

OPUS2

Manchester Arena Inquiry

Day 40

November 30, 2020

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1 Monday, 30 November 2020
 2 (9.30 am)
 3 (Delay in proceedings)
 4 (9.42 am)
 5 MR GREANEY: Sir, good morning. We are going to resume now
 6 the evidence of deputy assistant Commissioner Lucy
 7 D'Orsi. Who --
 8 SIR JOHN SAUNDERS: I'm really sorry you've been here twice
 9 before. This is your third attendance, maybe more. I'm
 10 grateful for your patience.
 11 MR GREANEY: We know that everyone is going to do everything
 12 they can to ensure that the DAC's evidence is concluded
 13 by the end of today and ideally by lunchtime today
 14 because there is other evidence we need to get through
 15 as well.
 16 SIR JOHN SAUNDERS: Okay. Thank you very much.
 17 DAC LUCY D'ORSI (continued)
 18 Questions from MR GREANEY (continued)
 19 MR GREANEY: DAC D'Orsi, you gave evidence last on
 20 12 November, which was Day 35 of the inquiry oral
 21 evidence hearings. It's sensible just to take 5 minutes
 22 to recap the topics that we dealt with then and then
 23 we'll deal with the balance of my questions over the
 24 course of, I hope, no more than an hour or so.
 25 You explained that you are the DACSO, so the deputy

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1 assistant commissioner for specialist operations?
 2 A. Yes, that's correct.
 3 Q. And that you therefore have responsibility among many
 4 other responsibilities for the Protect and Prepare
 5 strands of the CONTEST strategy?
 6 A. That's correct.
 7 Q. You dealt with the context for CT Policing in 2017?
 8 A. I did, yes.
 9 Q. Including reminding us of the statement of
 10 Sir Andrew Parker, the then head of MI5 in October 2017?
 11 A. Yes, I did.
 12 Q. You addressed the structure of CT Policing in the UK,
 13 including the role and history of NaCTSO and its
 14 relationship with partners, including JTAC and CPNI?
 15 A. That's correct.
 16 Q. And importantly, you explained the CTSA system?
 17 A. Yes, that's correct.
 18 Q. And so for those who are reviewing this, that is
 19 pages 166 to 197 {Day35/166:1} of the transcript for
 20 that day.
 21 I would like to pick up with you, please, on
 22 a number of things that you said because we're going to
 23 touch on them again this morning. You said of the fact
 24 that CTSA's give advice which may or may not be accepted
 25 by a site, and I quote:

2

1 "I think there's always a gap in a system that's
 2 discretionary. The way forward is new legislation and
 3 I have always been an advocate of a Prevent duty."
 4 Do you recall saying that?
 5 A. A Protect duty.
 6 Q. A Protect duty, yes, forgive me.
 7 A. I did say it.
 8 Q. "I don't think [you added] it should be discretionary as
 9 to whether protective security is considered by a
 10 business or a site or an operator."
 11 A. That's correct.
 12 Q. You agreed that if people are to be as safe as they are
 13 entitled to be in a publicly accessible location, there
 14 needs to be a change?
 15 A. That's correct.
 16 Q. And indeed, you describe it as being a need for
 17 a seismic shift.
 18 A. I did.
 19 Q. You added that the sooner that can be implemented, the
 20 better?
 21 A. That's correct.
 22 Q. You agreed that there would be no point imposing
 23 a Protect if that duty were not then to be enforced?
 24 A. That's correct.
 25 Q. Although your view was that the method or manner of

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1 enforcement was a matter upon which there ought to be
 2 debate.
 3 A. That's correct.
 4 Q. You explained to us that CTSA's were focused on sites,
 5 not events.
 6 A. That's correct.
 7 Q. And that it was not the job of a CTSA to, as you put it,
 8 operationalise a plan?
 9 A. That's correct.
 10 Q. Finally, so far as my recap is concerned, you addressed
 11 the development of approach from a vulnerability model
 12 to an attractiveness model.
 13 A. Around crowded places, yes.
 14 Q. As I indicated, there are a number of aspects of what
 15 you said that I want to pick up on before we move on.
 16 First, the discretionary nature of the scheme which
 17 existed in 2017 and still exists now. Would it be fair
 18 to say that whilst no two sites are identical, some
 19 sites will be similar or at any rate present similar
 20 challenges?
 21 A. Across the UK, there may be some similarities, yes.
 22 Q. And indeed, as your answer reveals, that might easily
 23 apply to two sites in different parts of the UK?
 24 A. It could do, yes.
 25 Q. If that is so, it means those two sites would have

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1 different CTSA's?
 2 A. They would.
 3 Q. So that different advice might be given?
 4 A. Well, the PSIA tool is aimed to try and give consistency
 5 with advice, but of course it should be bespoke to what
 6 the particular venue is. So I would suggest that CTSA's
 7 will tailor their advice around the particular venue
 8 that they're talking about.
 9 Q. So in relation to similar sites you would expect there
 10 to be a consistency of advice given by those two
 11 different CTSA's, but I suppose it might be fair to say
 12 within a range of appropriate advices?
 13 A. Yes, so it's tailored to the site, but there is a broad
 14 level of consistency in terms of the advice that NaCTSO
 15 presents for the CTSA's to use in their discussions.
 16 Q. In any event, given the evidence you gave on the last
 17 occasion, it would appear to be the position that,
 18 whatever advice they were given, the operators of those
 19 two different sites in different parts of the country
 20 might make different decisions about whether to
 21 implement the measures they had been advised to
 22 implement?
 23 A. That's correct, yes.
 24 Q. So does it come to this in the scenario that we have
 25 been discussing: that in each of those two different

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1 venues, similar venues in different parts of the
 2 country, the public would feel that they were equally
 3 safe yet the truth is that the protections available to
 4 them might be very different?
 5 A. I can't really comment on how safe the public feel at
 6 those locations because I suppose that's for them to
 7 decide, but in terms of the second part of the question,
 8 would it be different, it could be different, depending
 9 on what the operators have decided to put in place at
 10 those sites. So it could be different.
 11 Q. So the protections available to the public, whatever
 12 they perceived, and I quite take your point, might be
 13 different at those two similar sites?
 14 A. They may well be, yes.
 15 Q. And do you agree that that serves to underline the
 16 unsatisfactory nature of any discretionary system?
 17 A. Yes, so as I said last time, I don't support
 18 a discretionary system. I think protective security
 19 should be mandated, I think there should be a legal
 20 framework, and I think the public have a right to know
 21 that operators are considering proportionate protective
 22 security measures to put in a site and that there is
 23 some sanction if they get advice and they choose not to
 24 take it.
 25 Q. The second thing arising out of the evidence you gave on

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1 the last occasion relates to evidence given by
 2 Liz Forster, the principal CTSA for GMP, in the period
 3 that led up to the arena attack. I believe it's the
 4 position that you have viewed her evidence?
 5 A. I have, yes.
 6 Q. She described the principle "Something is better than
 7 nothing".
 8 A. She did.
 9 Q. And that I'm certain is a principle that you are
 10 familiar with?
 11 A. I'm familiar with the documentation in 2014 that
 12 referenced that, yes.
 13 Q. And you're referring I think to the NaCTSO document
 14 dated April 2014 that deals with the PSIA scoring
 15 system?
 16 A. That's right.
 17 Q. Which refers to "Something is better than nothing"?
 18 A. Yes.
 19 Q. You will recall, I am certain, that Mr de la Poer, who
 20 asked questions of Liz Forster asked her to consider
 21 whether "Something is better than nothing" was a "rather
 22 defeatist approach".
 23 A. Yes.
 24 Q. From your perspective, is that a fair comment?
 25 A. No, I don't think that's a fair comment. I think the

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1 contextual piece to this is in 2014 we were just seeing
 2 the declaration of the caliphate, so we were seeing
 3 a shift in attack methodology, which was this focus on
 4 a sort of any place, any time, maximum damage to the
 5 public, and that was a real shift away from the previous
 6 sort of threat, which was focused on probably
 7 Northern Irish related terrorism. So I think
 8 "Something's better than nothing", it doesn't mean
 9 nothing. There was a focus on physical security
 10 measures which were mitigating perhaps what was
 11 considered to be an older threat. And actually, what
 12 this was about was bringing in another suite of
 13 proportionate protective security measures, which would
 14 be good, reasonable and proportionate for a site to use.
 15 What I mean by that is sort of lower security
 16 measures such as security-minded communications. I have
 17 seen events where they have printed things on the back
 18 of tickets which is about security advice, not
 19 expensive, but equally has a role in a whole system
 20 approach to protective security. It was never a view
 21 that this -- in my view there was never a strategic
 22 direction which was "Something's is better than
 23 nothing". Nothing would tend to suggest we're talking
 24 about the absence of anything and I don't agree with
 25 that.

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1 Q. No, but the documentation that was being produced by
 2 NaCTSO referred to "Something is better than nothing"?
 3 A. So the report that I have seen was a report that was
 4 going to the thematic board at a strategic level and
 5 this was around looking at what the approach to
 6 protective security — and if you reflect on what was
 7 the trajectory of the attack methodology, we didn't want
 8 sites just to be considering physical security. Some of
 9 that wasn't relevant. So expensive hostile vehicle
 10 mitigation may not be relevant to another site but
 11 actually there is this other bucket of stuff that is
 12 perfectly reasonable and proportionate for them to be
 13 considering and that advice needed to be put out there
 14 and that wasn't being necessarily put out there
 15 previously.
 16 Q. Let's just look on the screen at the document that we've
 17 referred to, {INQ001540/1}:
 18 "Protective security improvement activity scoring:
 19 guidance for site owner/operator."
 20 This is dated April 2014 and, as we can see, this is
 21 a NaCTSO document. For what audience was this document
 22 intended?
 23 A. For the site owners and operators.
 24 Q. Could we go to —
 25 SIR JOHN SAUNDERS: While that is being done, we've been

1 told about there being a change, somebody coming in in
 2 2008, somebody else coming in in 2014; does this
 3 document set out the changes which came in in 2014?
 4 A. That's correct.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR GREANEY: So this was part of a change from the
 7 vulnerability model to the attractiveness model?
 8 A. That's right. I think I did touch on last time,
 9 I believe, that we know in 2012 that we had around about
 10 40% of sites under the vulnerability model that were
 11 seeing no protective security improvements. So this was
 12 about moving to the attractiveness model, but actually
 13 being reasonable and proportionate in the advice that
 14 was being offered over a suite of options, which
 15 included at one end the gold standard, if that's what we
 16 want to call it, right the way through to potentially
 17 printing security advice on the back of tickets.
 18 Q. And gold standard is the term that was used by
 19 Ms Forster, as all will remember. What we've understood
 20 is it was the London Olympics that was the driver for
 21 change from the vulnerability model to the
 22 attractiveness model?
 23 A. In part because I think that called for a review of what
 24 protective security improvement had taken place at
 25 sites.

1 Q. And that really revealed that a significant portion of
 2 sites were not making any of the changes that were
 3 thought to be necessary?
 4 A. Under the vulnerability model.
 5 Q. Has any equivalent survey been conducted of the extent
 6 to which sites have improved under the attractiveness
 7 model?
 8 A. Of course, the attractiveness model focused on a number
 9 of sites so it moved us away from this huge category of
 10 sites to a focus on the ones where we have considered
 11 the sites against the threat that's posed to the UK and
 12 focused our work on that. So that's the whole point,
 13 really, in many respects of the PSIA.
 14 SIR JOHN SAUNDERS: So the answer to the question is?
 15 A. Well, I think it's an ongoing process. Have we done one
 16 review? No.
 17 SIR JOHN SAUNDERS: Sorry, that wasn't meant to be a rude
 18 question.
 19 A. But I think there is no single review to go to in the
 20 same way that there was prior to 2014, but we know
 21 through the sites that are on the current list under the
 22 tiering process, we know the ones that are making
 23 progress and the ones that aren't.
 24 MR GREANEY: Is this a fair way of putting it: that we know
 25 on a statistical basis the extent to which the

1 vulnerability model was or was not working?
 2 A. Yes.
 3 Q. It seems as if it wasn't working. So far as the
 4 attractiveness model is concerned, there is some
 5 anecdotal evidence that it is working but there is none
 6 of the statistical data of the sort that there was
 7 in relation to the vulnerability model?
 8 A. Because the sites don't come off the list, they're
 9 constantly on there, and obviously with we've got
 10 tiers 1, 2 and 3, so we know which ones are in
 11 maintenance and which ones we are still working on and
 12 which ones have chosen potentially not to engage.
 13 Q. In any event, we were dealing with "Something is better
 14 than nothing". We've seen that this was guidance that
 15 was intended for the site owner/operator. Could we go
 16 to {INQ001540/3}, please.
 17 Could we enlarge the top half of the page?
 18 "Scoring tool guidance. The majority of the
 19 technical and specific protective security standards or
 20 advice is provided in annex B."
 21 It goes on, and then there is that phrase,
 22 "Something is better than nothing". So it would appear
 23 that this document and therefore that phrase was going
 24 out to the site operators?
 25 A. Yes.

1 Q. Would you agree?
 2 A. Yes, but I think the point I'm trying to make is this is
 3 not about a compromise, this is about encouraging people
 4 to use other security mitigation, which previously had
 5 not necessarily been considered, which could be, as
 6 I said, security-minded communication with your staff,
 7 printing on the back of tickets. It's still effective
 8 and has a disruptive approach in my view.
 9 Q. So whilst fully accepting that from the perspective of
 10 NaCTSO this was not about compromise, can you accept
 11 that from the point of view of an operator it would
 12 enable the operator to say: well, you say that I need
 13 this, but it's too expensive, so I'll do something short
 14 of that?
 15 A. This was never about NaCTSO saying that they didn't need
 16 to do the gold standard. If the recommendation was for
 17 a technical piece of equipment that was expensive, that
 18 recommendation would still be made. It's the choice of
 19 the site operator if they wanted to put different
 20 measures in place and not accept that one. But I don't
 21 accept that NaCTSO would ever be compromising and saying
 22 that it would be acceptable to move away from that. And
 23 certainly my understanding over a lot of documents
 24 I have seen, there was guidance that they would record
 25 the measures that they had recommended that hadn't been

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1 accepted and then obviously write down the ones that the
 2 site had chosen to put in place.
 3 SIR JOHN SAUNDERS: Without pushing this to death, looking
 4 at the whole sentence, it's:
 5 "Consideration of any security improvement measures
 6 should be proportionate to the site operation and not
 7 all the measures may necessarily have to be..."
 8 And then it goes on to "Something is better than
 9 nothing".
 10 An operator might say that the meaning of
 11 proportionate there at least involves a sort of level of
 12 profit that I am making out of what I am doing and if
 13 I am making very limited profit then to spend a lot of
 14 money on security may not be proportionate. I have
 15 a certain problem with the word proportionate because it
 16 can be used in so many different ways.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: But would a site operator be entitled to
 19 use that interpretation?
 20 A. I think because of -- obviously, in the absence of any
 21 legislation they can apply whatever thinking they want
 22 to it and they can make whatever decision that
 23 commercially they choose to make. We are not
 24 commercially driven; we make the recommendations that we
 25 believe to be appropriate to the site and proportionate.

14

1 MR GREANEY: We all well understand that you have a strong
 2 personal view that there needs to be change and so in
 3 a sense you are seeking to defend something that you
 4 think is not how we ought to operate, but can you see
 5 that an operator reading that would regard it, even if
 6 not as an encouragement not to achieve the gold
 7 standard, an approval of not achieving the gold
 8 standard?
 9 A. Well, I don't think they should read it like that, no.
 10 I can't accept that position. I think that the choice
 11 about what they choose to put in or not is their choice
 12 as a site operator. But I have never seen anything
 13 which would suggest that NaCTSO would not be
 14 recommending -- the CTSA's wouldn't be recommending the
 15 appropriate measures at a site: they will always do that
 16 and it is the decision of the operator. I can see that
 17 they may well choose to make a commercial decision, but
 18 that is their choice.
 19 Q. Let me suggest this to you and then we will move on:
 20 saying "Something is better than nothing" is hardly an
 21 encouragement to achieve the gold standard.
 22 A. Well, I do slightly disagree with you because I do think
 23 that it is important that we consider the suite of
 24 protective security options that are available. So if
 25 a site does make a commercial decision, if indeed they

15

1 do, not to go with the high-end protective security
 2 that's being recommended, there is a whole load of other
 3 things that should be considered. I wouldn't want them
 4 not to consider those and not to put those in place.
 5 We're probably focusing on people who are making
 6 a profit, there are also a lot of other sites that
 7 aren't, and they are maybe charitable bodies and other
 8 things, and I would like them to know there is this
 9 other suite of options they can choose to put in place.
 10 SIR JOHN SAUNDERS: I think that is absolutely understood
 11 and comes under the term "proportionate". It is just
 12 there can be unfortunate results of the use of the word
 13 "proportionate" and nothing is proportionate to the
 14 death of 22 people.
 15 A. No, absolutely not.
 16 MR GREANEY: I said we would move on and we will.
 17 The third issue arising out of the evidence you gave
 18 on the last occasion relates to the selection of CTSA's.
 19 As we've understood it, around the country some
 20 CTSA's are police officers and some are civilians.
 21 A. That's correct.
 22 Q. Where they are police officers, what prior experience is
 23 expected of them and, in particular, what prior
 24 experience of counter-terrorism is required?
 25 A. I'm not entirely ...

16

1 Q. Sorry, can I invite you to focus on 2017 in answering
 2 that question.
 3 A. Yes. I am not entirely sure of the selection process
 4 that was in place in 2017. But obviously there is an
 5 application process that they fill in an application,
 6 and then they're selected through the back of that, but
 7 I couldn't tell you specifically what criteria was being
 8 looked for because the training is obviously looking to
 9 train them up to the level that's required.
 10 Q. I understand and I asked you about that and it may
 11 be when you go away there's further information you can
 12 provide us with.
 13 A. Of course.
 14 Q. If you are able to, please do so in due course.
 15 Could I ask you the question in relation to
 16 civilians and what brings this issue into a particularly
 17 sharp focus is that Liz Forster explained, as we
 18 understood it, that as of now, all of the CTSA's
 19 operating beneath her are civilians. So are you in
 20 a position to say as of 2017 what life and professional
 21 experience was required of civilians who applied for the
 22 role of CTSA?
 23 A. I couldn't say specifically. Some of the civilian CTSA's
 24 that I do know previously were police officers, so
 25 naturally that probably would give them more breadth of

1 experience when they're applying for a post in terms of
 2 evidencing their competence and capability. But I would
 3 have to take it away and have a look specifically.
 4 Q. I will leave you to do that and move on to the fourth
 5 topic, which relates to another issue that Liz Forster
 6 raised and it relates to quality assurance. She said
 7 almost in a castaway remark, and this is Day 38, page 93
 8 of the transcript {Day38/93:9}, and I'll quote:
 9 "There used to be, and it's coming back in,
 10 a quality assurance process by NaCTSO as well."
 11 And she was talking about CTSA's. First of all, do
 12 you agree that it's important that there should be
 13 a quality assurance process for CTSA's?
 14 A. I do and I'm confident that there is quality assurance
 15 process by NaCTSO. It's led by one of my really capable
 16 chief inspectors who sits centrally and they have
 17 oversight of the quality assurance process and I'm very
 18 confident about that.
 19 Q. What Liz Forster seemed to be suggesting was that
 20 quality assurance had existed, then didn't exist, but
 21 was now coming back in. Is that, so far as you
 22 understand it, correct or not?
 23 A. No, that's not my understanding of the situation. A
 24 quality assurance process has always been there and
 25 I think the system is able to turn things around quicker

1 now than it did previously, so I think that's why it
 2 might feel differently to Liz, but I'm confident that
 3 the system has always been there.
 4 Q. And again, if you need to take this away and give us
 5 information in due course, please say so. What form
 6 does the quality assurance process take?
 7 A. This is conducted centrally and this is where it is --
 8 the work is sent in to NaCTSO and then they review it
 9 from a quality assurance perspective and I'm happy to
 10 take that away and come back with more detail if that's
 11 required.
 12 Q. Thank you very much.
 13 Fifthly, and I'm near the end of the topics arising
 14 from your evidence on the last occasion. In your
 15 principal witness statement at paragraph 39, you refer
 16 to the fact that the 2014 review, among other changes,
 17 introduced the role of counter-terrorism awareness
 18 adviser or CTAA. Would you tell us, please, what that
 19 role involves?
 20 A. Yes. This is really support to the CTSA's and their
 21 primary focus is to deliver some of the training
 22 products rather than rely on the CTSA's to deliver the
 23 training products. So it was felt appropriate that that
 24 could be delivered by the CTAA's.
 25 SIR JOHN SAUNDERS: Who are rather less well qualified, as

1 I understand it, than the CTSA's?
 2 A. Yes.
 3 MR GREANEY: Are they based within individual forces or
 4 centrally within NaCTSO?
 5 A. Within the forces.
 6 Q. Sixth and finally before we move on, the question of the
 7 number of visits to a particular site expected of
 8 a CTSA. I'm going to ask that we see on the screen
 9 a passage in Mr Horwell's questioning of Liz Forster on
 10 19 November. So Mr Lopez, could we have the transcript
 11 for Day 39 at page 164, please.
 12 (Pause)
 13 My reference is incorrect, but I'm certain that
 14 you will know what I am referring to.
 15 A. Yes.
 16 Q. And you'll have seen the questioning from Mr Horwell of
 17 Liz Forster. You suggested on the last occasion, and
 18 I'm quite sure I contributed to this difficulty with my
 19 questioning, that you would have expected there to be
 20 six physical visits by a CTSA, at least two, to each
 21 site on a yearly basis. Is there anything about that
 22 that you would like to change or qualify?
 23 A. Yes, I think I got a little bit muddled with my evidence
 24 so I apologise for that. I agree with Ms Forster's
 25 evidence. My understanding is that the re-scoring of

1 the PSIA happens twice a year and then there are four
 2 sort of quarterly reviews, but they don't necessarily
 3 have to be done in person. Of course, a site may get
 4 way in advance of that in relation to visits depending
 5 on work that's taking place, but I think I was a little
 6 bit muddled.

7 Q. Not at all and thank you for that qualification. So it
 8 seems that the position put to Liz Forster by Mr Horwell
 9 and expressed by her appears to have been the correct
 10 one?

11 A. That's correct.

12 Q. That's the long and short of it?

13 A. Yes.

14 Q. Let's move on. I'm going to deal next with NaCTSO
 15 guidance and assistance to CTSAAs. With the hope that my
 16 reference will be better this time, could we have
 17 Day 38, please, this is still the evidence of
 18 Liz Forster, 18 November, page 109 {Day38/109:1}.

19 I think the problem is that you're looking at the
 20 transcript arranged differently from the transcript
 21 I have looked at. I'm looking at the published version
 22 in a PDF. Do you have that available to you? We'll
 23 sort that out in the break.

24 The position is that Liz Forster expressed the view
 25 that there was available in NaCTSO at the time no

21

1 published guidance on the management of egress from an
 2 event. Do you remember her expressing that view?

3 A. Yes.

4 Q. And what I want to look at with you is whether that was
 5 a reasonable position for her to adopt. First of all,
 6 the background. These are all events that you are most
 7 familiar with and that we are most familiar with.

8 On 13 November 2015, coordinated attacks took place
 9 in Paris. That included an attack on the
 10 Stade de France whilst France were playing Germany in
 11 a football match.

12 A. That's correct.

13 Q. And as you know very well, the suicide bombers, there
 14 were three of them, did not gain access and it's widely
 15 considered that deaths were averted as a result.

16 A. That's correct.

17 Q. So would it be fair to say that the importance of
 18 stopping people getting into crowded places was
 19 emphasised by the experience of the Paris attacks?

20 A. Yes, I would agree with that.

21 Q. The Bataclan attack formed part of the same plot.

22 A. That's correct.

23 Q. Would it be fair to say that that demonstrated that
 24 concert venues were attractive to terrorists?

25 A. Yes, that's correct.

22

1 Q. On 24 July of the following year, 2016, an attack took
 2 place, one of a number, in Bavaria, when a suicide
 3 bomber attempted to gain access to an outdoor music
 4 festival.

5 A. That's correct.

6 Q. But was prevented from doing so by a security guard.

7 A. Correct.

8 Q. And in the result detonated his device, killing only
 9 himself?

10 A. Yes, that's correct.

11 Q. So that perhaps demonstrated, do you agree, both of the
 12 things that we've agreed upon, first of all that concert
 13 venues were attractive to terrorists and also that
 14 stopping the terrorists getting in was important?

15 A. Yes. But specifically at crowded places, it is about
 16 the volume of people at those locations as well.

17 Q. Yes. I'm not suggesting that only concert venues, but
 18 one of the things that made counter-terrorism police
 19 officers around the world focus, no doubt, was the fact
 20 that concert venues would be attractive to terrorists?

21 A. Yes, I think probably — as I said earlier, I think from
 22 2014 onwards there was this recognition that the sort of
 23 threat and attack methodology had significantly changed.

24 Q. And changed in what way?

25 A. I think from international terrorism, you know,

23

1 following on from sort of 2014, a declaration of the
 2 caliphate, the speed of radicalisation, the change in
 3 attack methodology in terms of simplicity of attack
 4 methodology in some of those examples and that we're
 5 seeing recently is a seismic shift.

6 Q. In any event, by 2017, stopping people getting into
 7 crowded spaces was recognised to be important and
 8 capable of saving many lives?

9 A. Yes, that's correct.

10 Q. And among other crowded places, concerts were regarded
 11 as attractive to terrorists?

12 A. Amongst lots of places. Iconic locations, we've got
 13 tourist attractions, lots of things. So yes.

14 Q. And we've heard evidence that transport hubs were
 15 another example of a place that might be attractive to
 16 terrorists?

17 A. As a crowded place, yes.

18 Q. The reason you refer to crowded places is because what
 19 these terrorists want to do is to kill as many people as
 20 possible?

21 A. Yes.

22 Q. And therefore they are inevitably going to target their
 23 activity on places where there will be lots of people?

24 A. Yes.

25 Q. The City Room. Had you ever visited the City Room

24

1 before the arena attack?
 2 A. No, I hadn't.
 3 Q. I didn't mean that in any way critically. You could
 4 hardly visit every crowded place in the country. As
 5 you will now know and agree, the City Room was just
 6 outside a concert venue?
 7 A. That's correct.
 8 Q. It was just next to a railway station?
 9 A. Yes.
 10 Q. And was an area where people tended to congregate?
 11 A. I presume so. I have never seen it with -- I've been up
 12 recently, I went up last year to look at it, but I've
 13 never seen it on a concert day.
 14 Q. I understand that. You'll be aware from the research
 15 that you have done to prepare for this case that it was
 16 a location in which people congregated, in particular
 17 during egress and ingress to a concert?
 18 A. Yes, absolutely.
 19 Q. Bearing in mind all of those factors, would it be
 20 reasonable to say that the City Room was an obvious
 21 target for a terrorist?
 22 A. So I think around that venue, in terms of where crowds
 23 are, it would be one of the locations where it would be
 24 crowded, so it would be attractive, which forms part of
 25 the attractiveness model.

25

1 Q. Before the arena attack on 22 May 2017, would you have
 2 expected that to have been obvious to those with
 3 responsibility for security in the City Room?
 4 A. Yes.
 5 Q. And by that, I mean the venue operator, SMG?
 6 A. Yes.
 7 Q. The crowd management company, ShowSec?
 8 A. Yes.
 9 Q. British Transport Police?
 10 A. I think anybody involved in looking at an event for that
 11 location would have needed to have done some thinking
 12 around the security at that location in the same way as
 13 where the crowds are on the other side, I believe that's
 14 Trinity Way, where there would have been lots of people.
 15 It is about the application of a lot of people in
 16 a particular place, so I would expect people to consider
 17 that.
 18 Q. That's perhaps all I need by way of an answer.
 19 Let's next understand what was done by NaCTSO to
 20 communicate that to CTSA's so that it could be
 21 communicated to others. You've referred in your witness
 22 statements to a number of documents. I'm not going to
 23 take you through them, but would it be reasonable to
 24 summarise the position in this way: that there were
 25 a number of guidance documents in use by NaCTSO

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1 informing CTSA's in their work and available to
 2 disseminate directly to business and venues across the
 3 UK in 2017?
 4 A. Yes, that's correct.
 5 Q. And for those following this, you summarise those in
 6 your principal witness statement, the first witness
 7 statement, paragraph 49 and following.
 8 Some of those, is this also reasonable to say, dealt
 9 with crowded places?
 10 A. That's correct.
 11 Q. And you've listed those at pages 13 to 16 of that same
 12 witness statement, which is {INQ025466/13-16}. However,
 13 is it also correct to say that in 2017 there was no
 14 guidance specific to concert venues?
 15 A. There was one document around stadia, but I can't
 16 remember specifically when that document -- what year
 17 that was.
 18 Q. I think I've taken that quote directly from your witness
 19 statement, but I'll be corrected if I'm wrong.
 20 Furthermore, I think you can confirm from your
 21 review of NaCTSO records that there was no specific
 22 guidance issued by NaCTSO around risks relating to
 23 egress prior to 2017?
 24 A. That's correct.
 25 Q. I know you have a strong view about this, so let me ask

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1 you about it: was it a mistake that NaCTSO issued no
 2 specific guidance around the risks during egress?
 3 A. No, I don't agree with that. Egress is not a form of
 4 attack methodology; it is about the timing. I do
 5 support the position of NaCTSO, which was focused on six
 6 attack methodologies, and I think it's absolutely right
 7 that that we weren't focusing specifically on egress,
 8 we were focusing on the actual attack methodologies. So
 9 in the case of Manchester Arena, that is around
 10 a person-borne IED, so that could be before, during,
 11 after, in the lift, anywhere. For me that's about
 12 timing.
 13 SIR JOHN SAUNDERS: Just listening to this question and
 14 answer, it seems to me apparent where an ambiguity can
 15 come in. So a CTSA may be thinking: I have to be
 16 concerned about someone getting in with a weapon or
 17 a bomb into a crowded place, the crowded place is the
 18 arena, and therefore I'm focusing on that, which
 19 certainly appears from the evidence to be what Ken Upham
 20 was focusing on.
 21 On the other hand, the question has pointed out to
 22 you that at the times of egress and access, the
 23 City Room itself was a crowded place and therefore
 24 someone should have been concentrating on access to the
 25 City Room at that stage because that was the crowded

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1 place.
 2 A. Mm—hm.
 3 SIR JOHN SAUNDERS: That may be where the error has come in
 4 as to the advice being given. Should NaCTSO's advice
 5 have actually focused on that problem?
 6 A. I don't disagree with your sort of synopsis of where
 7 people should be having their thinking.
 8 SIR JOHN SAUNDERS: It was meant to be an analysis, but...
 9 A. What I'm nervous about is if you focus on — if, for
 10 example, there was an over—focus on egress and then
 11 somebody decides to detonate at half time, or you take
 12 an event which goes over 3 or 4 days and somebody does
 13 hostile reconnaissance and notices that 1 o'clock in the
 14 afternoon is when the morning people are leaving, the
 15 afternoon people are coming. I think there should be
 16 a holistic focus on what the attack methodology is,
 17 which in this case was a person—borne IED and then
 18 people should consider the potential risks and
 19 application of that in terms of an operational security
 20 delivery plan.
 21 SIR JOHN SAUNDERS: Did the advice in 2017 cover that
 22 sufficiently in your view?
 23 A. Yes., I think it did.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR GREANEY: I believe the point you're making, and tell me

1 if I've got this wrong, is that those who are
 2 responsible for security at a location such as the arena
 3 should not just focus on egress from an event because
 4 that is to avoid the reality, namely that there are
 5 other occasions during an event when there will be a lot
 6 of people around?
 7 A. That's right. So if you were primarily to focus on
 8 egress, then it could be that people have previously
 9 done hostile reconnaissance, noticed your egress plan is
 10 really robust and therefore they will choose to do their
 11 attack at ingress or half time, depending on what the
 12 event is. I think you should holistically cover
 13 security to look at all of the times where that attack
 14 methodology potentially could be carried out.
 15 Q. So you're not suggesting that those responsible for
 16 security should ignore egress?
 17 A. No.
 18 Q. What you're saying is they should certainly have regard
 19 to egress but as just one point during the event and
 20 that they should be considering security for the whole
 21 of that event from start to finish?
 22 A. Absolutely.
 23 Q. When Mr Butt asked questions of Liz Forster, he took her
 24 to a particular document and I just want your insight
 25 in relation to this document, please. It was

1 a Project Argus facilitator 's manual and we'll put it on
 2 the screen in a moment. This may be a sensible moment
 3 to seek from you your explanation, first of all, of what
 4 Project Argus and Project Griffin are.
 5 A. Yes. Project Argus and Griffin are training modules
 6 which are delivered by the CTAs and the CTAs in
 7 partnership to industry. One of them is focused more at
 8 a strategic level in industry and the other is focused
 9 at a more ground floor level in terms of those people
 10 delivering security at those particular locations.
 11 Q. Argus is the high—level training?
 12 A. That's correct.
 13 Q. And Griffin is the more ground floor level training?
 14 A. Yes.
 15 Q. Then I have understood. So let's just have the
 16 facilitator 's manual on the screen. This is a document
 17 that Mr Butt took Liz Forster to. It's {INQ035521/1},
 18 "Project Argus: Stadia facilitator manual".
 19 If we go to {INQ035521/7}, please.
 20 SIR JOHN SAUNDERS: Is April 2016, the date we were talking
 21 about, the actual delivery?
 22 MR GREANEY: Certainly the evidence is, sir, that this was
 23 used for the basis of training to GMP, among others, in
 24 April 2016. We heard from Liz Forster that both she
 25 and, I believe, Ken Upham attended the training pursuant

1 to this on that occasion.
 2 SIR JOHN SAUNDERS: Well, I think she said she attended to
 3 meet and greet and dealing with general administrative
 4 matters rather than attending the training.
 5 MR GREANEY: That's precisely what she said.
 6 Can we go to {INQ035521/7}, please. Mr Butt
 7 correctly observed that one of the scenarios used in the
 8 training was an attack during egress and he suggested to
 9 Liz Forster, and in fact she agreed, that if there was
 10 short—sightedness on her part or the part of Mr Upham
 11 in relation to the risk of an attack during egress, it
 12 was not for the want of appropriate guidance from
 13 NaCTSO. I just want to understand whether that might
 14 have been putting things a little too high.
 15 First of all, upon whom was this guidance focused?
 16 A. This is focused to the senior level of management in
 17 companies.
 18 Q. If we look at page 2, I think we'll probably see that.
 19 {INQ035521/2}. The very top of the page, please:
 20 "A facilitation awareness programme directed to
 21 CEOs, senior managers, safety and security managers and
 22 specialists for stadia, arena and event holders."
 23 A. Yes. That's correct.
 24 SIR JOHN SAUNDERS: Is this what you were referring to when
 25 you mentioned some guidance relating to stadia?

1 A. Yes.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR GREANEY: So we know upon whom it was focused. Did this
 4 lead to the publication of a publicly available NaCTSO
 5 document?
 6 A. I believe it did. I think. I would probably need to
 7 check that.
 8 Q. Would you do that?
 9 A. Yes.
 10 Q. In particular, what we'd be interested to know is
 11 whether it resulted in the publication of a publicly
 12 available document that drew attention to the risk
 13 during egress, albeit we'll bear in mind the qualifying
 14 evidence you have given about that.
 15 Against that background I would like to look with
 16 you, please, at British Transport Police and in the
 17 course of that we'll consider a document that has been
 18 introduced since the attack that relates to egress.
 19 As you will appreciate, one of the issues the
 20 chairman is considering is the issue of primacy and I'm
 21 certain you'll have followed that.
 22 A. Yes.
 23 Q. By that I mean that both BTP and GMP had jurisdiction
 24 within the Victoria Exchange Complex.
 25 A. Yes.

