:6 195:12 relation (35) 12:22 17:19 18:11 24:2 28:14 34:4 35:11 46:21 53:6 57:10 59:20,22 60:24 68:2 71:7 72:7,10 73:17 74:12,17 76:24 81:7 84:1 89:8 101:7 111:21 122:16 124:18 131:2 134:7 140:20 194:22 205:2 210:17 213:19 relationship (4) 54:7 72:10,11 127:11 relatively (3) 92:12 161:23 171:24 relaunched (1) 202:22 relays (1) 162:3 relevant (5) 8:11 12:15 13:23,25 14:3,6,7,9 26:18 36:5 60:2 76:12 80:7 179:3 188:12 relies (1) 48:12 remain (1) 92:3 remarks (2) 73:7 90:9 remember (5) 3:7 153:24 175:14 179:24 206:17</p>
--	---	---	--	--	---	---

remembers (1) 181:24	returns (2) 36:21 159:18	17:6,11,17,21,23 18:14	searches (4) 48:24 49:2	senior (1) 192:2	65:23 66:1 163:12 164:1,3	164:5 167:15,18 176:19,24
reminder (1) 147:17	revert (1) 108:5	19:9,14,17 20:1 21:10,16	206:10 207:2	sense (5) 38:14 57:13 109:1	show (1) 163:5	184:22 185:12 186:2,8,11
remit (5) 44:10 120:4	review (19) 28:22	22:2,4,8,12 25:3,10,16	searching (12) 3:20 5:3	188:13 190:17	showing (1) 11:11	187:6,7 189:4,8 192:12,15
185:1,5,11	37:7,10,11,12,13,17 85:22	26:2,3 28:21 30:12	11:10 112:7 130:12,20,21	sensible (2) 69:9 88:1	shown (1) 180:6	193:20,21 203:21,25
removes (1) 5:5	116:20 141:4 142:20,22	31:5,14 35:13 23 38:6,9,12	140:21 145:7 206:6,25	sensitive (5) 88:24 136:11	shows (2) 104:20 152:9	204:1,18,22 205:5,8,20
removed (1) 167:17	144:23 150:17 165:15	39:25 40:13,23 41:7,13	213:19	167:1 171:8,16	showsec (4) 187:24 188:14	206:23 207:5,18
renewed (1) 8:7	167:15,18 188:11 213:24	42:1 46:5,12 48:23	seats (1) 11:2	sent (5) 38:20 121:22 147:10	189:1 196:25	208:2,9,15 209:8
renting (2) 62:25 63:8	reviewed (1) 128:25	49:15,24 50:12,25	seco (4) 193:7,19,22,25	177:3,18	sia (27) 2:2 3:12 4:22,24 5:2	212:8,12,18,21 213:4
rents (1) 62:21	reviewing (1) 207:13	51:10,18 53:22 54:10,22	second (4) 25:18 154:3	sentence (3) 49:5 123:3	11:7,19 15:23 16:3,15 49:3	sites (55) 91:23 93:2,2 94:17
repeat (4) 32:24 69:19 70:1	reviews (2) 60:7 178:9	57:1,6 59:3,7,11 60:10,15	160:17 206:8	187:14	53:24 54:17,21 70:25	95:4,8,24 96:2,2,17 97:13
116:8	revise (1) 37:13	61:5,13,22 72:25 81:21	secondly (1) 146:1	sentencing (2) 146:22	71:14,15,18 72:1,10,20	98:12 99:12,12 100:16
repeatedly (1) 184:12	revisit (1) 75:17	82:9,11 86:8,16,24	secos (8) 191:6,8,10	147:14	73:21 74:1,5,6 87:16,20	102:12,17 106:17 110:7
replace (1) 102:19	revisited (4) 116:16 117:8,9	87:3,7,11,23 88:2 89:25	192:17,22 193:4,13,18	sentinel (1) 147:7	sialicensed (2) 54:6 73:17	113:4,8 114:2,11 116:1,24
replicating (1) 19:6	159:9	90:8,13 96:8,24 97:1,6	section (15) 1:22 2:13 3:6,25	separate (6) 134:7 137:7,10	sick (1) 58:17	117:24 119:18,19 121:14
report (13) 35:10 49:10	righthand (11) 111:23 125:3	110:14 114:24 115:5,8,11	12:13 37:15 59:17,22 64:8	149:1,2 188:11	sick (6) 56:12 111:23 132:11	122:4,10 123:12 127:12
62:14 69:21 70:9,14 89:1	126:9,10,17,21 131:14	117:10,21 118:5,16 123:16	76:1,17 77:9 167:17 174:5	september (3) 142:20	185:25 186:3 187:11	134:12 135:3 136:12
113:12,15 116:17,18	138:15,19 185:25 186:3	124:1,5,9 128:3 136:21,24	183:20	144:23 160:19	signed (1) 54:19	137:3,9 149:8 159:11
152:13,14	rightly (1) 40:9	137:19 150:5 164:1,3	secure (2) 185:25 186:13	sequentially (1) 125:13	significant (5) 39:2 64:11	161:9 163:24 164:7,19
reported (3) 159:18 166:13	rise (4) 22:1,8,12 73:19	165:25 166:9 172:8 181:2	security (99) 1:25 2:1 3:10	series (7) 3:4 5:17 83:4	95:20 140:14 159:2	168:11 169:13 186:15
184:20	risen (1) 193:5	182:10,19 183:5 190:1,6	4:24 8:9,24 11:16 14:17	150:13 172:21 174:6 186:4	signpost (2) 114:16 118:10	188:3,4 191:7 192:16
reporting (2) 162:19 184:19	risk (29) 9:15 14:16 15:10	194:4,8,15,21	18:6 27:12,24 28:1 29:10	serious (2) 48:17 68:23	signs (1) 73:20	195:24 203:5 205:1 207:1
