

# OPUS2

Manchester Arena Inquiry

Day 43

December 3, 2020

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Thursday, 3 December 2020

(9.30 am)

MR DE LA POER: Sir, good morning, our first witness today interposing within the expert evidence is Inspector Michelle Wedderburn of British Transport Police.

I wonder if she may be sworn.

INSPECTOR MICHELLE WEDDERBURN (sworn)

Questions from MR DE LA POER

MR DE LA POER: Inspector, we'll begin, if we may, with you introducing yourself. Your full name, please?

A. Michelle Wedderburn.

Q. If you don't mind me saying, you're quite a softly spoken person. Could I ask you keep to your voice up a little bit? Those microphones perhaps don't amplify you as much as you might think.

I'm going to take you through the first page or so of your statement before we come on to some more detail. I think you have that in front of you right now.

This is a witness statement that you provided to the inquiry at the beginning of this week; is that right?

A. That's correct.

Q. It's dated 30 November?

A. That's correct.

Q. In it, starting at paragraph 3, you confirm that between March 2009 and 9 September 2017, you were a uniformed

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policing inspector responsible for railway stations in Greater Manchester; is that right?

A. That's correct -- not the whole of Greater Manchester because there's parts of Wigan that I'm not responsible for, but Greater Manchester and bits of Cheshire and Derbyshire.

Q. For our purpose did that include the Victoria Railway Station?

A. That would, yes.

Q. Between October 2016 and April 2017, were you seconded from that role to the operations department?

A. That's correct.

Q. In that secondment, were you responsibility for planning policing events throughout the Pennines?

A. That's correct.

Q. Did your remit cover football planning with the Pennine area and cross-border events?

A. That's correct.

Q. Then did you return to your previous role on 16 April 2017 where you took up your position as you had held it before your secondment?

A. Yes, that's correct.

Q. To complete the picture, in September of 2017, so after the attack, did you move to the operations department permanently?

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A. I did.

Q. And since September 2019, and we'll come back to this, have you been the single point of contact for planning of events at the arena?

A. Yes, I have.

Q. Turning now to deal with, very briefly, because we've heard a lot of evidence about this, multi-agency planning meetings. Did you attend the six-monthly meetings which took place at the arena as arranged by SMG?

A. Probably from about 2015, yes.

Q. So again, for our purposes, covering the period 2015 through to 2017?

A. Yes.

Q. Accordingly, you can confirm, and we've seen your name on the agendas for a number of meetings, you attended the meeting on 30 November 2016 at which the Ariana Grande concert was discussed?

A. Yes, that's correct.

Q. Was attendance at those meetings the sole extent of your liaison with the arena in the period 2015 to 2017?

A. No.

Q. What other sort of contact did you have with people at the arena?

A. They would email me the event schedules on a regular

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basis when the event -- when it changed, and they would also email me the event riders, and they would also contact me with any information that they had about a particular event that was possibly going to cause any concern.

Q. What was the nature, the general topic area of concern that you might be contacted about?

A. If there was problems with the tour, where it had been previously, to do with any sort of issues with disorder, violence, reports of thefts from the previous events.

Q. So to use policing language, that means that SMG would provide you at BTP with intelligence about potential trouble at particular events?

A. Yes, they would. Obviously from the previous events that had taken place on the tour, but we'd also get that from our intelligence section as well.

Q. Was there any other sort of contact that you had with the arena between 2015 and 2017?

A. No, it was predominantly in regard to the events that were taking place there.

Q. And finally on this topic, give us an idea of the frequency of that contact: was it annually, monthly, weekly, daily?

A. It would depend on how often the events were taking place. If there were no events taking place then the

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1 contact would be a lot less.  
 2 Q. How would you describe the relationship that you had  
 3 with the people at the arena that you dealt with  
 4 regularly?  
 5 A. Very good.  
 6 Q. Next, the Greater Manchester Resilience Forum. Was  
 7 there one occasion where you stepped in for  
 8 Chief Inspector Graham and attended one of those  
 9 meetings?  
 10 A. I did, yes.  
 11 Q. We'll hear a lot more in chapter 10 about that, but  
 12 that's all I will ask you about the resilience forum.  
 13 Exercise Sherman. We have seen your name on the  
 14 attendance list of Exercise Sherman. Do you have  
 15 a recollection of attending that event?  
 16 A. I do have a recollection.  
 17 Q. And as a result of your attendance, was there any  
 18 written learning identified for BTP?  
 19 A. No, there wasn't.  
 20 Q. Did your attendance cause you, that you can recall, to  
 21 reflect on the issue of primacy as between BTP and GMP?  
 22 A. No.  
 23 Q. I'm just going to turn now, please, to the materials  
 24 that you've provided the inquiry, just to help us  
 25 understand how they've come into the inquiry's hands.

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1 As we've established, your statement was signed and  
 2 dated Monday of this week. Accompanying that statement,  
 3 the inquiry received nine documents. Were those  
 4 documents, as you understand it, that you had identified  
 5 and provided to the BTP solicitor?  
 6 A. Yes.  
 7 Q. You won't know this, but we've checked this and it's  
 8 right, of those nine, seven had in fact already been  
 9 received by the inquiry. But what that means is that  
 10 there were two documents that you provided at the  
 11 beginning of this week that the inquiry had never seen  
 12 before. We'll come back to that in a moment; I tell you  
 13 that for your information.  
 14 Following that, the inquiry went back to BTP and  
 15 yesterday the inquiry received two more documents, those  
 16 being an email with officer deployments and a report  
 17 that you had written in 2019. Did you identify those  
 18 two further documents?  
 19 A. Sorry, identify them in what respect?  
 20 Q. Did you, following a request, identify those documents  
 21 as being relevant and provide them to the BTP solicitor?  
 22 A. Yes, I did.  
 23 Q. You provided those yesterday, did you?  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: Tell me the date of the report, the year

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1 of the report.  
 2 MR DE LA POER: November 2019. We're going to look briefly  
 3 at it in a moment.  
 4 Just to help the inquiry understand the disclosure  
 5 process, can you help us, inspector, with when you were  
 6 first asked to review the documentation that you had  
 7 access to for the purpose of this inquiry?  
 8 A. I can't remember. I don't know, sir.  
 9 Q. Would it have been recently, as in this year, or were  
 10 you asked before that, do you recall?  
 11 A. I was asked before this year, yes.  
 12 Q. So can you help us with why it was, if you were asked  
 13 before this year, that we received those 11 documents  
 14 only this week?  
 15 A. It depends which documents you're referring to.  
 16 Q. Well, let's focus upon the documents which are new to  
 17 the inquiry. We received two event schedules on Monday,  
 18 one of which covered the period of the Ariana Grande  
 19 concert. So those two documents were new to the inquiry  
 20 and, as I have said, yesterday, also new to the inquiry,  
 21 and we'll look at these both in a moment, there was the  
 22 email with the officer deployments including the  
 23 Ariana Grande concert and the November 2019 report that  
 24 you had written about the -- you describe it as  
 25 a tactical report for the arena.

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1 A. The event schedules, I thought they'd already been --  
 2 you already had those because I was asked for the event  
 3 schedules and I sent the event schedules. In regard to  
 4 the emails for deployments, that email was not sent to  
 5 me, it was an email from my rostering sergeant to the  
 6 rostering department, and I spoke to the sergeant,  
 7 I think it was earlier on this week or last week, and he  
 8 provided me with that.  
 9 Q. So was that a product of you having to make a witness  
 10 statement to the inquiry?  
 11 A. Well, it was just to sort of help me refresh my memory.  
 12 Q. I understand.  
 13 A. Because it was obviously quite a long time ago.  
 14 Q. So is part of the answer at least that in terms of that  
 15 email roster, that wasn't in your possession until this  
 16 week?  
 17 A. Yes, that's correct, sir.  
 18 Q. All right. We'll perhaps explore further with BTP the  
 19 background to it, but thank you for your evidence  
 20 in relation to that.  
 21 We've mentioned the tactical plan. I'm just going  
 22 to run through what the chronology is. Mr Lopez, can we  
 23 bring up, please on screen {INQ001985/1}?  
 24 Did you see any of the evidence of the security  
 25 experts yesterday, inspector?

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1 A. No, I didn't.  
 2 Q. Then you won't have seen this document being spoken  
 3 about, but it is a document that you're familiar with;  
 4 is that right?  
 5 A. I am.  
 6 Q. I'm not suggesting that you have an encyclopaedic grasp  
 7 of this detail, but I'm going to invite you to look at  
 8 a part of it. This is a document you have seen before  
 9 today?  
 10 A. Yes.  
 11 Q. If we look towards the bottom of the document, you'll  
 12 see the part that I'm particularly interested in. But  
 13 before we come to that we need to just identify the date  
 14 of this document because it's not dated on its face.  
 15 You provided an email in relation to this report,  
 16 didn't you, in which you suggested that the date was  
 17 April of 2014?  
 18 A. That's correct.  
 19 Q. You and I have spoken about this outside, so I'd like  
 20 you to tell the chairman what you can about that date  
 21 and how it came to be in the email that you identified.  
 22 A. Sir, in regard to the tactical plan, I can't remember  
 23 where I ascertained the date from. I would have,  
 24 obviously, made enquiries in regard to it to find that  
 25 date, but I can't remember how I came to get that date,

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1 I'm sorry. In regard to the tactical plan itself, I'd  
 2 not seen the tactical plan until obviously making  
 3 enquiries after the event had taken place at the arena.  
 4 Q. So in fact, I fell into error there, I have just brought  
 5 it up. The date you gave in the email, just so the  
 6 chairman can put it in his note, is 13 June 2014.  
 7 I said April and I was wrong about that. 13 June 2014.  
 8 Although you can't now remember where you got that  
 9 date from, at the time that you wrote it, were you  
 10 satisfied that it was accurate?  
 11 A. Well, yes, otherwise I would have put "approximately".  
 12 Because obviously it says it's for the Phones4U Arena,  
 13 so if I was unsure I would have probably looked at when  
 14 it was called the Phones4U Arena and put an approximate  
 15 date, but with it being a precise date, I would be sure  
 16 that it was the right date.  
 17 Q. Again, before we come to the detail of it, there are two  
 18 further versions of this document, aren't there? One in  
 19 September 2017, and we'll bring that up briefly, and  
 20 then a new version that you wrote in November 2019?  
 21 Is that correct?  
 22 A. That's correct.  
 23 Q. So given those dates, does it follow that this is the  
 24 applicable tactical report as at 22 May 2017?  
 25 A. I'm unsure about that, sir.

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1 Q. Well, if we look at it this way: if it was created in  
 2 2014 and not updated again until September 2017,  
 3 wouldn't it follow that that was the current edition in  
 4 May of 2017?  
 5 A. I wasn't aware of it, sir.  
 6 Q. Well, that perhaps is a different thing. So we can just  
 7 explore that statement --  
 8 SIR JOHN SAUNDERS: Okay, so you're not aware of any other  
 9 one which comes between June 2014 and October 2017  
 10 anyway?  
 11 A. No, I'm not.  
 12 MR DE LA POER: Thank you, sir.  
 13 Bearing in mind the role that you told us you had  
 14 during the period 2015 to 2017, having seen this  
 15 document, is this a document that you believed you ought  
 16 to have been aware of as part of your role?  
 17 A. It would have possibly helped.  
 18 Q. Because on the face of it, and in some detail, Police  
 19 Constable Peter Wood has provided quite a lot of helpful  
 20 information, hasn't he, about the arena?  
 21 A. Yes.  
 22 Q. And would you agree, having considered the entirety of  
 23 the document, it's clearly the product of careful  
 24 thought?  
 25 A. Yes, for somebody who doesn't know the arena.

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1 Q. Doesn't know the arena?  
 2 A. Who's never obviously worked it and doesn't know it.  
 3 Q. Do you know who commissioned the writing of this report?  
 4 A. It would have been Chief Inspector Moffatt and  
 5 Inspector Cooper from the operations department.  
 6 Q. And does Inspector Cooper know the arena?  
 7 A. He does.  
 8 Q. What about Chief Inspector Moffatt?  
 9 A. I'm unsure.  
 10 Q. Certainly one of those who commissioned it knew the  
 11 arena and they've tasked, presumably, an officer that  
 12 they regarded as being able to do the work with that  
 13 task. Would you agree that that's how BTP works?  
 14 A. Yes.  
 15 Q. And as far as you're aware, once it was produced it was  
 16 never withdrawn or cancelled?  
 17 A. I'm unsure, sir.  
 18 Q. Well, you have no information that it has been?  
 19 A. Yes.  
 20 Q. Certainly it didn't sit in a filing cabinet with a big  
 21 line struck through it saying, "We should ignore this";  
 22 is that right?  
 23 A. That's right.  
 24 Q. There's no such evidence that you have identified as you  
 25 have come to familiarise yourself with this document?

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1 A. That's correct.  
 2 Q. Let's have a look and see what the document says.  
 3 At the bottom:  
 4 "(1). The minimum recommendation for a relatively  
 5 small event would be 1x PC and 1x PCSO. Minor events  
 6 however, probably would not require officers dedicated  
 7 to arena duties."  
 8 Is that a sensible suggestion in your view?  
 9 A. Yes.  
 10 Q. "(2). For an event where ticket sales are high,  
 11 a recommendation of 1x sergeant, 4x constables and 2x  
 12 PCSOs. These figures would enable officers to monitor  
 13 the safe access and egress from the venue through  
 14 Victoria Railway Station, the City Room, Trinity Way and  
 15 Hunts Bank."  
 16 Let's have a look at parts of that. Firstly, do you  
 17 agree that the Ariana Grande concert fits with the  
 18 description of an event where ticket sales are high?  
 19 A. Yes, that's correct.  
 20 Q. So on the face of this document, what the tactical  
 21 report indicates then is that for an event such as the  
 22 Ariana Grande concert, one sergeant, four constables and  
 23 two PCSOs is the appropriate level of policing; do you  
 24 agree that's what the report is suggesting?  
 25 A. Yes, but that was written in 2014.

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1 Q. All right.  
 2 SIR JOHN SAUNDERS: We'll come to the question in a moment  
 3 whether you agree with it. But that's what it's  
 4 suggesting?  
 5 A. Yes.  
 6 MR DE LA POER: If you just read what the report says,  
 7 that's what it means?  
 8 A. Yes.  
 9 Q. When you say that was written in 2014, what had changed  
 10 between 2014 --  
 11 SIR JOHN SAUNDERS: Okay. Do you agree with it, as of  
 12 May 2017, as being a sensible suggestion or not, the  
 13 numbers? Sorry.  
 14 MR DE LA POER: Not at all, sir.  
 15 A. Yes, it would be a sensible suggestion.  
 16 SIR JOHN SAUNDERS: So had anything changed from 2014 to  
 17 2017?  
 18 A. Yes, sir.  
 19 MR DE LA POER: What had changed?  
 20 A. The design of the station.  
 21 Q. What about the change in the design of the station meant  
 22 that the numbers that are being identified there are or  
 23 might be considered to be different?  
 24 A. There was less risk in the -- when this report was  
 25 written, the exit from the City Rooms was directly on to

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1 the station, where the platforms are. There was two  
 2 stairwells coming straight down and also an entrance  
 3 from the City Rooms on to the overbridge, which caused  
 4 a lot of problems in regard to overcrowding, issues  
 5 with -- we had merchandisers coming and blocking the  
 6 steps. So that caused quite a lot of problems in that  
 7 area there.  
 8 Q. So the exit on to the overbridge, is that what we  
 9 understand to be referred to as the grey doors, which  
 10 came to be locked after the refurbishment?  
 11 A. Yes.  
 12 Q. Or became a fire exit effectively?  
 13 A. Yes.  
 14 Q. So to your mind, because of the reconfiguration, fewer  
 15 officers were required?  
 16 A. Yes.  
 17 Q. What about the notion that a sergeant, ie somebody who  
 18 was in charge, present on the ground? Had the  
 19 reconfiguration of the station changed the need for that  
 20 sort of oversight?  
 21 A. Um... A possibility that a sergeant would be of benefit  
 22 on the site but not particularly required.  
 23 Q. Well, if you're only deploying one officer, for example,  
 24 that officer might act autonomously in terms of the  
 25 decisions they make within the briefing they've

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1 received. But if you have more than one officer,  
 2 particularly if you have three, four or five officers,  
 3 don't those officers require some supervision on the  
 4 ground to help direct them with their duties?  
 5 A. No, sir.  
 6 Q. Not even when it comes to arrangements for, say, the  
 7 exit of 14,000 people?  
 8 A. No, sir.  
 9 Q. And just help us to understand why that is your answer.  
 10 A. Because they are trained to deal with that. They are  
 11 trained to use their initiative, they are trained in  
 12 regard to patrolling, so they are given the information  
 13 that the sergeant provided them in regard to the numbers  
 14 of people that are at the concert, the entrances that  
 15 are going to be used. He provided them with the  
 16 information, the areas where the -- sorry, the areas  
 17 where increased footfall would be, so the rooms, the  
 18 station and the front of the station, where obviously  
 19 you've got the problems in regard to build-up of people.  
 20 And then it's for the officers then to, obviously, carry  
 21 out that patrol, but the patrol is not at static points,  
 22 it's the patrol of the whole of the Victoria Exchange.  
 23 So if there was anything else, any further information  
 24 that's happening at that time, then obviously they would  
 25 be expected to change their patrol in regard to that.

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1 Q. In your role as an inspector, would you expect, where  
 2 multiple officers are deployed to an event at the arena  
 3 and the Victoria Station Complex, for them to be briefed  
 4 on where each of them by name should position  
 5 themselves?  
 6 A. No.  
 7 Q. So that is something that you would expect them to work  
 8 out between themselves?  
 9 A. Yes, they were quite capable of doing that.  
 10 Q. Well, we know on the night -- capability is a different  
 11 thing, but we do know on the night, and you'll have seen  
 12 this evidence, that's not what happened. At the point  
 13 of egress, all of the officers of BTP had congregated  
 14 at the war memorial exit. Knowing the arena as you do,  
 15 what's your view about whether that was an appropriate  
 16 place for those four people to position themselves at  
 17 that time?  
 18 A. One person -- an officer being deployed in that area  
 19 would be appropriate, but not all of them.  
 20 Q. Is that because the needs of an event such as  
 21 14,000 people also requires somebody to be in the  
 22 City Room?  
 23 A. Yes, possibly.  
 24 Q. What about down the Trinity Way link tunnel?  
 25 A. Not so much the Trinity Way. The majority of people

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1 come out of the arena via the City Room's entrance and  
 2 the Hunts Bank.  
 3 Q. The Hunts Bank and the City Room. So certainly someone  
 4 in the Hunts Bank area?  
 5 A. Yes.  
 6 Q. Certainly someone in the City Room?  
 7 A. Yes.  
 8 Q. Certainly someone by the war memorial?  
 9 A. Basically on the concourse covering the station  
 10 concourse and the barrier, the ticket barrier.  
 11 Q. Any other position that you might need a fourth officer  
 12 for an event such as the Ariana Grande concert?  
 13 A. Well, the positions are Hunts Bank and the road at the  
 14 front, so if someone's covering Hunts Bank they've got  
 15 a clear view of the road. And if there's somebody on  
 16 the concourse and the war memorial, they have got  
 17 a clear view of the barriers and the concourse itself.  
 18 Q. Then we have the City Room. I'm just asking you: is  
 19 there a fourth location that a person might usefully  
 20 deploy to, to improve the safety at the event?  
 21 A. The platforms.  
 22 Q. All right. Let's just see what happened to this plan  
 23 following.  
 24 Mr Lopez, {INQ001956/1}. This is the plan which we  
 25 understand to be dated September 2017. We can see from

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1 the content, can't we, that it is produced after the  
 2 arena attack?  
 3 A. Yes, sir.  
 4 Q. You are identified as one of the officers at the top?  
 5 A. Yes.  
 6 Q. Does that mean that you would have received a copy of  
 7 this?  
 8 A. Yes, sir.  
 9 Q. In fact, were you one of those who commissioned it?  
 10 A. I was.  
 11 Q. When you commissioned it, did you enquire what the  
 12 previous version of this report was to assist with what  
 13 might need updating?  
 14 A. Yes, sir.  
 15 Q. So bearing in mind that you've told us you didn't know  
 16 about the version that we'd just been looking at, does  
 17 it follow from that that when you commissioned this and  
 18 asked what the previous version was, you were told that  
 19 there wasn't one?  
 20 A. No, I had that when obviously I commissioned this.  
 21 Q. I understand. So although you didn't have it on 22 May,  
 22 when you came to commission this, that's when you  
 23 discovered the 2014 report?  
 24 A. Yes. Well, when I was asked -- yes, as part of the  
 25 investigation and the collection of documents for the

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1 Kerslake, that is obviously when that document was  
 2 brought to my knowledge. Then I used it to, obviously,  
 3 commission this document.  
 4 Q. Should that 2014 document have been updated before  
 5 September 2017, bearing in mind you have told us that  
 6 the refurbishment at the station gave rise to different  
 7 considerations?  
 8 A. Yes, in hindsight, yes.  
 9 Q. Then finally, we can go to, in terms of tactical plans,  
 10 {INQ035655/1}. We don't need to linger on it long.  
 11 We can see that this is a document that you created with  
 12 someone, W Mitchell, in November 2019. Does that  
 13 supersede the September version?  
 14 A. This has never been used, sir.  
 15 Q. Oh, is it in draft at the moment?  
 16 A. It was written, but our E Division colleagues were  
 17 writing the tactical plans, and then were commissioned  
 18 to write the tactical plans for all the stations, the  
 19 Category A stations. So they obviously -- that's been  
 20 superseded by that.  
 21 Q. I understand. So created but then overtaken by --  
 22 A. Yes.  
 23 Q. We don't need to look at the detail of that.  
 24 I'm going to turn now to the document that I was  
 25 asking you about that we received yesterday. This is

20

1 the email with officer deployments that you've only  
 2 recently been provided with.  
 3 Mr Lopez, {INQ039170/1}. We can see it's dated  
 4 January 2017. As you say, it's from your colleague  
 5 Anthony Ryan and it is sent to C-Rostering. Would  
 6 you have formed part of the list of C-Rostering?  
 7 A. No.  
 8 Q. That's not an email group that you're part of?  
 9 A. No.  
 10 Q. We can see various groups listed. If we look at the  
 11 bottom where it says "18", that's the indication of  
 12 18 May and we see the Take That concert. Can we go over  
 13 the page, please?  
 14 What's indicated for the Take That concert is five  
 15 collar numbers; is that right?  
 16 A. That's correct.  
 17 Q. I can take you to the transcript if you'd like, but  
 18 perhaps to start with you'll take it from me and we'll  
 19 see we get to.  
 20 We heard evidence near the start of this chapter  
 21 from PC Lorraine Johnson, whose collar number is 0309,  
 22 is the first of those identified for the 18th. What  
 23 PC Johnson told us was that she was on duty with  
 24 PCSO Charnock, that she had some frustration about that,  
 25 and that later that evening, two special constables

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1 joined those two officers. Were special constables  
 2 counted within this deployment in terms of collar  
 3 numbers or would this only be PCs and PCSOs?  
 4 A. I can't be sure. It would probably be PCs and PCSOs,  
 5 but I can't be 100% sure.  
 6 Q. So if PC Johnson is correct, rather than the five PCs  
 7 and PCSOs that this indicates, only one PC, one PCSO,  
 8 and at some point later in the evening two special  
 9 constables in fact policed the Take That event. If  
 10 that is correct, would you regard that as acceptable?  
 11 A. No.  
 12 SIR JOHN SAUNDERS: It may depend on the circumstances.  
 13 Presumably you can have occasions when something happens  
 14 which requires PCs to go elsewhere, does it?  
 15 A. That's correct, sir. So I have no knowledge of that.  
 16 SIR JOHN SAUNDERS: If you say it's unacceptable, it may be  
 17 going further than you can without knowing the details.  
 18 MR DE LA POER: I'm sure you're right, sir, but let's just  
 19 explore that.  
 20 Bearing in mind that event was planned to have five  
 21 PCs and PCSOs, which is what this email indicates,  
 22 in the event that an ordinary policing matter arises,  
 23 which requires one or more of those officers to be taken  
 24 away to deal with other duties, would you expect,  
 25 provided there was sufficient notice, that those

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1 officers would be replaced to make sure that it was  
 2 a full complement as planned?  
 3 A. If it's possible, yes, sir.  
 4 Q. Why might it not be possible?  
 5 A. Depending on what the incident that they're attending  
 6 is. So it may not be possible.  
 7 Q. So perhaps if there was a very short-notice event that  
 8 took them away at the start of their shift, for example,  
 9 would that be an example where it might not be possible  
 10 to get additional officers on duty?  
 11 A. That's correct, yes.  
 12 SIR JOHN SAUNDERS: A public order event at  
 13 Piccadilly Station, could that --  
 14 A. Possibly, or a fatality. I don't know, sir, because  
 15 I wasn't aware of that.  
 16 SIR JOHN SAUNDERS: But in normal circumstances there should  
 17 be five there? That's what the roster says.  
 18 A. They should be there, yes.  
 19 MR DE LA POER: Let's have a look at Ariana Grande. We've  
 20 got one fewer number of collar numbers there. I can  
 21 just run through these with you. I have checked one of  
 22 them in particular with Mr Gibbs, who represents BTP.  
 23 They are as follows: 9009 is a PCSO Burrows and we'll  
 24 come back to PCSO Burrows; 9063 is PCSO Renshaw, who we  
 25 know did attend; 1342 is PC Corke; 8415 is PC Bullough.