1 Q. The question arises of who had primacy generally and,
 2 moreover, who had primacy during incidents --
 3 A. Yes.
 4 Q. -- and how that was understood between the two forces,
 5 the Home Office force and BTP.
 6 This takes us to your fourth witness statement and
 7 I hope you have the bundle in front of you. I'm going
 8 to start at paragraph 3. From reviewing records
 9 available to you, are you able to say whether there is
 10 specific guidance available to CTSAs when providing
 11 advice to venues that fall within the jurisdiction of
 12 BTP?
 13 A. I don't believe there is specific guidance.
 14 Q. Is there any other comment that you would add?
 15 A. I think the only bit which obviously I've put in my
 16 statement is that obviously BTP -- we aren't talking
 17 about a lot of CTSAs, so their primary focus was around
 18 some of the statutory and regulatory framework
 19 in relation to the sort of rail network. That was their
 20 primary focus but I think that's something probably more
 21 for BTP to answer.
 22 Q. I'm at paragraph 4. Is there any formal guidance for
 23 local police forces and/or BTP in relation to working
 24 together to provide advice to a venue?
 25 A. No, there isn't.

1 Q. What would you say about the training for CTSAs in this
 2 regard?
 3 A. The training for CTSAs -- obviously the CTSAs on BTP and
 4 for Home Office forces is exactly the same training
 5 programme and I think for me there is the concept of
 6 engaging with all relevant stakeholders. It's hard for
 7 me to comment because I don't work in the GMP area, but
 8 certainly my experience of events in London is very much
 9 a partnership approach to working together and between
 10 different organisations.
 11 I suppose for me, the important thing is coming to
 12 a decision about the point about who is taking
 13 responsibility and if you're going to share some of the
 14 responsibility then that, of course, is known to each
 15 organisation.
 16 Q. So would NaCTSO provide specific advice or direction on
 17 whether a particular venue required joint working?
 18 A. No, they wouldn't.
 19 Q. But your expectation would be that where different
 20 organisations have jurisdiction and/or responsibility,
 21 you would expect them to work together?
 22 A. I would expect them to work together and to have a clear
 23 understanding of who's got primacy.
 24 Q. Why is that important?
 25 A. I reflect myself on operations that I've been involved

1 in and I think it's important to know who is the owner,
 2 the ultimately responsible person. I think that's
 3 really important. I think it makes decision-making much
 4 clearer and just my professional experience is it's
 5 a more seamless process. If I take the London
 6 landscape, you have some events we work together on, the
 7 City of London Police, the British Transport Police and
 8 the Met. We have a decision, we work under a guidance
 9 called Operation Benbow and that works out who is taking
 10 primacy for delivering that particular operation.
 11 Q. While we're dealing with working together, and parking
 12 BTP for a moment, are you aware of the evidence that the
 13 inquiry has received about the difficulties that SMG
 14 perceived in closing off the City Room during events
 15 because of the interests that other organisations had
 16 in that area?
 17 A. Yes, I'm aware that it has been raised. I haven't
 18 necessarily listened to all the evidence in relation to
 19 that, but I'm aware that it has been put forward as
 20 a challenge.
 21 Q. Do you have any experience of your own in managing
 22 challenges of that type?
 23 A. Yes. I've led multiple operations in London and where
 24 there is -- we want to potentially police in an area
 25 which other people own, my experience of that is that

1 through the strength of partnership working you can
 2 reach a mutual joint conclusion which is right and
 3 appropriate for delivering an operation. I led the
 4 London New Year's Eve celebrations. As an example,
 5 a lot that is in grey space, a lot of that is in spaces
 6 owned by the local authority or private companies, and
 7 I think if you work together you can reach an effective
 8 solution around protective security measures that need
 9 to be in place in those areas.

10 Q. So obviously, we're concerned with the City Room. Is
 11 this reasonable to suggest: that it is about identifying
 12 that there is an issue or a particular problem with an
 13 area of grey space?

14 A. Yes, I think it's important, I think the PSIA tool does
 15 have a category which is around partnership working, and
 16 I think it's important to bring stakeholders together to
 17 discuss the problem and reach whatever the outcome is.
 18 That might be that there is a resistance by one of the
 19 partners to accept that position, but I think it's
 20 important that there is a conversation about it and
 21 decisions are made.

22 Q. So you identify a problem, stage 1. Stage 2, you have
 23 a discussion with those who have an interest in the
 24 particular area?

25 A. Yes. So my view on something like the City Room is you

1 would be looking at it within the context of protective
 2 security, what you're trying to achieve in terms of some
 3 of the operational tactics that you want to put in
 4 place, potentially what are some of the enablers and
 5 what are some of the barriers, and then reach
 6 a collective decision on a pathway forward.

7 Q. Obviously you're not in a position to comment on the
 8 particular difficulties that either did or did not exist
 9 in relation to the City Room. But what you can say,
 10 I think, from what you have told us is where you have
 11 been presented with comparable situations, you have been
 12 able to find a solution by working with partners?

13 A. Yes, I have, or if we can't find a solution, we have
 14 a reason -- we reach whatever the position is and we're
 15 all clear on what that position is.

16 Q. Let's go back to BTP. Prior to May 2017, as with today,
 17 venues could expect CTSA engagement from BTP or the
 18 local Home Office force?

19 A. I'm afraid I don't exactly -- I would have to take that
 20 away. I'm not quite sure what the position was
 21 in relation to BTP. We're talking about a handful of
 22 CTSA's across the country, primarily delivering on the
 23 regulatory stuff in relation to the rail network, so I'm
 24 not sure -- I'm not entirely sure about what the
 25 relationship was with some individual Home Office

1 forces.

2 Q. What you do say in your statement -- I'm at paragraph 5,
 3 this is your fourth statement, {INQ035098/1} -- is that:
 4 "There was no formalised direction from NaCTSO as to
 5 how this [namely whether it was to be a BTP or local
 6 Home Office CTSA] was to be arranged but rather it was
 7 left to the specific venue based on the circumstances."

8 A. Yes. So that was to be dealt with locally rather than
 9 centrally in terms of any direction.

10 Q. In your witness statement at paragraph 6, you talk of
 11 a meeting of 23 February 2017. Could you explain the
 12 significance of that to us, please?

13 A. This meeting -- my understanding of this meeting was
 14 that this was between NaCTSO, CPNI and British Transport
 15 Police, and it had the aim of improving the coordination
 16 and providing protective security support to the
 17 Department for Transport and Network Rail. There were
 18 no further meetings after that that were arranged and it
 19 was again really trying to balance out how they did
 20 their primary responsibility, which was in relation to
 21 the rail network, but there was no further follow-up
 22 meeting to that.

23 Q. After the Manchester Arena attack, was further work done
 24 to improve coordination between local forces and BTP for
 25 sites that fell under or across the jurisdiction of BTP?

1 A. There was a NaCTSO tasking which was 02/2017 and that
 2 was disseminated on 14 July, so after the attack in
 3 Manchester, and that was specifically designed to
 4 improve the coordination between local forces and
 5 British Transport Police for sites that fell under or
 6 across the jurisdiction of British Transport Police, the
 7 Department of Transport, or Network Rail. The tasking
 8 requested a number of things from the CTSA's. But again,
 9 I must stress that we are talking a handful of CTSA's
 10 within British Transport Police.

11 Q. Yes. I suspect that the precise number of CTSA's is
 12 operationally sensitive, but we are talking about a tiny
 13 number compared to the number of CTSA's within the
 14 Home Office forces?

15 A. Very small, yes, absolutely.

16 Q. Can we have that document on the screen, please, the
 17 NaCTSO tasking? It's tasking 02/2017, is it not?

18 A. Yes, that's correct.

19 Q. The INQ reference is {INQ023040/1}. It's a short
 20 document. Could we enlarge the top half of the screen,
 21 please?

22 It's headed:
 23 "Overview of planning developments regarding egress
 24 security post-Manchester Arena attack."
 25 So it appears from the heading that this was focused

1 upon egress; is that correct?
 2 A. It does -- sorry, could you just remind me who wrote
 3 this document?
 4 Q. I was hoping you might be able to help me with that.
 5 The identity of the author is not given in the document
 6 itself. It's simply described as "NaCTSO tasking
 7 02/2017". If you don't immediately recognise it, don't
 8 worry.
 9 A. I think this was from --
 10 MR BUTT: (Inaudible: no microphone) in relation to a NaCTSO
 11 tasking, that is also, I think, on Opus.
 12 MR GREANEY: Is this a document that you are familiar with?
 13 A. I have seen the document, but I am certainly of the view
 14 as well that it was produced by Greater Manchester
 15 Police.
 16 Q. Thank you very much indeed, Mr Butt.
 17 I will just ask you one question about it which
 18 you will be able to assist with. I won't delve into the
 19 detail given your answer. First bullet point:
 20 "Work is being undertaken in several areas by CT
 21 SECOS, CTASAs and individual sites. As already stated,
 22 CT SECOS assess each individual event and recommend
 23 a proportionate operational response and security
 24 measures for the whole event, including egress."
 25 Could you help us with what CT SECOS are, please?

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1 A. Yes, I can. These are a counter-terrorism security
 2 coordinator, and they are very different to a CTSA.
 3 They are a police officer --
 4 Q. Always a police officer?
 5 A. My understanding is they're always a police officer.
 6 I'm not aware -- I mean, I'm certainly not aware of any
 7 that aren't police officers, but I can check that.
 8 I suppose the easiest way to summarise what they do is
 9 these operationalise security plans for events, whereas
 10 CTASAs are involved in long-term protective security
 11 improvement. So that's the difference between the two
 12 of them. So if I as a Gold Commander for New Year's
 13 Eve, looking at the security plan for New Year's Eve,
 14 I would have a CT SECO who would work within my command
 15 structure, not a CTSA.
 16 The CT SECO may draw on some of the experience of
 17 the CTASAs, but their primary responsibility for
 18 a security coordinator is operationalising the plan.
 19 Q. So we can well understand that where you have a major
 20 New Year's Eve event, not that there will be one this
 21 year presumably, but an event such as that, or an
 22 Olympic ceremony, that you would --
 23 A. There can be for smaller events as well. It depends
 24 what the threat is perceived to be at a particular
 25 event, it depends on the crowds, it depends potentially

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1 on who's going, the crowds of people who may be there.
 2 I have seen them on smaller events. I know Liz Forster
 3 talked about royal visits, but it's not specifically --
 4 I wouldn't want anyone to think these have to be large
 5 events to have a security coordinator.
 6 Q. We know that at the arena there were over 100 events
 7 each year.
 8 A. Yes.
 9 Q. Would you expect a CT SECO to provide input in relation
 10 to each event?
 11 A. No, so the security coordinator tends to be primarily
 12 focused -- if there is a policing operation wrapped
 13 around it, then there is a CT security coordinator. The
 14 CT SECO wouldn't work with a private company delivering
 15 protective security.
 16 Q. So it would be dependent upon there being a policing
 17 operation associated with the particular event?
 18 A. That's my understanding, but I'm looking at that very
 19 much from a London perspective in terms of what I know
 20 happens operationally in London.
 21 Q. Whose responsibility would it be to decide if there
 22 should be a SECO?
 23 A. Gold Commander. Now, if, obviously, you take something
 24 like Manchester Arena and they wanted some advice, then
 25 they could through the partnership reach out to their

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1 CTSA, but obviously they've also got the right to be
 2 able to reach out to the private industry to get similar
 3 advice if that's what they wanted.
 4 Q. I'm going to move on to a different topic now.
 5 In the immediate aftermath of the arena attack, did
 6 NaCTSO take any steps to analyse what had occurred and
 7 what learning could be achieved?
 8 A. Yes. My understanding is that there is a document which
 9 NaCTSO came up with, some representatives from NaCTSO
 10 came up to Manchester alongside CPNI to look at if there
 11 was any fast time learning that needed to be reflected
 12 on and then disseminated across the network.
 13 Q. So this takes us to your third witness statement, also
 14 dated 30 July, {INQ035089/1}.
 15 On Saturday, 27 May, so 5 days after the attack, did
 16 NaCTSO and CPNI deploy a team to Manchester in order to
 17 undertake a broad protective security assessment, in
 18 other words a review following the bombing?
 19 A. Yes, that's correct.
 20 Q. Was that assessment undertaken at the request of two
 21 people, namely the head of NaCTSO?
 22 A. Yes, that's correct.
 23 Q. Neil Basu?
 24 A. No, not Neil Basu.
 25 Q. At the time who was that person?

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1 A. There was a chief inspector that was head of NaCTSO
 2 at the time.
 3 Q. And also the second person, a national coordinator for
 4 Protect and Prepare?
 5 A. Yes, that's correct, and that was Scott Wilson.
 6 Q. Was the intention to assess information relating to the
 7 bombing in order to inform more generally protective
 8 security work?
 9 A. Yes, that's correct. It was really about identifying,
 10 which I think is good practice, identifying if there was
 11 any fast time learning that needed to be captured, and
 12 then of course NaCTSO is the sort of public-facing body
 13 to be able to put protective security out across the
 14 security community. So it was looking at whether or not
 15 we needed to share some fast time learning.
 16 Q. The assessment was undertaken by two members of CPNI
 17 staff, who we won't name?
 18 A. Yes, that's correct, and two CTSA's.
 19 Q. The CTSA's who took part were Ken Upham and Dylan Aplin;
 20 is that your understanding?
 21 A. I can't remember whether it was Ken, but it was
 22 definitely -- Dylan Aplin was a CTSA.
 23 Q. We can no doubt check that.
 24 Did the report provide 21 recommendations?
 25 A. It did, yes.

1 Q. Have the majority of those recommendations been
 2 implemented?
 3 A. Yes, nearly all of them have been implemented.
 4 Q. With just a few in the process of being implemented as
 5 part of the crowded places refresh that we were told
 6 about by Mr Hipgrave?
 7 A. Yes, that's correct.
 8 Q. I'll give the INQ reference, albeit I don't propose to
 9 delve into the document, it's {INQ032344/1}.
 10 I'm nearly at the end of my questioning. Just two
 11 final topics, the first of which is the new crowded
 12 places guidance, that's my term, it may not be accurate.
 13 On 2 November 2020, there was published on the
 14 gov.uk website a guidance document relating to crowded
 15 places. I will put it on the screen and then ask you if
 16 you recognise it.
 17 Mr Lopez, I think the INQ reference is
 18 {INQ100055/1}. Do you recognise this document?
 19 A. I haven't seen it before.
 20 Q. "Introduction: the threat we face from terrorism is
 21 significant."
 22 It identifies the nature of that risk in further
 23 detail. Then the third paragraph:
 24 "This guidance is primarily aimed at those in the
 25 security sector and those who own or run businesses,

1 organisations, amenities or utilities."
 2 Next page, please, {INQ100055/2}.
 3 It deals with a number of risks including
 4 cybersecurity. Heading 2, "Law and liability":
 5 "There are legal and commercial reasons why venues
 6 should plan to deter terrorists and criminal acts or at
 7 least to minimise their impact."
 8 The an example of the legal reasons is given the
 9 Health and Safety Act and the Management of Health and
 10 Safety at Work Regulations. Then we're going to see
 11 that reputational damage is identified as well.
 12 Could you go further down, please?
 13 The Civil Contingencies Act is also identified and
 14 then reputation. Is this a document you're at all
 15 familiar with?
 16 A. No, I haven't seen it before.
 17 Q. I was going to ask you if NaCTSO had any part in the
 18 preparation of this document; so far as you know it
 19 didn't?
 20 A. Well, I haven't seen it, so ...
 21 Q. It seems unlikely then that NaCTSO is responsible for
 22 it, therefore?
 23 A. I can't comment as to whether they've had an input into
 24 the document because I don't know, but in terms of the
 25 crowded places guidance, I know that the website has

1 been refreshed to be more interactive in terms of the
 2 crowded places guidance, particularly around protective
 3 security advice, which came out in 2017, I believe, but
 4 I haven't seen this document before.
 5 Q. Given that you haven't seen it, I won't press you
 6 further on it.
 7 Finally, I would like to ask you about certain views
 8 expressed by Nicholas Aldworth. Is he someone that you
 9 know?
 10 A. Yes, I was his line manager for a period of time.
 11 Q. In 2018, he was, as you will therefore know very well,
 12 promoted to chief superintendent and became CT National
 13 Coordinator for Protect and Prepare?
 14 A. That's correct.
 15 Q. Presumably, therefore, from that point in time you
 16 worked closely with him?
 17 A. I did.
 18 Q. He has provided a statement to the inquiry dated very
 19 recently. It's dated 21 November. Have you had an
 20 opportunity to read that statement?
 21 A. Yes.
 22 Q. I want to ask you about just a small number of aspects
 23 of that statement and, to the extent that you feel that
 24 you can properly, given your role, comment upon them.
 25 The INQ reference to the statement is {INQ038949/1},

1 please. Could we go to {INQ038949/4}, please.
 2 I'm going to ask you about paragraphs 19 and 21.
 3 He's talking about the period post-2018 when he became
 4 CT National Coordinator for Protect and Prepare.
 5 Can we see paragraph 18 as well, please?
 6 Paragraph 19:
 7 "However, despite the many collaborations we enjoyed
 8 [he's talking about the relationship between CT Policing
 9 and the Home Office] when we started to broach the idea
 10 of the need for a Protect duty. It became clear that
 11 the door to conversation was closed. Both myself and
 12 Lucy D'Orsi had raised the prospect with our
 13 counterparts and I particularly had been badgering OSCT
 14 at every opportunity. Eventually, I was banned from
 15 mentioning the term Protect duty inside the Home Office.
 16 While the phrase was used lightheartedly, its
 17 application was real. It became clear that our
 18 persistence had gone beyond the point of tolerance and
 19 that a level higher than director had decided that there
 20 would be no further consideration of the matter."
 21 Paragraph 20:
 22 "In fairness to my OSCT colleagues, I did understand
 23 why this might be the case. After the five terrorist
 24 attacks in the UK in 2017, we had an enormous workload
 25 to prioritise in response to the learning that had come

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1 from those incidents. While some of this work had
 2 started before 2017, its need to accelerate to
 3 implementation became more focused through 2018. As
 4 a result of this, some of the structures described by
 5 Mr Hipgrave's evidence were established. I do believe
 6 that my Civil Service colleagues were as interested in
 7 a Protect duty as we in policing were, but they were
 8 being prevented from progressing it by an edict from
 9 a more senior position. I do not know if that was
 10 a more senior civil servant or a minister. It is worth
 11 noting at this point that all of my principal colleagues
 12 involved in these discussions during 2018 have
 13 subsequently moved to other roles and are not currently
 14 involved in the strategic decision-makings about
 15 a Protect duty consultation."
 16 21:
 17 "A Protect duty continued to be of interest to
 18 myself and Lucy D'Orsi alongside other initiatives that
 19 are currently in development or being reviewed."
 20 First, I'm certain that Mr Aldworth is correct when
 21 he states that, to summarise, you had a strong view that
 22 there should be a Protect duty because you have told us
 23 the same thing, have you not?
 24 A. I have, yes. I have had a very strong position on it
 25 probably from just after the Westminster Bridge attack

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1 in the early part of 2017.
 2 Q. As I have just read out, Mr Aldworth expresses his
 3 belief that his Civil Service colleagues, whilst they
 4 were as interested in a Protect duty as you in policing
 5 were, were being "prevented from progressing it by an
 6 edict from a more senior position" although he doesn't
 7 know whether that was a civil servant or a minister.
 8 Do you have a view that you're able to express about
 9 that?
 10 A. I don't think I've ever... I certainly don't feel that
 11 I was ever stopped from pursuing a Protect duty or
 12 talking about it at conferences; I have spoken about it
 13 multiple times at conferences. I think people
 14 absolutely know the strength of my position around the
 15 need for primary legislation. I don't really think it's
 16 appropriate for me to comment on whether ministers or
 17 senior civil servants were blocking it as I have no
 18 knowledge of that.
 19 I think in fairness, the backdrop was certainly
 20 there was a huge focus around some of the Brexit
 21 discussions and I think certainly for me, civil
 22 servants, rightly, were struggling to look at how they'd
 23 be able to bring it in, but I think there was a real
 24 shift in the run-up to the recent general election,
 25 where it featured in all of the parties' manifestos as

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1 something that politicians were committed to and I think
 2 that was the first time I saw a cross-party agreement
 3 that this was the right way forward.
 4 But yes, I don't think it's for me to comment on
 5 whether or not there were senior people in government
 6 who had a blocking viewpoint. It's certainly not
 7 something I felt.
 8 Q. We will all, I am certain, understand the caution with
 9 which you expressed your views, bearing in mind the
 10 position that you hold. But I think that we can derive
 11 this from the evidence you've given: that since the
 12 general election, or certainly in the lead-up to the
 13 general election, there appears to have been a greater
 14 focus on the introduction of a Protect duty than there
 15 had been previously?
 16 A. Yes, definitely. I think it was in August of this year,
 17 I was party to two round table meetings, chaired by the
 18 security minister, one which was a government-focused
 19 one internally across the government departments, and
 20 the other one I believe was focused around local
 21 authorities. So I've definitely seen some traction
 22 around people wanting to make progress in this area.
 23 Q. Next, I'm going to ask that we put up paragraph 44,
 24 which is the bottom of page 9, and again I seek your...
 25 {INQ038949/9}.

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1 It's paragraph 44, as I indicated:
 2 "This brings me to on my final observations that
 3 concern consultation for Martyn's Law. I have listened
 4 to the evidence from Mr Hipgrave, who I know to be
 5 a good and honest man, wholly committed to protecting
 6 people from terrorism."
 7 As you appreciate, we've heard evidence from him.
 8 A. Yes.
 9 Q. "In describing the cause of delay in consultation for
 10 Martyn's Law, he was clearly transmitting the intentions
 11 of his seniors and not necessarily his own.
 12 I fundamentally disagree with the assertion that he
 13 delivered on their behalf, that consultation cannot be
 14 undertaken meaningfully during the current health
 15 crisis."
 16 And again, bearing in mind your role, I'll ask you
 17 whether you feel able to express any view about that
 18 paragraph.
 19 A. The first part of it, I think Mr Hipgrave has been
 20 really supportive of CT Policing's position and has
 21 been — and his predecessor and those who work for them,
 22 very much have been trying to push forward the Protect
 23 duty. So I think that for me is really an
 24 unquestionable position and I'm really grateful for what
 25 they've been doing in that space.

1 I think the current health crisis, as we know, has
 2 challenged everybody and we need to think differently
 3 around some of the perhaps traditional ways of
 4 approaching things. I've been involved in two round
 5 tables in August with the security minister, which was
 6 around engagement with other people. From my own
 7 engagement with industry, I feel that they are ready to
 8 have consultation now, they welcome — they're looking
 9 forward to the consultation. My position, generally
 10 speaking to industry, is they're very supportive of
 11 a Protect duty. I would like it to move forward at
 12 a much quicker pace than it currently is, but I think
 13 that the delays are something that Mr Hipgrave covered
 14 as to the position from government around the
 15 consultation.
 16 We are doing consultation in other areas, which
 17 I know that Mr Hipgrave is involved in, and I suppose
 18 I do share the position that Figen Murray discussed in
 19 her evidence and mentioned in her evidence that she
 20 would like it to take place quicker. I think this is
 21 just about how we approach something in a slightly more
 22 different way with the backdrop of COVID that maybe
 23 we haven't done before and I think we should be
 24 exploring that.
 25 Q. Would a fair summary of your position be that, for

1 understandable reasons, you don't want to be critical,
 2 you want this to move as quickly as possible?
 3 A. Yes, I do, because fundamentally, as I said in my
 4 evidence last time, I think a Protect duty would be
 5 a seismic shift in the way that everybody approaches
 6 protective security, it would put it on that statutory
 7 footing, and it would be, I think, as groundbreaking as
 8 the GDPR was in terms of data handling. I think this
 9 would have the same impact in terms of protective
 10 security, so I think it's important we move it forward
 11 as quick as is possible.
 12 In terms of whether the pace can be sped up, I think
 13 that's a matter for Mr Hipgrave to comment on.
 14 Q. And indeed, it's important to bear in mind, do you
 15 agree, that this is not just change for the sake of
 16 change, this is change which is necessary in order to
 17 protect people in publicly accessible locations?
 18 A. Absolutely. I think that this is about everybody
 19 playing their part. It would be a great leveller and
 20 I think it reflects the learning that we've seen from
 21 some of the dreadful attacks that we've seen where
 22 people have lost their lives. I think it's important
 23 that we take that learning and we move forward and that
 24 the regulatory and the legal framework is there and very
 25 clear to everybody.

1 SIR JOHN SAUNDERS: Can I just — I don't want to go into
 2 the detail of it because that's obviously a matter for
 3 consultation, but certainly in relation to certain
 4 crowded spaces, the idea appears to be that advice needs
 5 to be taken or an audit taken of the security measures
 6 in place and recommendations made as to what needs to be
 7 done to make them safe. And no doubt you would envisage
 8 some sort of follow-up to make sure they are actually
 9 done rather than just being recommendations which can be
 10 taken on board or not.
 11 Is it possible for the CTSAs to do that sort of
 12 audit and make the necessary recommendations?
 13 A. Not at the moment. That wouldn't be possible.
 14 SIR JOHN SAUNDERS: Because you haven't got enough?
 15 A. We've got 200 CTSAs. Their role is very much focused
 16 in the category which is around specific sites, that's
 17 where they are focused. Site zones and sectors will
 18 feature across the board in terms of the publicly
 19 accessible location work. So I think there would need
 20 to be some consultation and thinking around what is the
 21 assurance process and what is the enforcement process
 22 and what's that going to look like. I think we would
 23 have to look towards things — how does that happen
 24 currently with health and safety and those sort of
 25 areas. I don't know what the solution is.

1 SIR JOHN SAUNDERS: That clearly is something which needs to
 2 be thought out.
 3 A. It needs to be looked at, yes.
 4 SIR JOHN SAUNDERS: The alternative to CTSAs is the private
 5 security industry, which I have no doubt is highly
 6 respectable and very good. Is there any Kitemark
 7 quality control for security businesses or can anyone
 8 set up?
 9 A. At the moment anyone can set up and I think that's
 10 something we've been looking at in terms of an
 11 accreditation process for experts going forward.
 12 I think that's something that the industry want, they
 13 want to know they're buying the right people in to
 14 deliver the right advice. We haven't got a solution for
 15 that at the moment but I think that's something, working
 16 with the government and the industry themselves, and
 17 CT Policing — we need to look at how we can get to
 18 a better accredited process going forward.
 19 SIR JOHN SAUNDERS: And then there will need to be some sort
 20 of inspection process, presumably, to make sure that the
 21 recommendations have been carried out or some sort of
 22 appeal mechanism to say, this is unreasonable or not
 23 proportionate, which will no doubt be the phrase which
 24 is used?
 25 A. I suppose one way of approaching it is that there is

1 that sort of process. Another way is you own your
 2 decisions as an operator, whether you be a local
 3 authority or a private sector operator, and it's for you
 4 to be able to evidence that you're presenting it and do
 5 we need to assure that process or do we just know that
 6 actually —
 7 SIR JOHN SAUNDERS: Rely on people to do it?
 8 A. Rely on people. But also I think I mentioned last time
 9 that I do think failure to comply with it has got — you
 10 know, the GDPR is at such a high level that people have
 11 compliance and I think that's the question.
 12 SIR JOHN SAUNDERS: It's one thing to say, "We're going to
 13 proactively go out and look to see whether you have done
 14 it", it's another thing to say, "We'll wait for a bomb
 15 to go off and see whether you've broken the law", which
 16 some people might say is too little, too late.
 17 A. That's right.
 18 SIR JOHN SAUNDERS: Can I make clear, I'm not suggesting
 19 these things are not possible, it's to highlight through
 20 you that there are clearly things that need to be worked
 21 out — maybe it's the reason why we need to get on with
 22 the consultation pretty quickly —
 23 A. Yes.
 24 SIR JOHN SAUNDERS: — because there are things that need to
 25 be sorted out before it can actually be put into

1 operation?
 2 A. Yes, it's inevitably going to be a long process to work
 3 out what the end product is going to look like and the
 4 consultation is really critical to that. But I would
 5 say, I do feel we certainly in CT Policing have had
 6 a lot of support from industry and their engagement in
 7 this process has been really good. I think we also need
 8 to remember that when we're talking about industry it's
 9 not necessarily big corporations who have big security
 10 departments with lots of finance behind it, you have
 11 also got your small/medium enterprises, and whatever we
 12 end up with does need to be proportionate and reflect
 13 the whole scale.
 14 SIR JOHN SAUNDERS: And it is unlikely to be recommended in
 15 every case, however small the operation, that they would
 16 have to have some sort of independently paid for
 17 security assessment and audit before they could actually
 18 be allowed to continue. It has to be —
 19 A. And I think the very valuable asset of CTSAs also need
 20 to be there to provide the support to those who
 21 potentially don't have access to the same sort of
 22 resources or capability of other organisations. I do go
 23 back to some of those charitable organisations that do
 24 find themselves within that tiering process. Clearly,
 25 that's where we arguably, as the public sector, want to

1 be able to support those people by providing them with
 2 the advice.
 3 SIR JOHN SAUNDERS: What we have established, I think, at
 4 the moment, is that for your 200 CTSAs, they're already
 5 pretty heavily work committed —
 6 A. They are, yes.
 7 SIR JOHN SAUNDERS: — and if you're going to take on more,
 8 you need more of them.
 9 A. Yes, or we need to think differently and there needs to
 10 be potentially a commercial solution to the problem.
 11 SIR JOHN SAUNDERS: I want to make clear I'm not suggesting
 12 this is not a thoroughly good idea; this is just me
 13 looking at some of the practicalities involved.
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR GREANEY: I just want to ask about one final aspect of
 17 Mr Aldworth's statement. It may be that no one in this
 18 room and no one watching doubts that there is a need, an
 19 urgent need, for a Protect duty. Mr Aldworth expresses
 20 the view that the current licensing regime should form
 21 no part of the solution. I wanted to give you an
 22 opportunity to express your views about that, if
 23 you have a view.
 24 A. I must start by saying I have never in my career been
 25 a licensing expert. It is not something that is a

1 strength of mine in terms of licensing legislation .
 2 I am sure it has its benefits and I have listened to
 3 some of the observations so far around some of the
 4 benefit of licensing and, actually , when I started my
 5 thinking around the Protect duty, I was drawn to health
 6 and safety, I was drawn to planning legislation, I was
 7 drawn to licensing legislation , and how you could
 8 certainly empower local partnerships to take
 9 responsibility .
 10 I don't necessarily -- I don't disagree with any of
 11 the suggestions being made, but I wouldn't want anything
 12 else to derail the progress to make a Protect duty. So
 13 I think that the prize is definitely the Protect duty,
 14 but if there are amendments that could be made
 15 relatively quickly or a focus to local authorities to
 16 consider it in some of their current licensing
 17 framework, then of course I think that would be great,
 18 but I wouldn't want to destabilise progress on a Protect
 19 duty.
 20 SIR JOHN SAUNDERS: And I don't think anyone's made any
 21 suggestion to the contrary of that. The fact of the
 22 matter is, though, that Health and Safety at Work,
 23 licensing authorities , they have a responsibility under
 24 their act to do something about it. So you can't
 25 just -- you could say, we'll take terrorism entirely out

1 of Health and Safety at Work and out of licensing, but
 2 if they're going to remain having some responsibility,
 3 it has to be incorporated into the Protect duty under
 4 primary legislation . That's all that's being suggested.
 5 A. Yes, and I don't disagree with that. I suppose the only
 6 thing that's never been mentioned is the safety advisory
 7 groups, which I have found a little bit impotent over
 8 the years --
 9 MR GREANEY: Would you explain what those groups are,
 10 please?
 11 A. A safety advisory group is a group which involves event
 12 organisers, it's the local authority, other sort of
 13 statutory partners at a local level , which provides the
 14 safety certificate for big events, so predominantly
 15 around football matches and some of the bigger events.
 16 If we are going to look at some of the opportunities
 17 in licensing , I think -- certainly I know that policing
 18 and my colleagues and myself included who have been
 19 working on some of those bigger events, we would like
 20 a little bit more teeth in the SAGs, the safety advisory
 21 groups. If we're looking at some quick wins without
 22 derailing the Protect duty, I think there's an
 23 opportunity there to be explored.
 24 MR GREANEY: DAC D'Orsi, thank you very much indeed, those
 25 are my questions.

1 Sir, this would be a convenient moment for a break.
 2 SIR JOHN SAUNDERS: 20 past? Does that give enough time for
 3 a break? Thank you very much.
 4 (11.09 am)
 5 (A short break)
 6 (11.24 am)
 7 MR GREANEY: Sir, I will ask Mr O'Connor to ask his
 8 questions, first of all , on behalf of SMG.
 9 Questions from MR O'CONNOR
 10 MR O'CONNOR: DAC D'Orsi, I want to start just by asking
 11 a few questions about CTSAs, the scope of the advice
 12 they give and so on. I appreciate it's ground we've
 13 covered with you already and also of course with
 14 Ms Forster, so I hope I can take these matters quite
 15 quickly.
 16 Let me start, though, with a comment that we saw you
 17 make when you were giving evidence at the London Bridge
 18 Inquests and which appears on the transcripts of your
 19 evidence there. You described in the course of your
 20 evidence the training that CTSAs undertake, which
 21 you have told us about, the two-year period and so on.
 22 The words you used were that:
 23 "The CTSAs were the highest qualified
 24 counter-terrorism security advisers in the country."
 25 I assume that's a description you still would stick

1 with?
 2 A. Yes.
 3 Q. We know that as well as all the qualification and the
 4 training that CTSAs have, they also, of course, have
 5 access to the intelligence , the developing understanding
 6 of the threats that the police and the counter-terrorism
 7 agencies have?
 8 A. Well, they don't have access to intelligence as
 9 a holistic category, no.
 10 Q. If there was a threat, a developing understanding of
 11 a threat to a venue, for example, within an area that
 12 a particular CTSA was responsible for, would that CTSA
 13 hear about that information?
 14 A. That depends on a whole range of factors. That's dealt
 15 with as part of the Pursue side. The operational
 16 meetings that take place will give due consideration to
 17 how to mitigate the threat posed from a live operation.
 18 Whether that includes sharing it with the CTSAs is
 19 a matter of -- that will be decided in collaboration
 20 with the security services and policing. It's not
 21 probably -- I'm not being very helpful here. It's not
 22 as straightforward as you're suggesting.
 23 Q. In that case the fault is mine. One can quite see that
 24 depending on the intelligence, depending on the
 25 sensitivity of the intelligence , there may be different

1 decisions made about who to share with it and when?
 2 A. Absolutely, yes.
 3 Q. And I hadn't intended to ask a question that went into
 4 that level of detail. Really, the understanding of SMG
 5 was that if there were particular threats that they
 6 needed to know about or prepare for and which the police
 7 or the agencies were becoming aware of, then the CTSA
 8 was someone who would inform them of that if
 9 appropriate.
 10 A. Probably not to be too picky about it, but actually
 11 it may be if there was a specific threat to a specific
 12 venue, then it might actually be the senior
 13 investigating officer that collaborates with the Protect
 14 side of the business to speak to the actual site
 15 operators. So it might happen in that way, depending on
 16 what the specific threat was.
 17 In terms of the generic threat, of course we expect
 18 all operators to have cognisance of what the UK threat
 19 level is.
 20 SIR JOHN SAUNDERS: I think what's being said is if the
 21 police somehow were to know about a threat of a bomb
 22 attack to a particular building, in some way or
 23 another —
 24 A. They would be told.
 25 MR O'CONNOR: Let's move on, thank you.