reports (2) 69:22 70:2	18:24,25 26:17 57:14	195:1,5,8,11,16,25	33:7,16 53:13 57:14,19,25	service (2) 67:12 114:18	similar (6) 84:9 114:21 115:6	sitting (1) 38:20
represent (6) 22:20 30:5	82:16 99:22 106:23 107:8	196:3,11,22	58:25 64:13 83:1,5 87:16	services (1) 134:19	126:17 174:25 195:23	situation (11) 14:23 25:12
61:24 62:2 75:15 124:14	114:23 115:15,20,24,25	200:1,8,12,18,23 201:5	91:3,22 92:2 95:25	session (6) 1:3 169:17	similarly (1) 161:15	51:5 135:10
representation (2) 80:17,20	116:1,11 119:3 124:7	202:8 208:4	96:3,6,13 98:24 99:5,9	171:14 199:8 200:16 216:4	since (11) 1:21 12:25 59:23	148:14,22,24,25 149:15,18
representations (10)	152:17,20 153:2 164:8	211:7,11,21,24 212:23	100:7 101:16,23 102:11,25	sessions (1) 93:7	91:6,11 148:17 149:18	213:24
13:23,25 14:3,6,7 16:8	168:3 193:6 197:12 199:23	213:23 214:8,11,18,23	104:1,8,22,24 105:17	set (21) 35:11 36:20 39:6	150:19 151:17,17	six (3) 53:5 202:11 204:12
19:12,13 20:4 79:22	210:7	215:4,16	106:12 110:9 112:22	43:20 46:21 67:6 68:15	single (6) 31:23 49:20 65:13	sixmonthly (1) 181:14
represented (1) 131:23	risks (5) 14:8 120:5 123:16	save (1) 140:17	122:16,19 123:6 124:15	76:9 80:16 81:19 83:4	119:24 173:3 203:19	size (1) 211:2
request (4) 88:20 90:18	152:24 200:4	saw (3) 70:8 131:22 188:19	127:14 131:21 134:17,22	125:17,19 173:3 183:9	sinnett (5) 129:7 142:19	slide (1) 41:9
187:7 196:24	robust (1) 56:18	saying (38) 11:6,20,21	135:23,23,25 137:5 140:2	187:15 196:9 203:19,23,23	160:19 162:1,18	slightly (5) 19:22 150:2
requested (2) 158:10 199:1	role (8) 8:25 12:20 76:3	26:8,9 28:5,17 41:17 50:14	150:16 153:22,22	208:12	160:19 162:1,18	152:8 169:6 191:23
requests (3) 66:23 193:7	91:2,10,15,17,21 156:2	62:10 66:20 101:11 102:19	154:23,25 157:5 161:19	sets (5) 18:10 37:4 48:3 76:1	160:19 162:1,18	slipping (1) 71:17
214:1	191:18,20,22,23 192:20	105:11 108:6 114:21	163:8 164:15,17	79:10	160:19 162:1,18	small (4) 63:13 146:11
require (7) 11:7 61:1	roles (4) 43:13,13,17 194:1	118:5,8 119:18 121:3,3	167:15,18,20 179:11	setting (2) 45:10 82:6	160:19 162:1,18	167:12 211:2
63:15,15 66:9 87:16	rolled (1) 58:14	123:18 127:24 128:5 155:6	180:20 184:13,17 187:21	setup (1) 121:13	160:19 162:1,18	smg (9) 48:25 49:22 50:4
161:13	rolls (1) 7:8	156:8 161:20 164:13,14	188:1,3,8,15 189:21	several (1) 191:6	160:19 162:1,18	147:4 150:10 162:2 200:16
required (13) 10:23 16:10	room (20) 27:25 28:2 108:24	178:2,8 182:14,14 186:21	191:11 192:15 193:20	severe (1) 152:2	210:19 162:1,18	208:23 210:13
18:4 43:9 49:2 55:18,19	111:25 112:2 118:22 120:9	200:7 202:1 206:8 208:1	194:22 195:12 203:3,5	sexual (2) 12:18 53:11	160:19 162:1,18	smith (1) 177:25
57:24 64:2 92:15 93:5	121:11 127:16 153:23	scale (2) 71:19 140:3	205:19 207:4,14,18 208:13	shall (9) 5:22 18:12 23:13,24	160:19 162:1,18	snapshot (5)
117:12 120:10	171:14 179:12 184:8,14	scenario (3) 100:18 115:12	210:19 211:19 212:8,18	24:6,9,18 89:14 208:4	160:19 162:1,18	104:11,17,18,20 133:3
requirement (14) 4:16 5:3	194:19 195:3,13,23	198:13	securityrelated (1) 8:13	shant (1) 122:9	160:19 162:1,18	soandso (1) 157:14
11:13,19 18:23,24 23:9	210:14,19	schedule (3) 79:5,10 86:21	see (110) 2:9 5:12,16 9:18	share (4) 52:4,9 71:8 192:17	160:19 162:1,18	socialled (1) 155:2
34:11,25 40:21 66:8 73:24	round (8) 24:14,21 41:21	scheduled (1) 36:23	12:5 18:18 19:4 21:6 28:23	shared (2) 165:21 209:5	160:19 162:1,18	social (1) 22:7
102:22 103:2	116:3 117:17,22 163:6	scheme (7) 7:4 89:22 93:3	29:14 31:14,25,25 32:4	sharekey (8) 16:25 42:4,6	160:19 162:1,18	socially (1) 22:11
requirements (6) 23:8,16	193:18	94:13 202:22 204:4 211:1	33:14 37:22 43:17 45:6,9	51:19 75:15,22 78:3	160:19 162:1,18	soft (1) 197:14
