

to in paragraph 576 of the Expert Report, stating that all security measures/police presence are the responsibility of the venue. I therefore agree with the statement in the Expert Report that this line was added by the Tour after the attack.

- 28 I note that paragraph 590 of the Expert Report, also comments on the statement in the Local Show Information Sheet that there was no police presence. The Experts have concluded that this shows that the author (i.e. Miriam Stone, as stated above) was unaware of the police deployment. I do not believe it to be necessarily correct that Miriam did not know there would be a police deployment. Although I have no direct knowledge of the reasons that Miriam omitted this from the document, it may have been that she simply did not feel it necessary to share this information with the Tour. American tours (such as this one) frequently ask for police presence, as it is my belief that this is something that can be requested/paid for in America. The position is not the same in the UK; my understanding is that, generally, the police will only attend if they deem it to be necessary.

Prohibited Items

- 29 Paragraph 570 of the Expert Report refers to discussions around prohibited items for the purposes of screening. It also notes, at paragraph 572, that the 'Door Policy' as detailed in the Local Show Information Sheet, contained a limited list of prohibited items, which did not include weapons or mass casualty weapons. Whilst this is correct factually in relation to the content of this document, in my experience of many concerts, the purpose of the Local Show Information Sheet and similar documents used for other tours and venues, is intended to act as an overview; and it is unlikely to represent the entirety of the security measures that the venue has in place.
- 30 The Tour Security Manager (or the promoter as the intermediary) would not in my experience delve into the specifics of each individual item that should be prohibited, as it would be expected that the venue would have a minimum standard, by virtue of them having carried out risk assessments and having standard policies and procedures in place. This would usually include a list of standard contraband items that are not permitted into the venue (such as knives and guns and other weapons as well as food and beverage). Sometimes, there may be further agreements between the parties as to what additional prohibited items are kept outside, but the Tour will generally only specify additional items that may not be on a standard list and that the artist/Tour does not want; for example selfie-sticks, bottles, or beach balls. However, on this occasion such items were not referred to in the correspondence with the Tour.