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1 Just to be clear, the A in CTSA stands for adviser.
 2 We have heard a lot about the fact that CSAAs have had
 3 that advisory role, have no power to instruct venues to
 4 undertake any particular measures, hence the discussion
 5 that you've had about the Protect duty and so on.
 6 A. Yes.
 7 Q. And therefore the discussion that's been had about the
 8 fact that responsibility for measures at a particular
 9 venue rests with the venue.
 10 A. Yes.
 11 Q. I want to be clear, I'm not going to go into that
 12 territory, that is something, so far as SMG is
 13 concerned, is not in dispute. But I do want to ask you
 14 some more questions about the advice therefore that
 15 CSAAs do provide to venues and in particular, to start
 16 with, the scope of the advice that they provide.
 17 In doing that, perhaps we can look at your fourth
 18 witness statement, please. If we can have it on the
 19 screen. {INQ035098/4}.
 20 Paragraph 15, please. You refer there, DAC D'Orsi,
 21 to the PSIA process, which again we have heard about;
 22 yes?
 23 A. Yes, that's correct.
 24 Q. But then you say this:
 25 "The CSAAs are encourage to provide bespoke advice

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1 and CSAAs will seek to understand what a site does and
 2 how it functions to ensure this advice is appropriate."
 3 That word, bespoke, is one that you use on a number
 4 of occasions throughout your statement. Can you
 5 elaborate on what you mean by that, in particular about
 6 the nature of the advice that you would expect CSAAs to
 7 provide to a venue?
 8 A. I think in this context here, bespoke advice is about
 9 advice that's relevant to that site. So there's no
 10 point just giving a list of generic advice of which half
 11 of it's not relevant to the way that site is designed or
 12 operates. So that's what I mean in relation to that
 13 specific comment of bespoke there.
 14 Q. Do we also take from that word, bespoke, that although
 15 of course the PSIA process is one which CSAAs do, it's,
 16 if you like, the sort of starting point for their work,
 17 and, as you have said in that paragraph, that process
 18 itself is designed to process the uniqueness of
 19 individual venues?
 20 A. Yes.
 21 Q. The advice that CSAAs will give will go beyond the PSIA
 22 process in order for it to have that bespoke character?
 23 A. I would expect people to be talking holistically around
 24 protective security at a site. But the primary focus is
 25 to be the focus of the PSIA, which is to address the

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1 six attack methodologies. So it needs a very strong
 2 focus on that.
 3 Q. It does, but when the CTSA, with all his or her
 4 expertise goes into a venue and looks around, as you say
 5 here, and understands how it functions, what the site
 6 is, looking through the lens of their CTSA experience,
 7 they won't be, as it were, hampered by the PSIA
 8 spreadsheet?
 9 A. No.
 10 Q. They will look and see what the unique features of that
 11 site are, what the counter-terrorism risks, if any, are
 12 and how to mitigate those risks?
 13 A. Yes. They shouldn't be hampered by the PSIA, no.
 14 Q. In that context, you were asked by Mr Greaney some
 15 specific questions about the City Room and about the
 16 risk that it presented because of its proximity to
 17 a railway station and the fact that it was a crowded
 18 place and so on.
 19 A. Yes.
 20 Q. And you were asked whether those risks would have been
 21 obvious to a number of people, SMG, ShowSec, BTP. Just
 22 to finish off the list, those risks would also have been
 23 obvious to the CTSA, Mr Upham, I take it?
 24 A. I do think it's — in terms of protective security
 25 advice, looking at the holistic picture, I think it's

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1 relatively obvious to everybody.
 2 Q. Including the CTSA?
 3 A. Yes.
 4 Q. Just moving on a little bit, DAC D’Orsi, you talk in
 5 your statement about extending the perimeter as one of
 6 the mitigations against terrorist attack. It’s in the
 7 paragraphs that follow the part we’ve just been looking
 8 at. If we look, for example, at paragraph 17 at the
 9 bottom of the page, you start to talk about extending
 10 perimeters.
 11 Then if we can carry on and look over the page to
 12 the next page {INQ035098/5}, please, just reading to the
 13 end of paragraph 17, you flag there in general terms
 14 what we’ve heard about here, is that right, that there
 15 can be obstacles or difficulties involved in extending
 16 perimeters because of the nature of grey space? Is that
 17 the point you’re making?
 18 A. On the second half of paragraph 17?
 19 Q. I’m asking you to think about paragraph 17 as a whole.
 20 A. Let me just refresh myself with that.
 21 Q. Yes, of course.
 22 (Pause)
 23 A. Yes. It talks about the complexity of the grey space.
 24 Q. Just to be clear, if one has an out-of-town arena or
 25 a stadium or football stadium built, as some newer ones

1 are often those days, outside the city, surrounded by
 2 land that the football club owners, and one wants to
 3 talk about extending the perimeter, searching people
 4 further away from the entrance or putting in other
 5 equipment or vehicle mitigation barriers, whatever
 6 it is, in that situation it can be fairly
 7 straightforward because one is dealing with land which
 8 isn’t being used by anyone else.
 9 A. Yes. I don’t think it’s about the sort of out-of-town
 10 location. It’s around who owns the land. This is not
 11 a new issue, this has been something that everybody’s
 12 been wrestling with for many years in terms of how you
 13 apply effective protective security in complicated
 14 spaces which are owned by multiple people. I think the
 15 point that I made earlier is it’s not insurmountable,
 16 but it requires a strength of partnership working. And
 17 in terms of gaining permission to work on other people’s
 18 land, that is possible but it requires good negotiation
 19 and good partnership working.
 20 Q. So the contrast is if the land is all owned, it’s not
 21 a difficulty. You make the point that if it’s what we
 22 describe as a grey space and other are people involved,
 23 it’s more complicated —
 24 A. Yes.
 25 Q. — but it’s not impossible?

1 You have given some examples from your experience of
 2 where those problem have been overcome?
 3 A. Yes.
 4 Q. And I take it, because they’re from your experience,
 5 that they have been examples where the police have got
 6 involved, have they?
 7 A. Yes, there are multiple examples where people work
 8 collectively together at multiple sites across the UK
 9 where the owners of land — you know, there are multiple
 10 owners of land and they come together and they find
 11 solutions to protective security. They set themselves
 12 a sort of common ambition of what’s the problem they are
 13 trying to solve and how they are going to do that
 14 together.
 15 SIR JOHN SAUNDERS: I think, Mr O’Connor, I have got the
 16 point in relation to this. Do you mind if we move on?
 17 MR O’CONNOR: Certainly, sir. I will move on.
 18 I want to come to the distinction you drew,
 19 DAC D’Orsi, between providing advice on protective
 20 security matters on the one hand and advice on what you
 21 describe as operational matters on the other. That,
 22 I think, is fair to say is the boundary that you have in
 23 mind about what a CTSA is there to advise on, protective
 24 security.
 25 A. Yes.

1 Q. When it comes to more operational matters, those are
 2 matters that you would not expect a CTSA to advise on;
 3 is that a fair analysis?
 4 A. That’s correct. I don’t expect them to operationalise
 5 the plan for protective security, but there are multiple
 6 people that can do that.
 7 Q. One can see that the boundary between those two things
 8 might be a bit fuzzy in some cases.
 9 A. I think it’s really clear.
 10 Q. Do you?
 11 A. Yes.
 12 Q. So for example, if one were looking at the City Room and
 13 describing the arrangements that were in place there,
 14 for example Access Control having access control staff
 15 positioned within the City Room or staff positioned on
 16 the link bridge to the station, would you describe those
 17 as protective security matters?
 18 A. I think protective security is a whole system approach.
 19 It’s often commonly described in both policing terms and
 20 in the private sector as "onion layering". You reach
 21 a point where you have a very, very tight secure bit
 22 in the centre and then you’ve got different bits of
 23 security, and the further you go out, that is different.
 24 You may have people that are looking at crowd behaviour
 25 outside and then it gets tighter as you get closer in.

1 So I think for the site, Manchester Arena, I would
 2 expect this application of the onion layering, and there
 3 are different levels and proportionate levels of
 4 protective security at different parts of the plan.
 5 Q. So those would be matters within the zone that you think
 6 of as protective security?
 7 A. I think so, yes.
 8 Q. And then, for example, if one were to say, we need more
 9 people at a boxing match — it's an example that's often
 10 given —
 11 A. I think events is different, so this is about profiling
 12 your events as to what happens and that is when you are
 13 scaling up and down. I wouldn't expect a site to
 14 particularly have the same security approach for every
 15 event, they need to make choices.
 16 You might have, for example, at the arena, there
 17 might have been an exceptionally controversial speaker
 18 that particularly attracts a crowd of people and the
 19 risk is higher, so therefore I would expect the
 20 protective security to step up. But there might be
 21 another event that's very low-key, people have
 22 considered who the audience is going to that, how it's
 23 marketed, the volume of people that are coming, there's
 24 the capacity of the arena, which is always a set piece,
 25 but if we take — there's shopping centres across the

1 country in the London area, some of them have 70,000
 2 people a day going into shopping centres, pre-COVID,
 3 obviously, and none of those people are searched going
 4 in.
 5 Q. That's very helpful, thank you.
 6 Really, I just wanted to get a feel for where that
 7 line was between operational and what is protective
 8 security. As I think I've understood from what you've
 9 said, the arrangements, the deployment of people on
 10 those onion rings that you describe, that is all what
 11 you would think of as the protective security plan —
 12 A. But not in terms (overspeaking).
 13 Q. — event by event is more operational?
 14 A. But not in terms of the PSIA document. That is talking
 15 specifically about the site. It's very clear, I think,
 16 that the PSIA is about the site. But in terms of
 17 operationalising security around an event, I think
 18 that's broader than — you need to think about what your
 19 security culture is and your approach to security.
 20 Q. Just to be clear and then I'll move on: the protective
 21 security advice, whether it's within the four corners of
 22 the PSIA or one of those examples where a CTSA might go
 23 beyond the PSIA, that's the stand-off, the onion rings,
 24 the deployment of people further away?
 25 A. I suppose, just so I'm clear, I'm talking about the

1 operationalisation of the security plan. So I think
 2 that you've always got to do your thinking broader than
 3 that.
 4 Q. Let me just try — it's an important point, DAC D'Orsi,
 5 and I don't want us to be talking at cross-purposes.
 6 I want to establish from you how far you would expect
 7 a CTSA to advise within the terms of protective security
 8 before you reach that (overspeaking).
 9 A. For the CTSA's specifically, I think their security
 10 advice was in relation to the site. Now, I think
 11 in relation to Manchester Arena, I think if I remember
 12 rightly from Ken Upham's statement, he talks about the
 13 City Room in relation to CCTV and some of the guiding
 14 principles there and I think that's right. Once we
 15 start to think broader than that, that's a matter for
 16 the site to decide whether they want to do that or not.
 17 Q. All right. There's evidence which sits behind that
 18 about what Ken Upham did or didn't say in his meetings
 19 with the site. Obviously I don't want to get into that
 20 with you, so perhaps let me just move on to a slightly
 21 related point, which is simply this: that distinction
 22 you've drawn between protective security and operational
 23 matters, we don't see that in any of the documents, do
 24 we? The venues are not told: this is what a CTSA will
 25 not advise you about?

1 A. No, but I think the documents are clear about what
 2 a CTSA is advising on, which is the PSIA document.
 3 That's what they're there for and also there is a lot of
 4 free, readily available, free to access protective
 5 security advice that people can self-service. So the
 6 PSIA and the CTSA's is only part of a security culture
 7 and process for a particular site.
 8 Q. Ultimately, though, will you agree, it's for the CTSA
 9 himself or herself to say to a venue when discussing
 10 security matters, "This is where I stop, I have given
 11 you my advice about the PSIA, if it's gone a bit
 12 further, it's gone a bit further, but now really we are
 13 talking about operational things, that is for not for
 14 me"? It has really got to be the CTSA who says that?
 15 A. I think that's a really basic level if we're at that
 16 point in terms of a relationship. I would expect the
 17 company — the site operator has a holistic approach to
 18 security. They know what the PSIA is and the survey and
 19 they know the focus of the CTSA. I would expect them to
 20 be complementing their thinking. These are security —
 21 in the case of the arena, these are security
 22 professionals that are involved in this process. If
 23 they feel there are gaps in it, they can either have
 24 a conversation with the CTSA or obviously they can seek
 25 a commercial provider to support the protective security

1 advice.
 2 Q. Let me ask you about that. We've seen and we heard from
 3 Ms Forster that there might be times when a CTSA would
 4 say, "You need some specialist advice about a particular
 5 piece of equipment", for example, "If you're going to
 6 install a new CCTV system, you should go and speak to
 7 these people or that part of the industry". If a CTSA
 8 is in a position of advising a venue, as was the case
 9 with the Manchester Arena prior to the attack, which
 10 didn't have any other internal source of
 11 counter-terrorism expertise, would you expect the CTSA
 12 to tell the venue, "You need to seek some other expert
 13 advice because I can talk to you about protective
 14 security but I can't talk to you about operational
 15 matters and you need to seek someone else who can tell
 16 you about that"?

17 A. Well, I would expect a venue to be aware of the --
 18 you've got the CPNI that put advice out there, and
 19 I think I refer to that in my fourth statement in the
 20 last paragraph, 31, which talks about the extranet for
 21 CPNI, which a site can seek to go on to that and seek
 22 excess access to the extranet to get that advice. Again
 23 we are talking about security professionals at some of
 24 these bigger sites, so I would I hope that they know
 25 that they can go and seek professional advice. It's

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1 readily available through the intranet. If they need
 2 some further support, particularly on the technical side
 3 of things, then they would need to seek that from
 4 elsewhere. CTSAs do not provide that technical advice.
 5 SIR JOHN SAUNDERS: Let's try and bring this discussion to
 6 a close if we can. If a site, like the arena, says to
 7 a CTSA, "Look, I've got a problem with this, that or the
 8 other", and it is operational and therefore outside the
 9 realm of CTSA advice, it wouldn't be beyond the wit of
 10 man for a CTSA to say, "Look, I can't advise you on
 11 that, if you want advice you have to go to
 12 a professional"?

13 A. Yes, that's correct. They wouldn't specifically name
 14 providers though, because that would be inappropriate.
 15 SIR JOHN SAUNDERS: Yes, it would be up to them to get their
 16 own.
 17 MR O'CONNOR: Thank you, sir, I'm going to move on.
 18 I want to look at a couple of guidance documents
 19 that you mentioned, DAC D'Orsi, now. Can we go to your
 20 first statement? {INQ025466/13}.

21 Mr Greaney was asking you some questions about
 22 sector specific guidance earlier today, DAC D'Orsi,
 23 you'll recall. You remember, he put to you, if we look
 24 at the third line down, the fact that there was no
 25 documentation with terminology specific to concert

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1 venues. I think that's probably where he got that point
 2 from.
 3 A. Yes, that's correct.
 4 Q. You go on there to describe that some documents were
 5 specific to particular sectors or areas and some were
 6 more general.
 7 A. Yes, that's correct.
 8 Q. You did mention when Mr Greaney asked you about it that
 9 there was a document which was related to stadia and
 10 arenas. If we could go to the next page {INQ025466/14}
 11 of this statement, please, and look at paragraph 50.
 12 There's a reference to NaCTSO guidance entitled,
 13 "Counter-terrorism protective security advice for stadia
 14 and arenas".
 15 Was that the document that you had in mind when you
 16 answered Mr Greaney's question earlier today?
 17 A. Yes, it is.
 18 Q. I'm going to take you to a few passages in that document
 19 in a moment. Before I do that, as you said, there may
 20 not have been a document entitled "Concert venues", but
 21 there was one for stadia and arenas and its importance
 22 to a venue like the Manchester Arena is obvious.
 23 A. Yes.
 24 Q. Would you expect a CTSA to provide a document like this
 25 to the venue?

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1 A. I can't remember whether it was on the internet at the
 2 time as well, because obviously a lot of these documents
 3 are published. If it's not on the internet and it was
 4 available to be shared, then I would expect so, or if
 5 it's on the internet, (a) people could self-service and
 6 get it for themselves or (b) their CTSA could, if they
 7 felt it was appropriate, refer them to it.
 8 Q. He might at least have directed them to it on the
 9 internet even if he didn't give them a copy of it; yes?
 10 A. Yes, if it was necessary, yes.
 11 Q. Well, it is necessary, isn't it, DAC D'Orsi? It's
 12 an important document for an arena.
 13 A. If it's on the internet, then I think it's perfectly
 14 reasonable to think that the security professionals at
 15 a location could find it themselves. But I can't
 16 remember whether it was or it wasn't.
 17 Q. Let's go to the document itself, please. That is
 18 {INQ020147/1}. Just so we're clear about the dating of
 19 this document, DAC D'Orsi, I think there may have been
 20 a question about this earlier. Could we look at the
 21 very last page, please? {INQ020147/65}.

22 If we zoom in on the bottom half, it's at the very
 23 bottom. I don't know if you can see that. It looks as
 24 though this document was perhaps first produced in 2006,
 25 but partially reviewed in 2014, and certainly

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1 Miriam Stone gave evidence that she was given a copy of
 2 this document at the Argus training we've heard about in
 3 mid-ish 2016. So it looks as though it was a current
 4 document at the time we're looking at.
 5 A. Yes, it does, yes.
 6 Q. Thank you. Can we go to the content of the document, to
 7 {INQ020147/30} to start with.
 8 If we look at the bottom half of this page, we see:
 9 "Searches of persons entering your stadium/arena."
 10 At the bottom paragraph of the page, in particular:
 11 "When the building search is complete, all persons
 12 [so that's having searched the building, the focus then
 13 moves on to searching the people] entering the stadium
 14 should get through as search regime. Dependent on the
 15 threat, this search could be restricted to random bag
 16 searches or, at times of a high security risk, extend up
 17 to full body searches of every person entering the
 18 ground."
 19 If we look at the next page, please, that is the
 20 rest of that section. {INQ020147/31}. I'm not going to
 21 read out that whole section.
 22 There are some relevant comments made there. But
 23 the point I want to ask you about is that we don't see
 24 on this page, nor, perhaps you can take it from me, do
 25 we see in the good practice checklist -- you can see

1 that's referred to at the bottom of the text there --
 2 any reference to X-ray machines or walk-through metal
 3 detectors. What do we make of that? Here is the NaCTSO
 4 guidance at the time, not referring to those forms of
 5 searching. Is it a fair reading that NaCTSO didn't
 6 regard X-ray machines or walk-through metal detectors as
 7 relevant to those types of venues or standard in those
 8 types of venues? What do we read into that?
 9 A. It's difficult for me to comment because obviously the
 10 document was created in 2006 when the threat picture was
 11 fundamentally different. It was obviously revised in
 12 2014, but I don't know what that revision was in 2014.
 13 And of course, it is about -- I presume the focus is
 14 recommending things that are commensurate to the threat
 15 and also proportionate. So it's difficult for me
 16 because I don't know what the work that sits beneath
 17 it -- why it was decided that was appropriate. And they
 18 would have been engaging with other agencies involved in
 19 the national security work. There might have been
 20 a whole amount of research that was undertaken and
 21 I couldn't comment. I'm happy to go away and have
 22 a look.
 23 Q. If there's anything you find that's helpful. I'm
 24 reluctant to add to the growing list of things you're
 25 going to go away and look at. Perhaps as far as we can

1 take it then is this was a document that was being
 2 handed out in 2016, it doesn't mention those things but
 3 you can't help us with whether -- you can't take the
 4 matter any further than that, I don't think?
 5 A. No, it might absolutely be the right recommendation
 6 based on work that was undertaken around it, but I can't
 7 comment.
 8 Q. All right. I'll leave that there.
 9 Let me just ask you about another document in that
 10 case, please, DAC D'Orsi. For that, can we go to --
 11 let's go first, please, briefly to your fourth statement
 12 where you refer to this document at paragraph 20
 13 {INQ035098/5}.
 14 You have referred during your evidence to the fact
 15 that there were a number of other documents published,
 16 in particular about threat types. This is one you refer
 17 to in your statement. It's tasking 02/2015, which was
 18 disseminated after the November Bataclan attack.
 19 A. Yes, that's correct.
 20 Q. You describe this as one of the documents which provides
 21 advice about searching outside the venue. So it's part
 22 of the whole story about extending perimeters; is that
 23 right?
 24 A. Yes.
 25 Q. Let's have a look at that document, please.

1 {INQ001441/1}. If we could go to {INQ001441/2}.
 2 In the top half, please.
 3 It's this part of it that I think you had in mind in
 4 the statement, DAC D'Orsi, in particular the bullet
 5 points that we see there. Is that right?
 6 A. I just need to refresh my memory on that.
 7 (Pause)
 8 Bullet point 2, yes.
 9 Q. They all read together, don't they? You're right, it's
 10 the second bullet point that refers to considering
 11 provisional search and screening on the approach or
 12 outside of the venue.
 13 Then if we read on in the third and fourth bullet
 14 points, we see there's a suggestion that:
 15 "Effective public address messaging of people as
 16 they approach, asking them to prepare for additional
 17 search and screening, should help with any delay."
 18 And also prior notification of these extra security
 19 measures, encouraging people to arrive early.
 20 Two points, really. One is -- this is focused, to
 21 the extent that it's important, on ingress rather than
 22 egress; would you agree with that?
 23 A. Those last two bullet points, I think it's ...
 24 SIR JOHN SAUNDERS: Just stop for a moment: searching and
 25 screening would inevitably relate to ingress rather than

1 egress, wouldn't it?

2 MR O'CONNOR: It depends, sir. There's a second point

3 I want to make. It depends on whether you're

4 restricting it to customers or to anyone coming near the

5 venue.

6 Let me ask you about that at the same time,

7 DAC D'Orsi. My suggestion is that these points focus,

8 first of all, on ingress, but, secondly, on searching

9 people who are actually coming to the venue rather than

10 dealing with that grey space type problem of people who

11 may be passing by the venue but not actually coming into

12 it.

13 A. Well, this document was circulated after the Paris

14 Stade de France, so obviously this is reflecting on the

15 attack methodology that was used at Stade de France and

16 signposting organisations to best practice documents

17 that are available when considering an attack such as

18 Stade de France. That was the catalyst for sending this

19 out there. So obviously that was around looking for the

20 searching going in. It talks about making sure that

21 you've got the peaks and allowing safe and effective

22 searching, so it's about thinking about queues outside

23 and the risk that comes with queues of people trying to

24 get in.

25 So does it specifically mention egress? No. But

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1 it's talking about — this was on the back of

2 a person-borne IED, which is the attack methodology, and

3 I think earlier on this morning I did touch on the sort

4 of — certainly from my perspective, we need to focus on

5 what the attack methodology is. It's not limited just

6 to ingress, the timing could be at any time that

7 somebody decides that's the moment that they want to

8 detonate.

9 Q. All right. Thank you for that, DAC D'Orsi.

10 I just have one further topic and it's about

11 something really quite different, which is about the

12 O2 Arena in London. We have heard some evidence about

13 similarities that may or may not be capable of being

14 drawn between the O2 and Manchester Arena. I would like

15 to ask you a few questions about that.

16 First of all, I think whether from your experience

17 in your current position or perhaps from your earlier

18 experience of local policing in London, you do have some

19 understanding of the arrangements in the O2; is that

20 right? I mean I'll ask you, but you have some

21 experience of it?

22 A. Have I been there? Yes. Have I been there when events

23 are on? Yes. Am I aware of the specifics of the

24 security arrangements? No.

25 Q. I'm not going to ask you about the specifics.

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1 Secondly, and before I ask those questions, I just

2 want to underline that we are giving evidence in open

3 session. I am going to try and direct you towards some

4 relatively high level points, but obviously you will

5 need to think carefully and you mustn't say anything

6 that's going to be sensitive.

7 SIR JOHN SAUNDERS: And if you're not in a position to

8 answer them, no doubt you'll say you're not in

9 a position to answer them.

10 A. I will, yes.

11 MR O'CONNOR: Exactly.

12 In 2017, was the risk of a terrorist attack at the

13 O2 on the one hand and at the Manchester Arena on the

14 other at a similar level and, if not, what made the

15 risks at those two venues different?

16 A. So the threat to the UK was the threat to the UK, and

17 that was applicable across any site.

18 Q. Yes, that was the threat level.

19 A. Yes.

20 Q. Again, don't answer these questions if you can't, but,

21 for example, did the fact that the O2 is in London or

22 its profile as a location make it a different — put it

23 at a different threat level to the threat of —

24 A. No, because it's a UK wide level. We don't do

25 site-specific threat levels.

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1 Q. We've heard a lot of about it that there was

2 a nationwide threat level.

3 A. Yes.

4 Q. Are you able to say anything about any differentiation?

5 A. There is no differentiation. The UK threat level is as

6 it is and we don't do site-specific threat levels.

7 Q. We know, for example, that the whole underpinning of the

8 vulnerability analysis involves putting different sites

9 into different tiers.

10 I don't want you to answer this if you can't, but

11 looking at it though that lens, is there any distinction

12 to be drawn between —

13 A. The attractiveness model (overspeaking) tiered sites,

14 yes. Obviously the O2 was in a different tiering to

15 Manchester Arena because the application of the criteria

16 put it into a different tiering. But that's not about

17 a threat level, that's about the attractiveness of

18 target.

19 Q. I'm sorry, maybe I got this off on the wrong foot.

20 I used the word "threat" in a non-technical way. We

21 know that there was a nationwide threat level and that

22 that's not — one doesn't sort of go below that. But

23 the tiering perhaps then, or the way in which you look

24 at the attractiveness, does provide a different analysis

25 whereby be one might regard the O2 as being in

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1 a different category to other places.
 2 A. In terms of attractiveness, yes. For the tiering, yes.
 3 Q. What about just the fact that it was in London as
 4 opposed to outside London?
 5 A. No.
 6 Q. Is that also a factor to be borne in mind?
 7 A. No, the attractiveness model had the application of the
 8 criteria, which I think you've heard the evidence as to
 9 the different categories and how they come about. The
 10 fact that it's London versus Manchester versus anywhere
 11 else in the country, it's not about a specific name of
 12 a city, it's around its attractiveness as a potential
 13 iconic location which is internationally recognised. Is
 14 the O2 more identifiable than potentially other sites
 15 will be applied within the criteria of the
 16 attractiveness model.
 17 But the threat picture, you know, was the threat of
 18 severe the same in Manchester? It was and is
 19 universally applied across the country.
 20 MR O'CONNOR: I'm going to leave it there. Thank you very
 21 much, DAC D'Orsi. Thank you, sir.
 22 MR GREANEY: Sir, I'm going to check whether Mr Gillespie
 23 has any questions on behalf of ShowSec and he doesn't.
 24 Thank you very much.
 25 I will next invite Mr Horwell to ask his questions

1 on behalf of Greater Manchester Police, please.
 2 Questions from MR HORWELL
 3 MR HORWELL: This is well-travelled territory, so I'm only
 4 going to ask you a few questions.
 5 In relation to a matter you've recently been asked
 6 about, metal detectors and X-ray machines, we heard from
 7 Liz Forster about these red triangles on a PSIA scoring
 8 sheet and if the cursor connects with them, there's
 9 a drop down box.
 10 A. Yes.
 11 Q. Do two of the search categories in the PSIA scoring tool
 12 indicate, or at least one of them, a question about
 13 metal detectors and X-ray machines?
 14 A. I haven't brought a blank document in, but I do recall
 15 reading that, yes.
 16 SIR JOHN SAUNDERS: I think we've been supplied with one,
 17 haven't we?
 18 MR HORWELL: We're in the process of doing that.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR HORWELL: In relation to one of the NaCTSO documents that
 21 you were taken to -- this is the "Counter-terrorism
 22 Protective Security Advice for Stadia and Arenas".
 23 Could we go to this, please? {INQ020147/45}.
 24 We can see from the top, this is section 14,
 25 "Suicide attacks". Could we enlarge the bottom section,

1 please, below the redacted square?
 2 "When considering protective measures against
 3 suicide bombers, think in terms of denying access to
 4 anyone or anything that has not been thoroughly
 5 searched."
 6 I don't want to concentrate on that, but I'm
 7 mentioning it because it is there. Second bullet point:
 8 "Establishing your search area at a distance from
 9 the protected site, setting up regular patrols, and
 10 briefing staff to look out for anyone behaving
 11 suspiciously. Many bomb attacks are preceded by
 12 reconnaissance or trial runs. Ensure that any
 13 suspicious behaviour is reported to the police."
 14 That is one of a number of examples that we can see
 15 in the NaCTSO guidance of the importance of vigilance?
 16 A. That's correct.
 17 Q. We have heard on frequent occasions now that it is not
 18 the CTSA's role to undertake an inspection or an audit
 19 of the security operation in action. This is the
 20 operational sequence to security.
 21 A. Yes, that's correct.
 22 Q. Again, in addition to the advice that a CTSA gives,
 23 there is, of course, all of the NaCTSO guidance that is
 24 available --
 25 A. Yes, that's correct.

1 Q. -- on the internet?
 2 A. Yes.
 3 Q. That guidance is expected to be read by those managing
 4 the site and who are responsible for its security?
 5 A. That is of course why we're producing this, the advice,
 6 so that security professionals and sites have free,
 7 readily available, easy to access advice.
 8 Q. Having established that there was certainly no shortage
 9 of advice available on the importance of vigilance,
 10 it is not the responsibility of a CTSA to examine, to
 11 audit, the briefing of staff to be vigilant; that is
 12 a matter for the site?
 13 A. Yes, that's correct.
 14 Q. And motivating staff to be vigilant, that is a matter
 15 for the site?
 16 A. Correct.
 17 Q. From what you have said this morning, if a site wanted
 18 an inspection or audit of its security operation in
 19 action, then there are private commercial concerns that
 20 can do that?
 21 A. That's correct.
 22 MR HORWELL: Thank you.
 23 MR GREANEY: Mr Gibbs has no questions on behalf of BTP.
 24 I'm therefore next going to call upon Mr Cooper to ask
 25 his questions on behalf of the bereaved families.

1 MR COOPER: Yes, sir. Can I pause for a moment on that?
 2 I'm aware Mr Weatherby might in fact be leading on this
 3 witness and I wouldn't want to be discourteous to him.
 4 MR GREANEY: That's my error. I misunderstood the order as
 5 I know you do have questions for this witness.
 6 Questions from MR WEATHERBY
 7 MR WEATHERBY: Yes, thank you very much, and thank you to
 8 Mr Cooper for pointing that out.
 9 Can you hear me, DAC D'Orsi?
 10 A. Yes, I can.
 11 Q. Good. Mr Greaney took you to some passages of
 12 Mr Aldworth's recent statement. I'm not going to take
 13 you back to that, but can I start by asking you whether
 14 you understand the frustration of at least some of the
 15 families at the pace of progress in terms of change?
 16 A. Yes, I do.
 17 Q. Can I ask you two points of clarification and then I'll
 18 return to it at the end of my questions about changes,
 19 but can I just ask you to clarify a couple of things.
 20 We've heard some evidence about the information-sharing
 21 platform that is going to be rolled out. Are you able
 22 to assist us a little bit with that?
 23 A. I can. So this is a joint collaboration between
 24 Counter-terrorism Policing, OSCT, and Pool Re is the
 25 insurance underwriter to look at an information-sharing

1 platform. This is to form part of the new sort of
 2 crowded places model, the Powell's model of the future,
 3 which is very much around putting information out there
 4 for people to be able to self-service and access. So
 5 there is a programme plan that is in place at the moment
 6 and I'm working with Shaun Hipgrave, myself, and
 7 a Pool Re representative.
 8 Q. Thank you very much. I'll come back to Pool Re at the
 9 end of the questioning to you, if I may.
 10 SIR JOHN SAUNDERS: Mr Weatherby, I'm really sorry. Do you
 11 mind if I follow up on that question?
 12 The fact that you're setting up this new
 13 information-sharing platform and joint collaboration,
 14 does that indicate that there has been some perceived
 15 lacking in the information sharing up until now?
 16 A. No, I don't feel that it would suggest that. The
 17 information sharing is part of a broader programme in
 18 terms of our engagement with industry and putting more
 19 and more information available. I think if we look back
 20 in time, as technology's progressed, we've obviously
 21 made sure we've put more and more material out there and
 22 this is a real opportunity for us, with the support of
 23 investment from elsewhere, to do something very
 24 different and very progressive.
 25 SIR JOHN SAUNDERS: Okay, thank you very much.

1 Sorry, Mr Weatherby.
 2 MR WEATHERBY: Thank you, that's exactly where I was headed.
 3 In terms of this and dealing with this very shortly,
 4 because I want to move on swiftly really, NaCTSO has had
 5 a kind of multi-pronged approach to counter-terrorism
 6 advice, hasn't it? And one of the areas that it has
 7 been keen on historically has been providing written
 8 guidance available to both CTASs and industry?
 9 A. Yes. I think it's sort of reflective of the evolution
 10 of technology, particularly in policing. Previously, if
 11 we go back to, say, 2014, we didn't have officers going
 12 to these venues with laptops, they needed to take
 13 products with them, and I think we've seen, obviously,
 14 a change, and certainly now people will know I have
 15 a mantra at conferences very much about daring to share
 16 information and the need to put more information
 17 available.
 18 However, I would say that Lord West's report in 2008
 19 talked very much about free, readily accessible advice.
 20 I think all we're seeing is this movement of putting it
 21 into a digital space and you'll see from our ACT
 22 products, particularly ACT e-learning, which I think is
 23 a real example of how we have been able to out things
 24 out on digital platforms, and the app that's available
 25 now, the CT Policing app, which again is about people

1 being able to self-service.
 2 Q. So fundamentally, this project is simply putting
 3 together what you've been doing for the last 10 or more
 4 years, putting it together in a more accessible way;
 5 is that a fair way of putting it?
 6 A. I like to think it's absolutely more innovative than
 7 that and being more progressive than that. It's not
 8 just about delivering an IT platform, it's broader than
 9 that, and certainly the people who are involved in the
 10 project planning are far more capable than me, I'm sure,
 11 of articulating that, but it's very much in terms of
 12 being progressive in terms of our reach to industry,
 13 local authorities, and it's part of this Powell's model
 14 for the future. So it's the whole approach to
 15 transforming the way we deliver -- deal with crowded
 16 places, sites, sectors and zones as we go forward.
 17 Q. From the perspective of a site, the arena, or a much
 18 smaller site for example with less resources, what will
 19 the difference be, the day before the roll-out of this
 20 platform and when it's rolled out? What's the
 21 difference to that?
 22 A. So there's a lot of -- you're going to have access to
 23 a lot of material, it's a different technology platform.
 24 There are a whole suite of options that will be
 25 different and I think probably it'd be helpful if

1 I could bring that back as a list to describe that. I'm
 2 afraid I'm not able to do that at the moment.
 3 Q. We're in the chair's hands, but certainly from where I'm
 4 sitting, I would certainly be assisted, and the families
 5 I'm sure would be assisted, if you could perhaps provide
 6 some kind of further material, further statements,
 7 setting out what the information—sharing platform will
 8 provide that isn't already applied.
 9 A. Yes. I would like to do that if possible because
 10 I think it's a really good piece of work which will help
 11 with protective security going forward.
 12 SIR JOHN SAUNDERS: We would find it helpful. I'm just
 13 concerned you're going to spend the rest of your working
 14 life giving us information if you're not careful.
 15 A. I have a lot of good people to help me.
 16 MR WEATHERBY: Mr Hipgrave said it was going to be rolled
 17 out next year. Is there in fact a roll-out date for it
 18 that you know about?
 19 A. We've just reached a point in the programme where we've
 20 signed off to go to the next stage of it, so I think
 21 definitely it will be rolled out next year. I don't
 22 have a final date yet, but I'm very confident it will be
 23 next year and there will be no delay on that.
 24 Q. Can I move on to the consultation process? Again,
 25 you've been asked questions about that and the fact that

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1 it's stalled. It has been put to you, Mr Aldworth's
 2 statement that he finds it difficult to understand why
 3 it's been stalled. I just want to follow up on that
 4 because I asked questions of Mr Hipgrave about it and
 5 I want to ask you much the same point.
 6 We have here an inquiry and one of the key reasons
 7 for it being set up must have been recommendations for
 8 the future. We have a consultation document that we are
 9 told is ready. Are you able to assist further in terms
 10 of why there is continuing delay and why we can't simply
 11 get on with it?
 12 A. Primarily, the consultation is led by the government
 13 through OSCT. So I think that really is a matter for
 14 them to explain in detail. I think there is a lot of
 15 work that is taking place. As I said I was involved in
 16 a couple of round tables with the security minister in
 17 August of this year, so it isn't that there is nothing
 18 happening. But I certainly feel that there is an
 19 opportunity and that we should be pushing forward with
 20 consultation. Yes, COVID is presenting some challenges,
 21 but I know that industry are keen for us to move to
 22 consultation.
 23 However, having listened to Mr Hipgrave's evidence,
 24 some of the government departments that do need to be
 25 consulted — I heard his evidence that some of that is

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1 challenging, but I'm sure — I think everybody knows
 2 that I'm very keen that we move forward and
 3 Counter-terrorism Policing is ready to help move forward
 4 on the consultation.
 5 Q. It may be that I'm putting you on the spot here, but
 6 from your point of view you would like the consultation
 7 document to go out today and for all of us, including
 8 the chair, to be able to look at what the proposals and
 9 the questions are and to feed back into it?
 10 A. In terms of the documentation that Mr Hipgrave said had
 11 been prepared? Is that the one that you are talking
 12 about?
 13 Q. Underpinning most consultations there is a document that
 14 goes out and people are asked to reply to it.
 15 A. Yes.
 16 Q. And on behalf of the families, what I have been pressing
 17 for, through Mr Hipgrave, is the consultation document
 18 that was supposed to go out some time after February,
 19 but we were told was certainly ready by September. What
 20 I have been pressing for is for that consultation to be
 21 made public and, in particular, to go to the chair
 22 because of the importance of this process to the
 23 consultation. So I'm just simply asking whether there's
 24 any reason that you know of why that shouldn't happen
 25 today.