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1 It perhaps doesn't matter terribly, bearing in mind  
 2 what we know happened, but 9009, PCSO Burrows, did not  
 3 in fact attend on the night of the Ariana Grande  
 4 concert. But 1807, who we can see mentioned in relation  
 5 to the Brian Cox concert, did, namely PCSO Morrey.  
 6 A. That's correct.  
 7 Q. So it appears there was a substitution which arose for  
 8 some reason between when this email was sent in January  
 9 and when the deployment actually occurred. So on the  
 10 face of it, we know that briefed to attend by  
 11 Sergeant Wilson were the two PCs and two PCSOs that were  
 12 envisaged, plus of course we know PCSO Lewis, who was  
 13 a mentee, he was alongside PCSO Morrey, but he wasn't  
 14 autonomous, was he, because in this period he was  
 15 effectively to stay by PCSO Morrey's side to observe;  
 16 is that right?  
 17 A. Yes.  
 18 Q. So in terms of headcount, is it fair to say that  
 19 PCSO Lewis Brown, sorry, wouldn't be counted?  
 20 A. No, he wouldn't, but -- no, he wouldn't.  
 21 Q. So we're going to come to risk assessment in due course  
 22 and examine why it might be that Take That had five and  
 23 Ariana Grande had four. But we've discussed already the  
 24 idea of officers perhaps being taken away. We know in  
 25 fact that PC Corke did not attend the Victoria Railway

24

1 Station complex until after the attack occurred. Are  
 2 you aware of that event?  
 3 A. I am now, sir.  
 4 Q. Were you aware that he was tasked at the start of his  
 5 shift, before he was due to go to the Victoria Complex,  
 6 to attend with another matter that he was involved in  
 7 investigating? Did you know that before today?  
 8 A. Well, as part of this process.  
 9 Q. That took longer than was envisaged by Sergeant Wilson,  
 10 and as a result, he wasn't there either for ingress, for  
 11 the period between ingress and egress, or egress up to  
 12 the point of attack. Is that an example of where  
 13 a certain number of officers are identified as being  
 14 required to attend but where events overtake things and  
 15 it means that we have less than a full complement?  
 16 A. That can be one of the reasons, yes.  
 17 Q. We'll come now, please, to the process of how those  
 18 numbers are arrived at and the general topic of risk  
 19 assessment, which is the final area that I'm going to  
 20 ask you about. What you say in your statement about  
 21 this is that you reviewed the allocation of police  
 22 officers with your sergeant when you returned from your  
 23 secondment; is that right?  
 24 A. That's correct.  
 25 Q. When you say you reviewed the allocation, is that

25

1 effectively reviewing a document which will contain this  
 2 sort of information?  
 3 A. Or it will be speaking to the sergeant and asking him in  
 4 regard to whether the events were adequately resourced  
 5 and if there were any problems with resourcing.  
 6 Q. When you allocate the number of officers to an event,  
 7 what you tell us in your statement is you consider three  
 8 things: the audience demographic, the numbers attending,  
 9 and any specific intelligence. Is that a fair summary  
 10 of that allocation process so far as you are concerned?  
 11 A. That's correct.  
 12 Q. Was there any consideration taken when allocating  
 13 officers of the terrorism threat level?  
 14 A. Yes.  
 15 Q. In what way is that reflected in the process of  
 16 allocating officers?  
 17 A. That's reflected in everything we do, in how we deploy  
 18 officers in regard to everything that we do.  
 19 SIR JOHN SAUNDERS: So if the threat level was lower, would  
 20 we have seen less officers being assigned to it?  
 21 A. Possibly not, no.  
 22 SIR JOHN SAUNDERS: Realistically, I know we say we take  
 23 account of terrorism, it's a day in, day out threat and  
 24 the severe level has been going on forever. So you want  
 25 to know how many are going to the concert, what you're

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1 concerned about is making sure they get out safely,  
 2 there are no bottlenecks?  
 3 A. That's correct.  
 4 SIR JOHN SAUNDERS: So you're not actually thinking, are  
 5 you, there may be a bomber there?  
 6 A. As part of their patrol, they are there to cover those  
 7 areas where they can be seen by most people, so they're  
 8 there to provide that reassurance and that visibility  
 9 and also that deterrent.  
 10 SIR JOHN SAUNDERS: Okay, but if the threat level were taken  
 11 into account, you'd have more there when the threat  
 12 level was higher and you're saying the number of  
 13 officers actually doesn't make any difference with the  
 14 threat level. Let's be realistic about it, okay? In  
 15 practice, did you actually say the threat level has gone  
 16 up to severe, we must have more than four officers  
 17 there?  
 18 A. Well, the number of officers there was enough, was  
 19 enough to provide that reassurance and that visibility  
 20 and that deterrent in regard to that location, the  
 21 severe threat level.  
 22 SIR JOHN SAUNDERS: And if there was no threat level at all  
 23 and you were just there for crowd control, would it make  
 24 any difference to the numbers?  
 25 A. Possibly.

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1 SIR JOHN SAUNDERS: Not possibly, would it? I'm sorry to  
 2 tie you down, but we're actually trying to get realistic  
 3 answers to what was actually happening in practice. It  
 4 may be you say, well, four was always enough, whatever  
 5 the threat level, because it had enough visible presence  
 6 to deter bombers. If that's your evidence, that's your  
 7 evidence.  
 8 A. Then yes.  
 9 MR DE LA POER: If four people are required to look after  
 10 a crowd of 14,000 people, substantially comprised of  
 11 children, I think this is just possibly a slightly  
 12 different way of putting the same point, that assessment  
 13 is completely independent of the terrorism threat level,  
 14 isn't it? It's saying: we have 14,000 people,  
 15 predominantly children, we're going to need four  
 16 officers to make sure there isn't a crush, to make sure  
 17 that people who need directions, to make sure people who  
 18 are lost, to make sure people can see police officers,  
 19 we need four for 14,000 people with that kind of  
 20 audience demographic. Do you see?  
 21 A. Yes.  
 22 Q. And it's four people for 14,000 people —  
 23 A. Well, it was five — sorry, no, sorry, no, it was four.  
 24 Sorry.  
 25 Q. It was four people whether the terrorism threat level

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1 was low, substantial or severe?  
 2 A. Yes.  
 3 Q. So in terms of the allocation of officers to the arena  
 4 in terms of numbers, the terrorism threat level doesn't  
 5 seem, as between low, substantial or severe, to make any  
 6 difference?  
 7 A. You've got all the other risks as well, haven't you?  
 8 Q. Yes. It's those other risks which are driving the  
 9 numbers: the fact there might be a crush, the fact  
 10 people could get lost, the fact that people may need to  
 11 ask for directions --  
 12 A. Those officers can provide that reassurance, they can  
 13 obviously be there to -- they're there to do a number of  
 14 things, not just to do crowd control. They're there for  
 15 a number of reasons.  
 16 SIR JOHN SAUNDERS: So in practice, you look at the numbers,  
 17 who they are, the sort of audience they are, and you say  
 18 to yourselves: right, now in order to make sure they can  
 19 get out safely without crush points and things like  
 20 that, we need four officers there?  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: Then maybe you go through a separate  
 23 process: now I remind myself the threat level is severe,  
 24 is that a sufficient physical presence to deal with a  
 25 severe threat level or should I have more because of

1 that severe threat level? Do you actually go through  
 2 that separate process?  
 3 A. Possibly if we had any further information.  
 4 SIR JOHN SAUNDERS: No, sorry. No further information.  
 5 Just on the basis the threat level is severe. No  
 6 specific intelligence about the particular concert but  
 7 just knowing that threat level of a terrorism attack is  
 8 severe.  
 9 A. Yes, that would be taken into consideration.  
 10 SIR JOHN SAUNDERS: By you?  
 11 A. Yes, sir.  
 12 SIR JOHN SAUNDERS: So you went through that mental process?  
 13 A. Yes, because we'd been at severe since 2014.  
 14 SIR JOHN SAUNDERS: I know. That may be the problem.  
 15 A. And the whole of the country was at severe, every single  
 16 station under my responsibility was at severe, not just  
 17 the arena. So I had all that to think about.  
 18 MR DE LA POER: You have told us what your thought process  
 19 was. Is it correct that that thought process was not  
 20 documented in any sort of formal risk assessment?  
 21 A. That's correct, sir.  
 22 Q. We've received evidence from ACC O'Callaghan, who says  
 23 that in his professional opinion, perhaps with the  
 24 benefit of hindsight, that should have been written  
 25 down. Do you agree with that point of view or, as the

1 person conducting that risk assessment, do you say it  
 2 doesn't need to be written down for each event?  
 3 A. With the benefit of hindsight, yes, I would agree.  
 4 SIR JOHN SAUNDERS: It is quite useful just to remind you  
 5 every time, isn't it: "I must remind myself of the  
 6 threat level being severe and whether what we're  
 7 providing is sufficient to deal with that"? It makes  
 8 sure you actually go through that mental process if  
 9 you have to write it down.  
 10 A. Mm.  
 11 SIR JOHN SAUNDERS: But you weren't being forced to by what  
 12 was written down, you were just saying you'd do it  
 13 anyway?  
 14 A. There was no procedure to write it down, no.  
 15 MR DE LA POER: Thank you very much, inspector. Those are  
 16 all the questions I have for you. I am on notice that  
 17 Mr Weatherby on behalf of the bereaved families wishes  
 18 to ask questions. Can I check before I turn to them?  
 19 And I know that Mr Gibbs will have an opportunity at the  
 20 conclusion of that. Before Mr Weatherby begins his  
 21 questions, can I check whether any core participant  
 22 wants to ask questions? I say that on this occasion  
 23 because of how recently we've received  
 24 Inspector Wedderburn's statement.  
 25 MR COOPER: I will listen to Mr Weatherby, who usually

1 covers most of the issues, but having heard the  
 2 evidence, I will have a few questions, please.  
 3 SIR JOHN SAUNDERS: You'll all be aware that I'm really  
 4 concerned about the timing today. We'll sit as long as  
 5 we need to. I am assured we are not going to sit  
 6 tomorrow. We need to get through it today. Bear that  
 7 in mind. If there are things that I have left unturned  
 8 or Mr de la Poer has left unturned, by all means.  
 9 MR COOPER: As you'll understand, we had this statement only  
 10 very, very recently. I will, I anticipate, have  
 11 questions, but, as always, and as I showed yesterday,  
 12 I will be diligent as to the time.  
 13 SIR JOHN SAUNDERS: Thank you.  
 14 Questions from MR WEATHERBY  
 15 MR WEATHERBY: Officer, this tasking plan or tasking report  
 16 that you've been shown this morning. You were the  
 17 officer that was signing off the deployments, including  
 18 22 May. Why were you not aware of it at the time?  
 19 A. It had not been brought to my attention, sir.  
 20 Q. You must have known in terms of deployments generally,  
 21 but talking specifically about the station and the arena  
 22 complex, that there would be a tactical report or  
 23 tactical plan covering this?  
 24 A. I wasn't aware, sir.  
 25 SIR JOHN SAUNDERS: What's the point of having the tactical

1 plan if the person who's overseeing it doesn't actually  
 2 know about it?  
 3 A. I wasn't... I wasn't overseeing all the events.  
 4 I was — at the police station, we were responsible for  
 5 the low-risk events. The high-risk events, they were  
 6 managed by the operations department who commissioned  
 7 that report.  
 8 MR WEATHERBY: Without having some kind of plan or some kind  
 9 of report, you're just making it up as you go along,  
 10 aren't you?  
 11 A. No. No, sir.  
 12 Q. If the reconfiguration of the station really had changed  
 13 the requirements of deployments, then there should have  
 14 been a new tactical plan or tactical report, whether or  
 15 not you knew of such things, shouldn't there?  
 16 A. It would have been worthwhile, yes.  
 17 Q. First of all, you should have known about this report or  
 18 plan, shouldn't you, as the person signing off the  
 19 deployments?  
 20 SIR JOHN SAUNDERS: It may not be your fault.  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: But you should have known about it,  
 23 shouldn't you?  
 24 A. I probably should have known about it, yes.  
 25 SIR JOHN SAUNDERS: Is there a probable about it?

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1 A. I should have known about it, sorry.  
 2 MR WEATHERBY: If this was supposedly the document which  
 3 underpinned or was the starting point for deployment and  
 4 deployment numbers, then if the reconfiguration really  
 5 had changed the picture then there ought to have been  
 6 a different plan?  
 7 A. Yes, sir.  
 8 SIR JOHN SAUNDERS: Apparently a sergeant originally drew up  
 9 this plan, you were telling us, as to how many people to  
 10 send to the Ariana Grande concert and the other  
 11 concerts.  
 12 A. The email?  
 13 SIR JOHN SAUNDERS: The document with all the numbers with  
 14 all the collar numbers for all the concerts.  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: A sergeant drew that up?  
 17 A. That's correct.  
 18 SIR JOHN SAUNDERS: Do you know whether the sergeant knew  
 19 about this tactical plan?  
 20 A. I don't know. I don't, sir.  
 21 MR WEATHERBY: In your statement of earlier this week, you  
 22 don't in fact mention the tactical report so far as  
 23 I can see, do you?  
 24 A. No, sir.  
 25 Q. Why? The evidence you have given this morning was that

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1 first of all you didn't know about it at the time but  
 2 you knew about it shortly afterwards when you were  
 3 tasked with getting the documents together for Kerslake.  
 4 A. Yes, sir.  
 5 Q. And you've also given evidence that the report didn't  
 6 reflect the true position at the time of the bombing for  
 7 the reconfiguration reasons that you've given.  
 8 A. That's correct.  
 9 Q. So when you were doing your statement for this inquiry,  
 10 why didn't you raise those two points? They're  
 11 obviously pertinent, aren't they?  
 12 A. Yes, sir.  
 13 Q. Well, if they're obviously pertinent, is there a reason  
 14 why you didn't cover them in your statement?  
 15 MR GIBBS: I'm going to intervene, if you'll forgive me,  
 16 because I know how this came about and I'll clear it up  
 17 perhaps, as it were, in re-examination. There were  
 18 communications between BTP solicitors and the inquiry  
 19 alongside Inspector Wedderburn's statement.  
 20 SIR JOHN SAUNDERS: Mr Gibbs is going to clear it up in his  
 21 questions, but Mr Weatherby, you can come back  
 22 afterwards if you wish to; is that all right?  
 23 MR WEATHERBY: Thank you very much. I fully understand.  
 24 SIR JOHN SAUNDERS: I'm not cutting you off. I just think  
 25 it may be best to do it that way.

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1 MR WEATHERBY: I'm aware of the imperatives of time so I'm  
 2 happy to move on.  
 3 Just dealing with the supervision in 2014, you have  
 4 said that the supervision is obviously covered in that  
 5 document we've looked at and I'm going to put it up  
 6 again in a moment. But the 2014 plan referred to there  
 7 being a sergeant, so a supervisor, in 2014, and you gave  
 8 evidence earlier this morning that there was no need for  
 9 a supervisor in 2017. First of all, have I understood  
 10 your evidence this morning correctly?  
 11 A. That's correct, sir.  
 12 Q. So I didn't understand why there was a need for  
 13 a supervisor in 2014 but not a need for a supervisor in  
 14 2017; can you help us with that?  
 15 A. I didn't...  
 16 SIR JOHN SAUNDERS: Do you mind? Just hang on a minute.  
 17 I think there's a question before that, if you don't  
 18 mind me saying so.  
 19 Did you think in 2014 there should have been the  
 20 necessity for a supervisor?  
 21 A. It's hard to say going back that far. No. Probably no.  
 22 SIR JOHN SAUNDERS: You're being asked what the difference  
 23 is on the basis that there was a need in 2014. That's  
 24 the only reason I say that, Mr Weatherby.  
 25 MR WEATHERBY: Yes, fair enough. Well, given what we know

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1 now what the officers on the night of the 22nd did,  
 2 given their level of experience, and the fact that they  
 3 didn't do what they were told, it's obvious, isn't it,  
 4 that deployment to the station, particularly when  
 5 there's an event on with 14,500 people there, it's  
 6 obviously, isn't it, that officers deployed there need  
 7 to be supervised?  
 8 A. In hindsight now, as a result of the event, yes.  
 9 Q. It's not really hindsight, is it, when in 2014 the  
 10 sergeant that wrote the tactical plan, which was  
 11 presumably signed off by higher ranks, was saying that  
 12 supervision was required? It's not really hindsight, is  
 13 it, it was obvious and obvious at the time that  
 14 supervision was required?  
 15 A. Um...  
 16 SIR JOHN SAUNDERS: It may be you didn't have enough  
 17 sergeants to go round, but ideally it would have been  
 18 a good idea to have a sergeant there, wouldn't it?  
 19 A. If there have been a sergeant available, yes.  
 20 SIR JOHN SAUNDERS: So is it resources that's the problem?  
 21 A. Mm.  
 22 SIR JOHN SAUNDERS: Is it?  
 23 A. A sergeant wouldn't be particularly required at the  
 24 time, no. But obviously in hindsight of what's  
 25 happened, yes, we now -- for a concert of that type,

1 we would deploy a sergeant.  
 2 MR WEATHERBY: I'm not trying to catch you out here. You're  
 3 saying with hindsight there should have been  
 4 supervision. I'm putting to you that in 2014 the plan  
 5 provided for supervision, so it's not exactly hindsight.  
 6 If, as the chair has just put to you, the answer is  
 7 there should have been supervision but we didn't have  
 8 the resources, then please give that as your answer.  
 9 It's not hindsight, is it? That's what I'm putting to  
 10 you. If the plan that was there at the time called for  
 11 supervision. That was on the plan.  
 12 A. I hadn't had sight of the plan. I didn't know about the  
 13 plan.  
 14 Q. With respect, that wasn't exactly the question, but I'll  
 15 move on.  
 16 Can we have it up, just once more, please, Mr Lopez?  
 17 {INQ001985/1}. Under "BTP responses" and I'll try and  
 18 deal with this as quickly as I can.  
 19 There are three criteria referred to: type of event,  
 20 historical and intelligence, and current threat level;  
 21 yes?  
 22 A. Yes.  
 23 Q. The current threat level in June 2014 was lower than the  
 24 threat level on 22 May 2017. So the deployment that was  
 25 being suggested or required, however we want to put it

1 on this document, was for a lower threat level; yes?  
 2 A. Yes.  
 3 Q. So taking that in mind, are you still of the view that  
 4 this was an overprescription of numbers, if I can put it  
 5 that way?  
 6 A. It would always be ideal to have a sergeant present if  
 7 there was one available, but it's not a necessity.  
 8 Q. You get the point I'm making that in 2014, with a lower  
 9 threat level, a sergeant, four constables and two PCSOs  
 10 and in 2017, with a higher threat level, you have one  
 11 very inexperienced PC, two PCSOs and a PCSO under  
 12 training. It was a substantial --  
 13 A. Yes.  
 14 Q. -- underdeployment, wasn't it?  
 15 A. Based on that recommendation, yes.  
 16 SIR JOHN SAUNDERS: Mr Weatherby, I think in fairness to the  
 17 witness, she actually has a fourth criterion, which is  
 18 the physical layout of the building as to the  
 19 difficulties of moving the crowd. I just think in  
 20 fairness to her, she wasn't just thinking of those  
 21 criteria, as I understand it.  
 22 MR WEATHERBY: No.  
 23 To complete the picture, you've already referred to  
 24 the fact that there was a change in the geography of the  
 25 station. I did put to you earlier that that should have

1 led to a different plan and I think you agreed with  
 2 that; yes?  
 3 A. Yes.  
 4 Q. I'll move on swiftly.  
 5 Sherman. In terms of Exercise Sherman, you attended  
 6 with another inspector. Can you recall who the other  
 7 inspector was?  
 8 A. It was Chief Inspector Cooper.  
 9 Q. So yourself and Chief Inspector Cooper attended at the  
 10 Sherman exercise in July 2016. That was a scenario  
 11 involving a gun attack in the station and a follow-on  
 12 gun attack in the City Room with a Disney on Ice event;  
 13 yes?  
 14 A. Yes, that's correct.  
 15 Q. Looking at that, the takeaways from that exercise were  
 16 that GMP counter-terrorism police were looking,  
 17 10 months before the bombing, at a terrorist outrage  
 18 starting in the station and moving into the City Room;  
 19 yes?  
 20 A. Yes.  
 21 Q. And the event itself, Disney on Ice, would presumably  
 22 have been cast as low risk in terms of the BTP criteria;  
 23 yes?  
 24 A. Yes, unless we had specific intelligence.  
 25 Q. It would have a young audience and, unless you had

1 specific intelligence , it wouldn't have a particular  
 2 high-risk element to it?  
 3 A. No.  
 4 Q. But the exercise would have presumably brought home to  
 5 you the fact that here was a high-density crowd in  
 6 a vulnerable spot on your patch?  
 7 A. Yes, that's correct.  
 8 Q. And a regular occurrence at the arena City Room?  
 9 A vulnerable property, policed by BTP, for which you  
 10 were responsible for things like rostering; is that  
 11 right?  
 12 A. Yes, it would have been deemed under the threat as  
 13 a crowded place like all the other stations.  
 14 Q. But to you, as the officer who was overseeing the  
 15 rostering of BTP for that venue, this must have brought  
 16 home to you, 10 months before the attack, the  
 17 vulnerability and the importance of the arena and the  
 18 City Room?  
 19 A. Yes, the same as the rest of the station and the other  
 20 stations like Piccadilly.  
 21 Q. Okay. It had been chosen by GMP precisely for that  
 22 reason, that it was a real life , local , high crowd  
 23 density, vulnerable spot; yes?  
 24 A. Yes.  
 25 Q. Do you agree it should have triggered a consideration

1 from you about reviewing the policing by BTP of the  
 2 station and the City Room?  
 3 A. Yes.  
 4 Q. I'm right, I think, that no documentation at all was  
 5 raised by you or Chief Inspector Cooper, no learning,  
 6 nothing cascaded down to patrol officers from that  
 7 exercise; am I right about that?  
 8 A. Yes, that's correct, sir.  
 9 Q. Why was it that there was no learning from it? Why  
 10 didn't it occur to you that those things that might have  
 11 been looked at from attending Exercise Sherman --- isn't  
 12 that the purpose of you going to exercises like that?  
 13 A. Yes. I cannot fully remember at the time, but if there  
 14 would have been something that would have been  
 15 highlighted, then that would have been cascaded down.  
 16 SIR JOHN SAUNDERS: It follows therefore that you and  
 17 Chief Inspector Cooper concluded that you were already  
 18 taking into account what was demonstrated could happen  
 19 through Operation Sherman, you were already fully taking  
 20 that into account and on board in your planning?  
 21 A. Yes, that's correct. All officers should have been  
 22 briefed with regard to the terrorism threat and  
 23 obviously in regard to the responses and what they were  
 24 required to do.  
 25 MR WEATHERBY: Well, for example, given that it was an

1 exercise involving both the station, moving into the  
 2 City Room, did it trigger a thought about who did the  
 3 counter-terrorism advice and whether it was working and  
 4 whether it was joined up? Did it trigger that in you  
 5 when you were at Sherman? Did you think, we've got two  
 6 properties that we are policing here, connected  
 7 together, was there proper joined-up working between  
 8 them on a counter-terrorism basis? Did it trigger that?  
 9 A. Sorry, in what respect, sir?  
 10 Q. When you left the exercise, did you think: we must make  
 11 sure that the approach that is being taken at the  
 12 station and the approach that's being taken in the  
 13 City Room is joined up, because here is a moving  
 14 terrorist attack between the two?  
 15 A. Yes, at the exercise there were people there from the  
 16 arena and from the station, so we do communicate quite  
 17 a lot, really, between the two.  
 18 Q. Did it cause any review after Sherman as to those  
 19 relationships between BTP and Northern Rail and BTP and  
 20 SMG about the interface between the two, for example?  
 21 A. Not that I'm aware, sir.  
 22 Q. In terms of the risk assessment, what was it that you  
 23 did in terms of a risk assessment for the Ariana Grande  
 24 concert on 22 May? You have told us it wasn't written  
 25 down. What was it you actually considered?