51:3 55:4 56:9 204:2	route (3) 60:5,18 68:22	scope (2) 182:2 189:9	50:12 74:7,20 76:22 78:2	216:11	160:19 162:1,18	software (2) 187:4,5
requires (8) 11:17,17 15:23	routine (4) 47:25 48:10	score (29) 83:1,1 94:4 95:6	100:8,10,16 102:20 110:19	shant (1) 122:9	160:19 162:1,18	solution (4) 82:20 100:20
25:1 28:15,16 73:12	55:22 74:12	101:4 105:10,16,24 107:25	111:16,20 112:21 121:1	share (4) 52:4,9 71:8 192:17	160:19 162:1,18	101:9,10
101:21	193:18	125:2,4,20,23	122:10 123:2 126:13,14	shared (2) 165:21 209:5	160:19 162:1,18	solve (1) 209:4
requisite (1) 16:3	royal (3) 192:5,6,11	126:2,6,12,23 127:3	128:19 129:1,10,23	sharkey (8) 16:25 42:4,6	160:19 162:1,18	somebody (4) 14:13 16:13
research (1) 212:23	rude (1) 37:16	132:7,7 134:1 137:14	131:13,17,21	51:19 75:15,22 78:3	160:19 162:1,18	46:22 101:20
resolution (1) 27:14	rudely (1) 169:15	138:23,23,24 139:5,10	132:1,5,7,12,18	216:11	160:19 162:1,18	somehow (1) 200:9
resolved (3) 28:14 145:1,3	rules (1) 30:3	140:3 175:1	133:2,4,6,15 136:19	sharply (1) 119:12	160:19 162:1,18	someone (6) 28:22 53:10
resource (6) 37:22 45:16,19	running (7) 64:15 107:23	scored (11) 105:13 125:7,9	137:16 138:14,16	sheet (3) 162:20 173:16	160:19 162:1,18	101:24 102:5 128:12
46:15 55:14 193:14	117:11 136:6 149:15	132:23 139:6 162:9 163:23	139:8,10,17,19,23 140:2	186:3	160:19 162:1,18	161:13
resources (9) 37:20 47:15	192:3,8	164:6 205:2,4 210:19	141:17 142:4,18 143:14	shes (3) 81:24 178:15 182:14	160:19 162:1,18	162:16,19 163:9 165:21
55:16 63:21 64:4 66:21		scores (13) 125:19 132:13	144:7,18 145:7,8 151:24	shift (1) 43:10	160:19 162:1,18	168:10 171:17 176:9
147:19 183:14 191:14		133:5 138:11,14,16 140:25	152:22 154:3 157:1	shopping (2) 33:5,14	160:19 162:1,18	177:8,10 182:24 185:14
respect (9) 4:25 12:20 13:9		160:2 162:20 163:4,10,11	158:20,23 160:18,20 161:2	shops (1) 206:17	160:19 162:1,18	186:22 188:19 6,20 3,23
22:25 33:7 63:17 65:22		164:19	166:12 167:15,17 168:6	short (16) 21:25 22:15 34:5	160:19 162:1,18	194:4 200:6,7 210:24
180:9 199:17		scoring (36) 94:10,20 95:3,3	169:4 172:20 173:13	61:16 69:24 86:16 142:21	160:19 162:1,18	211:13,16
respects (5) 45:18 65:8		100:21,25 101:8	174:4,6,13,22 177:5,24	145:17 147:22 150:8	160:19 162:1,18	212:12,17 123:10,20 124:7
67:21 105:9 121:11		103:14,20,24 104:6,25	178:3 179:5 180:15 181:13	153:25 159:8,10 185:22	160:19 162:1,18	145:3 146:9 148:14 149:12
responded (1) 80:13		105:4,25 106:25 120:15	187:18 189:22 190:16,24	191:2,18	160:19 162:1,18	154:15 155:7 161:22
responding (4) 20:4 97:21		122:7 123:2 124:11 125:6	192:13,20 202:25 205:2	shortcomings (1) 160:10	160:19 162:1,18	162:16,19 163:9 165:21
113:13 195:1		130:25 131:2,6,9 136:4	206:2 207:24 212:7,24	shortly (5) 90:23 92:12	160:19 162:1,18	168:10 171:17 176:9
responses (1) 191:4		137:5,23 145:1 158:23,25	214:5	149:13 152:5,23	160:19 162:1,18	177:8,10 182:24 185:14
responsibility (3) 92:2		160:7 166:14 176:3	seeing (2) 32:17 165:3	shortsighted (3) 185:13	160:19 162:1,18	186:22 188:19 6,20 3,23
113:18,21		203:2,22 205:13	seek (3) 27:19 68:24 156:13	194:9,16	160:19 162:1,18	194:4 200:6,7 210:24
responsible (10) 28:11 42:17		screen (9) 2:6 15:1 167:4	seem (1) 30:1	shortsightedness (5) 199:23	160:19 162:1,18	211:13,16
47:11 52:19 80:19 83:17		173:24 174:20 177:19	seems (10) 5:7 9:25 10:1,3	200:23,25 201:22 202:1	160:19 162:1,18	122:12,17 123:10,20 124:7
105:24 114:7 131:10		207:23 210:4 214:5	28:4 29:9,24 41:21 82:6	shortterm (1) 140:23	160:19 162:1,18	145:3 146:9 148:14 149:12
142:18		screening (7) 124:22 125:22	173:19	should (67) 3:15 5:12	160:19 162:1,18	154:15 155:7 161:22
rest (3) 74:15 178:3 181:13		131:21 132:24 133:9	seen (18) 23:			