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1 A. I can't comment whether there's a reason why that can't
 2 go out from a government perspective, but I am
 3 absolutely keen that it goes out as soon as possible
 4 and, of course, I think it should go to the chair of the
 5 inquiry as well.
 6 Q. Yes, I'm not asking you to answer on behalf of the
 7 government, and if you thought I was, then that's not
 8 right. So thank you. I think I've taken that as far as
 9 I can with you.
 10 As I say, I'll come back and ask you a few more
 11 questions about promises at the end of my questioning.
 12 A third point of clarification first of all, and
 13 changing the subject slightly. Mr O'Connor has asked
 14 you about your evidence about CTSA's being the highest
 15 trained counter-terrorism advisers in the country. I'm
 16 not going to comment or ask you to comment further on
 17 that. But am I equally right that it has never been
 18 a part of the process, and it has never been suggested
 19 to anybody, including large companies like SMG, that
 20 CTSA's, whatever their experience or expertise, are
 21 a substitute for other needs that those companies should
 22 have? Never been suggested —
 23 A. I would agree with that. Yes, it's never been suggested
 24 that they can't seek advice from elsewhere, particularly
 25 commercial advice that's available.

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1 SIR JOHN SAUNDERS: I think it's accepted, the
 2 responsibility for safety remains with SMG but they have
 3 had advice through the process from CTSA's as well.
 4 A. Mm. Yes.
 5 MR WEATHERBY: Before I move on, you've been asked about the
 6 level of engagement and of course you told us about the
 7 number of CTSA's. Whether it's two times a year or six
 8 times a year, it's plain and obvious, isn't it, that in
 9 a complicated, very, very large venue like the arena,
 10 that isn't going to be sufficient for all the needs of
 11 counter-terrorism within that space?
 12 A. Well, I don't entirely agree with that because I'm aware
 13 of way more complicated sites that have large security
 14 departments, probably have got significant commercial
 15 investment behind them, that probably wouldn't need much
 16 contact from a CTSA and might be in a different tiering
 17 within the attractiveness model. So I think each site
 18 is different and it depends on a lot of factors. But it
 19 could require more visits, depending on the situation
 20 that's at each site.
 21 Q. I think I may have put my question badly. I wasn't
 22 suggesting there was a need for more visits, I was
 23 suggesting that it was clear to a big concern running
 24 a venue with a 21,000 capacity that the service that the
 25 CTSA's were able to offer, doing their best with their

1 expertise, was not going to be sufficient to cover all
 2 of the counter-terrorism needs for that venue, and
 3 therefore the operator needed to have a significant
 4 degree of its own expertise.
 5 A. So an operator, in my view, would need their own
 6 expertise or they would potentially need to get some
 7 advice or guidance.
 8 Q. In house or contracted, they needed their own expertise?
 9 A. Yes.
 10 Q. That's all I was trying to establish, thank you.
 11 Moving on, you've been asked about the position
 12 post-Paris, so again I'll move quite swiftly through
 13 this if I may. But plainly, and of course it was before
 14 your time, but I think you have given quite a bit of
 15 evidence about it so I think that you're able to do so.
 16 Certainly post-Paris, NaCTSO, being reactive to the
 17 methodologies that were evolving, would very much have
 18 in mind both suicide attacks by Islamic State inspired
 19 actors and the vulnerability outside sporting and music
 20 events?
 21 A. Yes, correct. I think NaCTSO is part of the broadest
 22 Counter-terrorism Policing operation, which was
 23 reflecting on the whole of the Paris attacks, which
 24 of course, as we've seen, led to the increase in armed
 25 officers across the country funded by the government.

1 So they were part of looking at countering the threat
 2 from terrorism and NaCTSO is but a part of that.
 3 Q. Sure. So NaCTSO, picking up what was going on, would
 4 understand the attractiveness to the current threat of
 5 IS of those sorts of venues and then, no doubt, would go
 6 on to look at holistically, to borrow your word, if
 7 I may, at what the vulnerabilities around those
 8 attractive types of venue were? Would that be fair?
 9 A. NaCTSO is focused on the attractiveness model, so
 10 there's sites that were involved in the attractiveness
 11 and it was not about vulnerability, it was around
 12 looking at protective security improvements that could
 13 be there in order to mitigate the threat to those
 14 locations which were deemed attractive.
 15 Q. I think we've all got that point, but once one
 16 understands the shift of attractiveness with the
 17 different methodologies that are being evolved, then one
 18 would look at what those methodologies might create as
 19 a problem for sites. I have not put that very
 20 elegantly, have I?
 21 A. I think that's what -- is that in terms of the PSIA and
 22 how it looks at the six attack methodologies and looks
 23 at the protective security improvement for those sites?
 24 Q. Yes, but in terms of looking at protecting security, one
 25 would look at the methodologies, but also --

1 A. Yes.
 2 Q. -- the various opportunity issues that the particular
 3 site raises for those methodologies. So the geography
 4 of the site for one thing?
 5 A. Yes.
 6 Q. But also beyond looking at the particular architecture
 7 or geography of the site then, of course, timing would
 8 be another issue? If one is going to give advice, then
 9 one would have to look at the problems that that
 10 particular methodology might throw up? Would that be
 11 fair?
 12 A. Yes. I think the PSIA is -- and a lot of the advice
 13 that's out there is very much focused on how to mitigate
 14 the threat of one of those attack methodologies, and if
 15 you're looking at it holistically, timing and the
 16 vulnerabilities that come with potential opportunities
 17 for timing, then of course I would expect those to be
 18 considered.
 19 Q. Yes, exactly. And that's why egress must have been
 20 considered as being a particular problem, because at
 21 egress from a closed venue, that creates a particular
 22 problem with a high density movement of people over
 23 a short period of time.
 24 A. Yes, whether that be from a vehicle-borne IED or
 25 a vehicle attack or whether it be from a person-borne

1 IED. But egress is a timing point, you know, and
 2 opportunities to cause harm vary, so the timing of when
 3 a terrorist feels they might achieve the result that
 4 they want in terms of causing harm is a matter for them.
 5 But it must be considered in the planning process.
 6 Q. Right. So all I am trying to establish here is that you
 7 start with looking at the developing methodologies and
 8 then, in terms of giving advice on protective measures,
 9 then other factors such as opportunity, timing,
 10 geography then feed into that guidance and advice
 11 process?
 12 A. Yes, I would -- that's my view.
 13 Q. Therefore the position post-Paris, we then see that by
 14 May 2016 NaCTSO is rolling out this Argus programme that
 15 Mr Butt raised with Ms Forster about the double suicide
 16 attack on egress at a stadium.
 17 A. That's correct.
 18 Q. So you see a progression in thinking here, that's one
 19 understanding of that, and the inquiry has looked at
 20 another exercise, Sherman, which in fact picked the
 21 scenario of ingress.
 22 A. I'm not aware of Sherman, but definitely in relation to
 23 the Argus, that was very much focused on egress,
 24 post-Stade de France.
 25 Q. Yes. I'm just exploring with you the nature of the

1 evolution of the advice. It starts with the
 2 attractiveness and then, once you've identified the
 3 most -- I don't want to use the word vulnerable, the
 4 most attractive sites to terrorists, then within that
 5 the advice has to be bespoke, directed at perhaps the
 6 most vulnerable times or the most vulnerable parts of
 7 the venue?
 8 A. Yes.
 9 Q. Is that fair?
 10 A. Yes, that's fair.
 11 Q. You've already said, I think, and I can take you to the
 12 statement if I need to, that beyond the Argus exercise
 13 that we've looked at, I think there was no specific
 14 NaCTSO guidance relating to egress risks. The answer
 15 for why that would be is because NaCTSO takes a holistic
 16 approach to all of the risks around the attractiveness
 17 of a particular methodology; would that be right?
 18 A. There's no specific reference to egress, as I said,
 19 in the evidence with the exception of the one I think we
 20 focused on.
 21 Q. Yes.
 22 A. My answer to that is that NaCTSO focuses on the
 23 six attack methodologies and how to -- what is good
 24 protective security improvement and methods that can be
 25 used to mitigate the threat of those six attack

1 methodologies. And of course we would focus on those
 2 because the whole national security system looks at what
 3 are the main risks to the UK in terms of attack
 4 methodologies. Because there are others that take place
 5 across the world, but of course the decision is that
 6 we're focusing on those.
 7 Q. Yes. So in a way, would it be right that it's not
 8 really necessary then to put further guidance to CTSA's
 9 about ingress or egress because, really, those are very
 10 obvious pinch points at a venue which deals with large
 11 events like the Manchester Arena?
 12 A. I think I did say earlier -- I hope I said earlier --
 13 that I think the focus on attack methodology is the
 14 right approach. I do not think we should be adding
 15 specifics in around egress, ingress, half time, in the
 16 lift ... We're talking about the timing in relation to
 17 a particular attack methodology and, of course, that
 18 should be considered with all six of them, whether that
 19 be a vehicle-borne attack that might be at the
 20 beginning, middle or end, and the same for
 21 a person-borne IED.
 22 Q. Yes, but if it's necessary to put out guidance dealing
 23 with the attractiveness of areas or to target CTSA's at
 24 the attractiveness of the venue, why is it not equally
 25 important to put out material beyond the Argus programme

1 that we've looked at, dealing specifically with pinch
 2 points like ingress or egress?
 3 A. So the attractiveness model came in to focus our
 4 attention on the premises and on the sites which we felt
 5 to be attractive against the current attack
 6 methodologies, and as I said previously, under the
 7 vulnerability model we'd seen round about 40% which had
 8 had no improvement. So this was using the sort of
 9 valuable asset of CTSA's, which is limited, there are
 10 only a finite number of people, and making sure that as
 11 a resource they were focused on the areas that the
 12 intelligence community, and specifically in relation to
 13 NaCTSO leading on protective security, felt that that's
 14 where we needed to focus the advice and the material.
 15 Q. Okay.
 16 A. So I think where we are is with NaCTSO focusing on those
 17 attack methodologies and then obviously, within that,
 18 there are a suite of things that people need to
 19 consider. Hostile reconnaissance might be one of them.
 20 Timings for opportunity for attack. There's a whole
 21 plethora of things rather than -- it's not just timing,
 22 it's everything that goes with that.
 23 Q. I've got the attractiveness side of it, but in terms of
 24 this point about egress or ingress or other times, the
 25 point of the CTSA is to advise on protective security

1 measures to deal with real life threats -- again using
2 the word threat in a more general sense -- so in terms
3 of a venue like the arena, then the sorts of real life
4 problem that a CTSA is trying to assist in mitigating,
5 surely advice to the owner or operator must include when
6 the pinch points are or how to deal with the issues that
7 are raised in particularly vulnerable times? Doesn't
8 that follow?

9 A. The operators, I would hope, know the highest
10 concentration of their people from ticket flow in terms
11 of people going in and out -- a lot of stadia work on
12 peaks and troughs in terms of flow to look at when they
13 need to step up or scale down their protective security .
14 So I would hope the operators of sites would know that
15 and reflect on that. I think the CTSAs are there with
16 the PSIA document around protective security improvement
17 opportunities that an operator should consider.

18 The PSIA document -- I mean, it is a spreadsheet and
19 it has very clear drop-downs, some of the little red
20 triangles , that sites need to consider or not. That is
21 the focus, supplemented by all this additional advice
22 that is available for people to self-service or for it
23 to be shared with them.

24 Q. Yes. I'm not focusing at the moment on the PSIA tool
25 itself , it 's on the more general aspect of the CTSA

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1 advice.

2 Am I understanding correctly then that the reason
3 that there is a relative lack of emphasis in guidance or
4 availability of guidance or advice in writing on egress
5 is because it's really rather obvious, the problem at
6 egress?

7 A. When you've got a mass of people -- it depends on what
8 the event is because some events are a trickle of people
9 in and out all of the time. But in terms of -- if you
10 take perhaps some of the Christmas markets, people are
11 in and out all the time. There's not necessarily a mass
12 of people.

13 But in terms of maybe an event -- certainly an event
14 such as at the arena, I think it is obvious the minute
15 that the concert finishes there's going to be a mass of
16 people that come out. I think that's obvious.

17 Q. In your statement you have referred to it being not
18 uncommon for CTSAs to advise on extending a perimeter or
19 adding layers of security outside the perimeter,
20 although as you have given in evidence, there are
21 complications to that.

22 A. Yes. I don't think it 's uncommon for CTSAs -- I suppose
23 I do think it 's quite a basic thing to be discussing.

24 Q. Yes. That must be because of an awareness of the
25 vulnerability of large crowds either descending on

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1 a venue at ingress or leaving it at egress?

2 A. Yes.

3 Q. However, the other side of the -- the corollary is that
4 the CT advice was, and I'm quoting from your fourth
5 statement:

6 "... generally directed at the site owner/operator
7 rather than the grey spaces surrounding a venue."

8 So on the one hand you're saying it is not uncommon
9 for CTSAs to advise on onion layering, and on the other
10 hand you're saying that the advice was generally
11 directed at the site owner or operator rather than the
12 grey spaces in areas surrounding a venue. Is there
13 a lack of clarity about what CTSAs are supposed to do
14 and what owners can expect from them?

15 A. No, I don't think there is a lack of clarity . I think
16 it is absolutely right for the CTSA to engage with the
17 site owner. There is a clear category within the
18 PSIA -- I think it's pretty much all of the attack
19 methodologies -- around partnership. If a site operator
20 is struggling to operationalise their plan because of
21 challenges in a grey space, then that is when the
22 partnership working, in my view, should come in and
23 there should be conversations around delivering
24 effective protective security , led by the site operator,
25 but I see no reason why a CTSA could be asked to go

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1 along to those discussions , and that would be good
2 practice for partnership working.

3 Q. Going back to this word holistically , the threat to
4 a site like the arena is very obviously not simply
5 within the arena bowl, is it?

6 A. Well, in terms of crowds of people, no. If you look at
7 the attack methodology from a vehicle, obviously we're
8 putting hostile vehicle mitigation in. To stop
9 a penetrative vehicle-borne IED, you need to have
10 hostile vehicle mitigation which is outside the
11 perimeter of the site . So the very fact that that goes
12 in shows that it's broader than that.

13 Q. Yes, but your comment in your statement that the advice
14 is generally directed at the site itself rather than the
15 environs of the site , isn't there a problem with that?
16 Looking at it holistically , the service that you're
17 providing is trying to assist the owner or operator to
18 avoid the sort of outrage that we're considering here
19 and therefore necessarily , again looking at it
20 holistically , shouldn't that require a bigger picture
21 approach and advising on not simply the area within the
22 perimeter but very much the area surrounding it,
23 dependent on what that geography looks like?

24 A. I don't think it 's unclear at all , I think it 's very
25 clear . I think when you look at some of the options

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1 that are included for discussion through the PSIA
 2 document, I think it's clear that there are clearly
 3 discussions outside of the site. But I think it's
 4 absolutely right that those conversations take place
 5 with the site operator and then the site operator, if
 6 there are complications to operationalise their plan,
 7 that's when the effective partnership working should
 8 come together to look at how you problem solve that.
 9 SIR JOHN SAUNDERS: Okay. We may have gone as far as we can
 10 with this, I think. There seem to me, without reviewing
 11 the evidence, to be a number of distinctions between the
 12 evidence that you have given and the evidence that
 13 Ms Forster gave. So perhaps what you're saying as being
 14 what should be the practice wasn't always the practice.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: But you will be aware of the
 17 distinctions between what you're saying and what she
 18 said.
 19 Sorry, Mr Weatherby, I'm not stopping you, but
 20 I think we may have got just about as far as we can with
 21 that.
 22 MR WEATHERBY: May I just take it slightly further with
 23 Mr Upham's evidence?
 24 SIR JOHN SAUNDERS: Yes.
 25 MR WEATHERBY: Mr Upham's statements make quite clear that

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1 he did consider the City Room as part of the site but
 2 only took account of it with respect to mitigations
 3 within the perimeter of the arena bowl. This was
 4 a site, wasn't it, which really called out for an
 5 approach to counter—terrorism security involving
 6 measures outside of the actual arena bowl? It called
 7 for some form of layering or perimeter extension?
 8 A. I'm aware of his statement, but I do... I'm sorry for
 9 going back to the PSIA, but to deal with some of the
 10 mitigation measures that are suggested in relation to
 11 some of those attack methodologies, it's very clear that
 12 you've got to have a conversation about things outside
 13 of the site. For example, HVM.
 14 SIR JOHN SAUNDERS: What Ms Forster said appeared to me to
 15 be — looking at a suicide bomber, what they were
 16 looking at so far as the City Room is concerned is what
 17 steps were being taken in the City Room to prevent
 18 a suicide bomber getting into the arena and setting off
 19 his bomb, not, as I understood it, considering what
 20 you're going to do to prevent someone setting off a bomb
 21 in the City Room when people come out, so when the crowd
 22 meets them, rather than going out in to the crowd.
 23 That's my understanding. I think that may be what
 24 Mr Weatherby is talking about in practical terms.
 25 MR WEATHERBY: Yes, indeed.

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1 SIR JOHN SAUNDERS: So there does seem to be, from what the
 2 CTSAs were saying, that problem.
 3 A. I think it's clear that the — on a number of those
 4 things, recognising some of those are not person—borne
 5 IEDs in terms of attack methodology, but I think it's
 6 really clear from some of the advice that's in that PSIA
 7 that you should consider broader than just the
 8 perimeter.
 9 SIR JOHN SAUNDERS: That's obvious from the vehicle, as you
 10 made that example. Okay.
 11 MR WEATHERBY: And in fact, you do footnote a number of
 12 documents which refer to vehicle mitigation.
 13 A. Yes.
 14 Q. But there is —
 15 A. And hostile reconnaissance as well.
 16 Q. Yes. There's a lack of documentation, isn't there,
 17 about the onion layering or perimeter extension options
 18 for improving counter—terrorism security outside of
 19 a perimeter?
 20 A. I don't think there's a lack of documents. I don't for
 21 1 minute say that I know the absolute detail on every
 22 document, but having read through all the documents that
 23 I've referenced in my statement, there is a lot of
 24 material there that takes you beyond just thinking about
 25 within the perimeter of your site. There's a lot of

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1 stuff around CCTV, hostile reconnaissance, partnership
 2 working, which again immediately takes you to being
 3 outside of your site. I think there is documentation
 4 that is there. The application of that in Manchester
 5 was probably viewed differently.
 6 Q. Right. In paragraph 20 of your first statement, you
 7 refer to the document that Mr O'Connor put to you, and
 8 therefore I won't go back to it, the one with the bullet
 9 points after Paris. That referred to a layering
 10 approach with, effectively, soft searching outside of
 11 the perimeter. Do you recall that?
 12 A. I do recall that, yes.
 13 Q. In paragraph 20 you refer to that document, and then you
 14 footnote a number of other documents which, correct me
 15 if I'm wrong, but I think all of the other documents
 16 refer to things like hostile vehicle mitigation
 17 measures, bollards and that sort of thing, rather than,
 18 your words, onion layering or extension of perimeters.
 19 A. I think some of the measures they talk about I would put
 20 in within that category of the different layers of
 21 security as you go out and also an event is not just
 22 about the day, it's the lead—up to the day, particularly
 23 in relation to hostile reconnaissance.
 24 Q. Okay. Can I finally on this topic move on to training
 25 then.

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1 Prior to 2017, what was it that CTSA's were actually
 2 trained on in respect of extension of perimeters or
 3 layering? Were there particular training modules
 4 related to those subjects?
 5 A. I'm afraid I have to add that to my list and take that
 6 one away.
 7 Q. I'm sorry to do so, but I'm not able to identify
 8 anything in the disclosed material relating to that.
 9 SIR JOHN SAUNDERS: We're going to hear in due course,
 10 I think. Ms D'Orsi will take that away with her.
 11 MR WEATHERBY: Thank you very much.
 12 Just on the arena and the actual scope of the PSIA
 13 scoring tool, I just want your assistance. I know you
 14 visited the arena, you have told us that. I'm not going
 15 to ask you anything about Mr Upham's state of knowledge
 16 or what he was or wasn't told because obviously that's
 17 not for you. I just want to concentrate on the
 18 objective position and ask for your assistance.
 19 In one of its corporate guises, SMG was of course
 20 the leaseholder of the arena, the arena bowl, if you
 21 like. But it was also responsible for security in the
 22 common parts of the complex, including the City Room.
 23 Do you follow?
 24 A. Yes, I think so.
 25 Q. It had security responsibility either as leaseholder for

1 part of it or under a contract, a facilities management
 2 agreement, for the City Room; yes?
 3 A. I have to take your word for that.
 4 Q. I'm trying to lay the groundwork for the question. So
 5 assuming a CTSA, taking this away from Mr Upham or what
 6 did or didn't happen, but assuming a CTSA was aware of
 7 that, fully informed of that, would you expect the CTSA
 8 for the purposes of the PSIA tool and the advice that he
 9 or she gave — would you expect the CTSA to deal with
 10 the arena and the City Room as the footprint of the
 11 owner and operator?
 12 A. I think for me, the PSIA and the responsibility of the
 13 CTSA is around protective security against the threat,
 14 the six attack methodologies. So it's not specifically
 15 about security of the City Room or security of
 16 Trinity Way at the back or security of the tunnel that
 17 comes out of the side, it's around protective security
 18 improvement to mitigate the threat. So I would expect
 19 that there is a consideration of where the vulnerability
 20 is against those attack methodologies and what
 21 protective security improvement could be put in place
 22 and that may include measures within the City Room.
 23 Q. Yes. So what I'm getting at here is that on some of the
 24 questioning, I think we've all been talking about the
 25 perimeter being the perimeter of the arena bowl. But

1 actually, from the point of view of the CTSA and the job
 2 that the CTSA does, shouldn't the perimeter have been
 3 considered to be the City Room rather than the arena
 4 bowl?
 5 A. So I think — of course and, as I think I've said, there
 6 should have been a consideration wider, not just for
 7 person-borne IED but actually for the other attack
 8 methodologies. You simply cannot mitigate them by just
 9 focusing on the arena bowl, so of course you're going to
 10 have to have discussions around the outside to mitigate
 11 some of that attack methodology. Focusing on the arena
 12 itself inside is not going to mitigate the threat from
 13 a vehicle outside. You have got to step outside that
 14 perimeter.
 15 Q. I'm with you on that, but the questions I've been asking
 16 you based on your statements and Mr Upham's statements
 17 that the PSIA tool was focused on the site itself, ie
 18 the site up to the arena doors — was that —
 19 A. It's about engagement with the site, it's about focusing
 20 on reducing the threat from those six attack
 21 methodologies, but it's engagement with the site. So
 22 your point that I think you talked about earlier, it's
 23 not about engaging with a whole raft of partners outside
 24 of that, it is about specifically engaging with the site
 25 and the site operator. That does not preclude

1 conversations outside to mitigate the threat from those
 2 attack methodologies.
 3 Q. Yes.
 4 SIR JOHN SAUNDERS: Mr Weatherby, I think I understand the
 5 point you're making, I think I also understand the
 6 answer which is being given. Basically, I think the
 7 witness is agreeing that consideration should have been
 8 given to what could happen in the City Room, look at the
 9 bigger picture and not just the arena. Whether that's
 10 because a different company in SMG Group have the
 11 responsibility for security outside or not perhaps
 12 doesn't make a great deal of difference.
 13 MR WEATHERBY: Yes. The only point I have been trying to
 14 make on this is if a distinction is being drawn between
 15 the site itself and the PSIA being focused on the site,
 16 I was simply asking whether the site in fact includes
 17 the City Room rather than the way it appears to have
 18 been dealt with, which treated the City Room as outside
 19 of the site.
 20 SIR JOHN SAUNDERS: I think the answer is it makes no
 21 difference.
 22 MR WEATHERBY: Yes. I'll move on.
 23 In terms of the "Something's better than nothing"
 24 change in 2014, a lot of questions have been asked about
 25 this to a number of witnesses, including you, so again

1 I'll move swiftly on this. Of course this was quite
 2 some time before you became part of NaCTSO, I bear that
 3 in mind. There were two changes: first of all, the
 4 vulnerability to attractiveness model change, which was
 5 essentially about prioritisation of sites; is that
 6 right?
 7 A. That's correct.
 8 Q. The second was this change from what has been described
 9 as the gold standard to what is described as "Something
 10 is better than nothing"; yes?
 11 A. Well, I ... I mean, I think I have said before, there
 12 was not a strategy to move to "Something is better than
 13 nothing". This was about a recognition of the security
 14 landscape that there was, still recommending the
 15 appropriate measures that were necessary for that site,
 16 but also not dismissing other measures which are
 17 appropriate and actually bringing forward protective
 18 security. I think I mentioned this morning, that might
 19 be security-minded comms or printing security advice on
 20 the back of tickets. It might be telling people they
 21 can't bring bags to an event because actually that's an
 22 easier way of dealing with search by just saying that
 23 there's no bags allowed. There's a whole raft of
 24 issues.
 25 So it's not -- I sense that it's a feeling that

1 there is -- it was either this or it was nothing, and
 2 that is not the case and that's not what the language
 3 was ever supposed to -- and I have only ever seen it
 4 referenced in two documents.
 5 Q. Okay. But before the change in 2014, there would have
 6 been equal emphasis on putting warnings on the back of
 7 tickets or advertising the fact that it was a secure
 8 location?
 9 A. No, I don't think there was.
 10 Q. Right.
 11 A. I'm afraid I don't agree with that. I think there was
 12 an attitude of: these are the security measures which
 13 might have been -- it's difficult because I don't want
 14 to discuss in an open forum some of the measures. But
 15 we have seen in some of the attacks that some things
 16 that would fall outside of the extreme high-end measures
 17 but are here -- actually have been effective. I think
 18 that beforehand we had a tone where they would have been
 19 viewed as not being acceptable because they didn't
 20 necessarily meet the technical requirements. But
 21 actually, what we're seeing with this simple attack
 22 methodology is they are as valid and if people in terms
 23 of proportionate measures are able to put them in place,
 24 then we would encourage them to do that.
 25 Q. There's no necessary relation between how much you paid

1 for security measures and how effective they are, is
 2 there? Some very effective measures are either free or
 3 very cheap.
 4 A. But they're part of a whole bucket of stuff that we are
 5 expecting people to consider.
 6 Q. Absolutely, but the driver in 2014 was this study from
 7 2013, which had found that only 20% of sites had
 8 actually improved their security position.
 9 A. I'm not sure about the 20%. I'm aware for 40% of them
 10 there had been no change in the sort of protective
 11 security improvement. So this was looking at enhancing
 12 the suite of options that people could consider. At no
 13 point was this ever a commercial decision by NaCTSO as
 14 a public sector body.
 15 Q. Okay. In paragraph 65 of your first statement you refer
 16 to:
 17 "At best only 20% of sites had reduced vulnerability
 18 through the scheme of March 2013."
 19 So the point was, with this 2013 review and the 2014
 20 change, that a problem had been identified with a lack
 21 of take-up by business; that's right, isn't it?
 22 A. Well, there hadn't been a shift in protective security
 23 improvement at some sites, yes.
 24 Q. And what underpinned that was that it was
 25 a voluntary/discretionary scheme and therefore, whatever

1 was or wasn't advised, the business could just say,
 2 "We'll do it", or, "We won't do it"?
 3 A. That's correct.
 4 Q. So there therefore had to be a reduction of standards in
 5 order to get businesses to engage more?
 6 A. No, I don't agree with that. It isn't a reduction in
 7 standards at all, it's about ensuring that there is
 8 a comprehensive suite of options that people can
 9 consider. It's for all of the -- any operator to make
 10 their own decision as to which ones they want and that
 11 might be at one end of the scale, it might be at the
 12 other end of the scale, or it might be something in the
 13 middle which is proportionate to the threats and the
 14 perception of threat at that particular site.
 15 Q. I am not for a moment suggesting that a range of
 16 measures shouldn't be put forward and I'm not suggesting
 17 that there isn't a way of finding a proportionate way
 18 forward for measures. But as I have put to you, the
 19 drivers here were cost and the discretionary nature of
 20 the scheme. That's what drove the change in 2014?
 21 A. No, I don't agree with that. Also, I think if you look
 22 at the suite of measures that were perhaps seen as being
 23 the gold standard previously, some of those were against
 24 a completely different attack methodology, probably
 25 being driven by a different form of terrorism, and this

1 was about recognising that the landscape had changed and
 2 actually this suite of options could be broadened and it
 3 most certainly wasn't being driven by cost.
 4 SIR JOHN SAUNDERS: Can I put it on a slightly different
 5 basis, this whole thing? It took you very little time
 6 when you came into your job to realise that a Protect
 7 duty was necessary. It's clear from what we have heard
 8 that other people rapidly reached that conclusion as
 9 well. Could that conclusion have been reached in 2014
 10 or did it only become necessary because of the change
 11 in the way terrorists were behaving?
 12 A. I think it was the way terrorists were behaving, which
 13 was very much around the general public in crowded
 14 locations, which was not what we were seeing in 2012 and
 15 2013, that simply wasn't the case. And this was pretty
 16 much anywhere, any time, as simple as possible in terms
 17 of your attack methodology. So I feel that that was the
 18 thing that changed. Also, you know, for dreadful
 19 reasons, we saw a backdrop, in quick succession, of that
 20 type of attack methodology.
 21 SIR JOHN SAUNDERS: Thank you. Sorry, Mr Weatherby.
 22 MR WEATHERBY: I'll be quick to finish on this point.
 23 You've had a look at, I think, because I asked for
 24 it to be provided to you, but also I think you followed
 25 Mr Hipgrave's evidence. I put to him the ACPO note

1 dealing with this 2014 change. Am I right, you're
 2 familiar with that document?
 3 A. Is that the document that was going to the thematic
 4 board? Because if it is, I have seen that document.
 5 Q. I'm not sure it's that document.
 6 A. I think it is.
 7 Q. It's the one that refers to --
 8 SIR JOHN SAUNDERS: Let's work on the basis that it is the
 9 same one. Ask your question, Mr Weatherby.
 10 MR WEATHERBY: Okay. I put a paragraph to Mr Hipgrave which
 11 referred to the 2014 change from "expensive gold
 12 standards" and further down the document it referred to
 13 the change as "a positive approach favoured by
 14 business". That underpins, doesn't it, the fact that
 15 this was to do with cost and voluntariness?
 16 A. No, I'm afraid I still can't agree with that. I don't
 17 dispute the fact that that was written in the document,
 18 but that was a document written by a member of staff
 19 that went to a thematic board. It wasn't a document
 20 that was going out to the CTSA's. I think that it's
 21 probably been unhelpfully written with some of the
 22 language in it, but I think I still -- my position very
 23 clearly, having looked at this, is that very much the
 24 attack methodology was changing and changing at pace and
 25 actually some of those measures weren't probably

1 proportionate to the attack methodologies that we were
 2 seeing at that time and subsequently that we did see in
 3 2017. Therefore, there are a whole suite of measures
 4 which could be used that probably previously weren't
 5 being used by businesses and I think it was right that
 6 we should push them to consider some of those because it
 7 was providing protective security improvement and we did
 8 see in some of the attacks in 2017 where those measures,
 9 which you would say were say a compromise, I would say
 10 are an effective tool and actually did keep people safe.
 11 Q. Yes, okay.
 12 SIR JOHN SAUNDERS: It may be said then the answer to
 13 that is to say: well, we've now reviewed what you need
 14 to do in these circumstances and what we've been
 15 previously recommending, because of a change in attack
 16 methodology, is no longer necessary, so what we're going
 17 to ask you to do now, as we were under the old system,
 18 is do these things, which we think will be as effective
 19 as the more expensive option?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Rather than having something which might
 22 be misunderstood to say "Anything's better than
 23 nothing"?
 24 A. Yes, I think, of course, there's a reflection for us as
 25 to whether or not we need to be clearer with it. But

1 I think some of those measures are still necessary. If
 2 a site chooses not to do them, that's their choice as
 3 a site. But some of this other suite of measures which
 4 probably previously weren't necessarily pushed are
 5 applicable today and I have been walking around in the
 6 last 24 hours and I see some of those and I'm pleased
 7 they're there.
 8 SIR JOHN SAUNDERS: Mr Weatherby, you're not going to change
 9 Ms D'Orsi's mind.
 10 MR WEATHERBY: No. I want to finish this point with two
 11 quick references if I may, because I think it's
 12 important I round it off. Can I say, I'm absolutely not
 13 suggesting that the amount of money that is spent on
 14 mitigation is related to the effectiveness of it. Some
 15 free or cheap mitigations are obviously highly
 16 effectively but that's not necessarily the point and
 17 that's right, isn't it? This suite that --
 18 A. Yes, cheaper measures does not mean it's ineffective.
 19 Q. Not necessarily, no.
 20 Two quick references then. First of all, Mr Upham
 21 in his statement. He describes the new ethos, and
 22 of course he was in post at the time. He described the
 23 new ethos in 2014, his word "ethos", that:
 24 "It differed greatly from the gold standard that had
 25 previously applied."

1 And I quote:
 2 "It was realised that due to financial constraints
 3 on businesses, they may not be able to comply with that
 4 high standard of security measure and some form of
 5 security measures were better than none at all."
 6 Was he right?
 7 A. Well, it is right in effect that that was his
 8 interpretation. I don't agree with that. As I've said
 9 previously, this was not about an acceptance ourselves
 10 accepting that we would -- that there is a commercial
 11 drive behind that. I think this was accepting that
 12 there were -- this was accepting that there are other
 13 protective security measures available which may be
 14 cheaper but are applicable and we shouldn't be
 15 dismissing those. I think in many respects there was
 16 a tendency to potentially think of those less favourably
 17 and I think the shift that I think he is referring to is
 18 there was a view that they were -- some of those were
 19 proportionate and relevant to providing protective
 20 security at sites --
 21 Q. Can I finally --
 22 A. -- because we know that the sites range, they're not all
 23 big arenas, big shopping centres in terms of falling on
 24 the attractiveness tiering process. There are some
 25 smaller not-for-profit sites that need available options

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1 for protective security.
 2 Q. Quite. Can I take you to, finally, one paragraph of
 3 your first statement. Perhaps it's easiest to put this
 4 on screen. {INQ025466/9}. Paragraph 37.
 5 "NaCTSO provide the business process and tools by
 6 which a CTSA is equipped to engage with a particular
 7 site. Within that framework a CTSA has a discretion to
 8 advise which physical security mitigations
 9 and nationally designed CT awareness tools are suitable
 10 based on their training and knowledge of the site, and
 11 the site owner/operator's appetite for protective
 12 security engagement."
 13 Yes?
 14 A. Yes, that's correct.
 15 Q. So these highly trained counter-terrorism advisers, no
 16 problem with that. They're going out using their
 17 knowledge and training, the guidance that's provided to
 18 them to provide advice about mitigations that are
 19 necessary or advised. All of that, fine. But then we
 20 come to this point, the appetite for protective security
 21 engagement, and we're back to the problem, aren't we?
 22 What is being said by you on this occasion is, in
 23 effect, that NaCTSO and the CTSA's are operating within
 24 a system whereby effectively the owner's financial
 25 appetite, commercial appetite, is the bottom line?