1 A. We considered the number of people attending, the  
 2 demographic of the crowd, obviously the risk that was  
 3 already provided by the arena that they gave to the  
 4 event, which was low, the fact that we had no  
 5 intelligence or information in regard to any other risk,  
 6 the day of the week that it was taking place, and any  
 7 other events that were taking place in the city at the  
 8 time.  
 9 Q. When did you conduct this risk assessment?  
 10 A. I can't recall exactly.  
 11 Q. Where were you? Where were you when you conducted the  
 12 risk assessment?  
 13 A. I can't recall exactly where I was. I would have  
 14 been --- I'd have returned to my post as the inspector,  
 15 uniformed inspector at the police station.  
 16 Q. Was it communicated to anybody?  
 17 A. No, it would have been obviously a discussion between me  
 18 and my rostering sergeant. He's the one who obviously  
 19 made that decision prior to me returning and I would  
 20 have then just reviewed that to make sure that we had  
 21 adequate resources covering all these events and they  
 22 hadn't been taken away through sickness, annual leave,  
 23 courses. So it's a continual review process.  
 24 Q. Of course, policing generally requires a document audit  
 25 trail, doesn't it? So when you do important things like

1 risk assessments, you should be writing them down as  
 2 a risk assessment generally?  
 3 A. That's not a risk assessment, it's like a threat  
 4 assessment of the event. And generally, for large  
 5 events that cover a GSB, a Gold, Silver and Bronze, that  
 6 would be documented in the plan. But these were not  
 7 specific --  
 8 Q. I understand what you're saying about other events, but  
 9 sticking to this event, as I understand your evidence,  
 10 you've given evidence that you conducted a risk  
 11 assessment that --  
 12 A. Yes, it went through a decision-making process going  
 13 round the national decision makers. It would be  
 14 a decision-making process taking into account  
 15 information and intelligence, the risks and threats,  
 16 policies and procedures, contingencies and options, and  
 17 then that's how you come to your decision.  
 18 Q. Yes, I'm sure we're familiar with the decision-making  
 19 model. But my question was that in policing generally,  
 20 things like risk assessments, there's a requirement to  
 21 have an audit trail, isn't there, so that when things go  
 22 wrong and you have to give evidence about them, then  
 23 what you did or didn't do can be looked at and also you  
 24 can be supervised by your line managers as to whether  
 25 you are doing things like risk assessments? That's the

1 purpose or some of the purposes of documenting important  
 2 things like risk assessments; isn't that right?  
 3 A. Yes, sir.  
 4 Q. Is the reality here that you didn't in fact do a risk  
 5 assessment and perhaps you just cast your eye over  
 6 rostering that had been done by another officer?  
 7 A. Yes, taking into account what information we had in  
 8 regard to those events.  
 9 Q. And that's a risk assessment according to you, is it?  
 10 A. No, it's not a risk assessment.  
 11 Q. I can take you to the -- there's some emails that the  
 12 chair has seen, the inquiry has seen, where you are  
 13 tasked with replying to a series of questions from  
 14 Kerslake, from the Kerslake Inquiry, and risk  
 15 assessments are expressly referred to, but you don't  
 16 make any mention of a risk assessment that you conducted  
 17 about 22 May. I can take you to that email if you wish.  
 18 SIR JOHN SAUNDERS: I think she's agreeing that she didn't  
 19 do what we would describe as a risk assessment. She  
 20 says she does a decision-making model.  
 21 A. The risk assessments that are in that email, that refers  
 22 to a risk assessment generally for the police, a risk  
 23 assessment, because obviously we have risk assessments  
 24 for various activities that police officers are involved  
 25 in. So we have generic risk assessments for station

1 patrol, working on the track, and you know.  
 2 SIR JOHN SAUNDERS: So it's the risks to police officers  
 3 you're talking about not the general public?  
 4 A. Yes. And then we have an event risk assessment that was  
 5 written where officers are deployed, dedicated officers  
 6 are deployed within the arena and that one is utilised  
 7 and reviewed every time we have that special policing  
 8 services and we have those officers.  
 9 In regard to the event, that is like when we carry  
 10 out a review of -- if it's an event, if it's part of  
 11 a GSB, then the Silver and the Bronze would do a threat  
 12 assessment in regard to that.  
 13 MR WEATHERBY: Okay.  
 14 A. And that would be documented on their plan.  
 15 Q. Yes. I am a little confused, I don't want to take up  
 16 any more time. Can I just ask you: are you saying you  
 17 actually did a risk assessment for 22 May or are you  
 18 saying that you essentially, as I said before, cast your  
 19 eye over a deployment that was rostered by somebody  
 20 else?  
 21 SIR JOHN SAUNDERS: Okay, I think she's saying -- you're  
 22 giving two alternatives of which she's saying she did  
 23 neither. As I understand the evidence it is: I did do  
 24 a risk assessment in formal terms, I didn't just cast my  
 25 eye over it, what I did was I considered those matters

1 in making my decision for the matters she's mentioned.  
 2 MR WEATHERBY: I won't press it any further.  
 3 Finally on this point, the position has changed now,  
 4 hasn't it, officer? Now you're required or the officer  
 5 in charge of the signing-off of the rostering is now  
 6 required to do a documented risk assessment?  
 7 A. Yes, we document our decision, the decision-making that  
 8 I take is documented.  
 9 MR WEATHERBY: I won't take up any more time. Those are my  
 10 questions. Thank you very much.  
 11 MR DE LA POER: Sir, just before Mr Cooper asks the  
 12 questions that I know he is going to ask, can I just  
 13 indicate this: when I was questioning  
 14 Inspector Wedderburn I suggested that we'd received nine  
 15 documents, only seven of which we had received before.  
 16 In fact, I've been told that that is incorrect. All  
 17 nine documents that came with Inspector Wedderburn's  
 18 statement in fact we had had at various points. The  
 19 only two statements that were new were the two received  
 20 yesterday. I just wanted to clear that up and  
 21 I apologise that my information was wrong.  
 22 Questions from MR COOPER  
 23 MR COOPER: Just following on the assessment of risk, could  
 24 I take you to your statement, please, paragraph 15.  
 25 I'll give the number so it can come up on the screen,

1 which is {INQ039154/1}.

2 I just want to understand, so far as this particular

3 event is concerned on 22 May 2017, looking at your

4 paragraph 15, {INQ039154/5}, four lines down, where you

5 say:

6 "In deciding on the deployment of officers we took

7 into account: (1) numbers attending."

8 So that would be about 14,000 young people?

9 A. Mm.

10 Q. "(2). Audience demographic."

11 Do I presume from that, again, it's young people,

12 a mixture female or male but predominantly female?

13 A. Yes.

14 Q. Did you include in that older people such as parents or

15 guardians who may be in the vicinity coming to pick

16 these people up because they were young and vulnerable?

17 A. Yes.

18 Q. That was taken into account as well —

19 A. Yes.

20 Q. — that the demographic included older people? And:

21 "(3). Available intelligence."

22 So those are the three things that you took into

23 account for your risk assessment, and do you mean by

24 "available intelligence" the fact that the country was

25 at severe risk level?

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1 A. Yes. As I said before, the country had been at severe

2 since 2014, so that was always in my mind in regards to

3 it.

4 SIR JOHN SAUNDERS: Stop for a moment. In that statement

5 where you say "available intelligence", are you talking

6 about the general threat level amongst other things or

7 are you actually talking about any intelligence you may

8 have had relating to that particular concert such as

9 pickpockets following round and stuff like that? Which

10 are you referring to, the second?

11 A. Yes, that's what I am referring to, yes, sorry.

12 MR COOPER: Would you take into account that at this time

13 there had been a series of atrocities, three or four in

14 close proximity? For instance, London Bridge in March.

15 A. Mm.

16 Q. Did you take that into account, all of those atrocities?

17 A. Yes. There would have been — they would have been

18 taken into account as part of my day-to-day management

19 of all the stations, all the events taking place. We

20 did brief officers in regard to after that event.

21 SIR JOHN SAUNDERS: Mr Cooper, I think Assistant

22 Chief Constable O'Callaghan also said: we didn't include

23 in — it was always just in the back of our minds.

24 Whether that is sufficient and it appears to be accepted

25 by BTP now that it wasn't sufficient is something that

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1 I will have to form a conclusion on, but I think that's

2 the general tenor of the evidence you're giving.

3 A. Yes.

4 SIR JOHN SAUNDERS: It was always in our minds?

5 A. Yes.

6 MR COOPER: I'm comfortable that you clearly have the point.

7 SIR JOHN SAUNDERS: That wasn't said in order to stop you.

8 MR COOPER: It's a point I was trying to elaborate on, but

9 it's there now and I don't need to elaborate on it.

10 Resources, just a little on that. I would like to

11 press you on it. Would you accept that resources at the

12 time, in May 2017, you were very short of resources to

13 do your job at the time?

14 A. I can't recall.

15 Q. Well, have a think. The pressure that was on you at the

16 time, and I have been watching your evidence and the way

17 you've given it. At one stage, can I suggest to you

18 there was a degree of frustration in your evidence when

19 you said, "I've got to look after all these stations".

20 Do you remember that little passage of your evidence?

21 And you seemed very frustrated, understandably so, and

22 I'm asking you, not your fault, but were you strapped

23 for resources at the time to do your job in May 2017?

24 A. You can always want resources, you could never have

25 enough resources.

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1 SIR JOHN SAUNDERS: That's not the question. Were you —

2 A. Not that I can recall, no.

3 SIR JOHN SAUNDERS: Were you able to provide at the

4 Ariana Grande concert the number of officers that you

5 would ideally want there to protect the public?

6 A. Yes.

7 MR COOPER: All right. One of the jobs of officers that you

8 would send to the concert, would it be to patrol the

9 mezzanine area? Would that be one of the patrols an

10 officer would be expected to undertake?

11 SIR JOHN SAUNDERS: Do you know what is meant by the

12 mezzanine?

13 A. Do you mean the City Rooms?

14 MR COOPER: Forgive me. It's that raised area where

15 JD Williams and is where McDonald's was and, as you may

16 know, indeed where this murderer was hiding. Now, would

17 officers be expected to patrol that area?

18 A. I think they were asked to patrol the City Rooms area.

19 We wouldn't specifically tell them where to stand.

20 Q. Given that we've heard that is a particularly good

21 vantage point for security people to stand to observe

22 the whole panoply of the City Room, was it not a good

23 place for an officer to stand, if nothing else to

24 observe the whole sweep of the City Room?

25 A. That would be for them to make that decision. They are

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1 trained in order to carry out the patrol and to be in  
 2 places where they provide that — where they can be seen  
 3 by the most people. So that would be for that officer  
 4 to use their initiative and make that decision on the  
 5 day and at the time.  
 6 Q. Precisely. Officers using their initiative, using their  
 7 experience, using their training would most probably, if  
 8 they're doing their job, go to that area, the mezzanine  
 9 area, to help them with their patrolling? Correct?  
 10 A. Possibly, yes, sir.  
 11 Q. Well, more than possibly. Can I press you and suggest  
 12 to you on what you've just said to me —  
 13 A. There may be other areas that they feel that they can  
 14 provide that visibility and the role that they need to  
 15 undertake there.  
 16 Q. I'll leave it with this simple question at the end:  
 17 I think all will agree that it was a good area for  
 18 surveillance for legitimate individuals trying to  
 19 protect people, it would be a good place for officers to  
 20 go, you're saying your officers were well-trained, and  
 21 they would have gone there, wouldn't they?  
 22 A. It would be a good area for them to go.  
 23 Q. Stephen Corke. Have you made enquiries as to exactly  
 24 what he was doing when he wasn't there? We keep hearing  
 25 about this burglary but we have had no details about it.

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1 On behalf of the families, we'd just like to make sure  
 2 he was at this burglary. Have you checked out where he  
 3 was?  
 4 SIR JOHN SAUNDERS: Okay, we have had details that he was  
 5 there at the interview, so we know the times of the  
 6 interview as well. He was then asked, if you remember,  
 7 about what happened afterwards, and he was indicating  
 8 there was various documentation that he had to do which  
 9 was delayed. I don't know how much checking up on that  
 10 can take place. Was a check made of what PC Corke was  
 11 doing or do you not know?  
 12 A. I don't know, sir.  
 13 MR COOPER: Last question.  
 14 SIR JOHN SAUNDERS: Sorry, I just — I understand the  
 15 interest, if I may say so, but I'm not sure how much  
 16 this witness could help with that.  
 17 MR COOPER: Then I'll move on and it's my last question now.  
 18 Food breaks. What's the policy with officers as to  
 19 how long they take their food breaks for?  
 20 A. It's 40 minutes, I believe, for an 8-hour shift.  
 21 MR COOPER: Forty minutes for an 8-hour shift. Thank you,  
 22 sir.  
 23 MR DE LA POER: Finally, Mr Gibbs.  
 24 Questions from MR GIBBS  
 25 MR GIBBS: Just to answer, sir, your question on the subject

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1 of PC Corke, I think all the documentation has been  
 2 provided that's available, for instance screenshots  
 3 about progressing the person in custody, and as I recall  
 4 he gave evidence about it.  
 5 SIR JOHN SAUNDERS: Thank you. Certainly the interviewing  
 6 we have the documentation for, I do understand that.  
 7 I think it was later the difficulties of getting through  
 8 because it had to be sorted out where he went. We can  
 9 look at that later.  
 10 MR GIBBS: Inspector, the 2014 document that was produced by  
 11 PC Wood, do you know what prompted that document?  
 12 A. I don't, sir.  
 13 Q. Was it you?  
 14 A. No.  
 15 Q. Do you know what use was made of it in the period up  
 16 until the station layout changed?  
 17 A. I don't, no, sir.  
 18 Q. Do you know what use of it, if any, was made after the  
 19 station layout changed?  
 20 A. No, I don't.  
 21 Q. Were you ever using it?  
 22 A. No.  
 23 SIR JOHN SAUNDERS: It doesn't have a lot of use at the  
 24 moment, Mr Gibbs, this particular document. It doesn't  
 25 have much use at the moment, it looks like.

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1 MR GIBBS: It may have been extremely useful to somebody who  
 2 knows, but I'm just interested, as I'm sure you are,  
 3 sir, in the evidence.  
 4 SIR JOHN SAUNDERS: Okay.  
 5 MR GIBBS: Was it one of the documents that you were  
 6 provided with and onward provided to Mr Gregory as part  
 7 of BTP's internal Kerslake review?  
 8 A. Yes, that's correct.  
 9 Q. So it was attached to — it was one of the documents  
 10 attached to the email that you sent in response to  
 11 Mr Gregory's request for information?  
 12 A. Yes, that's right.  
 13 Q. And I have already given the statistics yesterday of  
 14 when it was provided by BTP.  
 15 Come forward, please, to 6 months before the  
 16 Ariana Grande concert. Can we just follow the process  
 17 of rostering, so the pre-decision-making process. On  
 18 30 November 2016, there is a biannual meeting hosted by  
 19 SMG; is that right?  
 20 A. That's correct, sir.  
 21 Q. And at that, the upcoming events are considered?  
 22 A. Yes.  
 23 Q. And you have a list of them there?  
 24 A. Yes.  
 25 Q. And you're still at that point, obviously, 6 months

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1 ahead of the concert. Do you at that point make even  
 2 provisional rostering arrangements?  
 3 A. When we get the event schedule then I would take the  
 4 event schedule back and then obviously make the sergeant  
 5 aware of it and then go through the rostering then.  
 6 Q. So let's just follow it chronologically. There's an  
 7 event schedule in January, I'm going to give the  
 8 chairman the number, {INQ039133/1}. It's an Excel  
 9 spreadsheet which shows all the upcoming events. That's  
 10 in January 2017.  
 11 Based on that, is that what goes to rostering or  
 12 what goes to your sergeant?  
 13 A. Yes, he would get a copy of that as well, yes.  
 14 Q. And then he produces his January email, which we've been  
 15 looking at, {INQ039170/1}, to rostering?  
 16 A. Yes.  
 17 Q. And we have seen the specific collar numbers, some  
 18 months ahead, of officers that would be deployed to  
 19 particular events.  
 20 A. Yes?  
 21 Q. Is that set in stone at that point?  
 22 A. No, because obviously officers will change, they will  
 23 either move, they will be absent through sickness,  
 24 holidays, so it has to be a continual review.  
 25 Q. We can see for instance that in that email four officers

1 appear to have been provisionally, at least, assigned to  
 2 the Ariana Grande concert, whereas the night before,  
 3 five officers are assigned to Take That.  
 4 A. Yes.  
 5 Q. Do you know what the numbers were at Take That?  
 6 A. That actually attended Take That?  
 7 Q. That were expected in January.  
 8 A. I think it was five.  
 9 Q. Not of officers, I meant the audience numbers.  
 10 A. Oh, sorry. I can't recall. I think they were quite  
 11 high.  
 12 Q. Do you remember what the demographic expected at that  
 13 was?  
 14 A. It would have been a majority of women, but potentially  
 15 there was a risk factor of drink involved.  
 16 Q. How much drink was expected at Ariana Grande?  
 17 A. Little, negligible.  
 18 Q. Then the next thing in time that happens is that here's  
 19 a March event scheduled, so the same Excel spreadsheet,  
 20 but now updated with whatever the fresh information is.  
 21 That is {INQ039158/1}. When you received that, what  
 22 happens to that?  
 23 A. Basically, we review that and look at any -- because  
 24 I think the difference between the one in January and  
 25 the one in March -- the only difference is there's more

1 events added. So obviously, they would be looked at in  
 2 regard to resourcing those.  
 3 Q. And then in May, there's a further schedule updated and  
 4 that is {INQ001581/1}. What happens when you receive  
 5 that?  
 6 A. That one, again, has further events added but it also  
 7 has the final figures for May because obviously the ones  
 8 before that had only the sort of cap, the capped figures  
 9 of the expected --  
 10 Q. Okay, thank you. Then the actual deployment we can see  
 11 from Sergeant Wilson's email, the chairman has the  
 12 reference for that, so that's the actual deployment.  
 13 When would that have been decided, how many days or  
 14 hours before the event, the actual officers who were  
 15 going to be there?  
 16 A. I can't say for certain.  
 17 Q. Usually?  
 18 A. It's difficult to say because it would have been --  
 19 obviously those officers would have been put in place  
 20 and then depending on, obviously, if there were any sort  
 21 of changes that were required at those various times  
 22 those changes would have been put in place due to those  
 23 officers becoming absent or whatever and then depending  
 24 on obviously if we had any further information  
 25 concerning any risk to the event where it required more

1 officers, then those changes would be made when we got  
 2 that information.  
 3 SIR JOHN SAUNDERS: So the changes could happen any time?  
 4 A. They could be made on the day if required.  
 5 MR GIBBS: One last thing is this: the threat level, the  
 6 general national threat level, not just to the arena but  
 7 to every site, to every police station, to every railway  
 8 station, when that goes up, is it just the arena that  
 9 you have to consider?  
 10 A. No, it's the whole of the network.  
 11 Q. How many railway stations were under your control?  
 12 A. I think it's approximately about 65 or more.  
 13 Q. At that time what sites, if any, did you understand to  
 14 be particularly at risk? What was the information you  
 15 were getting?  
 16 A. The ones at particular risk were Piccadilly, Victoria  
 17 and the airport.  
 18 MR GIBBS: Those are my questions.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 Mr Weatherby needs to be asked whether he wants to  
 21 come back.  
 22 MR WEATHERBY: Thank you very much for the opportunity. No,  
 23 I don't. Thank you.  
 24 MR DE LA POER: I wonder whether now would be a convenient  
 25 moment for us to take our break.

1 SIR JOHN SAUNDERS: So you have no questions?  
 2 MR DE LA POER: I don't, thank you, sir.  
 3 SIR JOHN SAUNDERS: Thank you very much for coming to give  
 4 your evidence.  
 5 Quarter of an hour, thank you.  
 6 (11.00 am)  
 7 (A short break)  
 8 (11.15 am)  
 9 MR GREANEY: Sir, before Mr Gibbs concludes his questioning,  
 10 there's one matter we ought to raise, which is this:  
 11 during the trial of Hashem Abedi, a video produced by  
 12 Islamic State was played to the jury. That video has  
 13 the exhibit reference CAH/38. The video provides  
 14 instructions for producing TATP and there are grounds  
 15 for believing that it was used by the Abedi brothers as  
 16 a guide for what they did.  
 17 The video is plainly dangerous and the inquiry has  
 18 exercised considerable care in its handling, so it has  
 19 not yet been disclosed to core participants although its  
 20 content is summarised in a statement of DCI Pickering.  
 21 Next week, of course, we will commence chapter 8 of  
 22 the inquiry oral evidence hearing, which will address  
 23 planning and preparation for the arena attack and the  
 24 video will therefore be relevant at that stage of our  
 25 process. We know, of course, sir, that you have seen

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1 the video. Furthermore, arrangements are to be made for  
 2 any core participant who wishes to view the video to do  
 3 so in this hearing room this lunchtime, and there will  
 4 of course be no broadcast from here during that stage.  
 5 The next question, however, is whether the video  
 6 should be shown in the hearing itself, so during the  
 7 course of chapter 8, and, if so, in what circumstances.  
 8 If it is to be shown during the course of the hearing  
 9 itself, it must, in our view, be shown in a restricted  
 10 session, and our current view, by which I mean the  
 11 inquiry legal team, is that that is probably the  
 12 appropriate course, although I'm bound to say we do have  
 13 some concerns about it.  
 14 Sir, I raise that at this stage so that if you have  
 15 anything you wish to say in response, you're able to do  
 16 so, and if any core participants has anything they wish  
 17 to say equally they are bale to do so.  
 18 SIR JOHN SAUNDERS: Mr Greaney, you of course gave me  
 19 advance notice of what you're about to say. I have seen  
 20 the video. It is an extremely dangerous video in the  
 21 wrong hands. It seems to me that the less times it is  
 22 shown the better, even with precautions being taken  
 23 because it is quite impossible to exclude any risk of it  
 24 getting into the wrong hands.  
 25 If core participants do want to see it, then they

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1 may do so at lunchtime with this room being completely  
 2 closed off. Can I discourage you from doing it? It  
 3 will be described by a witness. I'm not saying people  
 4 can't, but I would think people would find it  
 5 distressing. It is propaganda as well as having very  
 6 dangerous contents.  
 7 I am at the moment not convinced of the necessity  
 8 and certainly not convinced of the desirability of it  
 9 being shown even in a closed session with all the  
 10 precautions because excluding risk is very difficult.  
 11 I believe that the contents can be dealt with by  
 12 a description given by people who have seen it, forensic  
 13 scientists and by Mr Barraclough.  
 14 I'm quite happy, of course, to hear representations  
 15 made about it and reconsider my initial views at the  
 16 moment. And please, those who do want to see it at  
 17 lunchtime, feel able do so. I'm not sure you're going  
 18 to getting anything but considerable distress from it  
 19 having seen it myself and knowing what the contents are.  
 20 But, please, anyone feel entirely free when they've  
 21 thought about what I have said and, perhaps not just at  
 22 this precise moment, to make submissions to me about it  
 23 being shown as part of a closed hearing during the  
 24 evidence taking.  
 25 So I'm just giving you an initial view and why

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1 I have got an initial view, but, as ever, I'm always  
 2 happy to be persuaded or willing to be persuaded by  
 3 argument.  
 4 MR WEATHERBY: My team, I don't know about others, have been  
 5 involved in this. This is in fact a video that was  
 6 shown in the criminal trial. I don't disagree, with  
 7 respect, with anything you have just said. However,  
 8 I would value a discussion with your team and we may be  
 9 able to progress this a little bit more. There are some  
 10 outstanding issues about it and I'm sure they can be  
 11 resolved by a discussion.  
 12 SIR JOHN SAUNDERS: Mr Weatherby, genuinely, I encourage  
 13 discussion to take place. I am open to be persuaded,  
 14 but I'm giving you an idea of my initial views at the  
 15 moment.  
 16 MR WEATHERBY: I'm sure we can come to a sensible  
 17 arrangement based on the comments that you have made.  
 18 SIR JOHN SAUNDERS: Thank you. I'm grateful for that.  
 19 MR GREANEY: Thank you, Mr Weatherby.  
 20 Sir, I'm now going to invite Mr Gibbs to conclude  
 21 his questioning, please.  
 22 COLONEL RICHARD LATHAM (continued)  
 23 DR DAVID BAMAUNG (continued)  
 24 Questions from MR GIBBS (continued)  
 25 MR GIBBS: I'm going to be very short. There's two short

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1 points, two issues left, parts of issues. They're both  
2 policing issues and, again, if you'll forgive me, I'm  
3 going to direct my attention primarily to Dr BaMaung.

4 It's issue 7(b) and the question of a written risk  
5 assessment and I don't mean a risk assessment by the  
6 arena operator and I don't mean a risk assessment by the  
7 arena security provider, I mean a risk assessment,  
8 a written risk assessment by the police force that's  
9 responsible for that place.

10 Can I just get it clear? Is it your opinion that  
11 every police force should have a written risk assessment  
12 for entertainment events on its ground?

13 DR BaMAUNG: I believe so. It would be a natural thing to  
14 do and to have that documented as well.

15 Q. But for every entertainment event of any size or  
16 dependent upon the numbers attending?

17 DR BaMAUNG: I think the depth you would need to go into for  
18 a risk assessment for different sizes of events would  
19 possibly impact on the complexity and size of the risk  
20 assessment. But I believe, even if it's down to a very  
21 basic one for a small event, but for events when you're  
22 talking about several thousand people, then most  
23 definitely there should be a formal form of risk  
24 assessment.

25 Q. What criteria would you recommend to the chairman that

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1 should be applied in deciding whether for a particular  
2 event at a particular entertainment site a written  
3 police risk assessment should be looked for?

4 DR BaMAUNG: I think there's a very basic precept here. If  
5 the police have to attend — a lot of events the police  
6 don't cover at all. If the police deem they have to  
7 attend an event, that event should have a risk  
8 assessment, because you have many sites, many nightclubs  
9 that don't have a police presence at all, but I think in  
10 the case of the arena, when it was identified there were  
11 large events such as the Ariana Grande concert, then  
12 I feel there should have been some sort of formal risk  
13 assessment process undertaken. But Colonel Latham may  
14 want to have a view on that as well.

15 COLONEL LATHAM: From an event point of view rather than  
16 a policing point of view, it's quite clear that those  
17 events should have a risk assessment.

18 Q. Yes. I'm just asking about from a policing point of  
19 view, whether the police force — can I just test it?  
20 That's all. I'm just asking. In Glasgow, does  
21 Strathclyde Police have a risk assessment for every  
22 night at the King's Theatre?

23 DR BaMAUNG: No, because the police don't attend every night  
24 at the King's Theatre.

25 Q. There are 1,800 people coming out every night at 10.30.

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1 DR BaMAUNG: What I said to you was if the police are  
2 dedicated to police a particular event within the city  
3 centre, you have numerous nightclubs, the police will  
4 have an overall patrol, but they're not tasked to link  
5 in. I think the circumstances of the arena are quite  
6 unique, as was discussed before, and that fell within  
7 the particular remit of British Transport Police and  
8 that British Transport Police undertook a responsibility  
9 towards the event. Whereas if you're talking about  
10 Glasgow city centre, Strathclyde Police or  
11 Police Scotland don't undertake a requirement to have  
12 police personnel there because you have many, many  
13 venues within Glasgow city centre. If it was a busy  
14 night, you would have probably a police presence to look  
15 for any issues where there might be disorder.

16 But I don't think it's an accurate comparison when  
17 you talk about events within a city centre environment  
18 compared to one here where you've got dedicated BTP  
19 police officers.

20 Q. So your analysis of the arena, an event at the arena,  
21 is that it isn't a city centre event?

22 DR BaMAUNG: I would say in relation to the priorities that  
23 British Transport Police have the primacy for the  
24 policing of that particular area. And while it is  
25 within the city centre, the primacy issue is that

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1 British Transport Police have got first responsibility  
2 for the safe management of the event, including the  
3 egress from the City Room. When they get into the  
4 street, then the event is basically — the area is away  
5 from the actual event.