99:9 110:6 114:5,24 123:16 133:3 147:18 150:14 151:12 157:24 165:23 166:19 187:10 188:18 190:10	stance (4) 95:25 96:3,6 192:15 stand (1) 103:25 standard (16) 58:13 98:23 99:1,8,25 120:6 123:10 134:21 154:18,22,23 155:1,2,9,12 211:4 standards (1) 99:5 standing (1) 11:1 standoff (2) 205:2,4 start (11) 4:23 37:2 41:11 61:6 109:18 142:20 150:16 165:18 177:23 191:25 214:14 startcompletion (1) 161:5 started (4) 46:14 146:9 148:10 151:18 starting (2) 148:9 211:15 starts (1) 142:14 stated (1) 173:23 statement (46) 17:3 18:11 34:5 37:14 42:8 43:19 44:16 53:3 59:16,22 76:24 79:1 83:23 88:16,19 89:6 90:18 91:19,25 92:5,10 107:6 109:22 121:21 131:1 140:13,22 143:3 144:2 145:5,12,18 158:24 159:7 173:23 179:20,22,23 181:9,10,13 183:9 187:15,18 201:10 210:16 statements (3) 88:22 89:3 109:14 states (1) 116:24 station (18) 27:8,23 28:23 30:21 31:22 147:23 148:4 166:18,20,21 167:1,8 168:2,3,7 171:7,18 184:25 station (17) 3:22 8:18 27:9 45:4 77:17 81:15 108:1 109:13 114:7 157:3 170:15 176:6 193:11 207:10,17,22,24 specification (1) 55:18 specificity (1) 7:10 specifics (2) 103:11 173:18 specified (4) 3:9 5:23 6:6 119:20 specify (5) 11:15 103:9 127:20 154:9 202:17 spectators (5) 23:17 24:1,7,20 26:22 speculation (2) 87:6,8 speeds (1) 99:7 spider (1) 131:23 spirit (1) 31:17 spoke (1) 161:12 spoken (4) 127:13,16 188:3 212:20 sport (1) 60:14 spotcheck (5) 67:3 73:10,19 74:19,25 spotchecks (5) 65:14,15 66:1,3,22 spots (6) 25:19 127:21,24 128:4,6 184:19 spreadsheet (10) 105:6 125:9 133:11 137:24 138:2,18 139:19,22 141:17 172:14 square (2) 121:12 128:10 stade (4) 108:2,4,11 207:14 stadia (6) 156:22 198:6 201:1 202:4 206:1,17 stadium (3) 108:5 198:14,15 stadiums (1) 183:18 staff (17) 43:13 54:2,14,15,16 57:17 73:18 74:11,18,20 106:13 129:6 134:5 143:21 147:17 196:7 212:20 staffing (1) 26:19 stage (8) 79:20 80:25 104:5 135:5 138:6 156:9 159:17 165:10 stairs (1) 206:18	30:7,22,25 31:21 strikes (1) 72:7 strongly (1) 131:10 structural (1) 169:14 structured (1) 124:12 structures (1) 11:1 stuff (3) 118:13 127:19 188:7 style (2) 87:4,5 subcategories (5) 124:20 125:1 132:2,9 133:20 subcontracting (1) 134:22 subject (13) 19:16 23:18 30:8,12 37:25 67:5 85:14 88:23 89:12 112:7 143:21 159:9 170:4 submit (2) 92:23,24 submitted (1) 94:5 subparagraphs (1) 18:19 subsequent (2) 104:25 133:5 subsisted (1) 149:15 substance (1) 110:6 substantial (3) 69:8,9 152:1 substantially (1) 169:7 subtables (1) 139:25 success (2) 67:13,22 sued (2) 117:15 118:2 sufficient (4) 58:21,23 96:17 195:17 sufficiently (2) 57:20 120:9 suggest (17) 47:21 94:21 101:12 102:6 103:1,7 111:12 134:15 151:19 152:3 156:13 158:8 160:10 170:2 197:25 200:10 212:17 suggested (2) 21:17 136:5 suggesting (6) 48:25 50:12 133:24 134:2 151:24 195:16 suggestion (3) 29:24 59:17 60:18 suggests (3) 122:4 124:16 145:2 suicide (8) 111:3 153:3 169:18,23 198:20 207:25 209:25 210:8 sum (1) 124:23 summarise (1) 178:7 summarised (2) 141:8 181:22 summary (4) 83:1 104:6 105:4,20 supervisor (2) 2:18 87:18 supervisors (3) 2:10,11 4:10 supplied (2) 66:24 160:25 supplier (1) 158:12 suppliers (1) 183:23 supplies (4) 29:22 30:4,7,15 supply (5) 29:22 30:3 60:24 67:4 137:2 support (3) 17:24 20:21 107:11 supporting (1) 84:17 supports (1) 77:10 suppose (35) 2:20,23 3:21 4:14 8:14 11:13 12:15 13:1,11,13 14:7 16:7,7 18:23 19:16 20:13 24:24 26:17,20 27:18 28:14 32:11 33:8,9 36:4 37:6,19 73:22 94:16 114:8 118:17 124:6,6 194:15 199:17 supposed (5) 69:20 98:25 99:1,5 152:17 sure (30) 7:18 9:5 10:8 19:24 40:21 42:16 49:22 51:14 61:24 62:9 64:3,8 66:18 75:22 76:8 81:14 87:19 99:2 156:20 159:19 160:14 177:17 178:4,16 179:23 183:5 184:9 195:20 206:12 215:15 surprise (1) 176:2 surprised (1) 63:2 surprising (1) 10:7 surveillance (1) 15:22 survey (10) 102:20 109:19	110:1 113:15 114:3 117:2 128:25 129:3 148:11 192:13 surveys (5) 93:1 110:10,11 114:20 153:11 susceptible (2) 141:25 153:12 suspect (1) 4:22 suspicious (3) 119:8 184:20 195:21 sweeps (1) 130:13 swift (17) 1:6,9,11 2:9 5:11 12:8 15:20 17:25 22:20 31:16 38:13 40:4 55:1 75:18 76:1,21 216:6 swifts (2) 75:22 78:23 sworn (5) 1:8 88:7 90:10,11 216:18 symbolic (1) 95:16 system (23) 6:23 72:5 82:13 83:9 84:5 85:3 95:2,3 96:13 100:21,25 103:14,20,24 104:6 105:4 120:15 121:23 122:7 124:11 125:6 128:13 163:13 systematic (1) 206:13	155:7 156:5 161:22 170:8 202:16 territorial (1) 182:2 terror (1) 57:20 terrorism (9) 9:15 12:5,7 14:8 75:25 77:15 164:10 194:12 197:6 terrorist (4) 10:2 15:10 117:3 179:3 terrorists (1) 157:7 tested (2) 99:6 112:24 thank (70) 1:7,12,13 8:3 9:4 10:10,20 15:17,18 20:1 21:22 22:13,19 29:17 31:15 34:17,21 38:12 39:8,20,21 41:6,7,25 42:1 45:14 52:23 53:19 54:22 57:6 59:11 61:18,22 72:23,24,25 75:10,14 78:21 81:5 82:12 86:6,8,11 87:23,23 88:2 89:25 90:8,13,15 115:16 118:16 121:17 128:18 138:25 150:1,6 154:13 158:14 161:20 172:8 177:14 194:3,7 196:3 208:5 213:22,23 215:4 thanks (1) 42:6 that (108) 2:3 3:24 4:21 7:22 10:18 11:8 13:7 