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1 A. No, I don't agree with that. There is a document that
 2 drove my thinking in terms of framing this paragraph,
 3 which is where the CTSA's do record, should be recording
 4 the advice that they are giving. That might be
 5 something at the far end, but also what this is about is
 6 also recognising that if an operator has decided that
 7 they are not going to do that, this doesn't limit them
 8 suggesting other options. I think it would be really
 9 remiss if they didn't suggest other alternatives. So
 10 it's about being balanced and they should record what
 11 they have suggested in terms of, "This is the mitigation
 12 that you should be putting in place". If the site
 13 chooses to compromise and do something different,
 14 I think the CTSA should engage in that conversation but
 15 they should be recording the fact that they have
 16 suggested a different type of mitigation and that has
 17 been dismissed by the site. That's certainly my --
 18 things I've seen, I think that is what they did. But
 19 this is not being driven by any commercial compromise
 20 from policing as a public sector body.
 21 Q. Well, okay. The word "appetite", I'm not going to take
 22 this much further, but the word "appetite" there. This
 23 isn't simply a consideration of what is technically
 24 necessary or advisable; this is a financial part of the
 25 equation and one which the CTSA has to take account of

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1 in his or her advice: what is this particular owner or
 2 operator going to be prepared to wear for this
 3 particular problem?
 4 A. I'm afraid I just simply don't agree with that at all.
 5 SIR JOHN SAUNDERS: You can do like the Prime Minister says:
 6 I repeat the answer to the last question.
 7 I'm not being rude, but you're not going to change
 8 her mind, whatever you put in that statement, I think.
 9 MR WEATHERBY: I'm not, of course, and that's not my role.
 10 I have not finished but I notice the time. It's 1.10.
 11 I will be a little while.
 12 SIR JOHN SAUNDERS: How much more have you got?
 13 MR WEATHERBY: Possibly 15 minutes. I might be shorter
 14 after the break given we're going to go over the break
 15 anyway.
 16 SIR JOHN SAUNDERS: We should break for lunch. I'm
 17 concerned, as ever, with the timetable. This is not to
 18 stop people asking perfectly proper questions, but
 19 we are expanding the timetable at a rate of knots at the
 20 moment, which is not helpful, I think, to anybody at the
 21 end of the day.
 22 MR GREANEY: Sir, we must conclude the evidence of
 23 DAC D'Orsi this afternoon and also complete the evidence
 24 of Rik Weightman from Live Nation.
 25 SIR JOHN SAUNDERS: Can everyone bear that in mind, please?

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1 And, if necessary, we will sit to a finish. I'm also
 2 concerned that we have warned that we may need to sit on
 3 Friday. I really don't want to do that because I think
 4 everyone's got enough to do on Friday without having
 5 sittings as well and people do, including the families,
 6 not just the lawyers, find, I think, these sittings
 7 extremely tiring and quite daunting. So I don't want to
 8 sit on Friday. On the other hand, we have got to keep
 9 up with our timetable somehow.
 10 MR GREANEY: Sir, may we echo those remarks? It's highly
 11 undesirable that we sit on Friday because there is a lot
 12 of work to be done to prepare for the start of chapter 8
 13 next week. But on the other hand, we must conclude the
 14 security experts this week.
 15 SIR JOHN SAUNDERS: Okay. We have a lot of very experienced
 16 and skilled advocates who are skilled at asking short
 17 questions as well as long questions and perhaps we can
 18 put that into practice for the rest of the week.
 19 MR GREANEY: I'm sure we can, sir.
 20 SIR JOHN SAUNDERS: Thank you very much. I'm sorry that
 21 you're going to be here for longer, Ms D'Orsi.
 22 2.10.
 23 (1.11 pm)
 24 (Lunch adjournment)
 25 ^edited but no SC

1 (2.10 pm)
 2 MR GREANEY: Sir, I hope we'll be able to resume the link to
 3 Mr Weatherby. Yes, there he is.
 4 SIR JOHN SAUNDERS: Mr Weatherby.
 5 MR WEATHERBY: Thank you very much.
 6 DAC D'Orsi, I have one short topic with one document
 7 and then a short number of concluding questions. I hope
 8 I'll be no more than about 15 minutes.
 9 I want to ask you about the 2016 review of NaCTSO.
 10 I'm going to put a document on screen, if I may, which
 11 is {INQ035522/1}.
 12 12 February 2016 is the report from the review.
 13 I think that the review was actually conducted in 2015.
 14 Again, just for context, this review would have occurred
 15 some — or the report was produced 10 months before you
 16 were in post. Is that right?
 17 A. The report is dated 10 months before, yes.
 18 Q. Yes, okay. This is a report from the National
 19 Coordinator of Protect and Prepare. It's broadly,
 20 I think, a positive appraisal, if that's the right word,
 21 for NaCTSO. Would that be about right in overview?
 22 A. Yes.
 23 Q. Part of the review was to determine or to have a look at
 24 what NaCTSO does well and things that it doesn't do so
 25 well and to look to the future for change. So can we

1 scroll through to the next page, please, {INQ035522/2}.
 2 I'm going to refer to one passage near the bottom
 3 just above where it says, "Operationally sensitive".
 4 It's the longer passage:
 5 "Although governed by the Office for Security and
 6 Counter-terrorism through the Protect board, there is
 7 currently no national Protect strategy that directs
 8 NaCTSO work which sets out performance delivery
 9 measures. Performance measures all relate to crowded
 10 places or critical national infrastructure and are
 11 quantitative, and thus fail to indicate effective and
 12 efficient delivery of protective security measures or
 13 awareness."
 14 So can you help me with that? I think what the
 15 review is getting at is that it's looking at the fact
 16 that, at that point, there was no way of effectively
 17 determining how good or how not so good advice given
 18 through the NaCTSO system, either through CTSA's or other
 19 ways — of actually assessing how good or not so good it
 20 was; is that fair?
 21 A. I'm not entirely sure that it does say that. I think
 22 what it's talking about is — it obviously pre-dates me.
 23 I don't really know what was in the authors' mind when
 24 they were writing this. What it does talk about is
 25 quantitative performance measures. But I think in terms

1 of is it effective or not, the very fact that by this
 2 time we already knew that 40% of some of these sites
 3 hadn't seen any protective security, I think that
 4 already it was moving in a different direction against
 5 what the new sort of threat vector was and the attack
 6 methodology.
 7 Q. Yes, okay.
 8 A. Some of the things that are in this I don't recognise
 9 because there was quality assurance of some of the
 10 CTSA's work, which I have had sight of in terms of
 11 quality assuring some of the surveys. So some of this
 12 I don't recognise was there when I came into post.
 13 Q. That might short circuit what I'm going to ask you,
 14 because it was the quality assurance parts of this
 15 review that I wanted to ask you about. If I cut to the
 16 chase, if I may put it that way, and move to the next
 17 page {INQ035522/3}, please.
 18 The first substantive part of it, the review, refers
 19 to it being in 2015. Then just about two-thirds of the
 20 way down. The key themes raised by each of the
 21 questions that it refers to are:
 22 "What does NaCTSO do well and why?"
 23 And there's a significant list of those things. And
 24 then:
 25 "What does NaCTSO not do well and why?"

1 Again, there's a bit of a list there.
 2 The only one that I want to focus on is the third
 3 one:
 4 "Insufficient quality assurance of CTSA delivery and
 5 products."
 6 It doesn't say there was any, but it identifies :
 7 "Insufficient quality assurance of CTSA delivery and
 8 products"; yes?
 9 A. It does, yes.
 10 Q. I'm going to ask you about this in a minute, but I'm
 11 going to take you to a few passages and then ask you
 12 questions. On the next page, {INQ035522/4}:
 13 "What should NaCTSO do more of?"
 14 And the second item is:
 15 "Quality assurance of CTSA advice delivery."
 16 Then again if we can scroll down to the next page,
 17 {INQ035522/5}. I'm only dealing with the second half of
 18 the page:
 19 "Improved training of CTSA's."
 20 It refers to:
 21 "Training of CTSA's and CTAA's must be a major
 22 requirement for NaCTSO in the future and is an area
 23 which requires substantial investment, both financially
 24 and as a major part of NaCTSO delivery to the network."
 25 I don't need to read the next paragraph. Then the

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1 longer paragraph:
 2 "The continuous professional development of CTSA's
 3 and CTAA's must be reviewed using more modern methods of
 4 training as the current model, the annual Radius event,
 5 is unsustainable within current financial constraints."
 6 So it goes on, I don't need to read it. That's all
 7 I want to refer to in particular from that. I stress
 8 that it's a report that highlights that NaCTSO does many
 9 things well, but it's this quality assurance that I just
 10 want to ask you about and improved training.
 11 First of all, the phrase:
 12 "Substantial investment and training of CTSA's."
 13 Are you aware whether substantial further investment
 14 followed this report?
 15 A. I don't agree that the training was as is reflected in
 16 this report. So certainly speaking to a number of staff
 17 that were there at the time and are still there now,
 18 I think the training programme for CTSA's has always been
 19 very robust. It's a two-year training programme and it
 20 has a City & Guilds that they achieve at the end of it.
 21 That was the case then and that is still the case now.
 22 Clearly, there is a budget put aside for training and
 23 I think the fact that it talks about the Radius event
 24 being unsustainable, that's not the case. It has been
 25 sustainable, it has been in place every year and it's

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1 developing -- in fact, it took place last week and it
 2 took place in a virtual manner in order to adapt to the
 3 COVID-19. So I'm afraid I don't recognise the narrative
 4 in some of this report.
 5 Q. Okay. Can I just put the question, specific question
 6 again, and then I'll come back to your answer that you
 7 have just given: was there, so far as you're aware,
 8 substantial investment following this report or this
 9 review?
 10 A. Well, there was already investment in training, so
 11 whether or not there was any additional financial
 12 investment put in place, I don't know. But I don't
 13 share the position that this report is saying that
 14 actually it needed substantial investment. It was
 15 already well funded at the time and it was a good
 16 training programme.
 17 Q. Okay. Let me go back slightly then. This is a National
 18 Police Chiefs' Council review. It's done by the
 19 National Coordinator of Protect and Prepare. Who was
 20 the national coordinator? I don't mean the name.
 21 But --
 22 A. The superintendent who was the national coordinator. It
 23 was a superintendent who wrote this report and there was
 24 a national coordinator who sat above it, who I mentioned
 25 earlier on, and it's the same person.

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1 Q. Sorry, I wasn't -- I put the question badly. I wasn't
 2 interested in who the individual was, but you said you
 3 don't agree with this report and I just want to
 4 establish the position of this report, if you like. Is
 5 this an annual review or a review that is occasional?
 6 A. My understanding of this is it was a self-generated
 7 review.
 8 Q. The national coordinator is somebody whose job it is to
 9 oversee NaCTSO; is that fair?
 10 A. Could you just go to the last page? Because I am not
 11 sure it was the national coordinator who is the author
 12 of this report. It was the head of NaCTSO, which was
 13 a superintendent.
 14 Q. {INQ035522/8}.
 15 A. Yes, so it's the deputy national coordinator. So it
 16 wasn't initiated by the National Coordinator because
 17 that was the chief superintendent that was above them
 18 and it was by their deputy who had specific
 19 responsibility for NaCTSO.
 20 Q. Right. So far as you're concerned, the report is wrong
 21 and the level of training was good? What about the --
 22 sorry?
 23 A. I'm not saying -- this is a perception by the author, so
 24 I don't think it is for me to say that the report is
 25 necessarily wrong. What I'm saying is that in terms of

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1 their reflection of the training, having spoken to
 2 people that were in place at the time, understanding
 3 what the training looked like and knowing what it's like
 4 today, I think it's very good training that's given to
 5 CTSA's. So I suppose I don't entirely recognise the way
 6 that this is written and the criticism that is within
 7 the report.
 8 In relation to the quality assurance processes,
 9 there was a system of quality assurance. We've moved on
 10 a long way from this report, which in fairness, I think
 11 the work at the time, we're talking 2015, when they
 12 would have been doing the actual sort of survey and
 13 everything to form this report. But by the time I came
 14 into role in 2017, and by the end of 2017, this doesn't
 15 reflect what the quality assurance process was looking
 16 like.
 17 Q. Right. So you take issue with the training and you take
 18 issue also with the quality assurance points?
 19 A. Well, they're the two points you raised, and yes,
 20 I don't... Obviously, there's a reflection in here. It
 21 was a survey that was sent out to people. It's how they
 22 felt. I think it's important that at the time I presume
 23 people reflected on that and made whatever decisions
 24 were necessary. I think in terms of where we were in
 25 2017, and where we are now, this is unrecognisable.

1 We were talking about 11 people in 2016 in NaCTSO;
 2 there's over 60 people there now.
 3 Q. Yes. You're moving a little ahead of me.
 4 A. Sorry.
 5 Q. I was taking this as a review by the body or the office
 6 that oversees NaCTSO. I suggested it was favourable on
 7 a number of different levels and I picked out two
 8 in that context. I picked out two points where it was
 9 less favourable and I'm going to go on and ask you just
 10 a couple of questions about whether anything changed as
 11 a result of it.
 12 But in terms of the quality assurance, are you aware
 13 of changes that followed after the time of this report,
 14 February 2016? If you're not, please just say.
 15 A. Not specifically from this report, but I am very
 16 confident that the process in place now is a robust
 17 quality assurance process which is led by
 18 a chief inspector.
 19 Q. Let me just put it in a slightly different way, perhaps
 20 away from this document: by May 2017, or this whole
 21 period up to May 2017, in very short order, in one or
 22 two sentences if you're able to, what was the quality
 23 assurance of a CTSA who went into the Manchester Arena
 24 or any large venue and did a PSIA and delivered advice
 25 and guidance? What was the national quality assurance

1 process at that time?
 2 A. I think it's twofold. There's what was the quality
 3 assurance process locally with their own local line
 4 managers, and I think there was evidence from
 5 Liz Forster that was heard in relation to her role. So
 6 you have supervision at a local level and then in terms
 7 of the accreditation process for -- in effect, you're
 8 licensed to operate, and I say that in inverted commas.
 9 There were two assessments of two -- I think it's the
 10 surveys that they'd done, but I'd need to clarify that.
 11 They were assessed annually as part of your training
 12 programme.
 13 Q. So the CTSA, in order to get accredited, when they
 14 become a CTSA, has to submit a portfolio. That's
 15 probably the wrong word. Has to submit work to NaCTSO
 16 before they are accredited. I understand that.
 17 A. Yes.
 18 Q. In terms of the advice delivery and either 100% or
 19 a random advice delivery quality assurance, that is just
 20 local, is it? NaCTSO doesn't --
 21 A. I could check that. My belief is -- because at the end
 22 of the day the CTSA's are sort of, you know, funded
 23 nationally, but they're regionally managed.
 24 Q. Yes.
 25 A. So I am making an assumption that that is delivered at

1 a local level. For me that would seem appropriate.
 2 Q. Thank you. I shan't take the point any further.
 3 Finally, then, just a couple of points in
 4 clarification about the Protect duty and your views.
 5 You've been asked questions about a mandatory
 6 approach. Am I right that you would agree with an
 7 approach where a CTSA identifies proportionate
 8 improvement measures? You'd support a mandatory
 9 approach to them?
 10 A. So I think there should be a mandatory approach towards
 11 protective security. I think where that advice comes
 12 from needs to be part of the consultation process
 13 because I think there's way too many -- it would be
 14 wrong for me to say that that should be a role
 15 exclusively for CTSA's. I think there is a role for
 16 CTSA's in the new model in terms of the publicly
 17 accessible locations, the sites, zones and sectors, but
 18 the responsibility for local authorities, the private
 19 sector in terms of a Protect duty, I think there needs
 20 to be thought as to where that advice comes from.
 21 I don't think that that should sit entirely with CTSA's.
 22 So some people may well choose to get that advice from
 23 the private sector.
 24 Q. Okay. But where a CTSA undertakes a PSIA, scores
 25 a site, and then from that agrees an action plan with

1 three or 33 points on it, do you support a mandatory
 2 approach to the measures that are on that action plan?
 3 A. I think that's hard for me to say because I don't know
 4 whether the PSIA process in the new model -- whether
 5 PSIA has a role in the process going forward. We need
 6 to understand exactly what the process is going to be in
 7 terms of that sort of sites, zones and sectors. Because
 8 some of it I think is like a central delivery on
 9 a thematic basis to particular sectors. Within it there
 10 will be an element of site and I think we need to look
 11 at what is the process for providing protective security
 12 at those sites and then how mandatory is that in terms
 13 of the legislation. And I think that's what the
 14 consultation process needs to look at so we can
 15 establish what the options are.
 16 Q. Okay --
 17 A. So I am not -- I don't know whether PSIA is part of that
 18 future or not.
 19 Q. In terms of the Protect duty, and given your senior role
 20 in NaCTSO, are you able to say what should be mandatory?
 21 A. So I think there should be a duty for people to consider
 22 protective security and I think that's what should be
 23 mandatory. You should have to consider that. In the
 24 same way that you have to consider health and safety,
 25 and you have to put measures in place. That's my sort

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1 of high level view on what it should look like, but
 2 I recognise that that needs to be deconstructed to work
 3 out how that would sit in a legislative framework and
 4 where the accountability would be and who would provide
 5 advice. In the same way that health and safety -- there
 6 are professionals who give advice on health and safety.
 7 Q. Yes. I'm going to come to outside the CTSA in a moment.
 8 In terms of what should be mandatory, and again looking
 9 at it in a context that I think we can all follow,
 10 something like the arena, not necessarily the arena, but
 11 a location, and Mr Upham or any CTSA arrives and says,
 12 "I'm the CTSA, I would like to do a PSIA and give you
 13 advice", then at the moment the position is that the
 14 site can just say, "Sorry, we haven't got time, we don't
 15 want your help". That's the current position, isn't it?
 16 A. Yes.
 17 Q. And you're saying in effect that it should be mandatory
 18 for them to at least consider the CTSA's advice?
 19 A. That's right. Then if they choose not to take that,
 20 then there is -- that's their responsibility.
 21 Q. Yes.
 22 A. They might choose to put in a different measure.
 23 I suppose if we take the court today, I'm more
 24 regulated -- the regulation is more around the sort of
 25 sandwiches that we're provided in court than it was

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1 about -- so if the security was removed in the entrance
 2 to the court, that's a choice by the court.
 3 Q. Yes.
 4 A. They can have --
 5 Q. We understand that. And the chair has made the point
 6 that it's all very well that if someone gets the
 7 sandwiches wrong they can be prosecuted for it, but it's
 8 a different ball game when we're talking about bombs and
 9 terrorism, isn't it?
 10 A. Yes, but I think the Protect duty -- I actually think
 11 the collateral benefit is beyond just terrorism, it is
 12 about all forms of crime, hence the security measures
 13 here today are beyond just counter-terrorism.
 14 Q. Before I move on then, the extent of how mandatory it
 15 should be is that -- your view is it should be mandatory
 16 to engage with a CTSA but not mandatory to undertake the
 17 proportionate measures that are put forward by the CTSA?
 18 Have I understood you correctly?
 19 A. Yes, but I suppose my only caveat -- I wouldn't want to
 20 shoehorn the Protect duty around what the current
 21 framework is today. If we need to adapt the way that we
 22 operate in terms of CTSA's and the PSIA in terms of the
 23 future then we should look at that.
 24 So as to what the role of CTSA's should be and is
 25 in the future, I think certainly we as an organisation

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1 would want to reflect on the learning from the inquiry
 2 and I know we will work very closely with Mr Hipgrave
 3 and his team as to what the future should look like.
 4 Q. In terms of outside private expertise, we know that SMG
 5 have commissioned -- in the aftermath of the bombing
 6 commissioned an American security firm to advise them
 7 and that, according to the evidence, they have
 8 a full-time director of security who's an ex-senior
 9 police officer with counter-terrorism experience. We
 10 know that one of the chair's experts, Colonel Latham,
 11 has done a similar job at the O2 Arena and at the time
 12 when they were going to host the Ariana Grande concert
 13 a few days after the Manchester one. Would you support
 14 it being mandatory for large venues, high-capacity
 15 venues, to have employed or contracted expert advisers
 16 or expert managers with respect to counter-terrorism,
 17 possibly with an accreditational benchmark?
 18 A. I definitely think the consultation -- it's my view that
 19 business will feed back that they want to have -- have
 20 nowhere to go to for accredited people. I think the
 21 landscape is very cluttered with security professionals
 22 and I think it's important to join the consultation
 23 process to understand how people can confidently employ
 24 people that they know are accredited in that space.
 25 I think to discharge their duty, should they be able to

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1 go to an outside industry to contract in, I absolutely
 2 agree with that. I would need more time to consider
 3 whether that should be a mandatory condition or not.
 4 Q. Lastly, in terms of those bases, important but not
 5 attractive enough in the sense that we've discussed for
 6 CTSA engagement simply because of resourcing, so I guess
 7 important spaces but those below tier 2. Would you
 8 support a light touch approach but one which involved
 9 self-assessment tools of the type that have been rolled
 10 out by (inaudible: distorted)?
 11 A. I think there needs to be -- I come back to the word
 12 proportionate. There has to be a choice for people to
 13 make decisions. Nothing is risk-free. That's simply
 14 where we are. There are choices that always need to be
 15 made and I think that it should be proportionate. The
 16 legislative framework should be flexible enough to
 17 enable people to make proportionate decisions around
 18 their protective security. But I think that should be
 19 applicable across the board. Therefore it's not --
 20 we're not being disproportionate to some SMEs, who
 21 clearly are not going to be able to necessarily deliver.
 22 There are some things that larger corporations are able
 23 to deliver. So I think proportionality is the key bit.
 24 And people -- it's like in my job, I have to make
 25 risk-based, threat-based decisions, and I have to live

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1 with those decisions and I have to be able to evidence
 2 why I have made them.
 3 MR WEATHERBY: Yes. I don't think anyone, certainly not me,
 4 is arguing against a proportionate approach. Those are
 5 all the questions that I have. Thank you very much.
 6 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.
 7 MR GREANEY: Sir, next then, Mr Cooper.
 8 Questions from MR COOPER
 9 MR COOPER: Can we start by having a few questions about
 10 Martyn's Law? You have been extremely and positively
 11 invested in that initiative, haven't you?
 12 A. I have, yes.
 13 Q. And you've had a number of meetings with Figen Murray?
 14 A. I have met her a couple of times, yes.
 15 Q. I'm not going to go over Martyn's Law in any great depth
 16 with you, the chair has heard much of it, but there are
 17 just two references I would like to take you to. If we
 18 could have on the screen {INQ036722/1}.
 19 Unfortunately, my pages are not paginated, so if
 20 Mr Lopez could assist me, it's the page that has on the
 21 bottom left-hand corner, "What is Martyn's Law?" The
 22 document I have is pre-pagination. I wonder if we can
 23 scroll through it, that will be the quickest thing to
 24 so, I suppose.
 25 I want to go to the top of that page {INQ036722/6},

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1 please. Just to emphasise, if I can, officer,
 2 Martyn's Law consists of five requirements, that spaces
 3 and places to which the public have access: engage with
 4 freely available counter-terrorism advice and training;
 5 conduct vulnerability assessments of their operating
 6 places and spaces; mitigate the risks created by the
 7 vulnerabilities; put in place/have a counter-terrorism
 8 plan; and a requirement for local authorities to plan
 9 for the threat of terrorism.
 10 Do you agree with each and every one of those
 11 objectives?
 12 A. Yes, I do.
 13 Q. Thank you. I would like to ask you this in terms of
 14 potential sanctions, though. You've already touched on
 15 it. There needs to be strict sanctions for this, would
 16 you agree?
 17 A. I do.
 18 Q. Would they come in the way of fines? Is that what your
 19 thinking leads you to at the moment?
 20 A. Yes.
 21 Q. In terms of the level of fine, have you had an
 22 opportunity, because we're dealing with big, wealthy
 23 companies at times here, can you perhaps give the chair
 24 some idea as to the sort of band of fines that you might
 25 think appropriate?

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1 A. I think that's really difficult for me to answer. What
 2 I would say --
 3 SIR JOHN SAUNDERS: You and I would know of the sort of band
 4 of fine levels that we're talking about for safety of
 5 work and things like that, which can, as you know, go
 6 very high for companies. I would assume that we'd be
 7 looking at the same areas there, Health and Safety at
 8 Work type comparisons.
 9 A. The only thing I would say, sir, is that the GDPR
 10 legislation approached it slightly differently and it
 11 was more around a percentage based fine. But we are
 12 talking about -- and I think maybe there is something to
 13 do with a bit of reflection on that piece of legislation
 14 to see how they developed that.
 15 SIR JOHN SAUNDERS: A percentage in turnover terms?
 16 A. I think so, but of course it also applies to public
 17 bodies as well, so I'm not quite sure how that works.
 18 SIR JOHN SAUNDERS: It sounds fairly similar to Health and
 19 Safety at Work, actually.
 20 MR COOPER: Thank you, sir. The other reference I would
 21 like to take you to is the foreword by Figen Murray,
 22 please {INQ036722/2}:
 23 "Foreword by Figen Murray, mother of Martyn Hett."
 24 Right at the start of the foreword, please. Would
 25 you agree with this:

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1 "Martyn's Law isn't going to stop terrorism.
 2 Nothing can do that. But I do hope if the government
 3 legislates for Martyn's Law, then it will mean simple,
 4 common sense security will make it much harder to
 5 inflict mass casualties and fewer people will have to
 6 suffer what I and the parents of the 21 other bereaved
 7 families of Manchester have had to endure."
 8 Would you agree with that sentiment, officer, it's
 9 not going to stop terrorism, but if the government
 10 legislates in accordance with Martyn's Law it will mean
 11 simple common sense security will make it much harder to
 12 inflict mass casualties?
 13 A. I agree, yes.
 14 Q. Thank you. I would like to move on from that document
 15 now and ask you about consultation and only a few
 16 questions on that because others have covered it.
 17 You listened to the evidence of Mr Hipgrave?
 18 A. I did, yes.
 19 Q. And we've already dealt, others have and indeed the
 20 chair has, in emphasising the importance of swift
 21 consultation, getting the consultation process swiftly
 22 initiated.
 23 A. Yes.
 24 Q. Where we actually are at the moment, according to
 25 Mr Hipgrave's evidence, is that the consultation

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1 documents have been sitting on his desk since September
 2 and he has told the chair that it is his decision to
 3 leave them on his desk until he decides it right to give
 4 them to ministerial departments; does that surprise you?
 5 A. I mean, it is the government's decision when to lead on
 6 the consultation.
 7 Q. Yes. Indeed it is, but we're talking here about the
 8 documents, according to Mr Hipgrave, ready and waiting
 9 to go since September and he has taken the initiative,
 10 he has taken it, to leave them sitting on his desk
 11 without even distributing them to government
 12 departments. Does that surprise you?
 13 A. I think that's a matter for Mr Hipgrave to answer.
 14 Q. You can understand, can't you, how concerned the
 15 families are about that? It's not a matter that the
 16 consultation documents haven't been distributed to
 17 people for consultation, that's bad enough, perhaps some
 18 might say. It's the fact that Mr Hipgrave has had them
 19 ready and waiting to go on his desk for over 2 months
 20 now and they're not being given to government
 21 departments. We've asked him to come back to the chair
 22 to explain that. We'll hear his answers. I won't press
 23 you any more on that.
 24 SIR JOHN SAUNDERS: Okay. It may be that anyone who's going
 25 to comment on that -- I'm not saying that's not an

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1 accurate summary, but for myself I can't actually
 2 remember entirely what Mr Hipgrave said in relation to
 3 that and it might be worth, if anyone was thinking of
 4 reporting that, to look at what his exact words were.
 5 MR GREANEY: He said, for example, that he did not consider
 6 it appropriate to send it to the Department of Health
 7 and Social Care at this stage given that they are
 8 heavily committed to the response to the pandemic.
 9 SIR JOHN SAUNDERS: He may have had reasons which he gave
 10 more.
 11 MR COOPER: The tenor of his evidence at the end, and I'll
 12 be corrected if I'm wrong, it was his decision and her
 13 had taken the decision based upon their workloads.
 14 I think that would be a fair way of putting it.
 15 What I'm suggesting to you, officer, finishing off
 16 from that, is would it surprise you that Mr Hipgrave has
 17 taken that decision and not simply given it to the
 18 ministerial departments and allowed them to decide
 19 whether their workloads permitted them to read it?
 20 A. I work very closely with Mr Hipgrave and I know that he
 21 is very committed to delivering the Protect duty. It's
 22 for him really to comment on the best way forward for
 23 him to be effective in that consultation.
 24 Q. So you'll remember my line of questioning. I asked
 25 Mr Hipgrave that precise point: should it not be left to

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1 the departments to decide how to prioritise their work?
 2 SIR JOHN SAUNDERS: No doubt someone's going to come back
 3 with an answer.
 4 MR COOPER: Can I ask you about something we haven't covered
 5 yet. It's something certainly close to the heart of
 6 Figen Murray who I represent. It's the ACT initiative.
 7 What is that?
 8 A. Action Counter—terrorism, which is our sort of campaign
 9 to reach out to the public in terms of our communication
 10 with them. There's a whole suite of options that sit
 11 underneath that.
 12 SIR JOHN SAUNDERS: Has it taken over from the multitude of
 13 different other initiatives that go out? It's under one
 14 umbrella.
 15 A. It's a bit of a brand, Action Counter—terrorism, and
 16 then under it we have ACT e—learning, we led in 2017 on
 17 ACT for Youth, which was a part of the curriculum which
 18 was to cover how to keep themselves safe in terms of
 19 young people. We've just done some work which is
 20 ACT Early, which is around Prevent. But it's putting it
 21 all under ACT as an overarching campaign.
 22 MR COOPER: In short, it is to educate and encourage the
 23 public to spot terrorist —related or potential
 24 terrorist —related behaviour?
 25 A. I think it's probably slightly wider than that. It's

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1 about putting material out there in the hope that
 2 everybody plays their part in national security and
 3 whether that be -- and it covers each of the four
 4 pillars of the CONTEST strategy in terms of an approach.
 5 So I have some of the work from the Protect side, other
 6 colleagues have some of the work in terms of --
 7 particularly in relation to Prevent.
 8 Q. The first angle of it is a 45-minute long learning,
 9 e-learning facility. There's also an ACT Operational
 10 and ACT Strategic --
 11 A. Yes.
 12 Q. What are the differences between the two?
 13 A. So this is really replacing Argus and Griffin and
 14 putting it on to a different platform. So one,
 15 obviously, is aimed at the more strategic security leads
 16 and then the other is an operational delivery.
 17 SIR JOHN SAUNDERS: Strategies for management and
 18 operationally for people putting it into action?
 19 A. That's right. It's an interactive programme and
 20 certainly ACT Operational, you know, it's our hope that
 21 people, for example all security guards, as part of
 22 their training, cover ACT Operational. And again that
 23 would be if we look it into the context of a Protect
 24 duty, that could be something that people show they're
 25 discharging their duty by ensuring their personnel have

1 completed that. And it has been really successful, it
 2 is about amplification of the message, and the ACT
 3 e-learning, we have had over 3 million modules completed
 4 so far and that's growing and we did that in partnership
 5 with the private sector.
 6 MR COOPER: Would that be something perhaps to consider as
 7 to whether it should be made mandatory, particularly for
 8 those working as security officers and security guards,
 9 as it were?
 10 A. Yes. That's one way of looking at it. The alternative
 11 is, as I said, you could show that you're discharging
 12 your duty by -- that would be evidence that you are
 13 taking a Protect duty seriously and, for example, all
 14 your security guards complete that particular module.
 15 Other different types of businesses, it would be
 16 different personnel that they'd ask to complete it or
 17 certainly familiarisation of ACT Early in terms of the
 18 new Prevent website, again making sure that that's
 19 shared across your business would be an example that
 20 you're discharging your duty under a Protect duty.
 21 Q. That's very helpful, thank you.
 22 I would like to move on and touch upon, so far as it
 23 has not been touched upon, the "Something better than
 24 nothing" strand of this. I am not going to repeat the
 25 questions asked of you, the chair has them well in mind,

1 but I am going to ask you to look at a document, please,
 2 which we alerted you to over the luncheon adjournment.
 3 {INQ015819/1}.
 4 This is an SMG document. If we scroll down to
 5 get -- firstly, let's orientate ourselves. The date is
 6 1 June 2017. Can we scroll down, please? Next page.
 7 And again, please. {INQ015819/3}. If we see it's from
 8 John Sharkey, 1 June at 10.26, to a number of
 9 individuals. We'll look at the policy in a moment. He
 10 says:
 11 "The attached policy requires immediate
 12 implementation. Please work with your comms marketing
 13 team and ticketing partner to implement and also ShowSec
 14 and venue staff to enforce."
 15 Then he says:
 16 "I will get Vicky to arrange one-to-one calls, but
 17 this requires to be done ASAP."
 18 Obviously this is shortly after the atrocity. Let's
 19 look now, please, at the suggestions he makes. This
 20 should be {INQ015819/5}, please.
 21 Here is the policy. I'm only going to read the
 22 first two sections:
 23 "No backpacks, holdalls, suitcases will be admitted
 24 into the venue. The patron will be refused entry if
 25 they attempt to enter the venue with the prohibited

1 item."
 2 It then goes on to deal with medical requirement
 3 exemptions. Then:
 4 "There will be no temporary storage facilities for
 5 such items within the venue and it will be left to the
 6 patron to find a safe temporary facility to hold the
 7 item. The venue will not be responsible for late
 8 admission or non-admission as a result of this policy.
 9 All remaining bags will be searched."
 10 And just this section, "Communication":
 11 "All existing transaction holders to receive an
 12 email from Eventim or from the promoter's ticketing
 13 agent. Terms and conditions on all websites to be
 14 checked and updated. An explicit high-profile message
 15 to be carried on all venue websites. New tickets should
 16 be issued with the backpack ban to be highlighted.
 17 Signage to go up at venue entrances, including pop-up
 18 stands in advance of lines. Venue policy to be released
 19 to venue promoters and as an addition to the frequently
 20 asked questions for patrons, venue staff and ShowSec
 21 staff."
 22 And just over the page {INQ015819/6}, there are the
 23 prohibited items that are laid down with the last bullet
 24 point of that block:
 25 "Anything else which we deem to ruin the enjoyment

1 or viewing experience of others.”
 2 And it describes things being banned from backpacks
 3 to animals, air horns, aerosol sprays, balloons and
 4 masks and helmets.
 5 That was the SMG response. Is that an example of
 6 “Something is better than nothing”?
 7 A. Not my view of “Something is better than nothing”.
 8 Q. What would you say about this as a response?
 9 A. I don’t know the context. I think you mentioned that
 10 they also employed an American company to look at their
 11 security, so I don’t know whether this is — is this
 12 in relation to a specific ...
 13 Q. This is the immediate response, it’s 1 June, so very
 14 close to the atrocity. There may have been the matter
 15 of the American or the security adviser being employed.
 16 But in terms of this document as an immediate for
 17 action — let me put it another way: it makes no mention
 18 of proper CCTV, no mention of increasing staff numbers,
 19 no mention, for instance, of increasing the number of
 20 police on the ground, which all these things could be
 21 done immediately. No mention, for instance, of perhaps
 22 better recognition or better recognition of risk level
 23 or more checks, more patrols, proper pre-egress checks,
 24 better briefings, all these things. I have left some of
 25 the others out which might take a while to implement,

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1 but these are quickly implemented things, as quick as
 2 some of the things on here.
 3 A. Yes. I think the threat level on that date was probably
 4 at critical for the UK, so I would expect — there is
 5 a place for this, but there is a place as a part of
 6 a wider suite of measures that I would have expected to
 7 be implemented.
 8 Q. Yes, but in terms of the — if I may press you on
 9 this — in terms of this as a response on 1 June, these
 10 are quick responses, a simple: no, no, no, you can’t do
 11 this. Equally quick could have been the examples
 12 I gave: more feet on the ground, more visible police
 13 officers, just as quick to do, for instance.
 14 SIR JOHN SAUNDERS: What that is inviting is: perfectly
 15 sensible but it’s not enough?
 16 A. Yes, I think bear in mind the UK threat level would have
 17 been at critical. This is perfectly sensible but I
 18 would expect it to be accompanied by other measures.
 19 MR COOPER: And accompanied by other measures quickly?
 20 A. Yes, and a choice by the site operator what they wanted
 21 to do. There was a whole raft of venues across the
 22 UK — we worked collaboratively lots of venues to review
 23 their security certainly over the next few weeks. So
 24 yes.
 25 Q. That’s the time span: done within a matter of weeks

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1 rather than months or years?
 2 A. Yes, of course. The key point for me at this point in
 3 time is the UK’s threat level is critical, which is that
 4 an attack is imminent.
 5 Q. On that subject I should have asked you this in relation
 6 to consultation, I’m sure you’ll agree: the longer the
 7 consultation is left and the longer any mitigating
 8 features are left that need to be put in to achieve
 9 security, each and every day that goes by, the more the
 10 risk to the public?
 11 A. Well, yes, of course, and we have had attacks since
 12 Manchester Arena, regrettably.
 13 Q. On the issue of “Something’s better than nothing”, the
 14 expression used in the NaCTSO document, just this in
 15 terms of putting the importance of what NaCTSO says into
 16 context. Your statement, please. Can we look at one
 17 page of it. {INQ025466/1}. It’s appendix 2 of your
 18 statement.
 19 A. My first statement?
 20 Q. I think it’s your first statement. In any event, it’s
 21 {INQ025466/25}, appendix 2. I think it’s the first
 22 statement. Yes.
 23 Just so we can orientate ourselves as to the
 24 important position that NaCTSO has in the overall
 25 hierarchy of actors and bodies, it is obviously, is it

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1 not, officer, well-connected and influential?
 2 A. It is, but I don’t think in terms of the sort of
 3 hierarchy. Really for me, in terms of protective
 4 security delivery, the 200 CTAs are very important
 5 in that process at a local level. NaCTSO is obviously
 6 connected with the rest of the organisations involved in
 7 delivering national security.
 8 Q. I understand. The point of my question is: if NaCTSO
 9 say something, such as “Something is better than
 10 nothing”, that approach is potentially influential
 11 amongst many, many of the players within this diagram?
 12 A. Of course, but I think, as I said earlier, I don’t agree
 13 with the nothing being nothing. I think I did say that
 14 before lunch.
 15 SIR JOHN SAUNDERS: I think you have made that clear to us.
 16 MR COOPER: I’m not going to go over that, sir.
 17 SIR JOHN SAUNDERS: Not a criticism of you at all.
 18 MR COOPER: I was simply dealing with where NaCTSO fits into
 19 the matrix.
 20 I gave you notice a few days ago about some
 21 questions I was going to ask you about your inquest
 22 evidence, the London Bridge Inquest. To reassure you,
 23 although you were giving evidence all day, I only have
 24 11 references to make. That’s to reassure the inquiry
 25 more than you. But if I can take — and they’ve reduced

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1 by the way over the morning. Can I take you, please, to
 2 your document, which is {INQ035310/1}.