6 COLONEL LATHAM: We do have some NaCTSO guidance —

7 SIR JOHN SAUNDERS: I think, Colonel Latham, we're all very  
8 unused, and I am in particular, at having two witnesses  
9 at the same time. I am quite happy that if each of you  
10 has a comment on what the other has said that you should  
11 do it, but I think what we'll do is we'll come to you at  
12 the end if you don't mind, because it's quite  
13 distracting for the questioner —

14 COLONEL LATHAM: I apologise in that case.

15 MR GIBBS: Don't worry.

16 Can I just test the logic of this? The distinction  
17 between it being a city centre event and therefore it  
18 being policed generally by the Home Office force and it  
19 being some different —

20 DR BaMAUNG: I think that's not what I said. I said if  
21 there was a city centre event it wouldn't necessarily be  
22 policed, the actual event. The territorial police force  
23 would have responsibility for the city centre but not  
24 for the policing of that actual event.

25 Q. Quite. So imagine a situation, I know we do probably

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1 too much what if, but imagine that in fact it had been  
 2 GMP that had taken the lead policing role for the arena,  
 3 so that would be — would it then be from policing terms  
 4 another, a large, but another entertainment event in the  
 5 city centre?  
 6 DR BaMAUNG: I really can't hypothesise on what the role of  
 7 GMP would have been because GMP wouldn't have had the  
 8 responsibility internally within the Victoria Complex,  
 9 which includes City Room. You could hypothesise, but  
 10 I think from our perspective, both Colonel Latham and  
 11 myself, that particular event, British Transport Police  
 12 had the responsibility for inside the building and  
 13 inside the buildings was where the police presence was  
 14 going to be. In our view, if the police have got  
 15 a specific responsibility, as was demonstrated in the  
 16 documentation that's been provided by BTP where officers  
 17 are assigned to an event, then there should be a risk  
 18 assessment. If you're talking about events in the city  
 19 centre, officers would not be assigned as a matter of  
 20 course. Unless it was public order or a paid police  
 21 presence, they would not be assigned to that event  
 22 because there are so many events, it would be virtually  
 23 impossible to assign officers to them all. I hope that  
 24 answers your question.  
 25 Q. What it does is it ventilates the point that I'm

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1 offering up to the chairman for thought. Thank you very  
 2 much.  
 3 SIR JOHN SAUNDERS: Well, can I just clarify it? The  
 4 distinction that you are making is that BTP, as they  
 5 told us, were undertaking to get the crowd safely from  
 6 the arena to the public highway.  
 7 DR BaMAUNG: That's correct, sir.  
 8 SIR JOHN SAUNDERS: And that's the distinction, is it?  
 9 DR BaMAUNG: Yes. Unfortunately, we didn't see the full  
 10 proceedings before we came in as witnesses, but as far  
 11 as my view is, normally, unless police officers are  
 12 assigned to an event, there wouldn't be a risk  
 13 assessment because there are so many events. However,  
 14 if police officers are assigned to an event that should  
 15 be properly risk assessed so we can establish to have  
 16 the right officers deployed, are there any other  
 17 specialist units required for it.  
 18 SIR JOHN SAUNDERS: I see the issue, Mr Gibbs, and I will  
 19 hear further representation from you about it.  
 20 MR GIBBS: The subsidiary point here is the question of  
 21 money, so who pays. There was something you said on  
 22 Tuesday — I'm going to give the chairman the reference  
 23 in the transcript, it's page 215, you begin at line 4  
 24 {Day41/215:4} — and I just wanted to be sure what you  
 25 were saying. You described that the situation at the

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1 arena was extremely complex and you described it — this  
 2 was on the question of who pays — as unique in the  
 3 cases that you'd seen, you used that phrase. I want to  
 4 know what you meant by that in policing terms. Do you  
 5 mean that it's in your experience unusual for police  
 6 services to be provided in the way that BTP provided  
 7 them to the arena in the Victoria Complex without being  
 8 paid?  
 9 DR BaMAUNG: I think, to elaborate on what I said  
 10 previously, the complexity of the arrangement, in my  
 11 view, is that BTP had a responsibility for that  
 12 particular area and the general policing of that  
 13 particular area. The event — the way that BTP  
 14 resources were deployed for the events entailed them to  
 15 still cover that area, but obviously if you're talking  
 16 about a complex with a limited number of officers, then  
 17 it's a matter of common sense as well that the majority  
 18 of the people within that facility are protected at key  
 19 times, such as ingress and egress.  
 20 I think that would be different from most other  
 21 forces or territorial forces because when it came to  
 22 policing, they've got responsibility for policing the  
 23 whole area rather than a specific area.  
 24 And yes, you mentioned the payment of police.  
 25 Probably if police were required to attend from

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1 a territorial police force to an event, then they would  
 2 charge for that police service, be it one officer, two  
 3 officers or 20 officers.  
 4 Q. Yes. So again, thank you, I'm going to leave it there.  
 5 But that's the thought I'm offering to the chairman.  
 6 I don't know if the colonel —  
 7 COLONEL LATHAM: No comment.  
 8 Q. Thank you very much. Issue 17. It is my last issue and  
 9 it's about the late arrival of PC Corke.  
 10 We all agree that if PC Corke had finished up his  
 11 burglary paperwork sooner, if he hadn't stooped at  
 12 another place on the way, he would have been at Victoria  
 13 in time for egress, probably he should have been there  
 14 even sooner than that, certainly in an ideal world, but  
 15 he would have been there for egress. We all agree about  
 16 that.  
 17 When one then gets on to what he would have done  
 18 when he got there, what he would have said, if anything,  
 19 to his colleagues, what they would have said back, where  
 20 they would have gone if anywhere, we're speculating?  
 21 DR BaMAUNG: Not necessarily. I think Constable Corke  
 22 articulated, both in his interview to the BBC — I would  
 23 need to check the statements, but certainly this is  
 24 documented in evidence, whether it be the interview with  
 25 the BBC or his statement, in his experience, and he had

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1 considerable experience working in the arena, he would  
 2 have gone to the mezzanine level because that's where he  
 3 always did an observation of people coming out of the  
 4 event.  
 5 Q. So can we agree about this? He may have gone to the  
 6 City Room or another officer may have gone to the  
 7 City Room or they may all have stayed on the concourse  
 8 and it's a question of likelihood, possibility and an  
 9 assessment of those things in deciding what would have  
 10 happened?  
 11 DR BaMAUNG: I would say more than that. I believe that  
 12 Constable Corke had 30 years of experience and I think  
 13 if an officer had 30 years of experience and had been  
 14 there he would have gone to the area where he saw the  
 15 potential greatest risk and where he potentially saw the  
 16 most advantage for a police officer to be when he  
 17 oversaw the crowd and ensured the safety of people  
 18 coming out of the event.  
 19 Q. So here is my question: am I right in thinking that your  
 20 views, and you've written them down in your joint note  
 21 under issue 17, about what Mr Corke would have done,  
 22 what Mr Wild would have done, what Mr McGuffie would  
 23 have done, what Mr Hatfield would have done, are not  
 24 really expert opinions at all, are they?  
 25 DR BaMAUNG: Maybe to clarify that I will say what should

1 have been done. Certainly Constable Corke should have  
 2 had notified the supervisor that he was not going to be  
 3 there in time. The supervisor should have arranged to  
 4 have a suitably experienced officer at the scene to  
 5 oversee the staff because both of us have looked at this  
 6 extremely carefully and, from the experience level of  
 7 the officers there, there should obviously — and it is  
 8 should — have been some form of better supervision and  
 9 support from the supervisors or the actual BTP as an  
 10 organisation.  
 11 Q. Yes, all of which we dealt with and which you stated  
 12 under a different issue yesterday. I wasn't going to go  
 13 back to it.  
 14 Under issue 17, what you do is you express some  
 15 views, perfectly properly, about what Mr Corke, if  
 16 he had got there for egress, would have done, what  
 17 Mr Wild would have done, what Mr McGuffie would have  
 18 done, what Mr Hatfield would or may have done. My  
 19 question is: are those expert opinions that you're  
 20 expressing or are they the opinions of an intelligent  
 21 person having listened to all the evidence?  
 22 DR BaMAUNG: I think, having listened to some of the  
 23 evidence, I'm not sure — because we've viewed some  
 24 statements but I think Mr Agha commented he would have  
 25 spoken to a police officer if he'd been there to pass on

1 his concerns. As I say — I'll maybe check with my  
 2 colleagues just to confirm.  
 3 Q. Colonel, you have signed to the same expressions about  
 4 what somebody would have done and you listened to the  
 5 evidence and you read the evidence. You no doubt  
 6 applied your experience of how hindsight transfers into  
 7 witness testimony in court proceedings. I don't know,  
 8 do you have much experience of court proceedings?  
 9 COLONEL LATHAM: No, I don't have. This is my first  
 10 experience of court proceedings, but I do understand  
 11 hindsight bias and I can give you an academic reference  
 12 if you would like and I can also give you my expert  
 13 opinion about the matters which you've been asking us  
 14 questions upon.  
 15 My expert opinion, as expressed in our final report,  
 16 is that PC Corke should have been there and was not  
 17 there. And my expert opinion, supported by the  
 18 evidence, is that if PC Corke had been there he would  
 19 have been on the mezzanine.  
 20 Q. He would have?  
 21 COLONEL LATHAM: He would have been on the mezzanine and,  
 22 had he been on the mezzanine, there were people there  
 23 that who thought they had seen something suspicious and  
 24 it is likely, in my expert security witness opinion,  
 25 that they would have spoken to that police officer about

1 the thing that they were suspicious about.  
 2 Q. Do you think you're in a better position to judge that  
 3 than someone who's spent his life in court, including as  
 4 a High Court judge?  
 5 COLONEL LATHAM: I don't think that that sort of person is  
 6 in a better position to express those matters that  
 7 I have just talked about.  
 8 Q. You think you're in a better position than that person,  
 9 do you?  
 10 COLONEL LATHAM: No, that's not —  
 11 SIR JOHN SAUNDERS: Shall I say what the position is?  
 12 I will decide the facts. There are some matters of  
 13 expert opinion which are included in issue 17, but they  
 14 are always dependent on my finding of facts. Does that  
 15 accurately describe the — it's quite often difficult to  
 16 discriminate between opinion and fact because you give  
 17 opinion evidence on the basis of facts. But I do  
 18 understand that the factual matters in there are matters  
 19 for me on the evidence rather than for the experts.  
 20 MR GIBBS: Of course. I certainly, of course, understand  
 21 that you will have a perfect understanding of the  
 22 difference and of the boundaries of expert opinion. But  
 23 my question really for the witnesses, and I offer it to  
 24 both of them, is whether they'd agree that when we are  
 25 dealing with may and would and what is likely would have

1 happened and what is possible would have happened, we  
 2 should all tread very carefully to avoid overstepping  
 3 our expertise and trespassing on the tribunal's ground;  
 4 do you agree with that?  
 5 DR BaMAUNG: Yes, I do. What we've tried to do is to give  
 6 our balanced views based on the evidence we have read  
 7 and we have read a lot of evidence in relation to the  
 8 events of the night and the policing of the City Room by  
 9 BTP and the personnel involved. So I would totally  
 10 agree with you, Mr Gibbs. It's our view, we have not  
 11 tried to state fact, we've tried to give an opinion and  
 12 we can't say it would have because that's us giving  
 13 opinion about what somebody would have done.  
 14 What we will say is in our view, if these  
 15 circumstances had happened, we think this would have  
 16 happened.  
 17 Q. I'll leave it with you then.  
 18 SIR JOHN SAUNDERS: I fully understand the point you're  
 19 making and I will be careful to discriminate between  
 20 findings of fact and findings of opinion.  
 21 MR GIBBS: Yes. Those were my questions.  
 22 SIR JOHN SAUNDERS: Thank you very much.  
 23 Questions from MR LAIDLAW  
 24 MR LAIDLAW: The first thing I should say is I'm going to  
 25 take the same approach as Mr Gibbs has to this

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1 cross-examination. There isn't simply long enough to  
 2 deal with everything, so much will have to wait for  
 3 submissions in due course.  
 4 To the two of you, please, it is going to be  
 5 a sprint, both by me and by you, so running shoes on,  
 6 please, if you can.  
 7 COLONEL LATHAM: We will do our best to assist.  
 8 Q. There are some general matters, background expertise,  
 9 and then I'm going to focus on eight aspects of the  
 10 17 issues which I hope will be of most assistance to the  
 11 chair. And then to the point that Sir John was just  
 12 making. Unless I say otherwise, I'm going to direct the  
 13 question to just one of you and I'm going to take the  
 14 same division of responsibility that Mr Greaney adopted  
 15 when he called you. For my part I'm not going to seek  
 16 the view of the other expert. As far as I'm concerned,  
 17 you have, I think, on almost no occasions disagreed with  
 18 each other, but rather more importantly, it's for the  
 19 chair, and if he wants to have the other opinion I will  
 20 pause and allow him to seek it. Otherwise, please, if  
 21 you could just resist the urge to intervene or to  
 22 interject.  
 23 SIR JOHN SAUNDERS: It's an unusual procedure, we're all  
 24 unfamiliar with it, so we will understand. It's not  
 25 a criticism.

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1 MR LAIDLAW: Yes.  
 2 SIR JOHN SAUNDERS: I'll leave you to decide when we break  
 3 for lunch.  
 4 MR LAIDLAW: Shall I go until 1, sir?  
 5 SIR JOHN SAUNDERS: Absolutely. 1 o'clock.  
 6 MR LAIDLAW: Doctor, you first.  
 7 This is ShowSec's role in crowd management and event  
 8 security vis-a-vis expertise in counter-terrorism.  
 9 Let me just set the scene. The ShowSec directors  
 10 and managers have made their position clear as to their  
 11 company: it's a crowd management and event security  
 12 company and their position has been consistently they  
 13 do not hold themselves out to be counter-terrorism  
 14 experts. Presumably, you have checked their website and  
 15 the other ways they market and offer their services. Do  
 16 you agree with the way they have described their  
 17 company?  
 18 DR BaMAUNG: Yes, I don't believe it's a company that  
 19 markets itself as having significant counter-terrorism  
 20 expertise at all.  
 21 Q. Their position, I think you could probably say from your  
 22 experience, can be contrasted with other specialist  
 23 private sector companies that do offer or have begun to  
 24 offer what they describe, whether it is this or not is  
 25 a different question, as an enhanced CT security

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1 product. I shouldn't mention names, but can I mention  
 2 just one to give you an example of that sort of company,  
 3 Pathway Risk Management, which I suspect you have  
 4 probably heard about.  
 5 DR BaMAUNG: I have not dealt with it at all, I'm afraid.  
 6 Q. Right. You agree there are companies of the sort I have  
 7 described, which do offer to the marketplace specialist  
 8 CT skills, the sort of company which might employ  
 9 ex-service personnel, offer covert and overt techniques,  
 10 and who might even provide individuals who are trained  
 11 in bomb detection, disposal, how to intervene or disarm  
 12 a terrorist, all those sorts of things?  
 13 DR BaMAUNG: Yes.  
 14 Q. Do you also agree that in respect of companies of that  
 15 sort, this has become, in recent years, something of an  
 16 emerging market?  
 17 DR BaMAUNG: Yes, I think so. As the threats have emerged,  
 18 there's obviously a need to update with terrorist attack  
 19 techniques and there has been an increase in the market,  
 20 yes, I would agree.  
 21 Q. And I think there is reference to that in the very  
 22 recently disclosed statement of Mr Stuart, chair of the  
 23 UK Crowd Management Association. He's an ex-police  
 24 officer. I'll come back to him in a very few moments.  
 25 You, I think, cast some doubt on SMG's claim to have

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1 regarded ShowSec as experts. I will show you the  
2 passage in the notes that you had available to you when  
3 you gave evidence on the 15th because it draws the thing  
4 neatly together. Please, {INQ039043/3}.

5 There you write, I'll include the heading so we can  
6 all see -- this is on the lack of clarity between the  
7 two companies as to their roles in respect of CT. You  
8 then set out the SMG assertion, in other words they saw  
9 ShowSec as experts in the field of CT who could provide  
10 advice and guidance to SMG, and then you raise various  
11 questions:

12 "If so, why was ShowSec not represented at PSIA  
13 reviews? Why was ShowSec not involved in the  
14 identification and response to actions leading from the  
15 PSIA process? Why was ShowSec not included in any  
16 non-PSIA discussions between SMG and CTSA Upham?  
17 ShowSec state they were not contracted to provide CT  
18 expertise; was this position ever made clear to SMG?"

19 The question is this: does that still (overspeaking)  
20 your analysis of situation?

21 DR BaMAUNG: Yes, (overspeaking) position, yes.

22 Q. This is a document, you'll remember, that my learned  
23 friend Mr Cooper was going to show you yesterday, and  
24 have you now had a chance to see that overnight?

25 DR BaMAUNG: Yes.

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1 Q. Let's put it up on the screen, please. {INQ039132/6}.  
2 I'm going to just take you, because others may not have  
3 seen this, to paragraphs 32 and 33, please. Before I do  
4 so, can I declare publicly the connection between  
5 ShowSec and this organisation and this individual, just  
6 so nobody accuses me of not being transparent.

7 Mr Harding was the chair of this association for  
8 many years, wasn't he?

9 DR BaMAUNG: Yes. Sorry, can I have a chance to see this  
10 again?

11 Q. I'll read it in. 30 to 33. Just bear with me for a few  
12 preliminaries.

13 SIR JOHN SAUNDERS: Did you know that Mr Harding had been  
14 chairman of this organisation?

15 DR BaMAUNG: I believe there's a mention of it in  
16 the documents.

17 MR LAIDLAW: I think in the statement, the reference is  
18 paragraph 20 -- we don't have to turn it up --  
19 Mr Stuart, who is the present chairman, had said that  
20 he had met Mr Harding on a number of occasions, although  
21 not socially. And also, it's clear from the statement,  
22 as those who have access will be able to see, that the  
23 UKCMA have also had contact with ShowSec's lawyers  
24 before the submission of this document to the inquiry.  
25 Okay? So I hope I've publicly declared the connection

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1 before I go on.

2 There's an important passage here, or what the chair  
3 may see to be an important passage, and it's the  
4 relationship between crowd management and CT. I'm going  
5 to read it and then just see whether you agree with the  
6 manner in which this is described. If we begin from  
7 paragraph 30 with the second sentence, this is what  
8 Mr Stuart writes:

9 "We believe we can offer an existing insight into  
10 a complex and difficult environment where the  
11 triumvirate of crowd and public safety, security and CT  
12 are understood by many to be one and the same thing.  
13 We would state emphatically that this is not the case.  
14 Each of the three are specialisms unto themselves, which  
15 link inextricably to one another. The triumvirate must  
16 remain in balance and none treated as an absolute above  
17 the others. An example here is the language used  
18 in each specialism: public safety considers risk  
19 assessment whilst CT considers threat assessment.

20 "To try to differentiate these three, crowd  
21 management, my specialism, is a complex combination of  
22 sciences, maths, physics, [physiology], and human  
23 behaviours, such as heuristics" --

24 SIR JOHN SAUNDERS: Would you like to explain that word to  
25 me?

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1 MR LAIDLAW: I didn't know what it was. Mr Gibbs I'm sure  
2 would have known what it was. The definition is this:  
3 a flexible technique for quick decisions. It comes from  
4 the Greek word meaning "to discover".

5 SIR JOHN SAUNDERS: Quite useful for judges.

6 MR LAIDLAW: Very useful for judges and one wonders whether  
7 perhaps a rather different word might have been used  
8 instead.

9 SIR JOHN SAUNDERS: Quite.

10 MR LAIDLAW: "[These] are combined together and assessed by  
11 an experienced crowd manager who then write plans  
12 appropriate to the crowd for that event. Flow rates of  
13 crowds can be written into guidance but the difference  
14 in speed between an excited teenage crowd walking on  
15 concrete compared to a summer evening opera crowd on  
16 grass is marked. In an emergency, that would make a  
17 huge difference in evacuation time.

18 "Event security generally focuses on preventing  
19 people from entering venues illegally or un-ticketed,  
20 with harmful items or with 'contraband': those items the  
21 promoter does not wish to be brought in. These items  
22 may range from professional cameras and recording  
23 equipment to prevent copyright infringement, but will  
24 also include drugs alcohol, glass bottles and even small  
25 drones. The security team will also manage Security

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1 Industry Authority (SIA) licensable activity such as  
 2 front of stage, 'mosh pits' and 'wall of death'  
 3 activity , access control to back of house and stage  
 4 areas."  
 5 Then 33 {INQ039132/7}, please, Mr Lopez:  
 6 "Counter—terrorism, however, is or has generally  
 7 been seen as a highly specialist area that falls within  
 8 the remit of police and the security services . There  
 9 are a small number of companies that offer specialist CT  
 10 advice, but they are rare and were even more unusual in  
 11 2017."  
 12 I'm not for a moment, doctor, suggesting that you  
 13 might have picked precisely the same words to describe  
 14 the differences between these specialities . But is that  
 15 a reasonable series of distinctions , do you think, to  
 16 draw between them?  
 17 DR BaMAUNG: I think I would agree with some of the  
 18 comments. I think that -- can you go back to  
 19 paragraph 30, please?  
 20 The sentence:  
 21 "Each of the three are specialisms unto themselves  
 22 which link inextricably to one another."  
 23 I think is maybe -- I think potentially understates  
 24 the actual inextricable links because counter—terrorism  
 25 mitigation measures can be applied to security as well.

1 Q. They're part of that, aren't they?  
 2 DR BaMAUNG: Yes.  
 3 SIR JOHN SAUNDERS: It's actually quite difficult reading  
 4 that to know whether we're actually talking about two  
 5 things or three things. Crowd and public safety, one.  
 6 Security and counter—terrorism, two. I'm not sure  
 7 that's how he meant it. Is counter—terrorism inevitably  
 8 part of security to an extent (overspeaking).  
 9 DR BaMAUNG: I believe they are completely, sir, because  
 10 mitigation measures against crime are absolutely the  
 11 same as mitigation measures against counter—terrorism.  
 12 If I could give some examples --  
 13 MR LAIDLAW: We'll come on to that point. Can I also  
 14 indicate, I accept it as well. I also accept that CT is  
 15 very much a part of crowd management and event security.  
 16 SIR JOHN SAUNDERS: It's the specialism that you're talking  
 17 about?  
 18 MR LAIDLAW: Yes, it's the specialism which is my point.  
 19 Are you able just to address whether the specialism  
 20 is sufficiently well described here to be an  
 21 acceptable --  
 22 DR BaMAUNG: I think, yes, there is a specialism. But  
 23 I also think that there are tools which can be used by  
 24 organisations, not to bring them up to the standard of  
 25 a specialist company, but if I could give the example of

1 the arena. It was engaging with a CTSA at the arena and  
 2 with his skill sets and with the documentation that's  
 3 freely available via the public, I think that that would  
 4 be sufficient to give a grounding, a good grounding  
 5 in relation to counter—terrorism within the arena, and  
 6 I'm aware that ShowSec are not involved in these  
 7 conversations.  
 8 Q. I'll come to look at the training and the like and the  
 9 access to that material.  
 10 Next topic, areas of --  
 11 MR COOPER: Sorry to interrupt my learned friend, but I was  
 12 waiting until he moved off this topic. I object to this  
 13 course of questioning. Let me explain why. In my  
 14 submission, both experts should be allowed to make their  
 15 observations and I see the nodding of one expert on this  
 16 point, even if it's only to say, "I agree with the  
 17 course that's been taken".  
 18 Can I also say this very briefly? Particularly  
 19 in relation to this document, which is a relatively  
 20 recent document, but my submission goes wider than that.  
 21 I object and I strongly object to my learned friend's  
 22 course, which is seemingly now being taken, to ask one  
 23 expert questions that he chooses to choose, and no doubt  
 24 he'll choose another expert on another occasion. My  
 25 submission is that on each occasion, every time an

1 expert has dealt with an issue, the other expert should  
 2 be asked if they have any comments or at least whether  
 3 they agree or disagree.  
 4 SIR JOHN SAUNDERS: I have no problem with allowing  
 5 Colonel Latham to have his comments about certain  
 6 matters. The question is when. I was going to suggest  
 7 that Colonel Latham were perhaps provided with a piece  
 8 of paper and a pencil and on topics that you have  
 9 comments to make, would you please write them down?  
 10 I will then invite Colonel Latham to give his comments  
 11 at a suitable and convenient time or, alternatively , it  
 12 could be supplied to leading counsel for the inquiry who  
 13 could then look and see whether it would be helpful to  
 14 look at those matters.  
 15 Colonel Latham, would that be acceptable to you?  
 16 COLONEL LATHAM: If I've understood that correctly, that  
 17 would amount to me not commenting on this particular  
 18 question other than in writing?  
 19 SIR JOHN SAUNDERS: No, if you write down the topics you  
 20 want to make a comment on, which you think go beyond and  
 21 you're using your particular expertise, after all it's  
 22 an agreed expert report, so if there are things from  
 23 your own knowledge and expertise which you think can  
 24 assist , write them down and at a convenient time they  
 25 will be referred to.