14:2 18:22 19:2 23:20 24:24 26:22 27:15 30:12 31:10 33:4,8 34:7,14,14 36:15 39:20 41:6 42:9,20 44:14,14 49:4 53:7 55:2 56:24 57:5 58:20 59:23 60:15 61:11,21 64:17,19 68:9 69:24 71:22 71:11,15,19 77:24 79:2,24,25 81:19 83:20,21 85:10 86:23 87:10,21,24 88:11 101:6,14 105:20 106:18 113:3 115:20 118:8,15 119:3 122:23 128:7,20 134:9 136:12 138:5 139:22 140:7 142:7 144:20 145:15 146:21 148:19 152:17 154:21 156:2 157:12,12 159:21 160:7,24 163:13 167:17 168:10 169:19 175:3 176:1 181:2 182:10 184:12 186:9,22 187:8 190:23 193:8 194:18 211:21 213:11 214:16 theatre (1) 169:24 theme (1) 172:13 themselves (3) 102:23 120:5 137:2 thereafter (1) 152:24 thereby (2) 80:20 105:16 therefore (21) 28:3,12 63:9 74:1 99:11,24 102:2 103:2 107:15 108:10 130:16 142:9 143:12 151:12 153:12 164:20 165:20 169:14 192:7 193:24 212:22 thers (60) 1:8 5:17 7:6 8:18 12:18 27:11 32:2 36:16 38:16 42:24 47:16 52:18 54:20 58:16 59:8,16 60:21 64:8 69:20 70:16 71:14 72:7 79:23 80:2 82:3 83:9 84:6,20 85:20 86:9 105:9 118:12 127:10,19 129:18 133:6 134:25 144:23 149:4,6,10 151:3 159:5,15 164:24 165:7 167:1,22 174:5 179:2 180:21 181:21 185:5,13 186:4 188:7 189:9 191:8 193:5 206:6 theyd (3) 15:4 75:9 178:17 theyre (20) 8:7 9:9 13:19,22 15:2,7 19:6 42:18 43:9 54:17 57:19 85:10 87:4	99:6 105:17 119:18 127:18 178:8,16 194:1 theyve (7) 10:23 46:24 92:25 110:11 117:24 163:2 213:10 thing (17) 21:14 53:23 59:12 65:1 69:2,4 73:18 85:11 114:5 115:5 116:14 147:18 159:21 162:23 185:4 190:10 194:11 thinking (6) 16:20 63:23 106:19 107:19 108:18 194:18 thinks (1) 33:15 third (9) 10:11 134:16,19 135:17 136:3 141:24 142:1 143:13 206:16 thirly (1) 146:2 thorough (1) 206:13 though (7) 107:21 129:12 173:19 181:7 186:21 187:10,12 thought (12) 6:16 18:14 60:1 107:24 120:11,16 138:21 143:24 163:9 177:13 200:2 211:7 thoughtful (1) 71:4 threat (16) 12:5 57:20 75:25 108:9 146:19 151:23,25 152:2,5,8,12 153:19 157:2 193:5 197:5,16 threats (1) 205:5 three (8) 43:2 71:2,5 75:15 95:9 133:22 145:17 185:19 threepronged (1) 72:19 threeweek (1) 92:13 threshold (2) 68:12 193:8 through (37) 1:19 27:19 29:19 33:10 38:10 39:11 53:1 60:7 64:25 68:17 72:13,16 74:24 103:1 106:21 113:14 118:12 120:16 126:8 129:1 131:20 135:5 137:4 138:8 141:21 128:17 133:24 134:2 172:6,12 173:16 180:1,20 181:14 192:14 203:5 209:3 throughout (2) 137:17 173:5 thrown (1) 50:2 thursday (2) 146:8 215:24 thus (1) 77:19 tier (21) 82:14 95:13,13,13,15,18,22,22,22,24 96:2,5,8,15 97:13,13,16,17,25 98:6,12 tiering (8) 81:15,20 82:14 95:3 96:6,15 97:12 98:8 tiers (3) 94:9 95:9 96:23 time (63) 4:15 6:25 7:11,13,19 13:1 17:4 30:16,24 39:11 41:11 49:7 50:20,22,24 52:16 61:10 86:13 89:21 90:4 92:16 97:9 104:9,11,21 106:15 107:23 108:19 117:11,13 126:15 164:20 165:20 143:13 144:7,19 146:19 150:6 151:13,15 152:13,17 154:14 161:11,16,22 166:3 170:9 171:1 182:3,21 184:5,16 185:1,13 194:16 196:5 198:1 214:11 215:9,9 times (7) 3:9 21:1 41:15 88:12 109:15 189:24 215:17 tiring (1) 196:12 title (2) 2:17 44:3 titles (1) 74:15 together (9) 62:5 71:8 104:23 109:16 112:24 126:2 141:11 148:17 213:2 toilets (2) 130:6 205:14 told (19) 46:6 52:24 55:1 69:16 76:1 98:6 111:5 115:21 118:24 119:20	122:11 123:12,13 130:9 139:5 150:18 157:1 162:19 195:15 tomorrow (6) 196:13 214:8,14 215:7,8,12 too (5) 48:13 61:6 89:11 151:6 171:10 took (9) 18:14 56:16 129:9 146:10 150:2 165:18 178:13 182:22 211:13 tool (8) 72:22 73:4 104:7 123:2 186:14 202:23 203:22 208:19 tools (2) 103:17,19 topic (4) 53:20 78:22 147:22 149:13 topics (1) 21:23 total (6) 92:16 132:19 137:19 138:22 141:17 143:2 totally (3) 19:24 63:8 189:25 touch (3) 51:12 59:12 157:13 towards (4) 38:17 110:19 190:16,23 track (6) 18:2 126:7 131:20 132:12 139:12 141:21 tracked (1) 143:2 tracking (1) 141:20 trade (3) 20:19 21:2 37:25 trading (1) 44:8 traditionally (1) 98:22 traffic (2) 185:24 204:24 trafford (1) 198:8 tragedy (3) 30:14 32:16 61:25 train (1) 184:25 trained (5) 6:1 102:8 130:18 198:13,25 training (44) 18:5,20,21 34:13 35:2 57:9,17,22,23,24 58:12,14,16,22 92:11,18,19,22,25 93:11 105:10,10,12 119:17 128:17 133:24 134:2 146:20 161:15 170:17 184:16 188:25 189:14 197:9,25 198:22 199:1,3 203:14 204:9 209:15 210:22 212:19,20 trainingawareness (1) 130:1 trammelled (1) 65:20 transcript (1) 42:10 translate (1) 136:20 translated (2) 107:24 129:10 transport (4) 32:19,23 33:6,14 trickle (1) 20:25 tried (1) 108:4 trite (1) 62:10 troubling (1) 32:16 truce (1) 29:12 trusting (1) 127:11 try (16) 21:19 34:5 51:6 60:6 68:16 89:14 99:17 100:18 102:22 106:20 118:17 131:19 187:7 194:24 214:23 215:19 trying (14) 20:19 26:3 34:22 36:9 37:16 41:23 44:24 46:2 62:4 77:3 108:16 156:25 169:9 173:9 tuesday (1) 52:14 turn (10) 1:19 19:3 78:1 93:16 103:17 109:12 117:17 140:11 145:20 172:17 turned (1) 116:3 turning (3) 79:7 85:3 214:2 twice (4) 18:15,22 41:13 116:16 type (11) 8:15 55:3 63:19 110:1 116:23 156:11 157:10,20 163:16 178:19 203:25 types (6) 83:13 93:2 94:24
---	--	--	--	--	---	--