3 There are references I would like to take you to for
 4 clarification so far as they may assist the chair in
 5 this inquiry. Page 15, please, at line 11. I have to
 6 say that does not correlate with mine.

7 (Pause)

8 You were asked about:
 9 "What is the purpose of a national threat level?
 10 What does it do to inform a variety of public bodies and
 11 cause them to take preset arrangements?"

12 And you give an answer there, don't you, into how
 13 the national threat level should be interpreted; is that
 14 correct?

15 A. I'm terribly sorry, which quarter of the page?
 16 Q. This is {INQ035310/15}, line 11.
 17 A. Got it.
 18 Q. "In simple terms, what is the purpose of having the
 19 national threat level? What does it do to inform
 20 a variety of public bodies and cause them to take preset
 21 arrangements?"

22 And you say this:
 23 "So I suppose I would divide it into a number of
 24 sections. I think, firstly, publicised, so that the
 25 public are fully aware of what the threat level is to

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1 the UK and then from a public body perspective and
 2 certainly, from my perspective of policing, and in my
 3 role as a senior national coordinator, it enable us to
 4 think about the protective security stance that is being
 5 taken."

6 So that's as far as you're concerned, but the
 7 question I want to clarify is: how should, for instance,
 8 those responsible for security at, say, the arena have
 9 interpreted the national threat level?

10 A. In the same way. This is the government and the system
 11 telling us -- you know, if you look at when we moved
 12 from severe to critical, it's telling us that there is
 13 an attack imminent, so I would expect, and I know, a lot
 14 of people have their security plans that they put into
 15 place based on what the threat level is and I would be
 16 expecting everybody to re--think against that threat
 17 level what they should be doing in relation to
 18 protective security.

19 As I said before, it is UK--wide, it doesn't vary by
 20 site, so certainly after Manchester, the threat level
 21 increased and I would expect people to consciously be
 22 re--thinking what their protective security posture is.

23 Q. Thank you --
 24 SIR JOHN SAUNDERS: In a way, when we see the threat level
 25 go up, then most people will notice it, they would be

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1 alert to it?

2 A. Yes.

3 SIR JOHN SAUNDERS: Preventing terrorist attacks, whatever
 4 sort of systems you put in, is going to depend to a
 5 significant amount on people noticing things and taking
 6 measures individually.

7 A. Yes.

8 SIR JOHN SAUNDERS: In this case we have the severe threat
 9 level going on, I don't know for how long, but for
 10 a very long time.

11 A. Yes.

12 SIR JOHN SAUNDERS: You can remind people as much as you
 13 like how often it is, but after a while, like telling
 14 people about COVID measures, if to goes on long enough
 15 then they just begin to ignore them. How do you get
 16 over that or is it just not possible?

17 A. I think we're very alive to the fact that the longer
 18 we're at a particular threat level, the more there might
 19 be complacency. So that is part of ACT in terms of the
 20 overarching campaign, reaching out through social media
 21 channels. We put a lot of events on for security
 22 professionals within industry. We invite them in, we
 23 share information with them. So it is just a programme
 24 of reminding people exactly what it means. I do agree
 25 with you that the longer we're at a particular threat

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1 level, there is a danger that there is potential for
 2 complacency, which is why we have such a robust campaign
 3 with ACT and we put a lot of events on for security
 4 practitioners.

5 SIR JOHN SAUNDERS: A really difficult problem to solve,
 6 though, isn't it?

7 A. It relies on individuals to keep reflecting on their
 8 protective security posture.

9 MR COOPER: Just on that, can I take you, please, to
 10 {INQ035310/17} of the inquest pages. Line 2:
 11 "What are the key components of the concept of
 12 threat when JTAC sets the threat level?"

13 I won't read your answer, you can give it again to
 14 us, as it were. Maybe you could answer that question
 15 for us. What are the key components of the concept of
 16 threat when JTAC sets the threat level?

17 A. So I obviously can't go into the methodology of JTAC.
 18 That brings together all the intelligence practitioners.
 19 I think what I'm talking about here is that JTAC is very
 20 much focused around threat and that is around capability
 21 and intent. As I talked about in this evidence, and
 22 I think I did mention it when I was here last time, that
 23 risk also is very much around vulnerability and
 24 consequence. So we can all be vulnerable to
 25 a particular type of attack, but actually what threat is

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1 focusing on is capability and intent. And obviously,
 2 when the threat level changes, that's taken into
 3 consideration and the threat level is adjusted
 4 accordingly. There's a huge methodology that sits
 5 beneath that, which it wouldn't be appropriate to share.
 6 Q. Of course, and please don't answer this question in any
 7 way if it is inappropriate. Capability and intent, that
 8 would come from informed information? And don't answer
 9 the question if you are in difficulty with it.
 10 SIR JOHN SAUNDERS: They don't make it up, that's for sure,
 11 it comes from something.
 12 MR COOPER: Of course not, it's the level of it.
 13 I hear from your answer I don't need to push the
 14 issue.
 15 Those involved in the security industry would
 16 understand that, wouldn't they?
 17 A. Yes.
 18 Q. Thank you. That's all I need from you on that.
 19 Can I ask on a totally different issue,
 20 {INQ035310/19}, please. Much of your evidence concerns
 21 specific issues relating to vehicle threats at
 22 London Bridge, which, don't worry, I'm not taking you to
 23 any of that.
 24 {INQ035310/19}, line 14:
 25 "Turning then to the question of legislation, is it

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1 fair to say that there's little legislation which is
 2 specific to the work you do within the Protect and
 3 Prepare strands rather than general but touching upon
 4 them?"
 5 And you refer to a number of matters that you've
 6 already touched upon here. Is there anything else that
 7 you said, for instance, at the previous inquest such as
 8 references to Article 2 and such that you'd like to
 9 elaborate here before us?
 10 SIR JOHN SAUNDERS: It was counsel who mentioned Article 2.
 11 A. Yes. I don't think there's anything specifically
 12 I would want to add to that. I think the point of this,
 13 if I remember, was really just exposing the
 14 discretionary nature of protective security, which --
 15 I think I've covered my view on that. But there are
 16 some legal frameworks which are around the preservation
 17 of life, Article 2 and a couple of others. Nothing
 18 else, really, to add.
 19 MR COOPER: I'll take you to one more reference and then
 20 we're done with this document. {INQ035310/56}, please,
 21 line 9.
 22 This is really a question relating to deterrents and
 23 the effect of police deterrents or indeed uniformed
 24 police deterrents at a site which may be vulnerable. At
 25 line 9 you are asked:

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1 "In addition to the armed patrolling tactics, was
 2 a further tactic developed using unarmed officers for
 3 the purpose of deterrence and an immediate response to
 4 an attack?"
 5 Your answer at line 15. Again, let's hear from you
 6 directly. Can you help us with the importance in your
 7 view, as seems apparent from this document, of the
 8 visible presence of police officers?
 9 A. Yes. This was specifically in relation to London Bridge
 10 and the policing posture that was put in post the attack
 11 in relation to London Bridge. I reflected on the
 12 visible presence to deter terrorists. Of course,
 13 I would say -- I mean, on this occasion it was around
 14 police officers, but we do see some tremendous work by
 15 security professionals who are in uniform in and across
 16 many cities, who also provide a great role in creating
 17 a hostile environment for terrorists to operate in. But
 18 this specifically refers to a sergeant and several
 19 constables that were out on patrol who weren't armed.
 20 Q. My question simply on the relevance to this inquiry is:
 21 would you agree that the more the numerical presence,
 22 within reason, the more of a deterrent?
 23 A. It can be, but I think there are other methods of
 24 creating a deterrent and creating a hostile environment
 25 as well, complementary, but --

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1 Q. It's a package of measures perhaps?
 2 A. We all like to see police officers and they do act as
 3 a deterrent, but I think security personnel are equally
 4 capable and we see that in some of the busy high streets
 5 where the presence of security officers is far greater
 6 than the presence of police officers and that doesn't --
 7 for me, that's right, that's complementary, and that's
 8 partnership working in terms of security.
 9 Q. Thank you.
 10 Just one question on the issue relating to the
 11 perimeters and the issue relating to them being pushed
 12 back. And then being pushed back and this: we heard
 13 from Miriam Stone -- it wasn't her exact words, but it
 14 was the essence of it -- that presently there is some
 15 form of uneasy truce, as it were -- truce isn't the word
 16 she used, others will know the exact word she used, but
 17 that was the effect they put over -- between
 18 stakeholders at the moment in maintaining that pushed
 19 back perimeter.
 20 Have you experience of there being difficulties
 21 between stakeholders based on commercial problems,
 22 that is they don't want to implement something that may
 23 be good for security because it might affect their
 24 pockets? Have you ever come across that sort of debate
 25 among stakeholders when it comes to security?

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1 A. I'm probably not close enough to that level of tactical
2 delivery really to say one way or the other whether I've
3 experienced it. Obviously, when I'm experiencing a more
4 complicated space as a Gold Commander, it's usually for
5 a bigger policing operation anyway.

6 SIR JOHN SAUNDERS: I think it's fair to say we heard from
7 Assistant Chief Constable O'Callaghan that he had
8 concerns now about the pushing back of the perimeter
9 because he felt it pushed the problem further away, but
10 it didn't actually get rid of the problem, which he said
11 explained why BTP had concerns. I have no idea whether
12 others were expressing concerns.

13 A. There's always a displacement impact in terms of crowds
14 of people, so you have to keep managing it wherever
15 it is. You have to put in a process.

16 MR COOPER: The final series of short questions I want to
17 ask you is in relation to Nick Aldworth's statement,
18 {INQ038949/1}. You were taken to a number of
19 paragraphs. I want to take you to a few that you
20 weren't taken to for your observations.

21 Can we go, please, to paragraph 23? {INQ038949/5}.

22 He says this:

23 "In February of 2019 I was asked if I would meet
24 Figen Murray. I hadn't been aware of Figen previously
25 and I was a little bit worried about meeting her. By

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1 this time a number of reviews of the Manchester attack
2 had been completed and exposed possible failings or
3 missed opportunities that are now the focus of this
4 inquiry. I felt that as a representative of the state
5 Figen might be angry with me for letting her another
6 families down. It was a presumption that shames me to
7 this day."

8 Again, can you confirm, so far as your contacts with
9 Figen and any other family members are concerned,
10 they've been nothing but positive and magnanimous in
11 their approach?

12 A. Absolutely. I find — the first time I met Figen it was
13 a very humbling experience. She spoke before me at
14 a conference and I think it was probably one of the
15 hardest things I've ever done in my career, which was to
16 stand up and present in a conference after she had done
17 such a heartwarming, heartfelt and humbling
18 presentation. I think her passion for encouraging
19 everybody to do the right thing to keep the public safe
20 is fantastic and she's very balanced and very measured
21 and it's very humbling.

22 Q. Again, if it helps you, officer, she has nothing but the
23 highest regard for you as well.

24 A. Thank you.

25 Q. Can I take you to a few more paragraphs, please?

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1 SIR JOHN SAUNDERS: That would be such a good place to stop
2 and you've missed it!

3 MR COOPER: It was and I was sorely tempted. I'll try and
4 do it very quickly with a few short questions on this
5 statement. Paragraph 45, please.

6 I'm going to ask you just to remind yourself, and
7 I can do it quickly, actually, paragraphs 45, 46, 47,
8 48, 49 and 50 are the paragraphs which you weren't taken
9 to and I want to know whether you agreed with them.
10 {INQ038949/10}:

11 "45. My understanding of statutory consultation is
12 that it takes place online ..."

13 Can I just out this in perspective out of fairness
14 to you? This is all about the swiftness that
15 consultation could take place and one of the issues
16 Mr Hipgrave was speaking of when he gave evidence was
17 that consultation would take a little time because it
18 had to be put out for direct consultation and he
19 indicated, and I think I'm recalling this correctly,
20 that for some reason, and we're waiting for his
21 clarification on this, for some reason online
22 communication was not going to happen. And there's some
23 discussion at the moment going on and we'll hear the
24 result of it later as to whether that's a rule or simply
25 a view taken by individuals. I'll be succinct on

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1 paragraph 45. Mr Aldworth says you can undertake online
2 consultation, it's perfectly easy to do, and could be
3 done swiftly. Would you agree from your experience or
4 can't you comment?

5 A. I'm only aware of one consultation process, which was
6 drones. I'm the national lead for countering the threat
7 from hostile drones, and I agree with Nick Aldworth's
8 observation there that that was an online consultation.
9 However, I do know that Mr Hipgrave — as I say,
10 I participated in two round table events in August, so
11 there is definitely some consultation across government
12 departments and local authorities that's already taking
13 place. I'm not entirely sure on what the —

14 SIR JOHN SAUNDERS: Was the drones consultation with a view
15 to primary legislation?

16 A. Yes.

17 SIR JOHN SAUNDERS: And did primary legislation follow?

18 A. Yes.

19 SIR JOHN SAUNDERS: Thank you.

20 MR COOPER: Thank you.

21 Could we scroll down, please? Further down. Again,
22 at paragraph 48 {INQ038949/10}, Mr Aldworth again gives
23 examples of how simple consultation could be and, in
24 a nutshell, says COVID is not an adequate excuse for the
25 delay.

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1 What do you say about that? Do you agree with him?
 2 A. I don't understand the sort of structure of the way that
 3 government consultation has to take place, whether it
 4 has to meet policy requirements or anything legally in
 5 order to do that. But I and Counter—terrorism Policing
 6 were really keen that we move forward with the Protect
 7 duty, so we are very keen to support the consultation
 8 process as soon as that is possible.
 9 Q. I can put my last question succinctly. The delay here,
 10 would you agree, is nothing to do with COVID, it's to do
 11 with effectively getting on with it and sending out the
 12 consultation documents to ministerial departments, isn't
 13 it?
 14 A. I'm not entirely sure what the process is, so I don't
 15 feel able to comment on that.
 16 MR COOPER: All right. I'll leave it there.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR GREANEY: Sir, finally I'm going to ask Mr Butt if he has
 19 any questions.
 20 Questions from MR BUTT
 21 MR BUTT: You were asked some questions about what Ken Upham
 22 had said in his witness statement about "Something is
 23 better than nothing". It's at paragraph 20 that he
 24 references it and he cites a document.
 25 Can we go, please, to {INQ023064/1}?

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1 Do you recognise this as a CTSA tasks from NaCTSO
 2 that goes out to CTSA's and supervisors?
 3 A. Yes, I do.
 4 Q. If we look at {INQ023064/4} of the document, can you see
 5 the paragraph underneath "Completion of PSIA scoring
 6 tool" and what precedes "Something is better than
 7 nothing"? It says this:
 8 "As explained at the launch, no single set of
 9 measures can be expected to fit perfectly across a wide
 10 range of site/venue types without becoming overly
 11 complicated or unworkable. The scoring tool lays out
 12 a broad set of protective security improvement
 13 activities mapped against a set of agreed attack types.
 14 It is appreciated that appropriate measures are dictated
 15 by the type of site being dealt with and that each site
 16 has its own nuances and particular requirements, hence
 17 the 'broad' nature of the measures. Issues of
 18 proportionality, acceptability and achievability amongst
 19 others will dictate levels of protective security.
 20 Something is better than nothing."
 21 Does that reflect the guidance given that every site
 22 has to be assessed individually and in line with its own
 23 nuances with the recognition that proportional activity
 24 needs to be taken?
 25 A. Yes, that's correct.

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1 Q. Can we look at another document, {INQ032510/1}. Do you
 2 recognise this? We've looked at it before. This is the
 3 guidance to sites, which also contains guidance for
 4 CTSA's.
 5 A. Yes, I do.
 6 Q. If we look, please, at {INQ032510/10}. Does it state
 7 here that the list of improvement measures in the PSIA
 8 tool are not exhaustive but are deemed as the most
 9 applicable for use within the crowded places
 10 environment?
 11 A. Yes, it does.
 12 Q. Then over the page at paragraph 3.2, please,
 13 {INQ032510/11}. Does it states here that:
 14 "The examples are not prescriptive or exhaustive and
 15 you should sue your experience and training and local
 16 good practice to determine criteria eligibility"?
 17 A. Yes, it does.
 18 Q. Does that reflect the fact that guidance to and training
 19 of CTSA's stress they had to tailor their advice to the
 20 sites they were dealing with and that the examples in
 21 PSIA were not prescriptive and not exhaustive?
 22 A. Yes, that's the case.
 23 Q. We've heard a lot about training and guidance
 24 in relation to reporting suspicious activity and hostile
 25 reconnaissance. Do you agree that is an important part

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1 of what CTSA's will do?
 2 A. Yes.
 3 Q. And that can be both as part of and additional to
 4 protective security improvement activity within the
 5 tool; yes?
 6 A. Yes.
 7 Q. That training relating to spotting hostile
 8 reconnaissance and spotting suspicious activity would
 9 apply as much to what happens outside a site as it would
 10 to what happens within a site; is that right?
 11 A. Yes, that's correct.
 12 Q. It would be the CTSA's who would deliver packages such as
 13 Project Argus, Project Griffin, wouldn't it?
 14 A. Yes.
 15 Q. Are those training packages separate from the PSIA
 16 process or do they sit within it?
 17 A. They sit within it.
 18 Q. Could we look, please, at one of the Argus stadia
 19 courses that we've heard about that was launched
 20 in May 2016? We're going to look first at
 21 {INQ035598/1}.
 22 Do you recognise this as a NaCTSO bulletin that
 23 would be issued to CTSA's and their supervisors?
 24 A. Yes, I do.
 25 Q. Does it state here in relation to Argus stadia:

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1 "An invitation to key partners will be sent out week
 2 commencing Monday, 7 March 2016 by NCTPHQ. CTSAAs and
 3 CTAAs will be invited to attend and observe in order
 4 that a consistent product can be cascaded nationally."
 5 A. Yes, it does.
 6 Q. So this is NaCTSO telling CTSAAs and CTAAs of the need to
 7 promote the course and attend the course because they
 8 would then be cascading that course nationally, it was
 9 hoped, in a consistent manner?
 10 A. Yes, absolutely.
 11 Q. If we look, please, at {INQ034437/176}. These are
 12 extracts from Counter—terrorism North—west Business
 13 Sentinel documents. Do we see here CTNW, entirely
 14 appropriately, advertising, as they've been asked to,
 15 that launch for Project Argus?
 16 A. Yes.
 17 Q. It says at the bottom:
 18 "If you would be interested in attending similar
 19 events elsewhere in the north—west region, please let us
 20 know by contacting your local CTSA."
 21 A. Yes, that's correct.
 22 Q. Because after the launch event, the CTSAAs would be
 23 cascading that training in their region consistently;
 24 yes?
 25 A. Yes.

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1 Q. Could we look, please, at {INQ032598/4}.
 2 The question I had relates to the PSIA scoring tool.
 3 Does that tool mention Project Argus and Project Griffin
 4 specifically?
 5 A. Yes, it does.
 6 Q. Does it mention Argus and Griffin both to be trained for
 7 guards and also to be trained for staff?
 8 A. Yes.
 9 Q. So a site would be scored in relation to whether this
 10 training was rolled out to those responsible for the
 11 guarding; yes?
 12 A. Yes.
 13 Q. And also in relation to those who are staff within the
 14 organisation?
 15 A. Yes, that's correct.
 16 Q. Coming back to Argus stadia, I think you have mentioned
 17 before that the 2016 course, a course that was launched
 18 in 2016, at the beginning of that year, that was shortly
 19 after the Stade de France and the Bataclan attacks in
 20 2015?
 21 A. Yes, that's correct.
 22 Q. Was it informed in part by those terrible attacks?
 23 A. That's my understanding, that it was, yes.
 24 Q. And at around the same time, in fact shortly beforehand,
 25 had NaCTSO issued the guidance document we've seen a few

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1 times about reviewing protect particular security, note
 2 02/2015, that talked about provisional search outside
 3 a venue?
 4 A. Yes, that's correct.
 5 Q. And that also was in response to the Stade de France
 6 attack?
 7 A. Yes.
 8 Q. If we look at the notes for the Argus stadia launch,
 9 {INQ035521/6}, please. For the reasons we've looked at
 10 already, because this was to be cascaded consistently,
 11 you would expect CTSAAs to be familiar with the content
 12 of this training; yes?
 13 A. Yes.
 14 Q. This training focuses around an exercise, a hypothetical
 15 attack in which those who attend the event are asked to
 16 envisage their own venue, aren't they?
 17 A. That's correct.
 18 Q. And what happens in relation to this training over at
 19 {INQ035521/7}, please, is that there is first one and
 20 then a second egress attack as a crowd is leaving
 21 a stadium and a suicide bomber with a suitcase comes
 22 towards the crowd and detonates; yes?
 23 A. Yes, that's correct.
 24 Q. Does the training specifically state at the top of this
 25 page:

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1 "Consider mentioning an attack could be at any
 2 point, start, during or end?"
 3 A. Yes, it does.
 4 Q. You've mentioned attack methodologies. There are six
 5 attack methodologies within the PSIA tool; is that
 6 right?
 7 A. That's correct.
 8 Q. Those are: non—penetrative vehicle; penetrative vehicle;
 9 person—borne improvised explosive device; placed
 10 improvised explosive device; postal attack; and
 11 a marauding terrorist firearms attack?
 12 A. Yes, that's correct.
 13 Q. You've mentioned that an egress attack is not an attack
 14 methodology?
 15 A. Yes.
 16 Q. Could five of those six methodologies in fact be
 17 delivered by way of an egress attack?
 18 A. Yes.
 19 Q. Can you see any danger in highlighting one particular
 20 timing of an attack such as, for example, an egress
 21 attack within the tools?
 22 A. Yes, I do see a danger in doing that.
 23 Q. Just explain what that would be.
 24 A. I think I've mentioned before that could potentially
 25 mean people would stop looking at potential timings for

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1 that potential attack methodology and they would
 2 over—focus on egress at the expense of other areas.
 3 SIR JOHN SAUNDERS: An example of that might be that the
 4 emphasis on a marauding terrorist gun attack actually
 5 led people not to concentrate as much on other attacks
 6 taking place?
 7 A. But the system has prioritised those six attack
 8 methodologies. So the PSIA does ask people to consider
 9 all six of those.
 10 MR BUTT: A marauding terrorist attack could take place,
 11 just like a vehicle attack or a PBIED attack, at any
 12 time?
 13 A. That's correct.
 14 Q. Beginning, during or end?
 15 SIR JOHN SAUNDERS: It could do, but there is an argument
 16 perhaps that towards the end of 2017 what was being
 17 emphasised to people was to look at an attack, such as
 18 happened at the arena, and then there being a gunman
 19 elsewhere who is doing things so people — it's
 20 a possibility, we haven't looked at it yet — became
 21 over—concerned with that level of attack without
 22 thinking: it could be a lone bomber who's there simply
 23 on his own. That's something we have to look at. That
 24 may be an example of exactly what you're saying that if
 25 you emphasise one means of attack people concentrate on

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1 that and forget about the other ones.
 2 A. I think the sort of national security system was very
 3 much focused on those six attack methodologies and
 4 I think the timing — there is a danger that we all go
 5 to look at egress and suddenly people stop looking at
 6 half time ingress or it could be the coffee shop just
 7 outside that becomes a problem. So I think people need
 8 to consider the attack methodology and the advice that's
 9 there to mitigate it.
 10 MR BUTT: For the six attack methodologies, does the PSIA
 11 tool set out a number of generic measures?
 12 A. It does, yes.
 13 Q. Is one of those, in relation to each of the six attack
 14 methodologies, partnership working?
 15 A. It is, yes.
 16 Q. How important is providing advice relating to
 17 partnership working to the PSIA process?
 18 A. I think it's critically important.
 19 Q. Could we look, please, at {INQ020147/1}? It's
 20 a document you've been taken to before, it's the 2014
 21 updated counter—terrorism advice for stadia and arenas.
 22 If we look, please, at {INQ020147/8}.
 23 It states in the penultimate paragraph:
 24 "It is essential that all the work you undertake on
 25 protective security is undertaken in partnership with

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1 police and your neighbours if your stadium is to be
 2 secure."
 3 A. Yes, absolutely.
 4 Q. And does that guidance to sites — should it enable them
 5 to speak to their neighbours about overcoming difficult
 6 security problems that they encounter?
 7 A. Yes, it should.
 8 Q. And that's something they can receive advice on from
 9 CTSA's?
 10 A. Yes.
 11 Q. You were asked about the extent to which the PSIA
 12 strictly applies within a site or also includes
 13 considerations outside a site.
 14 A. Yes.
 15 Q. I think you have given various examples about certain
 16 attack methodologies that, by definition, relate to
 17 advice outside the site.
 18 A. Yes.
 19 Q. So for example, non—penetrative vehicle attacks are not
 20 going to penetrate the site?
 21 A. Yes, that's correct.
 22 Q. Placed IEDs. Does the guidance and training relate
 23 solely to IEDs placed within a site or also to without
 24 a site? Sorry, without a site.
 25 A. Outside the site.

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1 SIR JOHN SAUNDERS: That's a better word, yes, without and
 2 outside.
 3 A. So it's not restricted to just inside the site.
 4 MR BUTT: If we look at the same document at {INQ020147/19}:
 5 "Avoid the use of litter bins around the stadium if
 6 possible."
 7 A. Yes.
 8 Q. {INQ020147/23}. Does this include guidance in relation
 9 to CCTV, both inside and external to the site?
 10 A. Yes, it does.
 11 Q. {INQ020147/29}. Again, does this relate to search
 12 planning — and down to the bottom of the page,
 13 please — both inside and outside the site?
 14 A. Yes.
 15 Q. {INQ020147/30}. And {INQ020147/32}.
 16 It plainly includes guidance relating to searching
 17 inside and outside the site, litter bins inside and
 18 outside, CCTV inside and outside?
 19 A. It does, yes.
 20 Q. Can I ask you about "Something is better than nothing".
 21 It would be wrong to say, wouldn't it, that there was
 22 somehow a golden age before 2014 when higher standards
 23 were applied than after 2014?
 24 A. Yes, it would be.
 25 Q. You were asked about the thematic board document, the

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1 ACPO document, which is at {INQ035588/1}.

2 Is this the document that was being referred to

3 earlier which includes the phrase you have been asked

4 about, "Something is better than nothing"?

5 A. Yes, it is.

6 Q. Could we look, please, at paragraph 2.3? Because this

7 is where the expression gold standard comes from:

8 "The 2008 model was interpreted and implemented

9 inconsistently across forces in relation to site

10 definition advice delivery and prioritisation of effort .

11 The model was also slow to demonstrate success through

12 vulnerability reduction, owing to reliance on physical

13 measures, such as bollards, that increased vehicle

14 stand-off distance. The willingness of business to

15 engage was reduced by the requirement to achieve

16 expensive gold standards."

17 Is it important to read the reference to "expensive

18 gold standards" in context with the rest of that

19 paragraph?

20 A. Yes, it is.

21 Q. And in particular, in relation to the reference to

22 "a reliance on physical measures such as bollards that

23 increased vehicle stand-off distance"?

24 A. Yes, I think it's really important to read that.

25 Q. We looked at the tasking that Mr Upham references, which

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1 relates to this document, that talks about

2 a site-specific approach and then explains "Something is

3 better than nothing". He also mentioned that this

4 expanded upon the Radius training.

5 Can we look at {INQ035596/14}:

6 "The biggest criticism from the corporate level is

7 wide divergence noted from one force to another.

8 Detrimental to reputation, credibility and willingness

9 to engage. In lots of cases, it's gold standard or

10 nothing. Misses opportunities."

11 Is this training clearly saying the need is not to

12 miss opportunities by insisting upon a gold standard?

13 A. Yes.

14 SIR JOHN SAUNDERS: Mr Butt, speaking entirely for myself,

15 I think I've entirely understood that from Ms D'Orsi's

16 evidence. I think the problem, possibly, arises with it

17 may have been an unfortunate, in retrospect, with

18 hindsight, catchphrase if that's what it became. But

19 I perfectly understand, if I may say so, and I think

20 everybody does, the reasoning behind why it happened.

21 MR BUTT: Final point on this then, please. You mentioned

22 that there would still be instances in which the CTSA

23 would give advice and, if the site were to say, "I don't

24 agree with that", the advice would be given to do what

25 they can, but there would be a record kept on the action

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1 plan of the fact there was a non-agreed action.

2 A. Yes.

3 Q. Can we look, please, at {INQ035577/1}. This is an email

4 sent in July 2014 and there are two names that we

5 recognise, one of the inquiry's expert witnesses, and

6 Liz Forster. If we could go, please, in this email,

7 a little further down.

8 Next page, please, {INQ035577/2}, number 7:

9 "In the case of a not-agreed action but where

10 a compromise (something is better than nothing) has been

11 reached to a non-agreed (recommended) action, this

12 should be recorded and cross-referenced to the

13 non-agreed action."

14 A. Yes, that's correct.

15 Q. So there would be a clear audit trail of the fact that

16 the advice had been given, the response from the site,

17 the agreed action and also the non-agreed action

18 recorded within the action plan?

19 A. Yes. That's correct.

20 SIR JOHN SAUNDERS: And so what? What's the benefit of that

21 when they're perfectly entitled to do what they did?

22 A. I suppose the benefit is that we're not saying that

23 we've lowered our requirement, we've said that this was

24 our requirement, the site has chosen to do something

25 different, and for me it's due diligence in terms of

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1 record keeping.

2 MR BUTT: Does it show the advice is still given?

3 A. Yes, absolutely.

4 SIR JOHN SAUNDERS: It's not a litigation strategy?

5 A. No, definitely not.

6 MR BUTT: Can I finally ask you this: you were taken to your

7 evidence in London Bridge in which you said that CTSA's

8 were amongst the highest trained or were the highest

9 trained counter-terrorism police officers. Do you stand

10 by that evidence?

11 A. Yes, I do. I think they do an amazing job. I'm very

12 proud of the CTSA's and the CTAA's and all their

13 supervisors. They work tirelessly to provide advice,

14 tailored advice, bespoke advice, whatever you want to

15 call it, but they work really hard to keep the public

16 safe.

17 Q. In relation to the names we've heard in this case and

18 also to many others, we've heard there are around 200.

19 A. Yes, absolutely, everybody involved comes to work and

20 works very hard to a good job.

21 Q. Is there anything else you would like to say?

22 A. So probably the only thing really for me is seeing the

23 families here today, it's been a really humbling

24 experience, and I would like to say that my thoughts

25 will always be with you very much.