1 COLONEL LATHAM: Thank you, sir.  
 2 MR COOPER: I could see the expert, Colonel Latham, getting  
 3 most frustrated at this course.  
 4 SIR JOHN SAUNDERS: I'm not unaware of the frustration.  
 5 We will allow anything relevant from Colonel Latham to  
 6 come out.  
 7 MR COOPER: Thank you. I apologise if I've interrupted  
 8 counsel.  
 9 MR LAIDLAW: No, not at all. You do, of course, Mr Cooper,  
 10 have Mr Greaney to come --  
 11 SIR JOHN SAUNDERS: Mr Laidlaw, I leave it to you, however,  
 12 whether you do it on the basis it will give you an  
 13 opportunity to challenge Colonel Latham would say.  
 14 MR LAIDLAW: I'm not going to, because I cannot get through  
 15 even the selected topics if we have that. So I'm afraid  
 16 frustrations will have to remain with the two  
 17 individuals.  
 18 SIR JOHN SAUNDERS: Frustrations will be outed at some  
 19 stage, Colonel Latham.  
 20 MR LAIDLAW: And they're not alone in being frustrated at  
 21 times.  
 22 MR COOPER: Well, he's the expert, sir. He should be  
 23 allowed to opine.  
 24 SIR JOHN SAUNDERS: He will be.  
 25 MR LAIDLAW: Areas of expertise. Just to reassure you both,

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1 I'll deal individually with you both.  
 2 Starting with you, Dr BaMaung. You both have  
 3 different backgrounds, of course, police and military,  
 4 although you do share, as is absolutely obvious, a huge  
 5 amount of experience in counter-terrorism, albeit from  
 6 different perspectives. Without wishing to decry that  
 7 experience, which of course I accept, have you ever run  
 8 a crowd management company?  
 9 DR BaMAUNG: No, and I have never expressed the fact that  
 10 I have.  
 11 Q. No, no, I'm not suggesting you have. I'm just asking  
 12 you whether --  
 13 DR BaMAUNG: No.  
 14 Q. In terms of your experience of a crowd management  
 15 company, presumably you have come across them over the  
 16 years?  
 17 DR BaMAUNG: Not dealt directly with them. They've  
 18 obviously been involved at events that the police may  
 19 have been at.  
 20 Q. So when you were a CTSA, by way of example, you didn't  
 21 ever invite, when you were at a venue, a crowd  
 22 management company to come along and to assist you  
 23 in the advice you were giving?  
 24 DR BaMAUNG: We dealt directly with the client, which would  
 25 be the --

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1 Q. Slightly different question: did you ever invite a crowd  
 2 management company who was providing crowd management  
 3 services to the venue, did you ever invite them along to  
 4 a meeting about the advice you were giving the venue?  
 5 DR BaMAUNG: No.  
 6 Q. Colonel Latham, I know you've been frustrated. Now  
 7 it is your turn, all right?  
 8 COLONEL LATHAM: Can I answer that question then?  
 9 Q. No.  
 10 MR COOPER: Yes, he can, sir, forgive me.  
 11 SIR JOHN SAUNDERS: Mr Laidlaw ask your question then I will  
 12 ask Colonel Latham.  
 13 I have asked for anything he wants to say that he is  
 14 not being allowed to say directly to be written down.  
 15 I will not stop him from saying them at the appropriate  
 16 time. Can you stand the frustration?  
 17 COLONEL LATHAM: I can, sir. I'm at your disposal.  
 18 SIR JOHN SAUNDERS: Mr Cooper, you must restrain yourself as  
 19 well.  
 20 MR COOPER: I will now do so.  
 21 MR LAIDLAW: Colonel Latham, now we're looking, please, at  
 22 your expertise. You've drawn, as we have heard, both  
 23 when you were here on Day 15 and more recently on your  
 24 experience as head of security at the O2 between,  
 25 what was that, 2016 and 2018?

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1 COLONEL LATHAM: Correct and other places.  
 2 Q. Yes. And we've, as you would expect, been doing some  
 3 digging around in a sense or in an effort to gain an  
 4 accurate understanding of your experience of crowd  
 5 management companies. So I hope you'll forgive me if  
 6 I just explore that issue with you. Were you the head  
 7 of security at the O2 for the whole complex or just for  
 8 the arena within it?  
 9 COLONEL LATHAM: The whole complex.  
 10 Q. Right. So did you work at the events which went on at  
 11 the arena?  
 12 COLONEL LATHAM: Yes.  
 13 Q. All of them?  
 14 COLONEL LATHAM: No.  
 15 Q. What percentage of events would you be present at and  
 16 working?  
 17 COLONEL LATHAM: 80%. Possibly more.  
 18 Q. So is your role similar to that of Miriam Stone, as she  
 19 described it to be than, for example, Mr Cowley, who was  
 20 obviously involved --  
 21 COLONEL LATHAM: No, my role was not similar to that.  
 22 Q. So your role wasn't similar to Miriam Stone's?  
 23 COLONEL LATHAM: That's correct, my role was not similar to  
 24 Miriam Stone's.  
 25 Q. Or Mr Cowley's?

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1 COLONEL LATHAM: I was the head of security with  
 2 responsibility for all aspects of security at the O2 and  
 3 the events that we provided and in order to discharge  
 4 those responsibilities , I had a team of managers who  
 5 would provide a duty security manager, who would be  
 6 directly employed by me and would report to me, and  
 7 there would also be an event manager who was managing  
 8 the event and did not report to me, who reported to the  
 9 director of operations I think it was. Has that  
 10 sufficiently answered your question?  
 11 Q. That's helpful. So it's the event manager which would  
 12 have the equivalent role to that which Miriam Stone  
 13 discharges at the Manchester Arena? Have I got that  
 14 right?  
 15 COLONEL LATHAM: No. It depends on the circumstances. So  
 16 without -- I don't want to go into any operationally  
 17 sensitive details , but there were -- depending on -- if  
 18 an incident happened, it would depend where the incident  
 19 happened, it would depend whether that Miriam Stone  
 20 person would be in charge of the incident or whether  
 21 somebody else would be in charge of the incident. And  
 22 for the normal running of events, there would be an  
 23 individual who was responsible for safety and security  
 24 and the operation outside of event spaces and there  
 25 would be the event manager who was responsible for the

1 activity that was happening inside the event spaces.  
 2 SIR JOHN SAUNDERS: But the event manager at the O2 had  
 3 a similar position to the one Miriam Stone held at the  
 4 arena?  
 5 COLONEL LATHAM: That's correct, sir.  
 6 Q. We understand that a very large company called OCS won  
 7 the contract to provide what they certainly described as  
 8 manned guarding services to the O2 in January of 2014.  
 9 Did they still have that contract when you were in post,  
 10 colonel?  
 11 COLONEL LATHAM: I employed two companies on the security  
 12 operation that you're describing, one of which are was  
 13 OCS.  
 14 Q. Right. I don't think they're a specialist crowd  
 15 management company, are they?  
 16 COLONEL LATHAM: I would need to go and look at  
 17 documentation to give you a precise answer.  
 18 Q. If I put a suggestion, you can see whether you agree.  
 19 I suggest that they offer a huge number of services from  
 20 FM, facilities management, security, cleaning, catering,  
 21 aviation support, waste management, pest control. Does  
 22 that sound about right?  
 23 COLONEL LATHAM: I didn't know about pest control, but they  
 24 are a large company who does lots of things, yes.  
 25 Q. Right. Was there another company then who dealt with an

1 aspect of the events, was that SES, the Show and Event  
 2 Security Company?  
 3 COLONEL LATHAM: Yes.  
 4 Q. And I think the position is , but again you must say, SES  
 5 had the contract for backstage; is that right?  
 6 COLONEL LATHAM: That's correct.  
 7 Q. So OCS had, amongst their other duties at the complex,  
 8 they had, in terms of the arena itself at the O2, they  
 9 had the contract for the front of house; is that right?  
 10 COLONEL LATHAM: No.  
 11 Q. Okay. Was that work subcontracted by OCS to a number of  
 12 subcontractors?  
 13 COLONEL LATHAM: In the contract they were allowed to, with  
 14 my permission, bring in subcontracted staff.  
 15 Q. Right.  
 16 SIR JOHN SAUNDERS: Sorry, to help me follow. So far as you  
 17 are concerned, what services did OCS provide, whether  
 18 they subcontracted them out or did them directly?  
 19 COLONEL LATHAM: They provided event day security, so they  
 20 would provide stewards and SIA to do response teams and  
 21 to do the stewarding/SIA things that you'd be familiar  
 22 with. And they also provided staff for a 24/7 security  
 23 operation as did another company, who I could name if  
 24 that's useful.  
 25 SIR JOHN SAUNDERS: So amongst other things that OCS did,

1 they did the job that ShowSec did on event nights?  
 2 COLONEL LATHAM: That's correct.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 MR LAIDLAW: Just cast your mind back, colonel. Is that  
 5 correct or did OCS actually subcontract --  
 6 SIR JOHN SAUNDERS: Okay, I was allowing for subcontracting  
 7 in my question.  
 8 MR LAIDLAW: Absolutely, I just want accuracy.  
 9 In terms of precision , did OCS subcontract ShowSec's  
 10 type work to other companies?  
 11 COLONEL LATHAM: They had the ability to do that in the  
 12 contract if they couldn't make up the numbers and if  
 13 they had permission to do so.  
 14 Q. And did those sub-subcontractors involve or include  
 15 companies such as issue Systemic, Griffin , Counter,  
 16 Brits, AKD, K4S, Alart(?) 360, Manpower?  
 17 COLONEL LATHAM: I don't recall the names of the companies.  
 18 Q. Iridium, Response?  
 19 COLONEL LATHAM: Iridium I do recall and they were not  
 20 subcontracted by OCS. That was a separate contract  
 21 which was run by me and they provided a lot of our staff  
 22 who worked on the 24/7 security operation.  
 23 Q. But do you agree that OCS, in fact, subcontracted to  
 24 a number of companies aspects of the front of  
 25 house work, the work that ShowSec did at the arena?

1 COLONEL LATHAM: The contract allowed them to do that.  
 2 SIR JOHN SAUNDERS: Did they do it, is the question.  
 3 COLONEL LATHAM: Yes, sir.  
 4 MR LAIDLAW: Is our understanding also correct that the work  
 5 that ShowSec did at the arena, at the O2 may be divided  
 6 up at any one event between various different  
 7 sub-subcontractors, so one, for example, being  
 8 responsible for the doors, another for the floor, the  
 9 seated tiers, one patrolling the restaurant? Did that  
 10 happen on occasions?  
 11 COLONEL LATHAM: No, that's not how I viewed it. The  
 12 relationship was between myself and Iridium and OCS and  
 13 they were the people who were accountable to me for the  
 14 quality of the operation that was being delivered. And  
 15 we did not subcontract areas to other companies.  
 16 Q. Again, I understood --  
 17 COLONEL LATHAM: Except there were some particular events  
 18 where that happened.  
 19 Q. I understood you cast your answer in respect of your  
 20 view. But did the situation that I have just described  
 21 occur on occasions?  
 22 COLONEL LATHAM: You said sub-subcontract, and no, that  
 23 wasn't allowed in the contract.  
 24 Q. Were there occasions when different contractors,  
 25 different corporate entities were responsible for

1 different parts of the work within the front of house  
 2 activities?  
 3 COLONEL LATHAM: No, that's not my recollection. It was all  
 4 the responsibility of OCS or Iridium.  
 5 Q. Just help --  
 6 SIR JOHN SAUNDERS: Okay, sorry, just so I understand.  
 7 There can be a distinction between subcontracting  
 8 a particular part of the job to one company and  
 9 subcontracting, we need to make up the numbers on the  
 10 job we're doing.  
 11 COLONEL LATHAM: It is the latter --  
 12 SIR JOHN SAUNDERS: That's as you understood it?  
 13 COLONEL LATHAM: -- as I understood it that was happening at  
 14 the O2 when they couldn't make up the numbers.  
 15 SIR JOHN SAUNDERS: So subcontracting to make up the  
 16 numbers, not subcontracting for specific parts?  
 17 COLONEL LATHAM: Yes, and to give a really good example  
 18 that's come to mind I would recognise the same  
 19 supervisors in the same places most nights and if  
 20 I didn't see the same supervisors, I'd be going and  
 21 investigating why do we have different faces here. The  
 22 people who would be subcontracted would be much more  
 23 likely to be the more junior staff who were being  
 24 supervised by supervisors.  
 25 MR LAIDLAW: In terms of the numbers, obviously they would

1 vary according to the event, but if you had a comparable  
 2 event to Ariana Grande at the O2, that would involve how  
 3 many in terms of spectators, just roughly speaking?  
 4 COLONEL LATHAM: Probably about 18,000. Something like  
 5 that.  
 6 Q. And for a crowd of that sort, how many staff in terms of  
 7 the crowd management and event security team would that  
 8 involve? Roughly speaking.  
 9 COLONEL LATHAM: It would be very roughly speaking because  
 10 I haven't researched any of this, so it's purely from  
 11 memory. I think we bought in something like about  
 12 200 OCS security staff, we would have a core team of an  
 13 operationally sensitive number, which is smaller than  
 14 200.  
 15 Q. Right. In terms of the checks that it was possible to  
 16 carry out on -- let's take them separately. Stewards,  
 17 as to their training and whether they had paid attention  
 18 to their training or not, was that possible or  
 19 achievable for you?  
 20 COLONEL LATHAM: Yes. The way that I personally did that is  
 21 I went and watched what they were doing and if they  
 22 weren't doing what they should have been doing, I spoke  
 23 to their supervisor and got the supervisor to get them  
 24 to do what they should be doing. That's what  
 25 I personally was doing. And concurrently with that, my

1 managers were doing the same things and the supervisors  
 2 on each floor -- there's four layers in the O2 and each  
 3 layer has a floor manager, I think the name was, and  
 4 then you have someone who's in charge of each of the  
 5 main entrances coming into the venue. And all of those  
 6 people are not people who are going through churn.  
 7 They're all people who know me, they are all people who  
 8 speak to me and they are all people who understand what  
 9 my operation demands of them because it was a demanding  
 10 operation.  
 11 So I was relying on my supervisors and my managers  
 12 to do their jobs properly to make sure that those junior  
 13 staff, some of whom would have -- would not have a lot  
 14 of experience at events, that they were being properly  
 15 supervised and doing their job properly. And the  
 16 operation was designed in such a way that, simply by  
 17 looking at them, you could see whether they were doing  
 18 their job properly because we had made the job  
 19 incredibly simple for them to do. They had to say  
 20 a couple of sentences and get the member of the public  
 21 to do some simple things, and that would give me the  
 22 assurance that I needed.  
 23 Those members of staff who were doing jobs that  
 24 required more complicated training and were doing a more  
 25 complicated job, were those staff with more experience

1 that I had more faith in and therefore I made sure that  
 2 the harder jobs and the riskier jobs were done by people  
 3 who had more experience and that's why I answered your  
 4 question.  
 5 Q. It may be my fault, but I really wanted you to focus on  
 6 a slightly different aspect: what checks were you able  
 7 to make on the training that these members of staff  
 8 brought into the venue had received, rather than the way  
 9 you dealt with them or you reacted to behaviour which  
 10 fell short of expectations? So would you mind just  
 11 focusing on the question, please?  
 12 COLONEL LATHAM: Sure.  
 13 Q. What checks did you make on the 200 or so staff who came  
 14 in as to their training and the extent to which they had  
 15 been attentive or otherwise to that training? That's  
 16 the question.  
 17 COLONEL LATHAM: I understand the question. In my contract  
 18 was specified what the training levels were and  
 19 I trusted my suppliers to provide staff who had that  
 20 level of training. As I think came up in evidence  
 21 yesterday or the day before, I did not have the practice  
 22 to check that that training had been done. But if I saw  
 23 people or my manager saw people who were  
 24 underperforming, then we would investigate that with the  
 25 OCS or --

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1 Q. Forgive the interruption. I think the answer to the  
 2 question is really "I didn't do any checking"?  
 3 COLONEL LATHAM: I think it's me that's answering the  
 4 questions.  
 5 Q. You mustn't spar with me either because I'm actually  
 6 asking the questions of you and that, if I may suggest,  
 7 was an answer that could have been given much more  
 8 shortly than it was. You didn't carry out any checks;  
 9 that's the position, isn't it?  
 10 COLONEL LATHAM: I've explained why I didn't --  
 11 SIR JOHN SAUNDERS: Colonel Latham, you are saying it's  
 12 in the contract, you rely on the person you're  
 13 contracting with, if you see someone who's performing  
 14 like they don't know what they're doing, then you would  
 15 check up on them or get rid of them?  
 16 COLONEL LATHAM: Investigate it with the contract manager.  
 17 SIR JOHN SAUNDERS: Okay, thank you.  
 18 MR LAIDLAW: Did the sub or subcontracted staff, whichever  
 19 way you want to put it, be them (sic) stewards or SIA  
 20 staff, did they have to go any separate and additional  
 21 training which was venue specific before they started  
 22 work at the O2?  
 23 COLONEL LATHAM: Yes, we did training on, for example, on  
 24 practical training on search and screening. It would  
 25 not always be before they started at the O2, that

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1 particular search and screening practical training,  
 2 because we brought in a new search regime and new  
 3 equipment and we found that we had to regularly refresh  
 4 people on the practicalities of doing that.  
 5 The same with the practicalities of looking for  
 6 suspicious people. It's practical training on the  
 7 ground which is important.  
 8 Q. Again, just focusing on the question I asked you. It  
 9 did not necessarily follow that somebody who began work  
 10 in crowd management or event security had done  
 11 a venue-specific training course before they began work?  
 12 COLONEL LATHAM: That is accurate.  
 13 Q. Thank you. Blind spots. Not where they were, but were  
 14 there some blind spots, as there probably inevitably are  
 15 in any system, at the O2 on the CCTV?  
 16 COLONEL LATHAM: There will always be blind spots as CCTV's  
 17 jolly expensive and there are spots you don't need to  
 18 look -- you don't need to look in the roof.  
 19 Q. So there were blind spots, colonel?  
 20 COLONEL LATHAM: There were some blind spots.  
 21 Q. Thank you. Did you provide any documentation of the  
 22 sort we might be able to see where you pointed these out  
 23 in writing to the crowd management team?  
 24 COLONEL LATHAM: I don't have documentation from the O2, but  
 25 I do recall and I could name the individuals that I had

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1 the conversations with about whether we had blind spots  
 2 which affected our operation when I first took over the  
 3 job. They were pointed out to me and I arranged for  
 4 those blind spots to be covered off.  
 5 SIR JOHN SAUNDERS: I think the question is: would the  
 6 relevant people who are doing security at the O2 know of  
 7 blind spots?  
 8 COLONEL LATHAM: Certainly, sir.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR LAIDLAW: Did you meet with your CTSA during the two or  
 11 so years you were at the O2?  
 12 COLONEL LATHAM: Yes, I did.  
 13 Q. Was the crowd management company invited to that  
 14 meeting?  
 15 COLONEL LATHAM: No, I didn't invite other people to my  
 16 meeting with the CTSA, but it is relevant to your  
 17 question that I did then introduce the CTSA to my crowd  
 18 management company. I wanted them to have  
 19 a relationship with him.  
 20 Q. Sorry, and that crowd management company was, just so  
 21 you can tell me exactly who they were?  
 22 COLONEL LATHAM: OCS and Iridium Management.  
 23 Q. So they were invited to meet your CTSA?  
 24 COLONEL LATHAM: Correct.  
 25 Q. Do you remember his or her name?

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1 COLONEL LATHAM: Stuart Shawland, an excellent CTSA.  
 2 Q. In terms of the risk assessment for the arena I assume  
 3 you must have inherited a risk assessment when you  
 4 arrived at work?  
 5 COLONEL LATHAM: Yes.  
 6 Q. And whether you added to it, did a new document or not,  
 7 is not my concern for the purpose of this question. Did  
 8 the crowd management company have any part to play in  
 9 any further work that you did with the risk assessment?  
 10 COLONEL LATHAM: Yes.  
 11 Q. What did they do?  
 12 COLONEL LATHAM: We discussed the risks that we faced every  
 13 day. We shared an office and we talked about the risks  
 14 how we were going to mitigate them, how we could alter  
 15 the plan, which we regularly did, to make it better.  
 16 Q. Was that a conversation that you instituted, in other  
 17 words the suggestion came from you?  
 18 COLONEL LATHAM: It would come from me sometimes, but also  
 19 external events and other inputs, but sometimes from me.  
 20 Q. And did you see your crowd management company's risk  
 21 assessment?  
 22 COLONEL LATHAM: I don't recall.  
 23 Q. Thank you.  
 24 Doctor, the next topic is the broad nature of  
 25 security in crowd management.

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1 SIR JOHN SAUNDERS: Do you mind if we just move from that  
 2 for a moment. This is actually relevant to the  
 3 questions asked of you, Colonel Latham. The doctor was  
 4 being asked about the crowd management companies and  
 5 what he'd expect them to do and they wouldn't be  
 6 security specialists in the CT specialised way. Do you  
 7 want to comment on that, on the answer that's been  
 8 given?  
 9 COLONEL LATHAM: My security providers, it felt to me, were  
 10 crowd safety people first and I felt that I was, without  
 11 being disrespectful to them, I felt I was teaching them  
 12 terrorism. That's my answer.  
 13 SIR JOHN SAUNDERS: Thank you.  
 14 MR LAIDLAW: So security, please, doctor. Just some  
 15 propositions for your consideration, please.  
 16 Do you agree that the concept or the notion of  
 17 security in the context of crowd management or event  
 18 security is a broad concept, it encompasses a number of  
 19 different things? I'll go on to suggest what I think --  
 20 DR BaMAUNG: (overspeaking).  
 21 Q. The threats to the safety of a crowd which has to be  
 22 addressed by a crowd management company are numerous and  
 23 varied, one of which is a terrorist threat?  
 24 DR BaMAUNG: Yes.  
 25 Q. That in itself, I imagine you would accept, presents

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1 a number of challenges to the crowd management company.  
 2 By way of example, in the way that they train, because  
 3 they're going to have to train the workforce to look at  
 4 a number of different threats, the reaction to the  
 5 threat may be different according to its nature. I hope  
 6 that's a pretty uncontentious proposition.  
 7 DR BaMAUNG: Yes, but I don't think that takes away from the  
 8 need for the terrorist training to be effective --  
 9 SIR JOHN SAUNDERS: It hasn't been suggested yet.  
 10 There are a number of different challenges which  
 11 need training?  
 12 DR BaMAUNG: Yes.  
 13 MR LAIDLAW: Let me tell you, I'm going to come to CT, I'll  
 14 actually take you through the ShowSec module. Will that  
 15 reassure you? I can see that you are anxious to say  
 16 something about that. Will that reassure you?  
 17 DR BaMAUNG: Yes.  
 18 Q. I'll come to that, all right? A central feature of  
 19 ShowSec's approach, would you agree, to this varied  
 20 number of threats was to teach or to attempt to teach  
 21 vigilance?  
 22 DR BaMAUNG: Yes, I would agree.  
 23 Q. Do you also agree that the challenges in this area to  
 24 the crowd management company are further complicated by  
 25 the variety of work that it and its staff will do?

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1 Shall I explain what I mean about that?  
 2 DR BaMAUNG: If you could, that'd be good.  
 3 Q. We've been focusing, of course, on the arena, but as  
 4 you will know, ShowSec, taking the company we are  
 5 concerned with, would work at festivals, they may be  
 6 employed by local authorities for civic street events.  
 7 They may work at parades, they work, as we've heard, at  
 8 sporting arenas, Manchester City being an example, and  
 9 they were also involved, for example, in this general  
 10 area, at racecourses. So it's a varied amount of work,  
 11 a varied -- there's varied types of work that they have  
 12 to cater for and to teach that against?  
 13 DR BaMAUNG: Yes, I concur completely.  
 14 Q. When we strip away the detail, and as I say I will come  
 15 to the module so you can say whatever you want about  
 16 that, when we strip away the detail and we remember that  
 17 ShowSec is not a specialist CT company, do you agree  
 18 that there are really two things that somebody in your  
 19 position, with your expertise, would hope had been  
 20 taught and understood by the workforce? Those two  
 21 things being the ability to recognise anything which  
 22 looks out of place or is suspicious --  
 23 DR BaMAUNG: Yes.  
 24 Q. -- for any number of reasons? And if something is of  
 25 concern, curious, to borrow the colonel's phrase, if

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1 something was of concern, that that would be  
 2 investigated and, if necessary, reported quickly?  
 3 DR BaMAUNG: Yes.  
 4 Q. It's those two aspects, isn't it?  
 5 DR BaMAUNG: Sorry, I think additionally, the understanding  
 6 of that person's safety, if they get faced with  
 7 a situation such as a suspect package because that is  
 8 primarily the issue --  
 9 Q. You're quite right. There is obviously a safety issue  
 10 in that as well. But vigilance and reporting are  
 11 obviously essential things --  
 12 DR BaMAUNG: Yes.  
 13 Q. -- to teach. I'm just going to move on because I can  
 14 see that I've already slowed down.  
 15 As for ShowSec's position at the arena, I hope that  
 16 we can agree that ShowSec had a subordinate role to SMG.  
 17 DR BaMAUNG: Yes.  
 18 Q. However close the relationship was, they were  
 19 a subcontractor of the operator of the venue?  
 20 DR BaMAUNG: Yes, I would agree with that.  
 21 Q. You have dealt with where responsibility for safety  
 22 ultimately lay. I accept, as I think you know, on  
 23 behalf of the company I represent, they plainly had  
 24 a part to play in discharging that responsibility --  
 25 DR BaMAUNG: Yes.

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1 Q. -- as well. Let's come to the first of the issues,  
 2 please, that I'm selecting.  
 3 Colonel Latham, this is for you, please. This is  
 4 issue 3. Do you want just to bring that back to mind,  
 5 please?  
 6 COLONEL LATHAM: Yes.  
 7 Q. "Is the licensing and training of private security  
 8 personnel sufficiently robust and, if not, what changes  
 9 should be considered?"  
 10 I think you said words to this effect, that the  
 11 current SIA licensing system is useful, although basic  
 12 and not venue specific; is that right?  
 13 COLONEL LATHAM: Correct.  
 14 Q. You went on also to express a number of views, but  
 15 amongst the views you went on to express within this  
 16 heading was that the arena, and if we've got the  
 17 document open, it's the second part of the second line:  
 18 "The arena [so this is Manchester] needs to be aware  
 19 that they cannot rely upon SIA training to give  
 20 sufficient assurance on CT security."  
 21 Was that a view which was expressed without  
 22 reference to the events of May 2017 or was it a view  
 23 which included knowledge of what had occurred at that  
 24 event and the evidence we've heard in respect of the SIA  
 25 training or lack of it?