116:22 203:21,24
typical (1) 4:21

U

uk (1) 95:16
ultimately (6) 11:13 13:16
 21:6 26:20 27:17 209:8
um (2) 25:24 184:17
unacceptable (2) 6:11,12
unannounced (2) 65:15,16
unchecked (1) 206:14
unclear (1) 5:8
uncommon (1) 134:9
uncover (1) 70:16
undated (1) 151:3
underage (1) 47:21
underestimate (1) 41:16
underneath (1) 162:11
underpinning (1) 76:8
understand (39) 6:18,23
 15:5 18:3 22:20 25:14
 38:13 39:1 54:2,7 61:18
 62:4 63:6 78:11 90:6 92:8
 106:8 118:5 120:15
 123:20,23 124:5 134:19
 141:9 142:18 148:7 149:22
 151:10 161:21 171:22
 173:11 176:4 182:11,15
 184:6 193:1 197:4,5
 201:15
understandably (2) 24:22
 164:9
understanding (11) 71:10
 87:15 108:13 113:3,22
 164:9 182:6,20 191:19,20
 207:9
understood (10) 40:9
 138:9,19 140:22 156:8,18
 165:10 183:1 202:21 207:6
undertake (8) 67:13 68:1
 101:20 102:23 103:2
 105:12 142:24 168:13
undertaken (9) 22:24 104:25
 117:24 133:24 134:2
 143:20 171:2 191:6 192:13
undertaking (2) 105:25
 129:13
uneasy (1) 29:12
unfortunately (2) 6:7 36:25
unheard (1) 15:11
unified (1) 72:21
uniform (1) 75:6
unit (2) 72:2,19
unless (9) 7:6,15 31:6 49:21
 75:1 82:3 86:13 137:1
 196:15
unlikely (1) 75:1
unlimited (1) 48:19
unsophisticated (1) 197:12
until (5) 22:12 52:5 150:5
 165:3 215:23
unusual (2) 121:13 134:20
unworkable (1) 203:22
upcoming (1) 146:20
updates (5) 146:15,18,22
 147:14,15
updating (1) 147:20
upham (52) 88:11,14,18
 89:8,18,21 90:1 109:13
 121:5 131:1 140:11 142:21
 144:1 145:4,12 150:24
 158:17 160:11,19,22
 162:2,19,22 165:18 166:13
 170:9 174:16 175:19
 176:21 177:8,19,25
 179:7,12 180:17 181:24
 182:8 184:15 185:6,17
 186:1,21 187:10,15
 194:16,21 198:25 199:10
 202:2 206:22 208:23
 210:13
uphams (11) 88:22 91:10
 118:20 158:24 160:13
 165:15 179:19 180:25
 181:9 186:6 195:9
uphill (1) 178:22

upload (1) 187:4
upon (4) 18:24 116:10
 122:15 125:16
used (22) 29:20 31:20 35:7
 59:18 60:25 83:18 93:9
 101:6 104:2 107:15,17
 113:25 146:14 151:17
 157:6 161:8,8 165:8 173:4
 193:14,17 212:11
useful (5) 66:3,4 152:18
 173:20,21
user (1) 123:5
users (2) 95:20 96:21
using (5) 15:22 35:15 73:4
 83:22 99:18
usual (1) 193:8
usually (3) 146:19 192:1
 193:18
utilised (2) 114:13 146:17
utterly (1) 32:25

V

vacancies (1) 46:8
valid (1) 19:24
value (1) 122:18
variables (1) 94:25
variation (4) 20:17 29:7
 85:22 126:22
varied (1) 8:7
varies (2) 8:15 169:6
various (7) 71:20 92:22 93:2
 129:21 138:16 151:14
 183:14
vary (1) 152:9
vast (1) 201:14
vbirds (1) 169:16
vehicle (11) 99:3,18,18
 101:18 153:13,14
 157:16,19 204:15,17,21
vehicleborne (4) 111:21
 168:15 169:6,11
vehicles (3) 62:21,25 63:8
vein (1) 73:12
velvet (1) 51:14
vending (1) 206:18
venue (23) 14:12 57:14,19
 156:10 158:11
 163:10,15,18,19 164:8
 165:1,12 168:22 170:23,25
 173:16 178:20 179:1 183:2
 184:2 203:21 209:25 210:9
venues (18) 32:18 45:17
 60:20 155:20 157:1
 162:10,21 170:20 178:23
 182:21 183:10 184:5
 189:22 192:18,23 193:15
 199:1 205:23
version (4) 144:8 145:8
 173:24 210:10
versions (1) 159:24
versus (2) 73:17 99:13
vicinity (1) 111:12
victoria (12) 27:4,7,13,23
 30:21 30:21 147:23 148:4
 166:18,20,21 171:18
video (1) 137:11
views (1) 30:13
vigilant (1) 129:15
violence (1) 54:14
visible (1) 54:18
visit (17) 48:4 49:20 54:12
 65:16 70:15 96:24 119:24
 134:3 138:8,20 159:14
 160:13 166:6,8 192:5,6,11
visited (5) 55:23 63:20 135:4
 162:10,22
visiting (4) 47:22 73:23 74:9
 192:12
visitor (1) 168:4
visits (10) 47:19 52:10
 54:10,15 109:15 116:19
 119:24 133:5,22 166:1
visual (1) 112:8
visually (1) 124:12
vlsps (1) 52:10
voice (3) 34:17 63:22,25

voluntarily (3) 55:6 56:10,15
voluntary (6) 20:5
 62:8,12,20,25 63:7
volunteered (1) 200:23
vote (1) 131:3
vulnerabilities (7) 81:16
 114:13,22 152:16 155:25
 156:4,6
vulnerability (14) 19:20
 82:25 84:7 85:14 101:17
 102:4,7 103:7 113:14
 114:19 118:10 157:18
 158:4 162:8
vulnerable (1) 82:16