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1 SIR JOHN SAUNDERS: Okay. I don't intend to detract from
2 that, because that would be a good time to stop, but can
3 I just ask this: CTAs are not going when an event is
4 taking place, they're going there to go through on
5 a PSIA what happens, what the protections are, and often
6 taking what is said to them as being what is actually
7 happening. The operation of a system can be entirely
8 different from what is actually written down and it's
9 the operation, how the people do the job, which actually
10 matters.
11 A. It is.
12 SIR JOHN SAUNDERS: So what is the problem about CTAs
13 getting out and being there at an event and actually
14 seeing how the people do the job?
15 A. The training is not really geared towards that. The CT
16 security coordinators have more experience but there's
17 far fewer of them nationally; they are working very
18 closely on policing events.
19 SIR JOHN SAUNDERS: Let me stop you. If I understand the
20 difference, they are dealing with a policing event, so
21 you have something going on which needs police, so
22 you have to have a security adviser who says we need X
23 policemen here --
24 A. A security coordinator.
25 SIR JOHN SAUNDERS: Who says we need so many policemen

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1 there, we need to put them there, we need to make sure
2 this and that happens.
3 A. Not entirely. I work with a lot of people in events,
4 a lot of senior officers who will be making those
5 decisions around the number of resources that are
6 required. I suppose if I give a non-contentious
7 example, which the public would recognise, if you take
8 guard change, which takes place routinely as we know,
9 there is -- in terms of applying these attack
10 methodologies, there are measures that could be put in
11 place such as hostile vehicle mitigation, various other
12 tactics, and the counter-terrorism security coordinators
13 will recommend that to the Gold and Silver Commanders
14 and then that would be put in place. The number of
15 officers, whether I require 100, 200, 300 is not --
16 SIR JOHN SAUNDERS: It's not beyond the wit of man to train
17 CTAs if they need to so they know the theory to go and
18 look at something in practice.
19 Let me take an example. You ask the people at the
20 site: does your CCTV cover everything and do you have
21 them doing it all the time, proper CCTV coverage? They
22 say yes and it is marked in as whatever in the
23 scoreboard. Actually it may be, and I'm not saying for
24 definite, but it may be that, if you had gone to the
25 arena and actually seen it, you might discover (a) there

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1 is a fairly important blind spot and (b) actually during
2 events people are not covering CCTV all the time, so
3 then the difference between the theory and the practice
4 could be demonstrated. What's the problem with that?
5 A. So it's not -- I would never sit here and say that
6 resourcing is an issue because everything around
7 resourcing with the right funding is resolvable. This
8 is about an assurance process. I'm not so sure that
9 necessarily needs to be counter-terrorism security
10 advisers. I think that's really whoever is leading the
11 security for that site, if they know what they should be
12 putting in place, they should be checking that it's
13 happening.
14 SIR JOHN SAUNDERS: It's quite nice to have the check of
15 these extremely experienced, very well-qualified, very
16 capable people from an objective point of view.
17 A. And of course I'm very proud of my people and what they
18 deliver, but there are equally experienced -- there are
19 very experienced and qualified people within the
20 commercial sector that could provide that level of
21 assurance to an event at a particular site. That
22 happens all the time. Certainly on some of the bigger
23 events, I work in a multi-agency way. I recently led
24 the policing operation for NATO and that involves a lot
25 of commercial providers with the operation that we were

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1 a part of. I'm not checking their plan, they're not
2 checking my plan, but we are working in partnership to
3 know that we are both doing what we have agreed that we
4 are going to do.
5 SIR JOHN SAUNDERS: Of course resourcing affects everything.
6 Would the fact that you'd need to be employing people at
7 night have an effect on that?
8 A. No, but obviously pay terms and conditions all have to
9 get considered into the mix. I think the role of the
10 CTSA is very clear. I think this would be a development
11 on their role. I'm not necessarily sure that to provide
12 assurance we need to use the CTAs, but I understand the
13 point about we all feel better if we have got some
14 assurance. I think that's the role of the site operator
15 to assure themselves that what they think the risk
16 assessment has said and their operational plan should
17 deliver, they need to assure themselves that that is
18 happening.
19 SIR JOHN SAUNDERS: Thank you.
20 MR BUTT: I'm very sorry, sir, there was one other matter
21 which I should have mentioned.
22 You were asked about whether the 2014 guidance
23 covered X-ray machines and metal wands. We looked at
24 a document and you agreed it did not. You were then
25 asked by Mr Horwell about the drop down menus on the

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1 Excel spreadsheet and I think you broadly accepted from
 2 him that those menus did mention X-ray scanning and also
 3 metal wands.
 4 A. I'm sensing I've got that one wrong, probably.
 5 Q. It's not for me to answer the question. Did you see the
 6 evidence of Liz Forster?
 7 A. I did listen to her, yes.
 8 Q. Do you recall that she was asked about PAS127 and she
 9 said:
 10 "That is also contained in the drop down menu to the
 11 Excel spreadsheet"?
 12 A. Yes, that's correct.
 13 Q. If we just very briefly look, please, at PAS127, which
 14 is at {INQ032108/12}.
 15 Does it clearly here set out in the flow diagram --
 16 A. Yes.
 17 Q. -- those potential security measures?
 18 A. Yes, it does.
 19 Q. Would you expect this to come as a surprise to an
 20 experienced venue operator?
 21 A. No.
 22 MR BUTT: Thank you very much.
 23 MR GREANEY: Sir, I have no further questions. In a moment
 24 I'll ask you to rise so we can take our break. But
 25 first of all, I wanted to deal with three short matters

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1 relating to the evidence tomorrow and I wonder if
 2 DAC D'Orsi would mind just bearing with us whilst I deal
 3 with those matters.
 4 SIR JOHN SAUNDERS: Okay.
 5 MR GREANEY: Sir, first of all, the security experts will
 6 return to give evidence tomorrow. The experts met on
 7 23 November to consider the key issues in chapter 7.
 8 A note of that meeting was made by members of the
 9 inquiry legal team and has been agreed by the experts
 10 and has now been disclosed. That document will form the
 11 basis for CTI's questioning of those witnesses tomorrow,
 12 with just a small number of additional issues to be
 13 explored.
 14 Secondly, the inquiry legal team's view of the order
 15 for questioning of the experts is that the most
 16 appropriate course, given the state that we have
 17 reached, is that those who raise criticisms of the
 18 security arrangements or at any rate raise concerns
 19 about it should come before those who are criticised or
 20 about whom concerns have been raised. That will produce
 21 the following result: CTI, of course, will go first ;
 22 second, the bereaved families; third, any other CP, save
 23 for those I am about to mention; fourth, CTPHQ; fifth,
 24 GMP; sixth, BTP; seventh, Mr Agha; eighth, Mr Lawler;
 25 ninth, ShowSec; tenth, SMG.

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1 Of course, if something truly surprising emerges
 2 later down the order, then those who have been higher up
 3 the order can always seek your permission, sir, to pose
 4 further questions, although equally they will no doubt
 5 bear in mind that this should not become a tit-for-tat.
 6 The other or alternative way in which they could deal
 7 with such a situation is by inviting CTI to ask their
 8 questions for them at the very end of all questioning.
 9 That's the second issue.
 10 Thirdly and very shortly, for good reason, that it's
 11 not appropriate to mention at least at the moment,
 12 we will need to rise for a period at 11.30 tomorrow.
 13 SIR JOHN SAUNDERS: Thank you. Right, we'll now have our
 14 break. Is 10 minutes sufficient or do we never make
 15 10 minutes?
 16 MR GREANEY: Can we try to achieve 10 minutes on this
 17 occasion, please?
 18 SIR JOHN SAUNDERS: Just after 4 o'clock.
 19 You told us that everyone likes to see the police,
 20 so thank you for coming and for coming on so many
 21 occasions.
 22 (3.52 pm)
 23 (A short break)
 24 (4.02 pm)
 25 MS CARTWRIGHT: The gentleman in the witness box is

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1 Mr Weightman. Can I ask that he be sworn, please?
 2 MR RIK WEIGHTMAN (affirmed)
 3 Questions from MS CARTWRIGHT
 4 MS CARTWRIGHT: Good afternoon, Mr Weightman. Could you
 5 give your full name, please?
 6 A. Richard Anthony Weightman.
 7 Q. Could you start by giving us a brief overview of your
 8 career history, please?
 9 A. I have been a freelance production manager/production
 10 person since 2006. I was then employed by Live Nation
 11 to do procurement in 2018, November. I then changed
 12 role in November 2019 to production management and then
 13 I have moved back to be a freelancer since the end of
 14 September this year.
 15 Q. Thank you. I'm going to come to deal with a little more
 16 detail in respect of that role as a freelance promoter.
 17 You should have a witness statement bundle in front of
 18 you. We can see behind tab 1 your first statement dated
 19 19 December of 2019. Are the contents of that statement
 20 true to the best of your knowledge and belief?
 21 A. Sorry, which part?
 22 Q. The first statement. Is the content of the whole of
 23 that witness statement true to the best of your
 24 knowledge and belief?
 25 SIR JOHN SAUNDERS: We hope it applies to all of the

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1 statements.
 2 A. It does. Obviously the first line is now incorrect.
 3 It's changed in the last month or two.
 4 MS CARTWRIGHT: We can see you have given two further
 5 statements dated 8 July and 19 October this year,
 6 broadly speaking, to address matters raised by the
 7 security expert report.
 8 A. Correct.
 9 Q. Are the contents of those statements true to the best of
 10 your knowledge and belief?
 11 A. Yes.
 12 Q. I'm not going to take you into the detail of some of the
 13 observations you have made upon the security report, the
 14 learned chair has all of that information, but I wonder
 15 if you could first of all assist us in understanding
 16 a little bit more in terms of the various parties and
 17 bodies that we've heard about.
 18 A. Sure.
 19 Q. First of all, you have described how, in May 2017, you
 20 were acting as a freelance promoter's representative.
 21 A. Yes.
 22 Q. Could you please give us a little more detail about what
 23 that actually means and what that role is, please?
 24 A. Sure. The best way to probably describe it is to --
 25 there's three main parties to putting on a concert,

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1 which is the artist, or we sometimes call it the tour,
 2 just for reference, and then you have the promoter, and
 3 then you have the venue. They are the three main -- the
 4 promoter's rep falls under the promoter and what the
 5 promoter's rep does is they do the groundwork and the
 6 logistics, acting as a conduit or a liaison between the
 7 tour and the arena or other interested parties where
 8 additional equipment is required or such a thing.
 9 Q. Thank you. Can we perhaps put a little more meat on the
 10 bones in respect of the various parties and bodies. We
 11 know that the artist is Ariana Grande?
 12 A. Correct.
 13 Q. The tour was the Dangerous Woman Tour?
 14 A. Yes. But the tour and the artist is -- when they are
 15 referred to as "the tour", they're the same people.
 16 Q. And then there's a separate company, that is essentially
 17 the tour, is it the Ari Grande Company?
 18 A. I'm not sure.
 19 Q. Okay. Then you were at the time being contracted by
 20 Live Nation, who are the promoter?
 21 A. Yes.
 22 Q. And separate to that you've already described the venue?
 23 A. Yes.
 24 Q. And in respect of the matters with which you are
 25 assisting this inquiry, the venue is essentially the

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1 arena?
 2 A. Manchester Arena, yes.
 3 Q. Thank you. So then can you also assist with a few other
 4 individuals who I think your evidence touches upon just
 5 so you can assist in locating which of those three
 6 bodies, so to speak, they sit within? We're going to
 7 hear information about a Bob or a Robert Fontenot?
 8 A. Yes.
 9 Q. Can you assist as --
 10 A. He's in the Ariana Grande group of individuals.
 11 Q. In terms of his role, he's referred to as the
 12 Ariana Grande security manager or the venue security
 13 director. Can you just help us understand a little bit
 14 more about those roles, please?
 15 A. He's employed by Ariana Grande on this instance to look
 16 after her well-being and her safety. The tour security
 17 is split into two groups, one being a group of people
 18 that go around with the artist physically, so they're
 19 attached to wherever she is; he goes into the venue and
 20 deals with the arrangements prior to her arrival and
 21 that's why he's called the venue security director. He
 22 doesn't work for the venue or represent them in any way.
 23 Q. I think it's right this was a worldwide tour?
 24 A. It was.
 25 Q. And so would he follow the tour throughout Europe and

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1 internationally?
 2 A. He goes wherever the tour goes.
 3 Q. Thank you.
 4 We can also see that we have a production manager
 5 who is referred to as Omar Abderrahman?
 6 A. Yes.
 7 Q. Can you assist --
 8 A. He's with the Ariana Grande group of people.
 9 Q. Thank you. Then we've also received a statement from
 10 Kelly Chappel.
 11 A. Yes.
 12 Q. I understand she's part of Live Nation?
 13 A. She's Live Nation.
 14 Q. As the promoter?
 15 A. Correct.
 16 Q. There's also a Steve Hutchinson?
 17 A. He's Live Nation again. He stayed with the tour for the
 18 whole international duration in a similar role to the
 19 promoter rep role.
 20 Q. Thank you. Then we've also seen reference to an
 21 Anna Sophie Mertens.
 22 A. She's the promoter just for the UK part.
 23 Q. Thank you.
 24 In terms of you being employed as a self-employed
 25 promoter representative, were you just within the UK?

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1 A. Yes.
 2 Q. So would you have been responsible for the concerts that
 3 were put on in Birmingham on 18 May?
 4 A. Yes.
 5 Q. And you were planning to do obviously the concert — you
 6 did do the concert on 22 May?
 7 A. Yes.
 8 Q. And I think it's right that there were two further dates
 9 that were going to occur at the O2?
 10 A. Which didn't happen, yes.
 11 Q. Thank you.
 12 Then can I ask you, there's another individual,
 13 Roshad Ismail who's provided a witness statement. Can
 14 you help us as to how he fits into the relationships,
 15 please?
 16 A. He's the tour manager for Ariana Grande, so he manages
 17 that group of people as a whole. So he will be Bob and
 18 Omar's — he's their manager for the tour.
 19 Q. Thank you. Then can you assist as to what actually the
 20 promoter's responsibility is in respect of when they're
 21 employed, as they were by the tour? What actually is
 22 the promoter doing as part of the contract arrangements?
 23 A. The promoter isn't employed by the tour. The promoter
 24 makes an offer to the tour based on a number of
 25 concerts. So they will say, for in this case three

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1 dates, this is the amount of fee we can pay for those
 2 three dates, and they will have a contract with the
 3 artist, so they're more partners rather than employed,
 4 and then they will separately contract each of the
 5 venues to — so they're then in the middle of the whole
 6 deal.
 7 Q. I think it has been described as they act almost as the
 8 go-between between the tour and the venue?
 9 A. Yes, because they have contracted with the venue and
 10 they have contracted with the artist, so the venue and
 11 the artist don't have a direct link.
 12 Q. I'm going to take you in due course to the security
 13 rider and then a separate document that you played
 14 a role in in respect of security information. But
 15 can you assist the inquiry just to understand in
 16 a little more detail what your role is as the promoter's
 17 representative in respect of security arrangements and
 18 particularly here for Manchester Arena's concert,
 19 please, the Ariana Grande concert?
 20 A. I'm simply passing information back and forth from the
 21 tour or the security director for Ariana Grande to the
 22 venue and then the response back from the venue to the
 23 tour.
 24 Q. Would there be any relationship between any of the other
 25 individuals directly with the arena about security or

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1 are you the sole conduit for that?
 2 A. For the advancing period, ie the point prior to where
 3 the tour are physically in the building, it would
 4 normally go through myself and once they're in the
 5 building they talk directly.
 6 Q. So when you say, "Once they're in the building they talk
 7 directly", I think we can see that the tour doesn't
 8 arrive until the very early hours of 22 May; is that
 9 correct?
 10 A. That's correct.
 11 Q. So up until the very early hours of 22 May, all the
 12 discussions would have been taking place between you;
 13 is that correct?
 14 A. Via me, yes.
 15 Q. Can you then clarify one document? I think it's
 16 something you address in your witness statement.
 17 There's a document that you have produced which you say
 18 doesn't really assist because it's out of order about
 19 what you would expect ordinarily. I wonder if you could
 20 just use that document to assist us, please.
 21 If I could ask, Mr Lopez, to please bring up
 22 {INQ020167/1}. Have you had an opportunity before today
 23 to refresh your memory from that email?
 24 A. Yes.
 25 Q. It's an email from Steven Hutchinson, directly to

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1 Thomas Bailey, who the inquiry have already heard
 2 evidence from, who was one of the joint heads of
 3 security at the arena employed by ShowSec. We can see
 4 that Mr Hutchinson is introducing Tom Bailey to
 5 Bob Fontenot, the touring venue security director, and
 6 indicates:
 7 "Tom is your security contact for the show in
 8 Manchester UK."
 9 And then provides a zip of documents that include
 10 the security rider, stage deployment, pass sheet and
 11 local information sheet. Could you just help us
 12 understand how this email fits with what was the usual
 13 practice and procedure, please?
 14 A. It wasn't usual practice or procedure. I think this was
 15 Steven Hutchinson's first international tour, so it
 16 might have been just that he didn't know what the normal
 17 procedure was in this instance. Usually, the
 18 information would go from ourselves to the venue because
 19 the venue contract ShowSec, so it wouldn't be us sending
 20 the information in this manner in a normal situation.
 21 Q. Just using this document, please, for a moment, we can
 22 see that one of the documents that reference was
 23 provided in the zip folder was the security rider which
 24 I'm going to take you to shortly.
 25 A. Yes.

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1 Q. So would you have expected at that point anything else
 2 to be happening when those sorts of documentation are
 3 being provided directly to the venue security
 4 contractor?
 5 A. I wouldn't normally have expected it to be sent in this
 6 manner. It would be a conversation between us and the
 7 venue and then they instruct their security teams
 8 following on from those conversations. So I wouldn't
 9 have expected a response from Thomas Bailey at this
 10 point other than maybe for him to forward it on to
 11 Miriam Stone, who would have been the correct contact.
 12 Q. You have mentioned Miriam Stone. So in terms of her
 13 role, was she your point of contact at the venue?
 14 A. She was, yes.
 15 Q. And I think we're going to look at some emails that you
 16 and her sent in respect of security arrangements.
 17 Just for completeness, when this email was sent and
 18 you were copied in into it, would you have said anything
 19 to either Steven Hutchinson or Thomas Bailey to say,
 20 "Steven, that's not the way you go about it", or, "That
 21 will be dealt with in the fullness of time"?
 22 A. I can't remember.
 23 Q. Okay.
 24 I think we can then see, if we perhaps then look at
 25 your role in respect of the security rider, which

1 I could take you to, this is a document you then
 2 separately provided to Miriam Stone on 26 April. If
 3 I could just ask, please, if that document could be
 4 brought up, Mr Lopez. {INQ029106/1}.
 5 If we move nearer the end of the month where we see
 6 you, on 26 April, emailing Miriam Stone and a number of
 7 others. Can I ask you, have you had an opportunity
 8 before today to refresh your memory from that email?
 9 A. I have.
 10 Q. I'm not going to read all the contents of the email, but
 11 we can see, as part of this email to Miriam Stone, you
 12 provide a number of attachments. I'm going to ask you
 13 if you can assist us with a number of documents,
 14 included in the attachment, but I want to ask you
 15 principally about is the security rider. I wonder,
 16 before moving to deal with that, if you could assist us
 17 with another couple of documents and what they are
 18 before we turn to look at the security rider and the
 19 local information sheet.
 20 First of all, could you just explain to the
 21 chairman, please, the stage deployment plan and what
 22 that is.
 23 A. That was a document that was received from the tour, so
 24 from Ariana Grande's personnel, which would have shown
 25 where they wanted security personnel in front of stage

1 positions. So it will show literally where they want
 2 the number of people to protect the stage from the
 3 crowd.
 4 Q. Who would have advised in respect of the stage
 5 deployment plan?
 6 A. That would have come from Bob Fontenot and gone to
 7 the -- indirectly to ShowSec via Miriam and via the
 8 venue.
 9 Q. Would you have any role or responsibility in respect of
 10 that stage deployment plan?
 11 A. No.
 12 Q. The pass sheet then. Could you assist us as to what
 13 a pass sheet is, please?
 14 A. There's controlled areas of the building where they only
 15 want the artist or the artist's crew to have access. In
 16 order to get into those areas they have little pieces of
 17 plastic laminated passes and the pass sheet is simply
 18 saying what those passes do and where they can and
 19 cannot get into. So you have passes to get into the
 20 backstage area, passes to take photos of the concert,
 21 et cetera, et cetera. That's just to show what those
 22 passes are and what they do.
 23 Q. Thank you. Then I'm going to ask you just to explain
 24 the security rider and the local information sheet, but
 25 then I want to look in detail at the actual security

1 rider please.
 2 Can you give an overview of what the security rider
 3 is and what the purpose of that document is as well as
 4 who the author is? Sorry, there are three questions in
 5 one.
 6 A. The author is Bob Fontenot again. It's an overarching
 7 document of what they would like the venues to have in
 8 place prior to the show's commencement. So it's an idea
 9 of how they want the building to be set up for the
 10 artist's safety. Sorry, I forgot the second part of
 11 your question.
 12 Q. You have described what it is and you've described the
 13 author. In terms of its purpose?
 14 A. It's to get the information to the venue ahead of them
 15 physically being in the venue. So it's a specification
 16 of what they would like to happen before they arrive.
 17 Q. Can I ask then, when the security rider is provided to
 18 you, is that a document that you would comment upon?
 19 A. No, we would literally forward it on in its entirety.
 20 Q. Is that what you're doing in the email we see of
 21 26 April 2017?
 22 A. Yes.
 23 Q. Then would there be any sense checking of that document
 24 by you?
 25 A. No.

1 Q. Do you know whether there would be sense checking by
 2 anyone in particular of that document?
 3 A. What would normally happen would be the venue would go
 4 through the document and they'd say what they can and
 5 cannot do, because some of it may not be possible or
 6 some of it may. There may be additional information
 7 required to get things in place. So that would all be
 8 done by the venue and then they would pass back comments
 9 to myself, who would pass it back to the tour.
 10 Q. Thank you. We'll look in a minute at a dialogue that
 11 takes place over emails between you and Miriam Stone
 12 about that security rider.
 13 A. Yes.
 14 Q. Then can I ask you, just at this stage, to explain what
 15 the local information sheet is, and again it's
 16 a document I'm going to take you to.
 17 A. It's a document -- again, that template is from the
 18 tour, so Bob Fontenot or one of his people had made the
 19 document in the first instance. It's so that they can
 20 get an idea on local -- where the nearest local hospital
 21 is, where the nearest local police station is, just
 22 local information. They get one of those for each venue
 23 to go to. I'm not sure what they do with it, but that's
 24 information they ask for.
 25 Q. In terms of the local information sheet you're

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1 indicating it's venue specific?
 2 A. Yes.
 3 Q. Obviously because, depending on which venue, things like
 4 the hospitals nearby will change. Who is it intended
 5 will actually physically have that document and review
 6 it as a ready reckoner almost?
 7 A. We pass it on to the venues because they're best placed
 8 to fill in that sort of information. They fill in the
 9 information and then we pass it back to the tour.
 10 Q. Would that be a document then that the venue would
 11 provide to their security staff?
 12 A. No. I don't think the venue would necessarily do
 13 anything about that document. They fill it in, pass it
 14 back to the tour, and that's usually, I would imagine,
 15 what they do with it.
 16 Q. So then to understand how the tour, from your
 17 experience, would use that document?
 18 A. I don't know how they use that document.
 19 Q. Okay. So your role then in respect of completion of
 20 a local information sheet then? What are you told when
 21 you have to complete it? Why are you the person tasked
 22 to do that rather than someone else?
 23 A. It it's not necessarily I'm being tasked with completing
 24 it, they just -- all the information is passed through
 25 the promoter's rep, so it's generally saying: can you

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1 get this completed? Whether you do it or whether
 2 someone else does it doesn't matter, they just want the
 3 information back so they're not necessarily implying it
 4 should be me filling it out, they just want the
 5 information completed by someone who knows the answer.
 6 Q. How soon to the concert taking place would that
 7 information sheet be completed?
 8 A. It varies. I think in this instance the sheet was
 9 actually done on the date of the show. So something
 10 went awry there. It can be done weeks beforehand or
 11 days beforehand. It's just information for them to have
 12 to hand.
 13 Q. Thank you. Can I take you to the security rider to see
 14 if you can assist us at all with the contents? A number
 15 of witnesses have been asked questions about it and what
 16 some of the terms mean. I appreciate it's not your
 17 document but I wonder whether you can cast any light as
 18 someone who would circulate that as a document, please.
 19 {INQ020164/1}, please, Mr Lopez.
 20 Can I check as well, Mr Weightman: is this
 21 a document again you've had a document to review before
 22 today?
 23 A. Yes.
 24 Q. So can I ask for clarity, if you can clarify, first of
 25 all. We can see on page 1, it's a security rider. I'm

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1 not asking, Mr Lopez, for you to go there at the moment,
 2 but on the final page of that document we can see the
 3 author of it is "Bob Fontenot, venue security director".
 4 Could you explain -- first of all, on page 1 of that
 5 document, we can see it says:
 6 "Please make sure that the security knows that they
 7 work under the direction of the security manager and the
 8 venue security director."
 9 A. Mm--hm.
 10 Q. So the production manager is Omar Abderrahman; is that
 11 correct?
 12 A. Yes, it is correct.
 13 Q. And the venue security director, we know, is
 14 Bob Fontenot?
 15 A. Yes.
 16 Q. So what does that actually mean in terms of the
 17 security? Who are the security working under the
 18 direction of those two individuals?
 19 A. It doesn't mean anything, I don't think, because ShowSec
 20 will know that they're employed by Manchester Arena. So
 21 it's... I think it implies they would like to be able
 22 to give direction, but the reality of it is it doesn't
 23 mean anything.
 24 Q. Would that be something then -- so for example
 25 Manchester Arena receiving this document, would they

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1 know that was not meaning anything?
 2 A. Correct.
 3 Q. Could I ask you then, please, to turn over the page to
 4 {INQ020164/2}. We can see under "security requirements"
 5 there, the following is written:
 6 "Purchaser shall maintain full and adequate security
 7 arrangements and is responsible for the protection of
 8 artist , artist 's employees, agents, instruments and
 9 personal possessions."
 10 Can you assist as to who is the purchaser for the
 11 purposes of this document?
 12 A. That would be the promoter.
 13 Q. So in terms of this document saying that the promoter
 14 shall maintain full and adequate security arrangements,
 15 can you assist as to that, please?
 16 A. It's to do with the way that the contracts are. So
 17 they're talking about the purchaser as if it's the
 18 promoter, but the promoter then passes that on to the
 19 venue to arrange the security arrangements. So the
 20 purchaser will be, in the artist 's mind, the promoter
 21 and then the promoter passes that request to the venue.
 22 Q. If you can look a little further down that document,
 23 we can see that there's a number of items that are
 24 indicated shall not be permitted in the venue in
 25 accordance with the security rider . In particular ,

217

1 weapons or laser pointers of any kind.
 2 A. Mm—hm.
 3 Q. So can I ask you in terms of specific items. We see
 4 professional cameras. How is that then communicated to
 5 those tasked with managing security about those being
 6 prohibited items?
 7 A. Some of it will be done through the security briefing
 8 that happens on the show day. How it gets passed
 9 internally , I am not sure. But this document is
 10 obviously passed on to the venue as well so they will
 11 receive it in its entirety .
 12 Q. I'm going to ask you a little later about the security
 13 briefing because I think you were present at that on
 14 22 May.
 15 A. Yes.
 16 Q. So can I ask, because when we come to look at the local
 17 information sheet in a moment that does actually have
 18 a section for prohibited items, we don't see weapons or
 19 laser pointers contained within that. Why would they
 20 not be specified in the local information sheet?
 21 A. I don't know.
 22 Q. Can you assist then with you being present at the
 23 security briefing? Was it specifically indicated as
 24 part of that briefing that no weapons or laser pointers
 25 were part of prohibited items?

218

1 A. I can't remember the exact conversation because it
 2 wasn't an unusual briefing . These happen at every
 3 single show, so it wasn't unusual to have a security
 4 briefing . But they will have gone through prohibited
 5 items at some point. The meeting is driven by
 6 Bob Fontenot talking directly to the venue, so I am
 7 present rather than leading or really having heavy
 8 involvement.
 9 Q. It may seem obvious from the description, but can you
 10 describe what is a laser pointer and why is that
 11 a prohibited item?
 12 A. It 's one of those things you can click and a laser beam
 13 comes out. They normally prohibit them because they
 14 will be used by the crowd to try and get the attention
 15 of the artist and so they don't want people shining
 16 lasers in the artist 's eye.
 17 Q. Would that be something that you'd expect to be
 18 specifically briefed to stewards doing bag searches or
 19 bag checks to be looking for laser pointers?
 20 A. Yes. And the venue will have their own prohibited items
 21 list as well .
 22 Q. Staying with this document, please, could I ask you to
 23 turn over the page {INQ020164/3}. We can see that
 24 there's a section of the rider that specifically deals
 25 with first aid and medical provision at the venue.

219

1 Can you explain as to how that fits with the security
 2 rider , please?
 3 A. I can't explain how it fits . It just -- they happen to
 4 have put it in this document rather than a separate one.
 5 Q. Just a little further down the page, on {INQ020164/3} of
 6 that document, we can see for personnel, this is
 7 recorded:
 8 "The show producer/promoter shall provide adequate
 9 staffing for the front of house as well as backstage.
 10 All positions should be directed as follows. Show
 11 producer/promoter shall ensure the protection of all
 12 tour property. Security staff shall be provided prior
 13 to loading."
 14 So can you assist as to the role of the show
 15 producer/promoter in respect of adequate staffing in
 16 your understanding, please?
 17 A. Again, this is the document pointing towards the
 18 promoter, but all of this gets passed on to the venue
 19 and their security arrangements.
 20 Q. So in terms of responsibility for front of house
 21 staffing , who in your experience was responsible for the
 22 front of house staffing ?
 23 A. The venue.
 24 Q. Did the promoter that you were the representative for
 25 have any role in respect of front of house staffing ?

220

1 A. No.
 2 Q. Can you assist us then with this next phrase, which was
 3 a phrase that was asked whether someone could explain
 4 with an earlier witness. In respect of searches, this
 5 is recorded:
 6 "The show is requesting bag checks and metal
 7 detectors upon entry at the discretion of the venue as
 8 security and supervisor's house policy."
 9 Can you assist us as to what that means, please?
 10 A. I never asked Bob what that specific sentence meant, so
 11 I can only give you my understanding of what that
 12 sentence is pointing at.
 13 Q. Please.
 14 A. Their preference would be that there were metal
 15 detectors or equivalent at the search lanes coming into
 16 the building and that bag searches are done, but all
 17 within the standard venue policy.
 18 Q. So when a venue doesn't have a metal detector, how does
 19 that fit with the security rider?
 20 A. That's why you end up having a conversation about how he
 21 wants to handle it because it's not a standard venue
 22 policy, so you need to work out which way they want to
 23 go from there.
 24 Q. You say it's not a standard venue policy. Are you able
 25 to assist us as to the venues that you were involved in

1 on this Ariana Grande tour, namely the O2, Birmingham
 2 and the arena, did any of those have metal detectors
 3 upon entry?
 4 A. Only the O2.
 5 Q. Can I ask you -- we can see there's a requirement for an
 6 explosive ordinance sweep, a dog sweep. Can you assist
 7 as to your role in respect of organising that to take
 8 place?
 9 A. Again, it was passed to the venue to organise on our
 10 behalf.
 11 Q. So having forwarded that to Miriam Stone, I think that
 12 then started a dialogue. I want to just then, please,
 13 take you through the conversation that you had with
 14 Miriam Stone just to understand then how that translated
 15 as to what the venue itself was going to provide by way
 16 of searches and bag checks.
 17 So I'm going to ask you, please, if we could use
 18 INQ01623/1 (sic), please. This is a chain of emails and
 19 the latest in time of 18 May is the first one we see.
 20 But I'm going to take you, please, to ...
 21 SIR JOHN SAUNDERS: That didn't have enough numbers in it.
 22 Can you give us the reference again?
 23 MS CARTWRIGHT: Sorry, I do apologise. It should be
 24 INQ01623. If not, we'll use a different document. I do
 25 apologise. {INQ001623/1}.

1 We can see that that email exchange finishes on
 2 18 May. Have you had an opportunity to review these
 3 exchanges of emails?
 4 A. I have.
 5 Q. Can we please then move, Mr Lopez, to {INQ001623/5},
 6 please.
 7 We can see then, on 5 May, Miriam Stone is giving
 8 a response to the rider and also in respect of draft
 9 costs. So I think this is what you described as the
 10 dialogue that takes place then between the promoter and
 11 the venue in respect of the security rider?
 12 A. Exactly, this is the information coming back.
 13 Q. I'm not going to take you through all of that email
 14 exchange. If I could ask you then, please -- we can see
 15 that the discussion that's then taking place is in
 16 respect of whether or not there's going to be wandering.
 17 So if we move, please, to {INQ001623/3}, we can see on
 18 the same day your email to Miriam Stone at 19.07 at the
 19 bottom of that page.
 20 If we move over the page, please, {INQ001623/4},
 21 I want to ask you about the "floor decant/security".
 22 Specifically, I think we see your response with extra
 23 text that Miriam's added in as well in response to that.
 24 A. Yes.
 25 Q. So as of 5 May, it's indicated you ask the question:

1 "Do you use magnetic wands on the doors as
 2 standard?"
 3 To which Miriam Stone responds:
 4 "We don't as standard, but we do have them. W would
 5 need to add a couple of people per door to do a random
 6 wandering and a lot of people to do a full wandering."
 7 A. Yes.
 8 Q. So could you assist us as to what happens after that in
 9 terms of you going back to Bob Fontenot about that,
 10 please?
 11 A. I think at that point I just said to Bob that we needed
 12 to have a discussion about what he wanted to do as
 13 Manchester and Birmingham both didn't do the wandering as
 14 standard.
 15 Q. And what was Bob Fontenot's response in respect of that?
 16 A. I can't remember the exact wording, but I think he
 17 wanted to find out -- he was surprised they didn't do
 18 the wandering and then asked about pat-downs.
 19 Q. Why was Bob surprised that Manchester Arena didn't do
 20 and Birmingham didn't do wandering?
 21 A. I think he generally sounded -- he wanted to check what
 22 searches they did do if they weren't doing wandering, is
 23 probably a better way of putting it.
 24 Q. If I can get that email exchange as well for
 25 completeness. Could I ask that we move to another

1 document? {INQ034474/9}.

2 I think again these are emails that were exhibited

3 to your second witness statement, so have you had an

4 opportunity as well to refresh your memory from these?

5 A. I remember these, yes.

6 Q. So we can see on 5 May, in fact before your email to

7 Miriam Stone, at 2.48 pm, at the bottom of the page, and

8 if we move over the page, {INQ034474/10}, we can see for

9 "Customer searches", you indicated:

10 "No issues whatsoever with bag searches. The only

11 thing that may cause additional charges would be if

12 you're needing the venues to get magnetic wands in where

13 they don't do this as standard. I am clarifying what

14 you would like them to do in regards to that."

15 A. This is Bob?

16 Q. This is his response, I apologise. It's in fact on

17 10 May that he adds his responses. He told you:

18 "So are telling (sic) they at least don't do

19 a pat-down? Bags are fine."

20 So he was asking then for you to go back and clarify

21 about pat-downs?

22 A. Correct.

23 Q. I think then we need to go back to Miriam Stone's -- and

24 perhaps if we deal with it at a high level rather than

25 flitting between emails. Essentially when you went

225

1 back, you asked for full pat-downs, is that correct, of

2 Miriam Stone, which caused her to say actually that's

3 going to cost even more money than wandering?

4 A. No, I think what ended up happening, we got to this

5 point with the email correspondence with Bob, which

6 didn't get an answer as to what he wanted to do. So the

7 point at which the full pat-downs was talked about was

8 once we were on site in Birmingham on 17 May, because

9 we were in the day before the show day. That when he

10 said he didn't want to do the wandering and he'd do the

11 pat-downs instead and that's when it went on to full

12 pat-downs.

13 Q. If we finish with this document before we move back to

14 the earlier exchanges. We can see you responded to

15 Bob -- and I'm now at {INQ033474/9} -- at 11.07:

16 "Pat-downs/bag checks aren't a problem at all, it's

17 just the metal wands that they don't have as standard in

18 Manc/Birmingham. I'm still waiting for The 02 to

19 confirm but from memory I believe they do have either

20 metal wands or airport-style gates in house as

21 standard."

22 And then I think Bob, in the next email, just

23 responds, "Thank you".

24 A. Yes.

25 Q. Apologies that we're flitting around emails. If we can

226

1 move back into {INQ001623/2}.

2 We can see on 17 May, at 3 o'clock in the afternoon,

3 Miriam is chasing you about wandering:

4 "Can I check a couple of things including wandering?"

5 And in an email above that at 5.49 on the same day,

6 you respond:

7 "Definitely no full decant required. Same with

8 wandering. Full pat-down, though, please. Let me know if

9 you need extra staff to do this."

10 So on 17 May, where had the request for full

11 pat-down come from?

12 A. That would have come from Bob. We were in Birmingham

13 NEC Arena at that point, and that would have been via

14 a conversation rather than an email.

15 Q. Had you appreciated that a full pat-down at the arena

16 would come with an additional cost?

17 A. I would have appreciated it would come with

18 an additional cost, yes.

19 Q. And when Bob Fontenot was asking for a full pat-down at

20 the arena, did he appreciate that would bring with it an

21 additional cost from the venue?

22 A. I don't know.

23 Q. If we look then at {INQ001623/1} on the same document,

24 please, Mr Lopez. We can see Miriam Stone's response to

25 that request for full pat-down:

227

1 "Full pat-down, that's bigger than wandering,

2 requiring search lanes and around 30 or so staff. Are

3 you sure you want full pat-downs? Cost around

4 £3,500-ish."