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1 COLONEL LATHAM: That includes the knowledge that I have  
 2 gained since the attack.  
 3 Q. Are you prepared to acknowledge within issue 3 that  
 4 ShowSec did rather more at the arena in respect of the  
 5 cadre of licensed staff that it employed? In other  
 6 words it also required the SIA-licensed staff to  
 7 complete the induction course, which involved the CT  
 8 module, and they too had to do the familiarisation  
 9 course at the arena?  
 10 COLONEL LATHAM: I do accept that.  
 11 Q. Thank you. Issue 7 next. Again, this is for you,  
 12 colonel.  
 13 SIR JOHN SAUNDERS: I'm really sorry, just before we leave  
 14 that. It's slightly confusing in a way. So when you  
 15 talk about the current SIA licensing system, we do know  
 16 that quite a lot has been done to the training since  
 17 then. Is it operational yet, do you happen to know, the  
 18 new training?  
 19 COLONEL LATHAM: I had understood from the evidence that  
 20 they have rewritten the content of the training but have  
 21 yet to roll it out. I think we've had in evidence the  
 22 date it's to be rolled out. I think it's within the  
 23 next year, but we do have that in evidence, sir.  
 24 SIR JOHN SAUNDERS: Right.  
 25 DR BaMAUNG: Can I possibly just update you on that, sir?

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1 My understanding is it would be April 2021 and that  
 2 training has been developed in conjunction with NaCTSO  
 3 as well.  
 4 SIR JOHN SAUNDERS: The Licensing and Security Committee  
 5 (sic) of Parliament, on the evidence that they heard,  
 6 concluded that the SIA did not include any  
 7 counter-terrorism training whatsoever. Your evidence  
 8 is that that is not correct?  
 9 COLONEL LATHAM: That's not my evidence, sir. My evidence  
 10 is that --  
 11 SIR JOHN SAUNDERS: There was some but --  
 12 COLONEL LATHAM: I understand that the new -- NaCTSO have  
 13 worked with SIA --  
 14 SIR JOHN SAUNDERS: Sorry, it's not new. We're talking  
 15 about at the time, in 2017. It did include some CT  
 16 training?  
 17 COLONEL LATHAM: Yes, it did include some basic CT training.  
 18 SIR JOHN SAUNDERS: Is that all right by you, doctor?  
 19 DR BaMAUNG: I would agree with that. There were  
 20 counter-terrorism headings within the content of the  
 21 course, sir, but I don't know how in-depth it went. We  
 22 never got access to the materials.  
 23 SIR JOHN SAUNDERS: To avoid the risk of being in contempt  
 24 of Parliament, I'm not suggesting they shouldn't have  
 25 come to that conclusion on the evidence they heard.

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1 MR LAIDLAW: Colonel, issue 7. I think that was your  
 2 responsibility, wasn't it, risk assessment?  
 3 COLONEL LATHAM: I led on it, but...  
 4 Q. Sorry. You led on risk assessment. You obviously share  
 5 responsibility with Dr BaMaung for the conclusions  
 6 expressed.  
 7 It's just one short issue and if I take you to that,  
 8 we're concerned with 7(a), so these were the omissions  
 9 in the written risk assessment process carried out by  
 10 SMG and ShowSec and you know, I think, that ShowSec  
 11 accept criticism in this regard. I wanted just to take  
 12 you to your (v), do you see? It's the top of the next  
 13 page.  
 14 COLONEL LATHAM: Yes.  
 15 Q. You wrote there that:  
 16 "It wasn't clear to [you] [and I think this was  
 17 a week or so ago, was it?] that ShowSec yet have  
 18 a senior security professional to advise them on their  
 19 risk assessment system, and if not, they need to obtain  
 20 one."  
 21 You've had a lot of material to look at. Have you  
 22 actually seen Mr Harding's most recent statement? Shall  
 23 I put it on screen for you?  
 24 COLONEL LATHAM: Yes, that would be great.  
 25 Q. If we have {INQ035987/1}. I don't know whether you have

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1 seen this one, have you?  
 2 COLONEL LATHAM: I'm not sure, but when we get to page 8,  
 3 I'm sure I'll know.  
 4 Q. {INQ035987/8}, please, paragraphs 30 and 32. Just  
 5 glance at that, would you?  
 6 (Pause)  
 7 COLONEL LATHAM: I see that Mr Harding says he has done  
 8 a review of the counter-terrorism risk assessment  
 9 process. I don't see reference to who he has done  
 10 that -- could you point me to it?  
 11 Q. He instructed Storm to do this.  
 12 SIR JOHN SAUNDERS: So it looks like they've taken your  
 13 advice and instructed a company who presumably are  
 14 experts in this.  
 15 COLONEL LATHAM: In which case I accept that and thank you  
 16 for pointing it out.  
 17 MR LAIDLAW: I'm not being critical, I am just trying to  
 18 deal with obvious points which have thus far not been  
 19 dealt with.  
 20 31 as well, I think, if you glance at that and  
 21 confirm that, that also seems to be a sensible  
 22 precaution to have introduced as well.  
 23 (Pause)  
 24 COLONEL LATHAM: I would ask Dr BaMaung to comment on  
 25 paragraph 31.

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1 MR LAIDLAW: Yes, if he's better positioned to do that.  
 2 DR BaMAUNG: We've not seen the current e-learning training  
 3 programme, unfortunately. Does that refer to an  
 4 amendment of the one that existed in 2017?  
 5 Q. I'll tell you what I'll do, I'll make sure you see that.  
 6 That's probably the easiest thing to do.  
 7 DR BaMAUNG: That'd be very helpful.  
 8 Q. If one of you would just look at 32, again, in terms of  
 9 the planning, does that appear to be a further sensible  
 10 reaction to the criticisms made of the risk assessment  
 11 going forward? Who would like to deal with that?  
 12 COLONEL LATHAM: I will deal with that. That looks like  
 13 a good idea.  
 14 Q. Thank you. Issue 8(a), please. This is sufficient  
 15 numbers of security staff. I think this is you again,  
 16 isn't it, Colonel Latham?  
 17 COLONEL LATHAM: Yes.  
 18 Q. You led on this when Mr Greaney was asking you  
 19 questions. You started off yesterday by making the  
 20 point that there were insufficient staff to search bags  
 21 and you did the calculations for us: 600 people per door  
 22 per hour, 4,200 people in an hour. The chair then made  
 23 the point to you that in fact the instruction that the  
 24 ShowSec staff had received from SMG was not to search  
 25 everybody, but it was random searching, 1 in 10.

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1 Presumably that means that you do need to qualify, at  
 2 least to a limited extent, the criticism you made, does  
 3 it?  
 4 COLONEL LATHAM: The criticism that I made about lacking  
 5 staff numbers is that there were insufficient staff  
 6 numbers, for example in the City Room, to deliver  
 7 a security operation that would give a reasonable level  
 8 of assurance. Shall I say more?  
 9 Q. I'm just wondering whether the error which was pointed  
 10 out to you has caused you to reflect and perhaps  
 11 moderate it -- I'm not suggesting you should remove the  
 12 criticism, but to moderate it. Does that seem to be  
 13 a fair and reasonable thing for --  
 14 COLONEL LATHAM: Thank you for pointing out the --  
 15 Q. It wasn't me, it was the chair who pointed it out to you  
 16 yesterday.  
 17 SIR JOHN SAUNDERS: I can't actually remember whether 1 in  
 18 10 came from SMG or whether it was ShowSec who selected  
 19 1 in 10. It's certainly random.  
 20 MR LAIDLAW: It's a mixture of the two and I think it does  
 21 come from different places, you are quite right.  
 22 COLONEL LATHAM: I think we may be talking at  
 23 cross-purposes.  
 24 SIR JOHN SAUNDERS: The question is: for a random some  
 25 search, which they were instructed to do, did they have

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1 enough people to carry out the searches?  
 2 COLONEL LATHAM: No.  
 3 MR LAIDLAW: All right. You also suggested that SMG and  
 4 ShowSec made insufficient use of the anti—bootlegging  
 5 operatives to reinforce their operation. You seemed to  
 6 be suggesting that ShowSec staff on the floor should be  
 7 deputed to get those operatives to reinforce their  
 8 security operation. Was that the —  
 9 COLONEL LATHAM: I don't think that there's any criticism of  
 10 ShowSec here. I think that when SMG were making their  
 11 operational plan, one of the things that could have been  
 12 considered would be using the bootlegging people.  
 13 Q. If that's not a criticism of ShowSec —  
 14 COLONEL LATHAM: It's not.  
 15 SIR JOHN SAUNDERS: Can I clarify what I understood the  
 16 evidence to be, which is that you were saying on the  
 17 basis of your experience it is actually a good idea to  
 18 use your own security staff for the bootlegging  
 19 operation, to have additional ones to do that?  
 20 COLONEL LATHAM: Yes.  
 21 SIR JOHN SAUNDERS: To have it all under one head because  
 22 I think I pointed out to you that actually the  
 23 bootlegging staff had no contractual relationship with  
 24 SMG or ShowSec.  
 25 COLONEL LATHAM: Quite right, sir.

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1 MR LAIDLAW: If this is a criticism that's made of SMG then  
 2 obviously it is not for me to explore it further.  
 3 You spoke of a lack of sufficient liaison with BTP,  
 4 and again, was that an opinion aimed at SMG or did that  
 5 also include ShowSec?  
 6 COLONEL LATHAM: That was aimed at SMG who were running the  
 7 operation.  
 8 SIR JOHN SAUNDERS: Can we make sure the doctor agrees with  
 9 that because I think it's a policing matter.  
 10 DR BaMAUNG: I do.  
 11 MR LAIDLAW: Thank you.  
 12 Issue 9, please. This is training and this is  
 13 a long chapter and this is for you. I think, doctor,  
 14 you led on this.  
 15 DR BaMAUNG: That's correct, I did.  
 16 Q. You touched upon this issue first of all when you were  
 17 here in October on Day 15. If I can draw together my  
 18 summary, would you just have in mind this question,  
 19 whether that is evidence you still are content should be  
 20 the way that we look at what follows?  
 21 DR BaMAUNG: Yes.  
 22 Q. The reference in the transcript is Day 15, pages 168 to  
 23 180 {Day15/168:1}.  
 24 You spoke about an approach which first requires  
 25 identification of the issues requiring consideration to

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1 include identifying the specific training needs of the  
 2 venue and the staff and then, secondly, mapping the  
 3 existing training products within the police service and  
 4 identifying them and how they meet the needs of the  
 5 venue.  
 6 You spoke also of the need to develop a CT training  
 7 programme. Is the training to be one size fits all?  
 8 And if so, are there compromises to be made? And you  
 9 said the training should be mandatory. And you said  
 10 that identifying suspicious or out—of—place people  
 11 should form part of the training. You spoke of it being  
 12 easiest to get a member of staff to train online. One  
 13 important thing for online training is a knowledge  
 14 check. The second thing is face—to—face training, which  
 15 is more effective, but you acknowledged a time  
 16 commitment. And the final thing was blended learning,  
 17 which you appeared to support, mentoring and refresher  
 18 training.  
 19 That's obviously a barrister's summary of a long  
 20 passage of evidence, but do I appear to have identified  
 21 the essential features of what you would expect —  
 22 DR BaMAUNG: You've identified it very well, yes.  
 23 Q. — of somebody in ShowSec's position attempting to  
 24 provide a training programme which catered for those  
 25 thoughts of the CT expert?

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1 DR BaMAUNG: Yes.  
 2 Q. Right. More recently, this is Day 41, which I think is  
 3 probably Tuesday, isn't it. I'll just give the  
 4 reference, page 225, line 14 {Day41/225:14}. In respect  
 5 of ShowSec's CT module, you said there was no clear  
 6 learning aim or objective. What I wanted to show you,  
 7 please, was the beginning of that part of the module.  
 8 If we remind ourselves, we're looking at it in hard  
 9 form rather than its interactive form. But could  
 10 we have on the screen, please, {INQ012105/169}?  
 11 SIR JOHN SAUNDERS: Is this the pre—employment online  
 12 training or is it the on—the—job e—training?  
 13 MR LAIDLAW: This is the pre. This is the one everyone has  
 14 to do before they can start work.  
 15 This is the first page. It's very difficult to know  
 16 how this might appear on the screen and it's plainly  
 17 something we can't see in hard copy. But just in terms  
 18 of the learning aim or the object, can I take you by way  
 19 of example to the middle paragraph, where the author of  
 20 the document is describing that terrorism comes in many  
 21 forms. We don't need to read it out. If we go four  
 22 lines from the bottom of that middle paragraph he or she  
 23 writes:  
 24 "It is usually your manager's duty to assess the  
 25 terrorism threat level. However, there are many roles

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1 and assessments that you can undertake to ensure better  
2 safety against terrorist attacks. Being aware of what  
3 to look out for may help keep the work environment safe  
4 for you, your work colleagues and the general public.”

5 That, in a couple of sentences, is really setting  
6 out what the objective is of the training which then  
7 comes over the next —

8 DR BaMAUNG: Can I make a couple of comments on that if  
9 possible?

10 Q. Yes.

11 DR BaMAUNG: Firstly, the actual course that was undertaken  
12 by James Allen, that's not the text that was in the  
13 course. You'll see at {INQ012048/1}, the very top of  
14 the —

15 Q. Shall we put this on screen so everybody can see it,  
16 doctor?

17 DR BaMAUNG: Yes. That's what James Allen's first page was.  
18 So the actual introduction, I don't see in his evidence  
19 or the evidence... In relation to the —

20 Q. I'm sorry, it's really irritating to be interrupted,  
21 forgive me I think we have the same passage —

22 DR BaMAUNG: Yes, I think at the top —

23 Q. — at the top, haven't we?

24 DR BaMAUNG: If you see the actual content of the course,  
25 that is missing in the James Allen one.

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1 Q. Do you remember the words I took you to in the one I was  
2 asking you to look at? If we look now at the version  
3 you've just taken me to, it's the same paragraph, isn't  
4 it, but now it's at the top of the page?

5 DR BaMAUNG: To be honest, if it comes to clarity in  
6 delivering counter—terrorism training, I wouldn't class  
7 that as clear aims and objectives. Could I give an  
8 example of what I mean? The aim of the course would be  
9 to develop a greater understanding of the ShowSec  
10 personnel in relation to how to manage a threat from  
11 terrorism. To me, that would be quite a clear one—line  
12 aim. The objectives could be, as I say, I am making  
13 these up as I am going along — if it helps you, I'll  
14 give you an idea of that my thoughts are. Objective  
15 might be, one, to be able to identify hostile  
16 reconnaissance and to respond appropriately to it, and  
17 aim 2 could be to be able to identify suspicious persons  
18 or baggage and to know the appropriate response to this.

19 So when I talk about aims and objectives, yes,  
20 there's content — I would say my criticism of the  
21 general course is it's so wordy, so for someone to  
22 understand where to go to identify what an aim and  
23 objective is, they could be really struggling to find  
24 it.

25 My experience with delivering this for the last

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1 12 years is that in relation to counter—terrorism  
2 training, you need to be sparse in words and quite clear  
3 about what you're trying to achieve. This whole section  
4 is so wordy that somebody who's got no understanding of  
5 counter—terrorism will be struggling to find out what  
6 are the key parts of that two paragraphs, which maybe  
7 equates to 200 to 300 words. Sorry, if that helps.

8 Q. You have, if I may say, cast your position pretty  
9 clearly. I'm wondering if in fact there's middle  
10 ground. Let me see if I can establish what that is.  
11 You speak from a position of expertise in CT which  
12 involves teaching CT or advising upon it. You have, if  
13 I may say so, the advantage, what, of three or  
14 four decades of experience in this field?

15 DR BaMAUNG: I wouldn't say four decades.

16 Q. Shall we settle on three? It's your day—to-day  
17 business?

18 DR BaMAUNG: Yes.

19 Q. We're looking here at a company which does not  
20 specialise in counter—terrorism, which is — and we're  
21 looking at a document created in 2017, so before the  
22 emergence of private sector CT assistance. And we're  
23 seeing whether they are making a sensible attempt to  
24 cater for CT as part of a risk that they have recognised  
25 the crowd that they manage may face.

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1 I'm not for a moment suggesting that this couldn't  
2 be better, if you take the ACT course, which most of us  
3 have probably done now as a result of this case, that's  
4 a really beautiful piece, isn't it, of well—resourced  
5 and well—presented instruction?

6 DR BaMAUNG: Yes, I would agree.

7 Q. It doesn't compare to this, does it, at all, it's a much  
8 different object?

9 DR BaMAUNG: Yes.

10 Q. We're really, are we not, judging things by different  
11 standards?

12 DR BaMAUNG: Can I make a comment if it could assist you?

13 Q. Please do.

14 DR BaMAUNG: Firstly, it's my understanding is that Mr Wise  
15 from the training department, who has no CT background  
16 but a really strong crowd management background, who  
17 developed this course. In my view, you used — and I've  
18 compared the sections, the NaCTSO counter—terrorism  
19 guidance for bars, pubs and nightclubs as a foundation  
20 for much of the content that's brought across along with  
21 Wikipedia and open source.

22 Q. Yes.

23 DR BaMAUNG: My comment would be that if it was acknowledged  
24 by ShowSec at the time that they do not possess that  
25 specialist knowledge in counter—terrorism, they should

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1 have gone elsewhere to get that advice and created  
 2 a course, which would be fit for purpose then.  
 3 Q. Just so I highlight a point I'll come to a little bit  
 4 later, we'll need to think about whether that criticism  
 5 can withstand contemporary standards for crowd  
 6 management companies. In other words, whether you're  
 7 able to say to the chair: well, from my experience, this  
 8 is what other crowd management companies were doing in  
 9 2017.  
 10 DR BaMAUNG: I'll be perfectly honest with you, we've not  
 11 looked at other crowd management companies because our  
 12 remit from the chair was to look at what was available  
 13 at the time, and I'll be honest, it's of no interest to  
 14 me what other crowd management companies were doing.  
 15 What I am looking at is: was the product that was  
 16 available at the time from ShowSec fit for purpose to  
 17 deliver appropriate CT training to the staff? Now,  
 18 I totally understand that ShowSec are a crowd management  
 19 company and that counter-terrorism is not a major part  
 20 of the company, and I think ShowSec acknowledge that and  
 21 have been making that point since you've given your  
 22 evidence.  
 23 But to do an effective counter-terrorism training  
 24 programme, if a company is aware that it does not  
 25 possess that expertise, then irrespective of if it's

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1 before the attack, and you're talking about Bataclan and  
 2 Stade de France and Charlie Hebdo, so there had been  
 3 attacks in Europe, and ShowSec had also participated at  
 4 senior management level in a lot of Griffin courses, so  
 5 they were aware that there is -- there was at that time  
 6 a current terrorist threat. And in my view, ShowSec,  
 7 quite rightly, acknowledge what their expertise was in  
 8 and it was in crowd management and not  
 9 counter-terrorism. In my view, having acknowledged that  
 10 and recognised what the threat was, they should have  
 11 gone to an external source to get a properly structured  
 12 training course.  
 13 Q. We'll come to that and the availability of that in due  
 14 course but I do need to make the point, because it will  
 15 be a point which will be made in due course to the chair  
 16 for his consideration. We are going to suggest, and  
 17 that's why I want you to think about this, contemporary  
 18 industry standards are extremely important and it is  
 19 this simple: I'm not suggesting you're being unfair, but  
 20 it would be very unfair to judge ShowSec without  
 21 reference to contemporary standards.  
 22 DR BaMAUNG: I totally agree with you.  
 23 Q. I take the point you're not interested in that, but  
 24 others may be.  
 25 MR COOPER: Sir, may I -- and again you've tolerated my

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1 silence for a moment. We've all, clearly except my  
 2 learned friend, followed guidance, broad questions, the  
 3 same questions no comment. Now my learned friend is  
 4 making points. Could we ask through you, sir, that my  
 5 learned friend follows the same rules everyone else in  
 6 this hearing room is following followed.  
 7 SIR JOHN SAUNDERS: That's tempting providence, I think.  
 8 Okay. Can I ask something. Your point, doctor, may be  
 9 that what you require is something much punchier than  
 10 what you have here, putting the message across briefly  
 11 but in a much stronger way?  
 12 DR BaMAUNG: Yes, but if I could maybe make one other point  
 13 here if it helps the inquiry. Not just punchier but  
 14 actually containing appropriate information  
 15 (overspeaking) --  
 16 SIR JOHN SAUNDERS: But looking on the first block, the last  
 17 sentence:  
 18 "Being aware of what to look out for may help keep  
 19 the work environment safer for you, your work colleagues  
 20 and the general public."  
 21 Have you any comment to make about that and the way  
 22 that's expressed?  
 23 DR BaMAUNG: I think that's a general comment that would  
 24 make people aware, but I think that that can be applied  
 25 across the other courses as well. There is that link

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1 between terrorism and security, but if this is  
 2 a specifically designed counter-terrorism module, then  
 3 it really should have a focus on counter-terrorism.  
 4 SIR JOHN SAUNDERS: Okay. Just dealing with the point that  
 5 you were raising, Mr Laidlaw, obviously one will take  
 6 into account what the current standard was at the time.  
 7 Equally, I think it's for me to decide whether the  
 8 current standard, if this did apply with the current  
 9 standard, was appropriate or not across the board.  
 10 MR LAIDLAW: Absolutely, and I'm not suggesting otherwise.  
 11 You have the contextual point.  
 12 DR BaMAUNG: To concede one point to you, Mr Laidlaw --  
 13 Q. Just the one?  
 14 DR BaMAUNG: In relation to standards, I'm aware that there  
 15 were no standards in relation to counter-terrorism  
 16 training, if that's the point you're trying to get to.  
 17 Q. I'll come to that one. Could we see whether you and  
 18 I could race through this thing. We're just before  
 19 1 o'clock and the reason for raising it is that you know  
 20 perfectly well what is in here and so do I but it may  
 21 bring this back to the chair's mind and to others  
 22 if we just do this very quickly.  
 23 What I'll try and do is just identify what there is  
 24 there in these next 5 minutes or so and then, with the  
 25 chair's leave, we'll break and we'll come back to look

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1 at that as against your position, which this is -- which  
2 was that this is inadequate in certain respects.

3 If we go back to my page references, if you wouldn't  
4 mind, because I've got them in my note, can we go to  
5 {INQ012015/170}. That's the link to Operation Fairway,  
6 is it not, at the top?

7 DR BaMAUNG: Yes.

8 Q. In the middle of the page, there are reasons why, as  
9 a matter of law, CT has to be addressed. If we go down  
10 to the bottom of 170 and over to {INQ012015/171}, we  
11 will see there, if we have the time, that it includes  
12 a reference to the importance of vigilance and  
13 reporting.

14 Over to {INQ012015/171}, please. Do you see that in  
15 the middle of the page?

16 DR BaMAUNG: Yes.

17 Q. {INQ012015/172}, "Housekeeping". At the bottom of the  
18 page is the HOT procedures.

19 On {INQ012015/173}, we can see those are set out.  
20 Designated areas for searching and safety at the bottom  
21 of 173.

22 And then what to do, if we go over the page  
23 {INQ012015/174}, if something suspicious was found:  
24 calmness and then in due course we'll see going to the  
25 police.

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1 {INQ012015/177}, please. Turn the pages, would you,  
2 Mr Lopez? {INQ012015/175} is the CBRE attacks, and you  
3 had something to say about that, and there's reference  
4 to the Sarin attack on the Tokyo subway.

5 {INQ012015/176}, please. {INQ012015/177}. I think  
6 you'd made the point that some of this has been drawn  
7 from Wikipedia.

8 DR BaMAUNG: Yes, that's correct.

9 Q. The bottom of {INQ012015/177}, the threat of a suicide  
10 attack. If we look in the bottom of the page, it's the  
11 larger of the bottom paragraphs before the indented  
12 bullet points, the middle of that paragraph:

13 "Suicide bombers may use a lorry, plane or other  
14 kind of vehicle as a bomb or may carry or conceal  
15 explosives on the person."

16 And that continues to {INQ012015/178}. Then  
17 firearms and weapons attacks with the references to run,  
18 hide and tell, and the links to stay safe.

19 Then {INQ012015/178} at the bottom, please. We come  
20 here, don't we, to hostile reconnaissance? Identifying  
21 and responding to suspicious behaviour and the like.

22 That continues for the next two or three pages.

23 {INQ012015/180-181}. We've got a passage in bold,  
24 as it appears here, about reconnaissance. Over the  
25 page, please, to {INQ012015/182}. Threat levels, and

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1 there was a link to the present threat level.

2 Over the page to {INQ012015/183}. References to  
3 intelligence sources. Then there's the suicide bomb  
4 attack, which is drawn upon, which occurred outside  
5 a festival in Moscow.

6 {INQ012015/184} is the link to Eyes Wide Open.

7 That's the video which was current at the time,  
8 addressing suspicious behaviour --

9 DR BaMAUNG: That's correct, yes.

10 Q. -- was it not?

11 One more page {INQ012015/185}, please. That's the  
12 end of the course. We have raced through and I'm not  
13 doing justice to the content or the various points  
14 you have made about it. After lunch, with the chair's  
15 leave, I will come to some questions about that and --

16 DR BaMAUNG: Would it help if I give a very brief comment  
17 just now?

18 Q. Certainly.

19 DR BaMAUNG: The content that you have within the course is  
20 based on the NaCTSO guidance, which -- the NaCTSO  
21 guidance is the correct guidance at the time. The  
22 issues that I have are in relation to parts of the  
23 NaCTSO guidance that are brought out and also the way  
24 that the information has been delivered in your training  
25 course and omissions that have been left out, which are

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1 critical for the safety of personnel and audiences,  
2 which were in the NaCTSO guidance but have been omitted  
3 in your training.