W

wait (1) 17:19
waiting (3) 70:2,6 190:2
walkthrough (7) 154:7
 158:3,5 174:10,17
 175:4,20
walls (1) 10:25
wanting (1) 101:22
wants (2) 178:15 188:13
war (1) 202:8
warm (1) 54:24
wasnt (35) 13:10,12 30:23
 32:19 49:18 56:17 94:23
 99:12 107:11,14 108:14
 113:24 117:3 121:2,8,15
 129:6 149:16 164:13 165:3
 170:3 171:2 172:25 175:7
 179:13 181:1,10 184:21
 185:11,16 197:17 199:16
 202:2,21 211:4
waste (2) 70:11,12
watch (2) 81:10 175:12
watching (2) 75:22 184:18
watershed (1) 189:20
way (58) 17:13 20:3,11
 21:8,10 26:9 29:4,6 31:19
 34:22 41:21,23 46:16,22
 48:1 52:1 55:2,15
 56:6,11,22 66:13 73:25
 78:18 79:24 82:22 83:23
 85:4 90:10 92:8 98:19,20
 102:8,12 103:22 113:8
 119:16 124:3 135:11
 141:20 142:1,13 147:19
 150:23 160:17 163:6
 171:19 180:23 182:21
 183:2,7 184:1,6 190:4
 193:18 202:9 212:7 215:14
ways (1) 37:21
weak (1) 63:3
wear (1) 73:14
wearing (3) 54:18 74:14 75:6
weatherby (11) 39:24,25
 40:1,2,16 41:2,6 75:11
 214:3,6 216:9
website (4) 88:24 118:11,11
 129:19
wed (3) 56:17 97:7 200:2
wednesday (1) 1:1
weekend (1) 52:15
weekly (1) 52:12
weeks (2) 92:16 184:9
weights (1) 99:7
welcome (1) 178:20
went (7) 35:10 100:16 129:1
 162:9 182:25 183:20
 186:25
werent (10) 16:15 99:16
 108:14 119:6 136:15
 158:18 175:21 179:17
 201:7 207:6
weve (53) 1:14 15:20
 43:6,15 45:23 46:8,11
 47:20 50:4 53:23 54:4,24
 58:12 59:13 61:18 71:18
 82:1 87:12 90:4 103:16
 111:22 116:25 127:2 132:8
 133:14 139:9,25 143:2,8
 148:10,16 149:14,23
 151:7,8 159:19 163:4
 168:7 178:6,12,22 180:12

181:17 184:8 185:3 188:14
 192:13 195:20 204:12
 211:11 213:12 214:1 215:2
whatever (5) 28:18 67:6
 68:20 71:6 117:14
whats (13) 27:11 37:11
 52:15 58:11,13 82:25
 86:19 104:22 125:16
 133:13 137:12 162:11
 192:4
whenever (1) 152:22
whereas (9) 95:18 96:2
 97:16 135:14 148:1 169:11
 173:11 180:12 192:16
whereby (1) 54:7
wherever (1) 68:16
whilst (5) 65:12 77:17 92:25
 95:18 207:23
whispering (1) 22:7
whoever (1) 136:9
whole (8) 6:24 21:14 29:19
 64:25 84:24 170:20 195:3
 196:13
whom (2) 38:9 200:19
whos (2) 58:17 157:9
whose (3) 8:25 38:19 88:9
wide (3) 43:2 45:10 203:20
widely (1) 96:20
wider (4) 2:18 36:3 44:10,19
wideranging (1) 188:21
win (1) 161:7
wins (3) 161:4,8,17
wise (1) 169:17
wish (1) 21:23
wished (1) 20:6
wishing (1) 202:8
withdrew (1) 42:2
withstand (1) 99:7
witness (29) 1:5 26:13 31:15
 39:23 41:9,10,12 42:2,7
 81:23 82:3,6,8 88:9,10
 90:24 145:17 171:11,15
 172:7 179:20 181:3 182:12
 183:5,9 196:12 201:10
 214:13 215:8
witnesses (2) 184:12 191:10
wonder (8) 3:24 11:7 19:18
 61:10 88:7 133:17 150:3
 165:14
wonderful (1) 194:11
wondering (2) 17:12 81:22
wont (15) 33:20 50:23 62:15
 69:19 116:5 134:10 144:3
 161:11 162:12 172:6 184:1
 187:18 196:2 204:22 214:6
worded (2) 113:8 114:6
wording (5) 13:3 36:19 76:5
 115:6 123:23
wordings (1) 13:2
work (37) 21:14,20 22:24,24
 37:24 38:3,4 41:14 43:18
 45:15 47:4 51:21 56:10
 58:3 59:3,7 71:8 85:4
 92:24,25 99:6 100:17
 101:7 106:4 107:3 113:23
 117:23 158:9 159:15 160:6
 189:8 190:9 191:6 192:1
 202:20 208:24 209:1
worked (10) 52:7,8 59:4 60:3
 91:6 102:17 126:8 127:12
 137:3 143:3
working (14) 12:4 20:19
 21:18 37:21 68:17 71:12
 75:25 80:3 109:24 121:9
 187:1 193:10 208:21 209:3
works (3) 48:8 79:24 145:16
world (1) 146:22
worry (2) 16:24 182:10
worth (3) 7:2 31:3 62:10
wouldnt (41) 2:25 3:22 9:22
 15:11 19:19 49:9,20 50:14
 57:21,23 60:21,23 66:5
 67:19 74:13 103:9,11
 107:5 114:5 120:17 134:20
 158:6,7 159:4 162:23
 164:2 165:4 168:24