5 Then we can see your response:

6 "Let me speak to Bob tomorrow. What's the cost of

7 wandering?"

8 And that's because you were physically together

9 at the arena (overspeaking)?

10 A. -- wanted to give him both options so that he knew what

11 the options were.

12 Q. Then Miriam Stone, I think, gives you a compromise on

13 the same day, 17 May, of profile lanes with random

14 searches and random wandering for a lesser cost of £900.

15 A. Yes.

16 Q. Is it those two options then and costings that you took

17 to Bob Fontenot?

18 A. Yes.

19 Q. And we can see on 18 May at 11.49, you respond:

20 "Random pat-down only, no wandering."

21 So in terms of when you gave that information to

22 Miriam Stone, whose direction had given that to you

23 about random pat-down only?

24 A. Bob Fontenot.

25 Q. Had there been any specific discussion when Bob Fontenot

228

1 had effectively said no to both the random wandering and
 2 the full pat—down?
 3 A. We'd obviously had a discussion about it, yes.
 4 Q. And could you assist the inquiry as to how that
 5 discussion went to arrive at neither of the options?
 6 A. I can't tell you why Bob came to the decision not to do
 7 either. I know there was frustration on his part that
 8 they weren't doing these things as standard. That was
 9 how he portrayed it to me.
 10 Q. Can I ask you then, if you can assist, just to clarify
 11 one matter that arises out of a statement that's been
 12 provided to the inquiry from Roshad Ismail. We've
 13 already identified who he is. Have you had an
 14 opportunity to review the statement of Mr Ismail?
 15 A. Not recently, no.
 16 Q. I'm just going to give the INQ reference, please, and
 17 the page, because there's one matter I want to ask you
 18 about. {INQ025747/4}.
 19 It's paragraph 3 I'm going to ask you about. Maybe
 20 if you just refresh your — well, read paragraph 3. In
 21 doing so, "the venue affiliates" is a term that is
 22 identified in the witness statement earlier to cover
 23 venue, SMG, ShowSec and Live Nation. Could I ask you,
 24 before I ask you a question about it, just to read
 25 paragraph 3, please?

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1 (Pause)
 2 We can see in the statement that Mr Ismail has
 3 suggested that:
 4 "... in response to requests from artist's
 5 production team For additional security measures at the
 6 venue in addition to the venue affiliates '
 7 implementation of the dynamic risk assessment protocol,
 8 Mr Weightman stated that customer searches with magnetic
 9 wands were not standard in some of the venues within the
 10 United Kingdom."
 11 I think we can agree upon that from what you have
 12 already told us?
 13 A. Yes.
 14 Q. He then goes on:
 15 "In response to this email, Mr Fontenot had further
 16 telephone conversations with the venue affiliates to
 17 insist on obtaining the magnetic wands regardless of the
 18 cost. However, the venue affiliates denied the request
 19 and pat—down searches were instead implemented by the
 20 venue affiliates."
 21 What's your response in respect of that account of
 22 Mr Ismail from your perspective?
 23 A. It's inaccurate.
 24 Q. And can you clarify in what way that statement is
 25 inaccurate?

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1 A. If he had have insisted on having magnetic wands, he
 2 would have got magnetic wands, they do exist and they
 3 are hireable.
 4 Q. This statement also gives a suggestion that pat—down
 5 searches were implemented. But just to be clear in
 6 terms of what was ultimately agreed it was not for full
 7 pat—downs either was it?
 8 A. No, but there were random pat—downs.
 9 Q. Certainly from your perspective if the tour had wanted
 10 wandering then that's something that could have been put
 11 in place?
 12 A. Yes.
 13 Q. But at a cost, and in terms of who would have borne the
 14 cost, is the position that essentially Live Nation would
 15 have paid it originally but ultimately it would be
 16 charged back to the tour?
 17 A. It would have been. It would have been included in the
 18 show costs which go into the settlement. The profit is
 19 then split between the artist and Live Nation so it's
 20 not like Live Nation pay it first; it's done at the
 21 point of settling the shows from a financial point of
 22 view.
 23 Q. Can I then move to a document you have had a role in,
 24 which is the other item I said I was going to ask you
 25 about a little earlier, which is the information sheet,

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1 please, just if you could explain that. I'm not going
 2 to take you then to the risk assessment that
 3 Miriam Stone drew up because I think you agreed that the
 4 matters that have been agreed were essentially for
 5 a dynamic risk assessment and random pat—down searches.
 6 A. Sorry, the risk assessment?
 7 Q. I'm not going to ask you specific questions about the
 8 risk assessment that SMG put in place, so Miriam Stone's
 9 document. But you'd be provided with a risk assessment
 10 by Miriam Stone?
 11 A. Yes, I think a day before the show.
 12 Q. And so when you would get the venue risk assessment,
 13 would you do anything with that?
 14 A. No, and I don't think they would want our input anyway.
 15 Q. Was it just something you'd check at all?
 16 A. No, I put it into a drop box so that the tour could
 17 check it if they wished to, but we don't have any input
 18 on risk assessment.
 19 Q. It gets placed into the drop box so the tour can review
 20 that risk assessment if they want to?
 21 A. If they so wish.
 22 Q. I think you indicated you got that in the early hours of
 23 the day of the concert?
 24 A. The day before, I think.
 25 Q. I apologise, 21 May. Is that something that you —

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1 is that usual practice to get the risk assessment so
 2 proximate to the concert?
 3 A. From other venues? We sometimes don't get the risk
 4 assessments at all.
 5 Q. Okay. Can I then just ask you questions about the
 6 information sheet please, which is {INQ020187/1}.
 7 SIR JOHN SAUNDERS: While we're getting that up, can you
 8 help me? There were discussions about the wandering and
 9 the pat-downs which took place at the Birmingham venue
 10 as I understand it.
 11 A. Yes.
 12 SIR JOHN SAUNDERS: What was agreed there as to security?
 13 A. They did full pat-downs in Birmingham.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MS CARTWRIGHT: Was there a cost at Birmingham for the full
 16 pat-downs?
 17 A. There was. I can't remember the amount. It was less
 18 than 1,000.
 19 Q. So can you assist us as to whether the difference in
 20 costings that we have from Miriam Stone as opposed to
 21 Birmingham featured in the decision-making of
 22 Bob Fontenot?
 23 A. I can't and I can't tell you why there was a difference
 24 in the costs, either.
 25 Q. Just on that point briefly, we have also heard

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1 information about a Bruno Mars concert that took place
 2 at the arena on 3 May 2017.
 3 A. Yes.
 4 Q. Were you involved at all as a promoter's rep on --
 5 I think we've heard it was Live Nation. Were you
 6 involved at all in the arrangements for that concert?
 7 A. No.
 8 Q. I won't ask you about the arrangements that were in
 9 place for that concert.
 10 Have you anything else, sir, before we move to that
 11 local show information sheet?
 12 SIR JOHN SAUNDERS: No.
 13 MS CARTWRIGHT: {INQ020187/1}, please.
 14 I think you have already identified that there are
 15 emails that sit around this document which shows it was
 16 only finalised on the morning of the concert.
 17 A. Yes.
 18 Q. And so you've told us that the tour gave you the blank
 19 information sheet. Can you assist as to this document?
 20 To what extent is what we see recorded on it entries you
 21 made?
 22 A. It's very simple. The first five lines were me and then
 23 from where it says "Miriam Stone", it was Miriam Stone.
 24 Q. Okay. Was this then provided back to you from Miriam?
 25 A. Yes.

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1 Q. Would you have read it and considered it?
 2 A. No, I'd have sent it straight back to Bob.
 3 Q. Is this something that would go straight into the drop
 4 box?
 5 A. It was emailed directly to Bob.
 6 Q. Okay. So in terms of then the door policy that we see
 7 on the first page of that document:
 8 "No food or drinks. No professional cameras, selfie
 9 sticks or tablets. No pass out/re-entry.
 10 Banners/signs, no larger than A3. No poles or sticks.
 11 Random pat-down. Dynamic risk assessment. Random
 12 wandering. All bags checked. All large bags checked and
 13 held at customer services."
 14 A. That's the venue policy.
 15 Q. Pardon?
 16 A. That's the venue's policy.
 17 Q. Okay. So again, you didn't record the matters that we
 18 see in that document?
 19 A. No.
 20 Q. So those were entries that Miriam Stone made?
 21 A. Correct.
 22 Q. We can see there reference to random wandering. Was there
 23 to be any random wandering at the arena?
 24 A. No. Not that I had spoken to her about.
 25 Q. Again, in terms of the door policy, we've seen in the

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1 security rider there are specific items that are
 2 specified that would be prohibited from coming into the
 3 building which would affect the bag checks. Would
 4 you have drawn to the attention of Miriam Stone that
 5 this document omits reference to weapons or lasers?
 6 A. No, because she's not referencing their document, she's
 7 just putting their standard venue procedures so she's
 8 not -- I don't think she will have made this specific
 9 about Ariana Grande; this will just be the venue's
 10 standard practices.
 11 Q. But when you have a tour specifically identifying items
 12 as part of the security rider that shouldn't be brought
 13 in, where does that then get recorded and passed on to
 14 those that have to implement and (overspeaking) --
 15 A. I don't know from the venue's perspective but that is --
 16 this information is just so that Bob knows what they do
 17 as standard.
 18 Q. So then when Bob Fontenot gets this document is that
 19 something he would consider to ensure that is passed on?
 20 A. Yes, and they talk about it during the security briefing
 21 to make sure everyone's on the same page in regards to
 22 the wider information of what is not -- what is being
 23 prohibited.
 24 Q. In terms of then being present at the security briefing
 25 on 22 May, can you assist as to who else is present at

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1 that security briefing?
 2 A. There's three members of ShowSec security, from memory,
 3 and Miriam Stone was also there. Then there will be
 4 a front of house manager from the venue, I can't
 5 remember who was there, and then myself and
 6 Bob Fontenot.
 7 Q. In terms of the — do you remember what was said
 8 specifically about bag checks at that security briefing?
 9 A. I don't. I remember my memory is that all bags were
 10 being checked.
 11 Q. Do you remember if there was any specific discussion
 12 about lasers at that meeting?
 13 A. I don't remember there being specific...
 14 Q. If we could turn over the page, please {INQ020187/2}.
 15 At the bottom of the security information sheet we can
 16 see a star and the comment:
 17 "All security measures/police presence are the
 18 responsibility of the venue."
 19 I think you have confirmed in a witness statement,
 20 as has Mr Ismail, that that rider or caveat would not
 21 have been on the document as drafted on 22 May; that's
 22 something that was added subsequently when disclosure
 23 was made to the coroner.
 24 A. Yes, that wasn't on the document when it was sent from
 25 Miriam to Bob, so that was added at a later date.

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1 Q. Can you assist us: do you know why that specifically was
 2 added to this document?
 3 A. I can't help you with that, I don't know. I don't know
 4 who wrote it or when it was added.
 5 Q. Can you clarify one other matter as well please and I
 6 can take you to the document if need be, but it is a
 7 general point. We can see also reference within the
 8 security rider about how Bob Fontenot would need to have
 9 a meeting with the local law enforcement. Was there
 10 ever any arrangement that there needed to be police
 11 present for Bob Fontenot to meet with them?
 12 A. No, I don't believe that was possible.
 13 Q. In terms of the security briefing itself, is there
 14 anything else that's relevant to this inquiry that you
 15 feel it's important that the chairman is aware of as to
 16 what was discussed in that meeting that day, please?
 17 A. No, it was a very standard discussion. They went
 18 through the points of — point by point of the pass
 19 sheets and the arrangements for the security in front of
 20 the stage and bits and pieces. They will have gone over
 21 the searches as well and they were all happy with the
 22 arrangements that were in place.
 23 Q. So would you participate in that security briefing or —
 24 A. No, I'm just simply present.
 25 Q. Would there be any occasion when you would make comments

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1 or contribute to the discussions?
 2 A. No.
 3 Q. I'm not going to deal with what happened
 4 post—detonation, but you were present throughout the
 5 concert?
 6 A. Yes.
 7 Q. Your witness statement deals with a comment that
 8 Mr Fontenot made about reference to pat—downs. Can you
 9 describe to the inquiry what Mr Fontenot said to you,
 10 please, about that?
 11 A. He said, "This is why we need full pat—downs".
 12 Q. When did he say that to you?
 13 A. This was whilst we were being — leaving the venue at
 14 the end of the night — well, once we were being sent
 15 out of the venue.
 16 Q. And why was that something that stuck with you when he
 17 said it to you?
 18 A. Because it was all fairly traumatic and I think the
 19 suggestion that that was part of the problem seemed —
 20 it struck me, I suppose.
 21 Q. But from your evidence, would it be fair to say that if
 22 the tour had wanted full pat—downs, that is something
 23 that would have been put in place by the venue but
 24 it would just have been to be subject to arrangements
 25 and additional costs?

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1 A. Yes, 100% they could do it.
 2 Q. Again, for the avoidance of any doubt, you had
 3 a specific discussion with Mr Fontenot about that
 4 costing and the ability of full pat—downs and he
 5 declined or didn't ask you to take that forward with the
 6 venue?
 7 A. Yes.
 8 Q. And you're clear about that?
 9 A. Yes.
 10 MS CARTWRIGHT: Mr Weightman, that concludes the questions
 11 I have for you. Others have questions for you,
 12 potentially.
 13 Can I first of all turn to Mr O'Connor on behalf of
 14 SMG to see if he has any questions, please?
 15 Questions from MR O'CONNOR
 16 MR O'CONNOR: Mr Weightman, just two or three questions from
 17 me. First of all, just on that security rider. Perhaps
 18 if we can just bring it back up on screen, please. It's
 19 {INQ029106/1}.
 20 Sorry, wrong reference. Maybe that was the right
 21 reference. Mr Cooper helpfully says {INQ029116/1}.
 22 I wrote it down wrong in that case.
 23 That wasn't what we were looking at.
 24 MS CARTWRIGHT: {INQ020187/1}.
 25 MR O'CONNOR: No. I think that might be the information

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1 sheet. It's the security rider.
 2 MS CARTWRIGHT: {INQ020164/1}.
 3 MR O'CONNOR: I think it follows from the answers you have
 4 already given that this document was not drafted
 5 specifically for the Manchester Arena concert.
 6 A. No, it's a generic document.
 7 Q. It's generic. Is it in fact generic for the entire
 8 tour?
 9 A. Correct, yes.
 10 Q. So we haven't heard the full dates of this tour, but
 11 I think we know it was worldwide?
 12 A. Yes.
 13 Q. Would this same document have been going to venues all
 14 over the world?
 15 A. Yes.
 16 Q. And it was then, as you described, a question of
 17 discussing the tweaks that needed to be made on a venue
 18 by venue basis?
 19 A. Exactly.
 20 Q. Thank you.
 21 You were asked about the security apparatus
 22 available at some of the venues that the Ariana Grande
 23 concert visited in the UK, in particular, I think,
 24 Birmingham, Manchester and the O2 were mentioned, and
 25 you said that the O2 was the only one of those venues

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1 where there were walk-through metal detectors, arches;
 2 yes?
 3 A. Yes.
 4 Q. Is it right that you have a broader experience of venues
 5 in the UK other than those few that the Ariana Grande
 6 concert happened to visit on that occasion?
 7 A. Correct.
 8 Q. What is your understanding as at 2017 of which venues in
 9 fact had walk-through metal detectors there?
 10 A. I might be wrong, but my understanding was, I think, the
 11 O2 was one of the only venues at that point that had
 12 that level of security.
 13 Q. Thank you.
 14 One other related question. We've seen, through the
 15 emails, the discussion between you and Miriam Stone.
 16 You, on behalf of Bob Fontenot, about the different
 17 levels of pat-downs, wandings and so on that were
 18 possible, approaches that could have been taken; yes?
 19 A. Yes.
 20 Q. And we've seen that what you ended up with was full bag
 21 checks or searches, I won't go into all of that, with
 22 random pat-downs?
 23 A. Yes.
 24 Q. What was your understanding then, from the experience
 25 you've told us about, about whether that was a normal,

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1 an exceptional or an unusual level of security at
 2 concerts of that type in the UK?
 3 A. It was fairly normal at that point, but it wasn't
 4 unusual for the searches to be heightened. It would
 5 always be driven by the tour or the artist. The
 6 standard fallback, I believe, would normally be for
 7 random pat-downs to take make place.
 8 MR O'CONNOR: Thank you. Those are my questions.
 9 MS CARTWRIGHT: There is an indication that the families
 10 have questions. I don't know who's taking the lead.
 11 Questions from MR COOPER
 12 MR COOPER: Yes. Mr Weightman, on behalf of the families,
 13 can you just explain the relationship between
 14 Live Nation and ShowSec? Have I got it right that 61.1%
 15 of ShowSec is owned by Live Nation?
 16 A. I don't know. I don't know the ins and outs.
 17 Q. Well, a proportion of ShowSec is owned by Live Nation;
 18 you know that, don't you?
 19 A. Yes.
 20 Q. Can you help us with how that works, for instance, in
 21 terms of business? Is there liaison between ShowSec ---
 22 and take it from me, it is 61.1%, it comes from
 23 Kelly Chappel's statement, paragraph 20. Can you
 24 explain how that works then? 61.1% of ShowSec is owned
 25 by Live Nation. What sort of influence does Live Nation

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1 have on ShowSec?
 2 A. I don't know.
 3 Q. You know nothing of that?
 4 A. No.
 5 Q. Who would?
 6 A. Someone who works for Live Nation in the ---
 7 Q. Let's get a name. Who would? Who's your boss?
 8 A. Sorry?
 9 Q. What's your boss' name? Who's the top man in
 10 Live Nation?
 11 A. Dennis Desmond.
 12 Q. A bit louder, please.
 13 A. Dennis Desmond.
 14 Q. Where is Mr Desmond based?
 15 A. I believe he's either based in the UK or Ireland or
 16 both.
 17 Q. So he would know the answer. So if I am asking you
 18 questions and you can't answer, then simply say, "Well,
 19 Mr Desmond could". All right?
 20 So 61.1% of ShowSec is owned by Live Nation. Do
 21 ShowSec and Live Nation regularly meet up and discuss
 22 business issues?
 23 A. I don't know.
 24 Q. For instance, when it comes to security, security
 25 arrangements at venues, do ShowSec and Live Nation

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1 liaise about knowledge of security and security issues?
 2 A. I don't know.
 3 Q. You don't know. For instance, given that ShowSec, 61%
 4 of them is owned by Live Nation, do they communicate to
 5 Live Nation, for instance, this is the security —
 6 MR GILLESPIE: These questions could have all been put to
 7 Mr Harding, who's the managing director of ShowSec.
 8 SIR JOHN SAUNDERS: Thank you. Just complete the question
 9 and then you give us your answer and then I will deal
 10 with this.
 11 MR COOPER: If there's any objection to these questions
 12 (overspeaking).
 13 SIR JOHN SAUNDERS: Complete the question, could you? Or
 14 start again.
 15 MR COOPER: And there was an attempt to put these questions
 16 to the witnesses.
 17 I will ask you again and if there's objection to it,
 18 we'll hear from ShowSec: when it came to security issues
 19 and, for instance, risk levels and problems relating to
 20 security, did ShowSec communicate with Live Nation and
 21 keep you informed about these issues?
 22 A. I don't know and I'm not the person to ask.
 23 SIR JOHN SAUNDERS: He doesn't know anything about what
 24 happens between ShowSec and Live Nation. We'll have to
 25 consider getting someone else if this is important.

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1 Let's cut the questions about this.
 2 MR COOPER: Then I will do. All I was interested in here is
 3 when Live Nation, because of their very close
 4 association with ShowSec, start their job with
 5 a particular venue, they would have access, would they
 6 not, if they wanted it, to security information through
 7 ShowSec if they wanted it? They could simply go and ask
 8 ShowSec with whom 61.1% —
 9 SIR JOHN SAUNDERS: Okay, we've had that.
 10 MR COOPER: They could ask them, couldn't they, what's the
 11 security situation here so that we can protect people?
 12 SIR JOHN SAUNDERS: Have you got any more knowledge about
 13 that than the ordinary person?
 14 A. I have no knowledge of the relationship —
 15 SIR JOHN SAUNDERS: I'll form my own view about that and
 16 I'll remember 61.1% so you don't need to keep reminding
 17 me.
 18 MR COOPER: Thank you, sir.
 19 Then I'll move on from those questions and we'll
 20 argue them as to whether they occur elsewhere with
 21 another witness.
 22 I want to ask you this then: as far as Bob Fontenot
 23 is concerned, do you have a good working relationship
 24 with him?
 25 A. I don't know him that well.

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1 Q. When you were dealing with him at this particular
 2 concert or this particular venue, had you met him or
 3 worked with him before?
 4 A. I have worked with him before but only met him very
 5 briefly.
 6 Q. And a competent man, no doubt?
 7 A. So far as I could tell, yes.
 8 Q. He was concerned, was he not, as head of the
 9 Ariana Grande team with levels of security? I'm not
 10 going to go through the emails again. My learned friend
 11 has done that perfectly ably. He was clearly concerned,
 12 when one looks at the email traffic, with security,
 13 wasn't he?
 14 A. He felt there was a need for — he suggested there might
 15 be a need for additional requirements, yes.
 16 Q. Did you agree with him?
 17 A. I didn't have an opinion.
 18 Q. You didn't have an opinion?
 19 A. No.
 20 Q. Simply as someone who was working in the business and
 21 security was being considered to protect people who were
 22 at the concert, you didn't have an opinion?
 23 A. No, that's not what I'm saying. I'm saying I didn't
 24 have an opinion as to whether he was correct that more
 25 was needed or whether the venue — what the venue had in

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1 place was already sufficient. I'm not trained enough to
 2 know the difference.
 3 Q. Was it something you took seriously when Mr Fontenot was
 4 bringing this to your attention?
 5 A. Yes.
 6 Q. And when Mr Fontenot said, at paragraph 23 in his
 7 statement, he says he said it, "This is why we should do
 8 full pat-downs", after this atrocity had been committed,
 9 you told the learned chair that that struck you.
 10 A. Yes.
 11 Q. Because you probably agreed with it?
 12 A. I'm not sure if it was because I agreed with it. It was
 13 the suggestion that we could have done something.
 14 Q. All right. You've been taken through all the email
 15 correspondence by my learned friend, and I'm not going
 16 to repeat that, but there was certainly communication
 17 going backwards and forwards, wasn't there, about the
 18 level of security?
 19 A. Yes.
 20 Q. Can I ask you another tranche of questions, please,
 21 concerned with the artist's security, the artist's
 22 employees' security and agent's security. It appears
 23 in the security rider. Were you responsible for
 24 agreeing the artist's security, the artist's employees'
 25 security and agent's security?

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1 A. No. We passed that information directly to the venue.
 2 SIR JOHN SAUNDERS: You were a bit of a postbox, were you,
 3 or the go-between?
 4 A. Yes, we were passing information back and forth.
 5 MR COOPER: Postbox is the word I have written down here.
 6 SIR JOHN SAUNDERS: Go-between sounds better.
 7 MR COOPER: So who was responsible then, SMG, ShowSec, so
 8 far as you're aware, for the artist's security, the
 9 artist's employees' security?
 10 A. It was an ongoing conversation between SMG and the tour.
 11 Q. And that would include Live Nation?
 12 A. As a conduit in the middle, yes.
 13 Q. And the level of security offered for those individuals,
 14 the artist, the artist's employees and the agents, was
 15 very high indeed, wasn't it?
 16 A. It was yes.
 17 Q. For instance, restricting access to backstage?
 18 A. That's very common.
 19 Q. Yes. 24-hour security?
 20 A. Again, quite common.
 21 Q. It may be quite common, but I'm trying to compare it to
 22 the security these 22 people were given. 24-hour
 23 security. What did that entail?
 24 A. That's essentially so that they have security available
 25 from the moment they arrive until the moment they leave

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1 the venue because they will normally arrive very early
 2 in the morning and leave very early the following
 3 morning, so it's to be able to have access to the
 4 backstage areas at those points.
 5 Q. And what sort of security does that involve? Close
 6 personal security?
 7 A. No, no, this is opening doors and for general points
 8 around the arena.
 9 Q. And making sure people who shouldn't be backstage
 10 weren't backstage.
 11 A. Yes.
 12 Q. For instance, people with backpacks and that sort of
 13 thing? They would be very suspicious, wouldn't they, if
 14 someone with a backpack was wandering about backstage?
 15 A. It depends whether they had a pass to get backstage or
 16 not.
 17 Q. If they hadn't got a pass?
 18 A. There's still searches done on the backstage entrances
 19 as well.
 20 Q. You see, what I'm trying to do is compare the level of
 21 vigilance and security for the artist, the artist's
 22 employees, the artist's stage and backstage, to the
 23 level of security, as we're trying to understand it, for
 24 the people at the front of stage.
 25 SIR JOHN SAUNDERS: Okay. There's very high security for

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1 the artist and the artist's entourage, right?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: And that's perfectly normal as
 4 I understand it.
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Whether that's the same for the
 7 customers who come is perhaps something for me to judge
 8 rather than for you to comment on. There's clearly
 9 a distinction between the two.
 10 MR COOPER: Thank you, sir.
 11 I want to ask you about the briefings now, please,
 12 and this appears, in fact, in one of your statements,
 13 which is {INQ029183/1}.
 14 I'm taking you, please, to paragraph 15 of that.
 15 Just to familiarise yourself, you say this. You start:
 16 "It is also relevant that at every show there is
 17 a security briefing. These normally take place for an
 18 evening concert at about 4 to 5 pm, although for the
 19 Ariana Grande concert at Manchester Arena, it took place
 20 earlier at 1 to 2. I recall being at that security
 21 briefing along with Miriam Stone, Bob Fontenot and the
 22 event security."
 23 Why were you there? I'm asking you for a reason
 24 because you said a moment ago you didn't contribute, you
 25 didn't say anything and you didn't ask any questions.

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1 What was the purpose of you being there?
 2 A. They could have had the meeting without me there, but
 3 it's useful for me to be present because obviously I was
 4 in the conversations leading up to the day.
 5 Q. And why would it be useful?
 6 A. Just in case there was any conflict.
 7 Q. Any what?
 8 A. Any conflicting information or any feeling that
 9 something was wrong.
 10 Q. Did you speak at these meetings?
 11 A. Not outside of pleasantries.
 12 Q. Not outside of? It's these things, you see. Did you
 13 speak --
 14 A. No, it's led by Bob Fontenot.
 15 Q. Well, it's at this meeting you told the chair a moment
 16 ago that arrangements for security front of stage were
 17 discussed?
 18 A. Yes.
 19 Q. And that's crowd management, is it, that sort of thing?
 20 A. Yes. So there's a barrier line and they have security
 21 and then they have the stage.
 22 Q. How long did this security briefing last for?
 23 A. I can't recall. It would have been less than an hour.
 24 Q. Was that the main item of business, arrangements for
 25 security front of stage?

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1 A. No, they would have gone over every point of security
2 that had been discussed.
3 Q. So what other points of security did they go over?
4 A. They start with talking about the pass sheets so
5 everybody is familiar with those.
6 Q. Before I take you down this whole route, this is
7 a security briefing purely for the artist, the artist's
8 employees and the crew, is it? It's nothing to do with
9 the security for the general public?
10 A. It's mainly focused on the artist's areas.
11 Q. But is this a meeting where, if there was a security
12 issue for the general public, it would be raised?
13 A. It should be, yes.
14 Q. Right. So I'm just trying to understand, what issues
15 relating to the general public, with all due respect to
16 Ariana Grande, were raised as far as the general public
17 were concerned at this meeting?
18 A. There was no specific issues raised that I can remember.
19 Q. Right. So at a meeting for security, which lasts about
20 an hour, and you can certainly remember discussions
21 about security for front of stage and passes, was
22 anything discussed, as far as you can recall, about the
23 safety of the general public?
24 A. The conversation is specifically for the artist's team
25 to talk about the safety measures that are in place for

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1 the artist. So the wider conversations of the crowd
2 aren't discussed at that point.
3 SIR JOHN SAUNDERS: Okay. There have been negotiations
4 about what searches should take place of the general
5 public. Were they raised at that briefing?
6 A. They will have been talked about, yes.
7 SIR JOHN SAUNDERS: Thank you.
8 MR COOPER: If any issue relating to the general public --
9 I prefer to call them the general public rather than the
10 crowd, you understand.
11 A. Sure.
12 Q. If any issues relating to the security of the general
13 public were to be raised, this is the meeting where it's
14 raised, I presume?
15 A. It would be raised on occasion, but equally the venue
16 may not feel the need for the artist's security team to
17 be involved in a conversation about the safety of the
18 public because the safety of the public is predominantly
19 looked after by the venue rather than the artist's --
20 Q. Right. So as far as you're aware then, there's
21 a separate meeting?
22 A. There should be, yes. But in some instances, the
23 security -- the artist won't have a security team. So
24 it's not every show that this happens in this way.
25 Q. All right. In terms of a risk assessment, I presume

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1 that as far as you're concerned, and I don't mean this
2 disparagingly, I'm just talking about your professional
3 concerns, the risk assessments generally for the arena
4 were not a matter for you?
5 A. No.
6 Q. Would that be right? Were there any separate risk
7 assessments done, for instance, for the artist?
8 A. Yes.
9 Q. What was the risk assessment for the artist on
10 22 May 2017?
11 A. They wouldn't have done show-specific, they did general
12 risk assessments that will have covered all of their
13 equipment and their general working practices on the
14 tour.
15 Q. I'm not so much interested, you'll forgive me, in their
16 equipment, I'm interested in risk assessments relating
17 to their personal safety. Did Ariana Grande have a risk
18 assessment?
19 A. Yes.
20 Q. And can you tell us what the result of that risk
21 assessment was for her appearance on 22 May 2017?
22 A. I can't. Again, the information was passed from me to
23 the venue for assessment.
24 Q. No idea whatsoever?
25 A. No, I'm not trained or equipped to --

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1 Q. Do you have any idea at all what that risk assessment
2 said in relation to her? Was she in danger, for
3 instance? Were there any warnings given about her
4 performing at this particular time?
5 A. I haven't read the entire document, so I'm not sure, but
6 I don't believe there were any specific dangers towards
7 the artist. It was more working practices.
8 Q. For instance, in terms of a general approach, was
9 concern being taken about the vulnerability of an
10 American artist at this time?
11 A. I don't know. Not that I recall.
12 SIR JOHN SAUNDERS: It may be of significance for us to get
13 this document, if we can, rather than -- I quite agree
14 it's relevant, the document. I'm not sure it's going to
15 be much help to ask a witness --
16 MR COOPER: I don't want witnesses to come back unduly.
17 I will leave it there then.
18 SIR JOHN SAUNDERS: We'll try and get the document itself.
19 MR COOPER: Thank you.
20 Can I take you, please, to your statement at
21 {INQ034475/8}. Just one paragraph. It's paragraph 28,
22 please.
23 SIR JOHN SAUNDERS: This is your second statement.
24 MR COOPER: It's the second statement, yes.
25 If you look, please, Mr Weightman, towards the

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1 bottom of that paragraph, you say this:
 2 "American tours such as this one frequently ask for
 3 police presence, as it is my belief that this is
 4 something that can be requested/paid for in America.
 5 The position is not the same in the UK. My
 6 understanding is that generally the police will only
 7 attend if they deem it to be necessary."
 8 From what you know, was there any enquiry on behalf
 9 of Ariana Grande's team for there to be a police
 10 presence in any way at the event?
 11 A. Only what's detailed in their security rider.
 12 Q. All right. As far as those security riders are
 13 concerned, you told my learned friend a moment ago that
 14 they were generic documents. Would you agree, looking
 15 at them now, and this is simply a genuine attempt to see
 16 whether improvement can be made, that perhaps these
 17 documents should be more particular and thought out in
 18 a more particular way tour by tour, event by event,
 19 without, for instance, repeating security issues such as
 20 metal detectors, which don't necessarily apply? The
 21 question is simple: should these documents be more
 22 bespoke rather than generic?
 23 A. I don't know the practicalities of them being able to do
 24 that. The document is a tour by tour document. It's
 25 not covering all of her tours, but it's not venue by

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1 venue.
 2 Q. It's just that you commented, and it's apparent from
 3 one's reading of the document, that they are generic.
 4 Are you in any position to observe whether maybe one
 5 small lesson to be learned from this, as far as these
 6 documents are concerned, is that they should be more
 7 particular?
 8 A. I think the conversations that they have in the lead-up
 9 to each show should cover off that problem because they
 10 do talk about venue-specific issues with their overall
 11 document. I'm not sure them generating more documents
 12 would necessarily assist; it might confuse matters if
 13 anything.
 14 Q. I see. And simply this, and it's my concluding
 15 question: from looking at the communications between
 16 yourself, Mr Fontenot and Miriam Stone, an issue as to
 17 how much security costs can at times mean security is
 18 not taken, would you agree, because it is just too
 19 expensive?
 20 A. It can at times be the case, I guess.
 21 MR COOPER: Thank you.
 22 MS CARTWRIGHT: Sir, I don't know whether Mr Weatherby has
 23 any questions. I think that is a no. Mr Atkinson?
 24 Thank you.
 25 Finally, please, under the Rule 10 procedure, the

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1 only other core participant who's indicated they wish to
 2 ask questions is Mr Gillespie on behalf of ShowSec.
 3 Questions from MR GILLESPIE
 4 MR GILLESPIE: Just a few questions, Mr Weightman. You were
 5 asked questions about Live Nation's relationship with
 6 ShowSec. So far as the Ariana Grande UK tour was
 7 concerned, Ariana Grande was playing at three venues;
 8 is that correct?
 9 A. That's correct.
 10 Q. At Birmingham, did ShowSec provide the security?
 11 A. I don't believe so.
 12 Q. Did they provide the security at the O2?
 13 A. No.
 14 Q. So the only arena where they provided the security was
 15 the Manchester Arena?
 16 A. That's my belief, yes.
 17 Q. Did Live Nation have any input into security
 18 arrangements at all that you knew about?
 19 SIR JOHN SAUNDERS: He doesn't know anything about the
 20 arrangements. You stopped those questions being asked
 21 and I'm now going to stop you asking that question. The
 22 first one was perfectly okay, the second one is not.
 23 MR GILLESPIE: Did you have any input into security
 24 discussions apart from acting, as we've described it, as
 25 a conduit?

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1 A. No, every input I had I think you've seen.
 2 Q. We heard you, and this is the final topic, talking about
 3 the briefing that you attended. The subject matter of
 4 that briefing, was it primarily focused on the artist
 5 and her security?
 6 A. Correct.
 7 Q. So this was not the briefing that was attended by the
 8 supervisors who were to deal with the general crowd
 9 security once the concert had started?
 10 A. No, that's a separate briefing. This is literally to
 11 talk about the artist's arrangements.
 12 Q. And so far as Mr Fontenot is concerned, we've heard
 13 quite a lot about him and his role, is it correct that
 14 his focus, when he is making the requests that he's
 15 making, is all to do with Ariana Grande's security?
 16 A. Correct.
 17 Q. And this is not to denigrate him in any way. He is not
 18 concerned with the crowd or with those sorts of issues,
 19 it's all focused on the safety of his artist?
 20 A. Yes. She is his client and she has employed him to
 21 ensure her safety.
 22 Q. And he has followed her from America to Europe and then
 23 to the UK?
 24 A. For the duration of the tour, yes.
 25 MR GILLESPIE: Thank you. That's all I ask you.

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1 SIR JOHN SAUNDERS: Thank you very much.
 2 MS CARTWRIGHT: Sir, I have no further questions. Is there
 3 anything else that would assist you?
 4 SIR JOHN SAUNDERS: No.
 5 Thank you very much for your evidence. I'm sorry
 6 you had to stay so late.
 7 Thank you, everyone, for staying. Thank you to the
 8 staff for staying on. It's good to have got the witness
 9 finished. Thank you.

10 (5.23 pm)

11 (The hearing adjourned until 9.30 am
 12 on Tuesday, 1 December 2020)
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