4 So these are the issues. If that helps, just to  
5 point out my position.

6 MR LAIDLAW: That certainly clarifies the ground, doesn't  
7 it? Thank you.

8 Sir, is that a good place to stop for the moment?

9 I think I have 40 minutes. I will finish within that  
10 time. Having asked that other people observe those  
11 timings, I'll do the same myself.

12 SIR JOHN SAUNDERS: Thank you. Both of you, please, would  
13 you -- I said for me this is unique ground having two  
14 witnesses at the same time -- can you write down things  
15 and encapsulate your own thinking in as clear a way as  
16 you can, what other comments you haven't been permitted  
17 to make that you wish to make, and we will, I promise,  
18 come to them in due course.

19 DR BaMAUNG: Sir, I've created a list of bullet points. If  
20 that would help the inquiry, I'll use the bullet points.

21 SIR JOHN SAUNDERS: Fine. I'm really talking about things  
22 you haven't had the opportunity to deal with because  
23 you're being questioned one at a time, if you want to  
24 come back to them.

25 1.45.

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1 (1.01 pm)  
 2 (Lunch adjournment)  
 3 (1.45 pm)  
 4 MR LAIDLAW: [No audio] us to absorb in detail, but it is  
 5 something that you have looked at carefully on at least  
 6 one occasion, if not more occasions —  
 7 DR BaMAUNG: Yes, because as I said before, the document is  
 8 based on a NaCTSO guidance, which is in fact the  
 9 standard for CTSAs.  
 10 Q. And you have made the point already, you think it's too  
 11 long, too wordy in parts, but you also wanted to draw  
 12 the chair's attention to, I think, important things that  
 13 you think have been missed?  
 14 DR BaMAUNG: That's right.  
 15 Q. I said I would give you the opportunity to do that.  
 16 This is the opportunity.  
 17 DR BaMAUNG: I think in addition to the omissions, would it  
 18 be possible to give a very brief oversight of what I see  
 19 are the key issues with regard to the whole programme  
 20 rather than the omissions?  
 21 SIR JOHN SAUNDERS: If they are additional to what we have  
 22 already had, then fine.  
 23 MR LAIDLAW: It's not repeating evidence you have given  
 24 before?  
 25 DR BaMAUNG: No.

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1 Q. All right.  
 2 DR BaMAUNG: As far as it's appearing to be  
 3 a counter-terrorism product, what I would look at is the  
 4 product structure, the content layout, the context and  
 5 the target audience, and my concern with the product  
 6 is — we have mentioned there were too many words, but  
 7 the other aspect is the impact on the learner, who would  
 8 be the ShowSec steward.  
 9 This particular document contains some concerns for  
 10 me in that if the stewards had poor reading skills or if  
 11 they were using mobile devices rather than computers to  
 12 translate 300 words or so on to a mobile phone —  
 13 SIR JOHN SAUNDERS: I understand that point.  
 14 DR BaMAUNG: I think one of the issues I would have is that  
 15 there are very, very simple ways of overcoming, such as  
 16 audio overlay, so if they don't want to read the content  
 17 they could actually listen to it.  
 18 In terms of the omissions, there a number of ones  
 19 and the most important to me is that when an IED is  
 20 sighted by somebody, there is no mention whatsoever  
 21 in the guidance to stewards on not using the radio or  
 22 phone within 15 metres and out of line of sight of that  
 23 device. And if I could explain the context —  
 24 SIR JOHN SAUNDERS: So what we're saying is if you used  
 25 a radio, you might actually set a bomb off?

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1 DR BaMAUNG: Yes.  
 2 MR LAIDLAW: We understand that.  
 3 DR BaMAUNG: So it's difficult to understand why that's not  
 4 in it because when I was doing the review of the  
 5 documents, this is actually highlighted in the ShowSec  
 6 counter-terrorism awareness document 2017.  
 7 Q. That takes me to another point we're going to come to.  
 8 To focus on the chair's direction, just to deal with  
 9 additional stuff for him, please.  
 10 DR BaMAUNG: Probably the concern for me is that although  
 11 you've mentioned there are two hostile reconnaissance  
 12 videos, there's no dedicated section in the document  
 13 that was in existence at the time of the attack to  
 14 hostile reconnaissance. It's simply related to two  
 15 videos. I think the issue for me is that unless the  
 16 context of the videos is taken into account, the actual  
 17 learning points could be missed.  
 18 One of the other issues is in relation to — you  
 19 mentioned there's a good section on radiological and  
 20 chemical devices, but there's actually no mention of  
 21 what a member of staff should do in relation to  
 22 evacuation if one of these devices goes off. That is  
 23 totally contrary to what the procedure is — the  
 24 procedure is contrary to what a normal evacuation would  
 25 be —

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1 SIR JOHN SAUNDERS: Let me summarise what I think you're  
 2 saying: a lot of the content is good because it's  
 3 actually NaCTSO training which is done, presentation you  
 4 think is not as good as it could be. There are some  
 5 significant omissions —  
 6 DR BaMAUNG: Yes.  
 7 SIR JOHN SAUNDERS: — which we may hear are made up for  
 8 elsewhere I don't know. But you don't think it has the  
 9 impact which the training should have?  
 10 DR BaMAUNG: That's correct, sir.  
 11 SIR JOHN SAUNDERS: Okay.  
 12 DR BaMAUNG: The final points were, and this only came to  
 13 light to Colonel Latham and myself over the last couple  
 14 of weeks, is the lack of knowledge check and the  
 15 confirmation that the learning has actually been  
 16 undertaken.  
 17 SIR JOHN SAUNDERS: I think we've got that point. That's  
 18 why I didn't mention it. It should have been checked,  
 19 they should have done the knowledge thing, and it should  
 20 have been checked that they'd actually done it, although  
 21 obviously Mr Laidlaw has been dealing with the point,  
 22 well, did anyone actually doing that otherwise.  
 23 DR BaMAUNG: Yes.  
 24 SIR JOHN SAUNDERS: Was that quick enough, Mr Laidlaw?  
 25 MR LAIDLAW: It was fine if I may say so, thank you.

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1 Your point really was, to me: yes, I accept that  
 2 ShowSec are not a counter-terrorism firm, don't have  
 3 that expertise, they should have gone to somebody else.  
 4 So the obvious question for the chair: who is it they go  
 5 to?  
 6 DR BaMAUNG: They could have gone -- obviously, the  
 7 discussion has been held about the role of the CTSA.  
 8 They could have gone to a private security company who  
 9 has counter-terrorism expertise. Without naming  
 10 companies, there are several companies, probably with  
 11 ex-CTSAs or ex-CT SECOs that could have -- I think what  
 12 ShowSec have done is they've transferred content from  
 13 a critical document and they have transferred a lot of  
 14 good content into the document, but they've not had --  
 15 in trying to do it without expertise, they've not picked  
 16 up on key points that should have been brought across as  
 17 well.  
 18 Q. I need to put a position to you. It's one I have  
 19 touched on already. When you say they could have gone  
 20 to a private security firm staffed by ex-CTSAs, the  
 21 directors struggle, they just don't think in 2017 such  
 22 a resource was available. It certainly is now in 2020.  
 23 And that's why I wanted to ask you about -- and I have  
 24 touched on this already -- contemporary standards.  
 25 SIR JOHN SAUNDERS: I'm going to stop you there. To your

1 knowledge were there companies that were doing that sort  
 2 of thing in 2017 as far as you're concerned?  
 3 (Overspeaking)  
 4 DR BaMAUNG: -- but I believe there would be, yes.  
 5 MR LAIDLAW: And this is a belief, you haven't done any  
 6 research --  
 7 DR BaMAUNG: I haven't done any research and it would be  
 8 difficult to retrospectively check back to 2017, I'm  
 9 afraid.  
 10 Q. You would presumably accept, and I think you have  
 11 touched on this point, it's important not to just focus  
 12 upon this one module, there are other aspects which feed  
 13 in to the nature of the training --  
 14 DR BaMAUNG: Yes.  
 15 Q. -- that ShowSec personnel received?  
 16 DR BaMAUNG: Yes.  
 17 Q. There's the classroom training, there was the half-day  
 18 or day session they got after the induction. The  
 19 e-communications as well.  
 20 DR BaMAUNG: Yes.  
 21 Q. We saw examples of them. There was the briefings.  
 22 DR BaMAUNG: Yes.  
 23 Q. And we are dealing, are we not, with a very experienced  
 24 workforce at the arena? Do you remember those  
 25 statistics from Mr Harding? They had done 18,000 shifts

1 between them, the staff who were on duty on 22 May.  
 2 DR BaMAUNG: I think that's maybe a generalisation about  
 3 everybody's experience. There were people there that --  
 4 Q. No, it was a generalisation about the staff generally.  
 5 Between them they had 18,000 shifts. There was a very  
 6 experienced managerial and supervisory level. Do you  
 7 remember the figures that Mr Harding give?  
 8 DR BaMAUNG: No, I can't, no.  
 9 Q. 33 supervisors, including the four managers, against the  
 10 17 which had actually been ordered by SMG, managers  
 11 having an average of 10+ years in terms of experience.  
 12 So I'm afraid I'm not going to retreat from this point.  
 13 A very experienced workforce at work?  
 14 DR BaMAUNG: Yes.  
 15 Q. All of that you feed into the question of whether there  
 16 had been adequate training?  
 17 SIR JOHN SAUNDERS: Bearing in mind those figures, does that  
 18 change your mind about the adequacy of the training?  
 19 DR BaMAUNG: No.  
 20 MR LAIDLAW: In fact, your views have changed, haven't they,  
 21 about the nature of the training? Can I trace them  
 22 through with the references? First of all, you wrote  
 23 this in the context of this particular module. You said  
 24 this was the low standard that was appropriate at the  
 25 time. I will give the reference for that:

1 {INQ032612/9}, paragraph 19. That changed to below  
 2 standard, in other words leaving out the standard,  
 3 because you can't talk as to contemporary standards, can  
 4 you?  
 5 DR BaMAUNG: No, that's right.  
 6 Q. You changed that to below standard. That is  
 7 {INQ035292/147-148}, paragraphs 280 to 282, and then  
 8 finally, this:  
 9 " ... fell below the quality of guidance that could  
 10 [the word underlined in the report] have been given."  
 11 That was in your final report, {INQ035611/54},  
 12 paragraph 122. Do you accept that you have moved during  
 13 the course of the iterations of your report to  
 14 the position that we finally reach, it could have been  
 15 better?  
 16 DR BaMAUNG: As we are discussing the iteration of the  
 17 report, I think that's an important issue because we  
 18 took on board the comments of the various organisations  
 19 that were involved in the consultation and the amount of  
 20 information that we've received, which has actually had  
 21 an -- the impact on our understanding of the subject has  
 22 been considerable. So yes, I would agree that initially  
 23 probably the terminology was stronger, the word standard  
 24 was not intended to indicate that there was any specific  
 25 standard in place, but it's maybe the incorrect use of

1 the word standard and we weren't referring to any  
2 particular standard, as in PAS68 or PAS69, but we were  
3 talking about the actual quality of the content within  
4 the training programme.

5 So very briefly, yes, the wording has changed but  
6 the wording has changed because our access to  
7 documentation has been immense. I think when the first  
8 report was written we had access to 1,000 documents. At  
9 this point in time it's nearly 2,000, so all of these  
10 documents, including the ones from ShowSec, have been  
11 taken into account.

12 We tried to be fair to every core participant that  
13 we would take on board comments they've done and if the  
14 comments were fair then we were prepared to incorporate  
15 that into the report and I think you'll find that's why  
16 the wording has been less critical because we've taken  
17 on board a lot of comments that were made both in  
18 statements and in the document --

19 SIR JOHN SAUNDERS: Okay, I've got that point, thank you.

20 MR LAIDLAW: The point which was being made to you, which

21 I think you accept, was the difficulty you faced -- when  
22 you said "the standard" you were plainly intending to  
23 convey what the contemporary standards were --

24 DR BaMAUNG: No, I wasn't --

25 Q. Let me just finish -- and as you have told the chairman

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1 in fact you have done no work at all in this area.

2 DR BaMAUNG: We looked at what was available at the time  
3 and --

4 Q. Forgive me, contemporary standards: you haven't gone to  
5 any of the organisations or any other security company  
6 and said to them, listen, guys, what were you teaching  
7 at the time, could we have a look at your module? We're  
8 being asked to assess ShowSec, so we would like to do  
9 a comparison exercise. You just haven't done that.

10 SIR JOHN SAUNDERS: Now you answer without interruption.

11 DR BaMAUNG: Thank you. I think you're maybe confusing our  
12 remit from the chairman at the time. It was to look at  
13 what was in existence at the arena and the SIA  
14 documentation was brought in along with other CTSA  
15 documentation. We did a comparison there and there  
16 was -- I think to go to other organisations would fall  
17 outwith what we were tasked to do for this inquiry.

18 MR LAIDLAW: Right. I don't know how many times you have  
19 given expert evidence in a court or at an inquiry or --

20 DR BaMAUNG: This is the first time I have given expert  
21 evidence.

22 Q. I'm going to suggest that, generally speaking an expert,  
23 to found a basis for a criticism, would be looking at  
24 contemporary standards.

25 SIR JOHN SAUNDERS: Okay, Mr Laidlaw, it depends on the

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1 question. I quite agree that on what you've read out,  
2 the experts' opinion appeared to be relating to  
3 standards at the time, so I well understand the point  
4 you're making. But my remit is to look at advice that  
5 was being given by ShowSec and whether it was accurate  
6 and if everybody else was giving inadequate advice then  
7 so be it. But that's the primary thing. I'm not here  
8 to say whether this fell below the contemporary  
9 standard; I'm looking at whether the standard itself was  
10 sufficient.

11 MR LAIDLAW: I understand that, but I think you would also  
12 understand from my client's position that to find  
13 themselves being criticised at this sort of level when  
14 nobody is able to point to anything which has been  
15 better at the time, and against the difficulties that  
16 I have sketched out, it is context, sir.

17 SIR JOHN SAUNDERS: Where we landed, the expert report  
18 landed, is it fell below the quality of guidance which  
19 could have been given. Are you unhappy with that?

20 MR LAIDLAW: Well --

21 SIR JOHN SAUNDERS: Perhaps you are not going to express  
22 happiness or anything.

23 MR LAIDLAW: No.

24 Issue 10, please. Colonel Latham, this is for you,  
25 please. It's your (iv), do you recall, on issue 10?

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1 I will allow you to catch up.

2 Issue 10 is in these terms: if other aspects of the  
3 security set-up function properly, such as CCTV  
4 monitoring, searching and screening of concertgoers, and  
5 the running of two control rooms at the arena. (iv)  
6 that I want to focus upon is supervision of ShowSec  
7 staff in the City Room, which you describe as  
8 inadequate.

9 If we just glance on, please, to issue 13, so I can  
10 draw the two together, I don't want to cover the same  
11 ground, do you see that in the body of issue 13, which  
12 relates to Mohammed Agha and Kyle Lawler not reacting to  
13 the report of 22.14, you, again taking the lead in this  
14 section, have written:

15 "There was insufficient supervision of and direction  
16 to Agha and Lawler."

17 COLONEL LATHAM: Yes.

18 Q. So it's the issue of supervision. When you were here  
19 dealing with this issue in answer to Mr Greaney's  
20 questions, you said this, and I have drawn this from  
21 transcript, Day 41, page 229, line 4 {Day41/229:4}:

22 "When people at the bottom of the chain of command  
23 are getting things wrong, it's often a symptom of poor  
24 management or supervision. Therefore I look at the  
25 managers and their supervisors rather than those at the

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1 bottom of the pile who may have got things wrong.”  
 2 It ’ ll be for the chair, obviously, to judge whether  
 3 that is an appropriate approach or not, it is not for  
 4 you and I to debate, but can I just draw aspects of the  
 5 evidence to your attention so that you do have the  
 6 opportunity, if you want to modify or conduct something  
 7 of a retreat to do that now and then I will leave the  
 8 point. All right?

9 This is a summary of what might touch upon that  
 10 issue in this context and looking at the critical time.  
 11 There’s a combined sequence of events, the reference is  
 12 {INQ035973/211}, which shows that PC Bullough was  
 13 speaking to a number of members of ShowSec staff in the  
 14 City Room at 21.48. Do you recall that?

15 COLONEL LATHAM: Yes.

16 Q. It was obviously after 2200 hours, as you recall, that  
 17 the concern about Abedi was noted by Mr Wild. And  
 18 it would have been also after 22.00 that the final  
 19 pre-egress check was carried out. Looking at that time  
 20 period, from the sequence of events, {INQ036727/1}, the  
 21 following were in the City Room: Middleton, along with  
 22 licensed staff including Jordan Beak and Dan Perry.  
 23 Okay? Do you remember also in Agha’s evidence that he  
 24 mentioned the presence of another supervisor,  
 25 Don Barrett in the area? In terms of radio holders

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1 in the City Room, our analysis is that during the last  
 2 hour before detonation, there was a period of only  
 3 2 minutes when there was no radio holder in those rooms.  
 4 The point, as I’ve said, is this: against that body of  
 5 evidence, do you believe that that is a balanced  
 6 criticism to make, a lack of supervision?

7 COLONEL LATHAM: Yes. Mark Harding said, whilst it’s true  
 8 that Mohammed Agha was not directly supervised on  
 9 22 May, he had a brief that ended when he didn’t know  
 10 where he was supposed to go to because he’d never been  
 11 to the grey doors before. It was his first day as  
 12 an SIA officer. He was told by somebody who wasn’t  
 13 a supervisor to stay at those doors and he wasn’t given  
 14 a written brief, and nobody visited him throughout the  
 15 course of his shift to check if that young,  
 16 inexperienced SIA understood his role and had any  
 17 questions and to give him some leadership and  
 18 management.

19 For those reasons, I stand by what I have said.

20 Q. Okay. So that addresses the criticism in issue 13,  
 21 which I well understand. Can we then go to issue 10 and  
 22 (v), which seems to be a broader —

23 SIR JOHN SAUNDERS: (iv).

24 MR LAIDLAW: Sorry, it seems to be a broader criticism, that  
 25 supervision of ShowSec staff in the City Room was

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1 inadequate. Is that the same point made in two  
 2 different places or is there a broader point that you  
 3 are seeking to make in respect of issue 10?

4 COLONEL LATHAM: The broader point would be that there was  
 5 not a pattern of the supervisors going and checking on  
 6 the people who were below the level of supervisor. For  
 7 example, we didn’t see supervisors going out on to the  
 8 bridge.

9 SIR JOHN SAUNDERS: You’re talking about the City Room here.  
 10 Is there anyone but Agha who we’re talking about being  
 11 supervised in the City Room? The access people?

12 COLONEL LATHAM: The access people, one of those was  
 13 a supervisor, sir. So perhaps if we are confining that  
 14 comment simply to the City Room —

15 SIR JOHN SAUNDERS: Well, you did, that’s all.

16 COLONEL LATHAM: Perhaps I am talking about that Agha  
 17 explanation that I gave. Does that answer your  
 18 question?

19 MR LAIDLAW: It certainly answers it in part. Turning then  
 20 to the Agha position, can I remind you of various  
 21 passages in your various iterations of your report?

22 I ’ ll give you the point that your previous opinions,  
 23 certainly at face value, appear to be inconsistent with  
 24 this more recently expressed view of inadequate  
 25 supervision, either of Agha or more generally.

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1 Let me read to you from the addendum report,  
 2 {INQ035292/18–20}. There you said this at paragraph 32:

3 “In our opinion, and as a summary of all the related  
 4 evidence we have seen, ShowSec security staff in and  
 5 around the City Room were sufficiently well trained for  
 6 both of them to know that they should report suspicious  
 7 activity and to know how to do so.”

8 Then paragraph 33:

9 “We have not seen evidence that staff lacked  
 10 confidence to report incidents immediately for fear of  
 11 criticism from management.”

12 Then these words:

13 “In our opinion, SMG and ShowSec security staff had  
 14 sufficient training, confidence, empowerment [then this  
 15 word] and support to report suspicious activity.”

16 Do you see the point that I’m making to you? The  
 17 use of the word “support” would appear at face value to  
 18 cut across your criticism of a lack of supervision?

19 COLONEL LATHAM: Is now good to answer?

20 SIR JOHN SAUNDERS: Absolutely, you answer.

21 COLONEL LATHAM: Thank you, sir.

22 Exactly as Dr BaMaung said, we wrote three reports.  
 23 As we wrote each report, we took account of all of the  
 24 evidence we had and we reflected it in each of those  
 25 reports as we had the evidence. We also reflected the

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1 information that we got from questions from core  
 2 participants on our first report, which then ended up  
 3 with us producing our addendum report.  
 4 As that information has come in, we have learned new  
 5 things. For example, we have learned that there has  
 6 been some suggestion that perhaps Mr Agha didn't  
 7 complete the training in the way that we might have  
 8 thought he had when we wrote our first report, for  
 9 example.  
 10 We hadn't seen all of the CCTV. I didn't know that  
 11 the supervisor had not been over to Agha until quite  
 12 late in the process. Not until I saw the more recent  
 13 statements did I know that Agha was almost unbriefed and  
 14 so those, all of those things, and others, amounted  
 15 together when we took all of the evidence into account  
 16 and we looked at the oral evidence that we had heard to  
 17 allow us to arrive at our final position because we now  
 18 had all of the evidence that was available and that is  
 19 why we have concluded what we concluded.  
 20 Q. And you say Agha gave evidence that he was unbriefed.  
 21 You have worked, have you, on the basis that that  
 22 evidence is reliable? Is that the basis for this  
 23 particular opinion?  
 24 COLONEL LATHAM: No, the full body of evidence is the basis  
 25 for my opinion and not simply one statement by one

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1 individual.  
 2 Q. Right. I'm going to suggest that your report in this  
 3 regard does lack balance, but that again is for  
 4 submissions to be made.  
 5 SIR JOHN SAUNDERS: Can I just know, in the context, if the  
 6 word unbriefed is talking about the requirement that you  
 7 consider there was to have a written brief?  
 8 COLONEL LATHAM: No, sir. It's particularly in relation  
 9 to — I will forget one of the names. After the  
 10 supervisor's brief with Dave Middleton, Agha had then  
 11 been told he was going to go to grey doors, but he  
 12 didn't know what grey doors were or where they were. So  
 13 he asked, I think it's somebody called Dimitri, I might  
 14 have that name wrong. He asked someone he knew, he  
 15 didn't want to go to Middleton because he didn't find  
 16 him approachable or something, I have got some wording  
 17 somewhere, but he wanted to go to someone who he knew to  
 18 ask that question —  
 19 SIR JOHN SAUNDERS: So it's relying on that oral evidence  
 20 that we heard from Mr Agha?  
 21 COLONEL LATHAM: Not only from Agha but also from — I think  
 22 his name is Dimitri — that that conversation took place  
 23 and that he was told to go to the doors and stay there.  
 24 SIR JOHN SAUNDERS: Okay.  
 25 MR LAIDLAW: Let me then take you to the final report,

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1 {INQ035611/378}, paragraphs 871 to 872. In fact, in the  
 2 final report you said precisely the same thing and  
 3 I will read what you wrote there:  
 4 "Staff were sufficiently trained for them to know  
 5 that they should report suspicious activity and to know  
 6 how to do so. We have not seen evidence that staff  
 7 lacked confidence to report incidents immediately for  
 8 fear of criticism from management. In our opinion SMG  
 9 and ShowSec security staff had sufficient training,  
 10 confidence, empowerment and [again] support to report  
 11 suspicious activity."  
 12 You have in fact, haven't you, seized on the single  
 13 words of a single witness in what is effectively a new  
 14 conclusion which we now see wrapped up within issues 10  
 15 and 13? And the point I really want, rather than going  
 16 back over the material, is: do you think that that it is  
 17 appropriate for an expert in terms of the opinion he  
 18 expresses to a public inquiry to seize on particular  
 19 words of a single individual when that individual's own  
 20 position is subject to great question, and no doubt  
 21 concern, in terms of conclusions by the chair in due  
 22 course?  
 23 COLONEL LATHAM: I don't accept that I've settled on the  
 24 words of a particular individual. It's based on  
 25 a review of all of the evidence available to us and it's

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1 something that we have discussed, Dr BaMaung and I, over  
 2 a very long period of time and it's something that  
 3 we have discussed as experts and agreed upon having  
 4 reviewed all the evidence.  
 5 Q. Issue 12, please, next. Colonel Latham, for you,  
 6 please.  
 7 Issue 12 was this:  
 8 "Why was Salman Abedi's hostile reconnaissance on  
 9 the days prior to the attack not noticed by anyone? Was  
 10 it understandable or instead a failure and, if  
 11 a failure, was that the result of a systems or  
 12 individual failure?"  
 13 You began that paragraph in this way:  
 14 "Given the number of security staff in place at the  
 15 arena and the lack of specific training about hostile  
 16 reconnaissance, there was almost no chance to recognise  
 17 Abedi's hostile reconnaissance before 22 May 2017."  
 18 This may be my fault, so I need some clarification  
 19 first of all. Are you suggesting that's a failure in  
 20 respect of CCTV monitoring by SMG or are you suggesting  
 21 that's a failure which was shared by ShowSec personnel  
 22 on the ground during the pre-22 May period, or  
 23 a combination of the two?  
 24 COLONEL LATHAM: Shared, Mr Laidlaw.  
 25 Q. So you do suggest that ShowSec personnel had a lack of

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1 specific training? Can I suggest that is simply wrong  
 2 on the evidence. It's plainly inaccurate. Each of  
 3 them, as part of the induction course, had been taken  
 4 through the Eyes Wide Open video from the NaCTSO  
 5 guidance, which is all about hostile reconnaissance.  
 6 COLONEL LATHAM: Participating in training doesn't make it  
 7 sufficient. What makes it sufficient is if it delivers  
 8 on the ground. There were individual members of ShowSec  
 9 staff who did a fantastic job looking for and  
 10 identifying potential hostile reconnaissance and  
 11 reporting it in the way that they were supposed to do.  
 12 There were other members of ShowSec staff who didn't do  
 13 that.  
 14 SIR JOHN SAUNDERS: Okay. It's quite difficult — I'm sorry  
 15 to interrupt again. It can be that people have the  
 16 training and just don't do the job properly?  
 17 COLONEL LATHAM: Indeed.  
 18 SIR JOHN SAUNDERS: And despite the training they miss  
 19 something, which again may be understandable. But if  
 20 you think the training is — you can't just, can you,  
 21 look at it and say: you missed that, therefore  
 22 you weren't properly trained to do it?  
 23 COLONEL LATHAM: That's correct, sir.  
 24 SIR JOHN SAUNDERS: You can't do that, can you?  
 25 COLONEL LATHAM: You can't do that.