170:1,2,2 171:1 176:23
 188:10 193:19 195:16
 197:6,10 208:13,17 209:19
write (1) 113:19
writing (1) 167:12
written (11) 71:3,3,15
 112:17 117:2 122:5 135:1
 142:22 151:6 152:23 203:2
wrong (15) 5:14 35:19 41:21
 49:1 60:8 61:6 82:10 104:1
 115:1,3 136:14 152:4
 165:7 196:22 209:24
wrote (2) 190:15 200:3

X

x (2) 112:25 216:1
xray (5) 174:10,17,22
 175:4,20

Y

year (13) 36:18 37:3 43:22
 45:6 68:1 90:19 93:7
 116:16,19 178:2 180:12
 198:23 201:23
years (2) 43:4 81:13
yellow (2) 124:19 132:7
yet (5) 142:8,25 145:2
 180:11 186:14
yidder (1) 169:17
youll (5) 22:20 61:24 126:2
 162:7 175:14
youre (50) 1:15 10:1,5,8
 11:10 17:8 21:17 22:12
 28:17 30:14 32:11 36:7
 40:18 42:1 43:18 48:20
 49:19 53:17 66:20 70:2
 78:3,10 87:7 91:14 95:2
 99:23 101:11 102:15
 105:22,24 111:4,16 112:14
 116:4 118:5 121:2 126:23
 128:21 144:25 156:20
 161:7 162:16 169:9 170:11
 189:16,22 190:6,13 199:19
 205:4
yourself (4) 109:5 180:1
 201:9 202:2
yourselves (1) 119:22
youve (48) 18:3 20:11 26:7
 29:15 33:24,25 40:6,24
 51:19 52:23 59:15 64:6
 70:25 76:22 80:5 86:8
 92:10 98:9 100:11
 115:8,12,21 116:3 120:23
 122:11 128:19 133:3
 148:25 153:5 158:23,25
 160:14 166:19 167:10
 171:9 172:12 177:16,18
 178:24 179:23 182:20
 183:8,12 184:9,18 190:17
 201:18 204:12

Z

zero (2) 125:19 133:23
zones (1) 204:24
zoom (5) 2:7 44:17 131:19
 156:24 177:22

I

I (20) 2:8,9 18:19 34:10,14
 35:4 95:13,15 97:13,17
 98:6 110:24 116:17 125:14
 139:9 140:3 160:2
 216:3,6,7
10 (4) 5:11 24:17 135:14
 214:1
100 (5) 34:6 36:10 66:21
 143:20,25
1005 (1) 1:4
1039 (1) 22:14
1044 (1) 22:16
11 (5) 26:25 141:17 143:2,7
 144:9

114 (2) 139:6,10
1145 (1) 61:15
115 (1) 78:2
119 (1) 139:17
12 (2) 145:8 177:23
120 (1) 163:18
1200 (1) 61:17
122 (1) 139:19
1245 (1) 88:3
13 (2) 29:18 203:1
140 (1) 139:3
1400 (1) 45:6
145 (2) 88:2,5
148 (1) 139:6
15 (3) 125:4,23 132:19
150 (2) 163:15 216:20
16 (1) 160:19
160 (1) 135:15
18 (1) 1:1
182 (1) 77:9
19 (2) 62:18 215:24
197 (1) 216:21
1986 (1) 91:6
19a (1) 59:17

2

2 (25) 12:13 18:19 37:15
 76:1,17 95:13,18,22 96:5,8
 98:12 110:24 111:7
 116:17,17 125:14 139:1,2
 140:3 141:22 144:18,21
 160:3 185:25 186:13
20 (3) 43:20 44:17,24
200 (1) 43:25
200000 (1) 35:16
2003 (6) 1:23 7:4 42:19
 51:11 59:17 86:17
2007 (1) 152:3
2008 (2) 110:20 152:4
20082009 (1) 151:10
2008early (1) 109:24
2009 (5) 109:24 148:11
 152:3,4,23
2010 (1) 53:4
2011 (8) 53:9 91:8,11
 148:10,10 150:19 151:8,19
2014 (24) 53:9 93:19 94:13
 95:11 106:2,21 110:4
 120:16 142:20 148:13
 154:14 160:19,19 175:8,15
 178:13 185:13 197:20
 201:23 202:22 203:17
 207:20,25 208:6
20142015 (2) 131:14 132:16
2015 (5) 139:9,17 177:19
 207:13 208:6
20152016 (1) 131:15
2016 (10) 12:2 143:14 145:1
 197:25 198:9 199:14,21,24
 209:19,24
20162017 (1) 146:24
2017 (21) 1:15 32:17 53:5,11
 62:18 106:21 107:15,23
 108:22 109:10 119:3
 120:17 136:6 149:16 194:9
 197:12 199:14 202:2 207:6
 208:7 209:14
2019 (1) 144:23
2020 (4) 1:1 42:8 197:23
 215:24
21 (6) 1:22 2:13 3:6,25
 42:24,25
22 (8) 32:17 43:20 50:13
 53:5 122:10 144:11 149:16
 216:8
223 (5) 75:23 76:5 78:16
 79:8 80:16
247 (2) 126:19 127:3
26 (1) 53:2
28 (2) 19:18 41:20
29 (1) 179:21
2a (5) 95:22,24 97:13,17
 98:6
2b (4) 95:22 96:2 97:16,25
2bs (1) 97:21

3

3 (10) 95:13 96:15 111:1,17
 125:14 126:18,24
 137:14,16,17
30 (1) 215:2
31 (2) 83:24 122:25
319 (1) 150:7
32 (1) 203:11
33 (1) 83:24
330 (2) 150:6,9
34 (3) 46:12 59:22 70:22
39 (1) 89:3

4

4 (5) 19:4,18 116:18 140:3
 160:3
40 (3) 145:18,21 216:9
42 (4) 42:24 46:12 216:11,12
430 (1) 196:4
47 (2) 132:22,23

5

5 (8) 19:5,18 22:10 126:12
 132:19 134:1,1 139:18
50 (1) 134:5
502 (1)