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1 SIR JOHN SAUNDERS: What we're talking about, as  
 2 I understand it, is on the bridge, we've got  
 3 Salman Abedi walking past Kyle Lawler and  
 4 Robert Atkinson, and you say they should have been  
 5 suspicious about him because he's carrying a heavy bag.  
 6 That may be, "I didn't understand the training, I didn't  
 7 follow it, I didn't know what it was", or it could be,  
 8 "I missed it", or it could be, "It's not surprising you  
 9 missed it, you're on the top of a station", which is a  
 10 question I was asking you before.  
 11 COLONEL LATHAM: Or it could be they weren't looking.  
 12 SIR JOHN SAUNDERS: Absolutely. So why do you attribute it  
 13 to the training?  
 14 COLONEL LATHAM: Because the training that was in place at  
 15 the time and of which SMG were well acquainted with and  
 16 which they heard about at the Argus Stadia presentation  
 17 and for which there were other sources, was about deny,  
 18 detect, deter. That was not language — those 3Ds is  
 19 not language which is used throughout this evidence.  
 20 It's few and far between and it didn't appear to be the  
 21 currency that was being used by SMG and ShowSec.  
 22 Neither did there seem to be practical training in that  
 23 and it is the practical training in looking at what  
 24 something suspicious looks like and then interacting  
 25 with it, which is most successful.

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1 So there were some unusual individuals who did  
 2 a really good job, but there was not the level of  
 3 reporting and then re-briefing that I would have  
 4 expected to see if the practice had been good.  
 5 SIR JOHN SAUNDERS: Sorry, I'll leave it to you now.  
 6 MR LAIDLAW: I'm going to come back to this passage. This  
 7 is a question really focused upon you as the expert  
 8 witness and the quality of the opinions you are prepared  
 9 to express. It goes beyond this example.  
 10 Let me take you back to the words you used:  
 11 "Given the number of security staff in place at the  
 12 arena and the lack of specific training about hostile  
 13 reconnaissance, there was almost no chance to recognise  
 14 Abedi's hostile reconnaissance before 22 May."  
 15 Do you not think that that is a conclusion, the  
 16 reference to a lack of specific training, which simply  
 17 cannot stand the uncontentious evidence every single  
 18 ShowSec witness had seen the hostile reconnaissance  
 19 video, which is approved by NaCTSO?  
 20 COLONEL LATHAM: I'm not sure that we can say that every  
 21 single ShowSec employee —  
 22 Q. Just work on the basis that we can because that,  
 23 I think, has been the uncontested evidence thus far.  
 24 Whatever the inadequacies of the training, and the  
 25 doctor has spoken to that, everybody saw that video.

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1 Do you think, as the expert witness, this is a —  
 2 SIR JOHN SAUNDERS: Okay, there's a bit of doubt about —  
 3 I'm quite happy for you to ask the question on that  
 4 basis. I'm not sure —  
 5 MR LAIDLAW: Mr Greaney also wants to speak.  
 6 MR GREANEY: I was simply going to make the observation that  
 7 we would certainly accept for our part that each  
 8 employee should have seen the video. Whether the  
 9 evidence establishes that they all did see the video is  
 10 a different and properly controversial issue.  
 11 SIR JOHN SAUNDERS: Okay.  
 12 MR LAIDLAW: Let's take the position on the basis of  
 13 Mr Greaney's recent observation. This is a criticism  
 14 aimed at the company, not at the individual. You are  
 15 accusing the company of not providing specific training.  
 16 Working on Mr Greaney's basis, the evidence or the  
 17 accepted position, certainly of CTI, is that everybody  
 18 should have seen this video, in other words it is not  
 19 a failing of the company. Do you think as an expert,  
 20 expressing opinion in a very important public inquiry,  
 21 you ought to have reflected that rather better in this  
 22 sentence?  
 23 COLONEL LATHAM: I think that if it was the position that  
 24 I knew that everybody had recently seen that video, then  
 25 I might have expressed it differently. But that was not

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1 the position that I was in.  
 2 Q. Or is the truth, actually, Colonel Latham, that come  
 3 what may, you're just, as it were, pathologically  
 4 incapable of acknowledging error or omission or  
 5 oversight or exaggeration?  
 6 SIR JOHN SAUNDERS: That's an unhelpful comment.  
 7 Pathologically coming into it as well is slightly  
 8 unhelpful. It's not helpful to me, it might be in other  
 9 venues.  
 10 Colonel Latham, can I ask you this? You have always  
 11 put great importance on deny, detect and deter as  
 12 a catchphrase or, sorry, that's put the wrong way, but  
 13 the way of explaining it to people.  
 14 COLONEL LATHAM: Yes, sir.  
 15 SIR JOHN SAUNDERS: I think the training they saw, which was  
 16 approved training, probably doesn't have that in it,  
 17 does it?  
 18 COLONEL LATHAM: I couldn't say that off the top of my head.  
 19 I think the reason I've placed so much emphasis on it is  
 20 it's the thing venues can do which is not expensive  
 21 which is very effective and that is really why it is so  
 22 important.  
 23 SIR JOHN SAUNDERS: Let's rephrase Mr Laidlaw's question.  
 24 The suggestion is that really you're prepared to say  
 25 anything to criticise, that you've come here to look for

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1 criticisms, and to make them whether they're justified  
 2 or not.  
 3 COLONEL LATHAM: That is absolutely not the way that we have  
 4 approached it. We have tried to give praise where it's  
 5 appropriate. I think earlier on today I delivered some  
 6 praise to Miriam Stone. We've not come here with that  
 7 intention at all. We have no ulterior motive. We've  
 8 tried to be completely balanced.  
 9 MR LAIDLAW: Can we just pick up issue 13 and your point,  
 10 again in the context of supervision, which rests upon  
 11 Agha's claim that he was unbriefed and this is  
 12 presumably unbriefed as to, what, what his role was  
 13 at the grey doors or the circumstances in which he'd be  
 14 entitled to leave them?  
 15 COLONEL LATHAM: The briefing that he got for those doors,  
 16 as I understand, is, "The doors are over there, don't  
 17 leave the doors".  
 18 Q. Right.  
 19 SIR JOHN SAUNDERS: I don't think that just comes from him  
 20 either.  
 21 COLONEL LATHAM: No, it's not just from Agha.  
 22 MR LAIDLAW: I don't think I suggested it had at that  
 23 moment.  
 24 Again, you believe that that's a conclusion that can  
 25 stand against Middleton's evidence about the nature in

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1 which he briefed? Do you remember, by way of example,  
 2 him telling the chair that at the end of the briefings  
 3 he would say if people didn't understand things they  
 4 were to come and tell him in private?  
 5 COLONEL LATHAM: I do remember him saying that and I have  
 6 heard many people saying that and some of those people  
 7 are approachable and some of those people are not.  
 8 I make that comment on it.  
 9 Q. Right. So as it were, you're introducing, as it were,  
 10 your own judgement as to the reliability of that  
 11 statement?  
 12 COLONEL LATHAM: I'm not --  
 13 SIR JOHN SAUNDERS: I'm really sorry, I don't think that  
 14 follows. I'm sorry, Mr Laidlaw.  
 15 If somebody says to you, "You go and stand by the  
 16 grey doors and you don't leave them", that is not  
 17 capable of being misunderstood, you don't need a further  
 18 explanation for that, that's what they're told.  
 19 MR LAIDLAW: All right. Well, it may be this is better left  
 20 for submissions.  
 21 SIR JOHN SAUNDERS: I think it may be. Mr Middleton's  
 22 answer was: any idiot would know in an emergency you  
 23 came over and tell somebody.  
 24 MR LAIDLAW: It's not obviously just Mr Middleton's  
 25 evidence. You had Lawler's in particular. I won't

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1 persist with this line if it's not going to be helpful  
 2 to you.  
 3 Issue 14. Again, for you, Colonel Latham. This is  
 4 in respect of missed opportunities at an earlier time to  
 5 identify Abedi, including when he first entered the  
 6 City Room at 21.51. You dealt, you will remember, with  
 7 the rucksack, the way he was dressed.  
 8 COLONEL LATHAM: Indeed.  
 9 Q. He looked nervous, didn't fit the profile of the  
 10 audience, he was wearing headgear. I want to take you  
 11 to the final paragraph of the note of 24 November and  
 12 the final two sentences. What you said to the chair was  
 13 this, both in the note and in the evidence:  
 14 "When Abedi walked past two BTP officers on the  
 15 station concourse, there was nothing particularly  
 16 suspicious about him."  
 17 And you stand by that, do you? That would be at  
 18 20.48, was it not?  
 19 COLONEL LATHAM: I don't believe that I've said or written  
 20 that there was nothing suspicious about him.  
 21 SIR JOHN SAUNDERS: I think you did to me because I asked  
 22 you what was the difference.  
 23 COLONEL LATHAM: The sentiment which I was trying to express  
 24 was that to those BTP officers I could understand that  
 25 he would not have stood out. I didn't say this at the

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1 time, but to expand, as they are officers used to  
 2 patrolling a station and used to seeing passengers.  
 3 SIR JOHN SAUNDERS: That's exactly what you said. You said  
 4 the location on the station made the difference.  
 5 COLONEL LATHAM: Indeed, because they were on the station.  
 6 If the BTP officers had seen that up on the bridge or in  
 7 City Room I agree that he would have looked suspicious.  
 8 It is location based.  
 9 MR LAIDLAW: I'm sorry, we just need to examine that. At  
 10 20.51, so 3 minutes later, his appearance hasn't  
 11 changed, neither has the rucksack or its weight. He  
 12 walks past Lawler and Atkinson and goes to the City Room  
 13 in due course. How would they know where he was going?  
 14 COLONEL LATHAM: They wouldn't know where he was going  
 15 unless they asked him.  
 16 Q. Why couldn't he have been a member of the public walking  
 17 straight through to the Fifty Pence on his way to  
 18 Trinity Way?  
 19 COLONEL LATHAM: He could have been.  
 20 Q. Right. So why is it, as against that being an obvious  
 21 explanation for a failure to intervene, bearing in mind  
 22 these people do not have any right to stop members of  
 23 the public, why is it you're prepared to, as it were,  
 24 excuse the police but blame or accuse ShowSec personnel?  
 25 COLONEL LATHAM: I'm not trying to blame or accuse ShowSec

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1 personnel. I'm pointing out that there was an  
 2 opportunity for a member of the security staff who was  
 3 on the outer perimeter when somebody walked past him  
 4 with an unusually large bag to have interacted with that  
 5 person or reported it to the control room and say,  
 6 "I have seen this person", maybe on the radio, he could  
 7 have said, "Maybe you can keep an eye on him", or he  
 8 could have stopped and talked to him if he wanted to.  
 9 He didn't have the right to search him, but he did have  
 10 the opportunity to speak to him, as he spoke to many  
 11 people.  
 12 Q. This last point of mine is actually based on the  
 13 chairman's words to you. He actually asked you in this  
 14 precise context whether it was a balanced and a fair  
 15 point for you to make. That's Day 42, page 38, line 21  
 16 {Day42/38:21}. You didn't actually answer the chair.  
 17 You gave a similar answer to that which you've addressed  
 18 to me. Could you now address the chair's question,  
 19 please? Do you think it is balanced and fair of  
 20 somebody in your position to take that sort of point,  
 21 the one we've just been looking at?  
 22 COLONEL LATHAM: Yes.  
 23 Q. You do?  
 24 COLONEL LATHAM: Yes.  
 25 MR LAIDLAW: Thank you.

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1 MR GREANEY: Next, Mr O'Connor.  
 2 SIR JOHN SAUNDERS: Well, I think what I'd quite like to do  
 3 is just -- do you have your things you wanted to say  
 4 which were not permitted to say or do you think  
 5 everything has been covered?  
 6 COLONEL LATHAM: I was going to make a comment on  
 7 Mr Harding's statement, but I haven't had a chance to  
 8 re-read it, but I don't think it's a material one, so  
 9 I'll leave it at that.  
 10 SIR JOHN SAUNDERS: Thank you.  
 11 Questions from MR O'CONNOR  
 12 MR O'CONNOR: Sir, like Mr Gibbs and Mr Laidlaw, I have much  
 13 to cover, and I am proposing, like them, to take  
 14 Dr BaMaung and Colonel Latham to some of the points  
 15 I need to cover. I hope I will take them to the points  
 16 we can all gain from most, and there will be other  
 17 points we'll address in our submissions.  
 18 SIR JOHN SAUNDERS: Would you prefer to address your  
 19 questions to one or to both or would you like them both  
 20 to chip in?  
 21 MR O'CONNOR: Since you put it like that, sir, I certainly  
 22 think it would be more straightforward if I address my  
 23 questions to one of the witnesses.  
 24 SIR JOHN SAUNDERS: So we're not cutting the other out, so  
 25 please think about things you may need to mention.

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1 MR O'CONNOR: And I will follow the same pattern of  
 2 addressing the questions to those witnesses who  
 3 addressed the issues first with Mr Greaney.  
 4 The first issue I'm going to cover, and doctor,  
 5 I want to ask you about this, is that batch of issues  
 6 around SMG's relationship with Mr Upham, the CTSA  
 7 system, the PSIA scoring, and so on. Do you follow?  
 8 DR BaMAUNG: Yes.  
 9 MR O'CONNOR: And can I make it clear at the outset,  
 10 Dr BaMaung, that SMG and in particular Miriam Stone had  
 11 a very good relationship with Ken Upham and I think  
 12 you have commented on that.  
 13 DR BaMAUNG: That's right.  
 14 Q. You have also said there were positives and negatives  
 15 in that relationship and that's the position which SMG  
 16 endorses. You have also stated in your note, the most  
 17 recent note, it's issue 5, that in your words:  
 18 "Ken Upham delivered good support to SMG."  
 19 It's that observation that I want to explore with  
 20 you just a little bit first of all.  
 21 The first point I will come to is the whole question  
 22 of comparison of PSIA scores. You observed during your  
 23 oral evidence, I think in October, a couple of months  
 24 ago, that it was something that concerned you  
 25 when individual sites compared the PSIA scores that they

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1 had received. But I think you went further and said it  
 2 was actually a matter of concern amongst the CTSA  
 3 community.  
 4 DR BaMAUNG: Yes. You cannot compare different sites. And  
 5 I think as well as that, naming other sites is not  
 6 standard protocol. I also raised the issue about if the  
 7 different sites were of the same company, that could be  
 8 taken as a measure of the success of that site, which is  
 9 totally inappropriate for the purposes of PSIA.  
 10 Q. It's not only — those points I'm sure are very well  
 11 made, there are confidentiality issues, it simply  
 12 doesn't fit, does it, because the PSIA scores are  
 13 specific to the venue?  
 14 DR BaMAUNG: That's correct.  
 15 Q. There's a rather more important point I would suggest  
 16 which is that sort of comparison can give one particular  
 17 site or another a false understanding of their own level  
 18 of security, can't it?  
 19 DR BaMAUNG: That's correct, yes.  
 20 Q. And in that note, let me just take you to an email from  
 21 2014 which I imagine you've seen before. It's  
 22 {INQ036738/1}. If we can have the top half of the page.  
 23 We see it's dated September 2014, so shortly after  
 24 the first PSIA meeting at the arena, Ken Upham,  
 25 Lee Sinnott and Miriam Stone. Is that right?

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1 DR BaMAUNG: That's correct, yes.  
 2 Q. This is an email from Lee Sinnott to James Allen, the  
 3 general manager of the arena, as you know.  
 4 DR BaMAUNG: Yes.  
 5 Q. And we see at the first paragraph, the first substantive  
 6 paragraph of the email, in this report that Lee Sinnott  
 7 is making back to the manager:  
 8 "Hi James. You will be pleased to know that the  
 9 vulnerability assessment with the counter-terrorism  
 10 adviser went really well and we scored well above all  
 11 the other venues he's visited including ..."  
 12 And then there are some other venues named.  
 13 That's obviously something that's come from  
 14 Ken Upham, isn't it?  
 15 DR BaMAUNG: Quite possibly. I can't comment.  
 16 Q. You don't know, but I think it's a fair inference, isn't  
 17 it?  
 18 DR BaMAUNG: Possibly, yes.  
 19 Q. The obvious suggestion is that's what he told them  
 20 at the meeting, "You've done really well, better than X,  
 21 Y and Z"?  
 22 DR BaMAUNG: It appears to be, but I can't totally confirm  
 23 it.  
 24 Q. And we can see that that's the very first thing that  
 25 Lee Sinnott tells Mr Allen in that email, feeding back

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1 from the meeting. And it follows, doesn't it, from what  
 2 we agreed a moment ago that that was in one sense  
 3 setting the whole relationship off on the wrong path?  
 4 Would you agree with that?  
 5 DR BaMAUNG: To an extent, yes. The scores, as we've  
 6 explained several times, are a starting point, and the  
 7 more important part is the action plan, but if a site  
 8 was given a high score, it may give an inference to the  
 9 site that they're doing well.  
 10 Q. The site knows its own score and then 6 months later, or  
 11 however long it is, if the score goes up or down, it can  
 12 draw appropriate conclusions?  
 13 DR BaMAUNG: Yes.  
 14 Q. But as we've agreed, if the site knows its own score and  
 15 is told, "You have done better than these other places",  
 16 that's just inappropriate, isn't it?  
 17 DR BaMAUNG: It could mislead the site as to in what the  
 18 actual position could be.  
 19 Q. And if we just look at one more slide, Mr Lopez, this is  
 20 {INQ001475/1}. If we could go to {INQ001475/8} of that  
 21 document, please, we see on the second bullet point  
 22 something that looks like very much the same thing:  
 23 "72%, highest in Manchester City centre."  
 24 DR BaMAUNG: Yes. Scores should not be discussed in public,  
 25 to be honest.

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1 Q. This isn't necessarily public, Dr BaMaung. This is the  
 2 internal SMG training exercise.  
 3 SIR JOHN SAUNDERS: ShowSec. It's a ShowSec training  
 4 document.  
 5 MR O'CONNOR: It's the slides from the internal — and  
 6 you'll recall Miriam Stone and Tom Bailey's evidence  
 7 that they prepared it together, and you're quite right,  
 8 it does appear on ShowSec paper, but that's what it is.  
 9 The point, doctor, is simply one can see from that  
 10 comment by Ken Upham at that meeting, first of all  
 11 James Allen gets told, the next thing everyone or at  
 12 least those people who are attending that tabletop get  
 13 told, and in fact, as we have heard from the evidence,  
 14 after the Stade de France attack, these slides were then  
 15 sent to all the SMG venues in the country. So one can  
 16 see how that (overspeaking) —  
 17 DR BaMAUNG: Yes, there is an ongoing effect from the  
 18 original, yes, I agree.  
 19 Q. And it can breed, as you say, a misunderstanding about  
 20 a site's security and perhaps complacency; yes?  
 21 DR BaMAUNG: Yes.  
 22 Q. Was this actually something — I think we have agreed  
 23 that that was poor practice on the part of Mr Upham.  
 24 DR BaMAUNG: I was surprised, yes.  
 25 Q. Was there actually written guidance, saying don't do

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1 this, or was it something that you would just simply not  
2 have expected to be done?  
3 DR BaMAUNG: I would simply not have expected that to have  
4 been discussed because there's a commercial sensitivity  
5 about that as well as the potential for it to be  
6 inappropriately distributed.  
7 Q. Yes. Thank you.  
8 SIR JOHN SAUNDERS: Just before we leave that, let's try to  
9 put it in what I understood to be the context you were  
10 putting it in before. You're saying that scores are the  
11 beginning of the whole rather than the end. And  
12 you have also explained the limitations of what PSIA  
13 does, it doesn't actually do an audit of what's in  
14 practice. So I am not quite sure how important the  
15 scores are. What is necessary, isn't it, is they know  
16 that this is not an audit, this is a score on the things  
17 we have looked at, that doesn't mean necessarily that  
18 you're running a good security operation.  
19 DR BaMAUNG: I think there was a problem in that, sir,  
20 because it's a quantitative measure, a lot of sites took  
21 the percentage and thought, we're doing really well.  
22 But that's explained during the PSIA that that --  
23 SIR JOHN SAUNDERS: So it's a question really of whether  
24 Ken Upham explained the process properly and what could  
25 be taken from the scores. But actually if you have

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1 a good score but understand the limitations, it should  
2 still give you some comfort, shouldn't it?  
3 DR BaMAUNG: Yes, it should.  
4 SIR JOHN SAUNDERS: If you have a 2% score you'd say,  
5 "That's pretty bad, we're in a bad way". But if you got  
6 a 99% score, you would probably be delighted and would  
7 say, "We seem to be doing some of the things right".  
8 DR BaMAUNG: I think if it had a really low score that would  
9 question the position of the organisation being put in  
10 a tier 2B when it should really have been moved up to a  
11 2A for (overspeaking).  
12 SIR JOHN SAUNDERS: It has an effect?  
13 DR BaMAUNG: Yes.  
14 SIR JOHN SAUNDERS: I'm sure there's no doubt about any of  
15 that.  
16 MR O'CONNOR: I will of course come to the question, which  
17 I entirely agree is at the centre of this, which is the  
18 understanding of the process itself.  
19 Before I do, let me ask one other preliminary point.  
20 That's the provision of documents from Ken Upham to SMG.  
21 You've mentioned the fact, and we've seen in the  
22 evidence, that Ken Upham didn't provide, on an ongoing  
23 basis, those PSIA score sheets at the end of each -- of  
24 the meetings, despite the fact that Miriam Stone had  
25 asked for them. And that was something that was, as it

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1 were, departing from guidance, written guidance, that  
2 Mr Upham had received. He should have done that?  
3 DR BaMAUNG: That was wrong because the guidance was given  
4 at the initial launch of the PSIA and it was also made  
5 clear in other documentation from NaCTSO.  
6 Q. And it goes a little further than simply not providing  
7 the documents to people with whom he'd been in the  
8 meeting because one of the points that is made in the  
9 inquiry is that those are documents that SMG might have  
10 used to help with their risk assessing process, but they  
11 can't do that if they haven't got them?  
12 DR BaMAUNG: Yes, the documents are the property of SMG.  
13 Q. And there's the whole issue about whether the documents  
14 should have been shared with ShowSec, but again, if they  
15 haven't been given the documents, there is an obvious  
16 problem there, do you agree?  
17 DR BaMAUNG: Yes.  
18 Q. Let me move on to other documents. I'm going to ask you  
19 about two documents which are government drafted  
20 guidance documents and we heard a little bit from  
21 Lucy D'Orsi, I think it was, about the fact that the  
22 provision of these documents is an important way in  
23 which sites are educated and informed about  
24 counter-terrorism matters. You agree with that, I'm  
25 sure?

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1 DR BaMAUNG: I would need to see documents first.  
2 Q. I'm going to talk to you about the documents, but in  
3 principle the sort of NaCTSO guidance documents we  
4 have --  
5 DR BaMAUNG: Yes, that would be general NaCTSO guidance  
6 documents or CPNI that are generally through the  
7 internet, through the websites.  
8 Q. It's one of the ways in which NaCTSO teaches people by  
9 providing them with those documents?  
10 DR BaMAUNG: That's correct.  
11 Q. And I'm not going to actually take you to the documents,  
12 I'm sure you have them in mind and we'll look at them in  
13 a little while.  
14 The first of the documents I want to mention is the  
15 stadium and arena NaCTSO guidance. I can take you to it  
16 if you like, but I think you know the one I mean.  
17 DR BaMAUNG: I do.  
18 Q. We have heard from Miriam Stone she didn't receive that  
19 document, she didn't have one, until she went to the  
20 Argus training when it was handed out and that was,  
21 I think, May 2016, so 1.5/2 years after she had first  
22 seen Ken Upham.  
23 As I say, we're going to look at it in due course,  
24 and certainly I'm going to be suggesting that's  
25 a central document, it is the NaCTSO guidance about

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1 stadia and arenas.  
 2 DR BaMAUNG: I would need to check the publication date of  
 3 the actual document.  
 4 Q. Will you take it from me for now it was published in  
 5 2006 and updated in 2014?  
 6 DR BaMAUNG: Yes.  
 7 Q. It's certainly a current document at the time.  
 8 Do you think it's something Ken Upham should have  
 9 provided to Miriam Stone?  
 10 DR BaMAUNG: I think it's something that either Ken Upham  
 11 could have provided or Miriam Stone could have accessed  
 12 herself because I think that was a publicly accessible  
 13 document that could have been obtained by any manager of  
 14 a site.  
 15 Q. I am sure you're right, I'm sure it was publicly  
 16 available on the internet. Do you think that's good  
 17 enough? Do you think it's good enough for a CTSA simply  
 18 to leave it to the site to do its own looking around on  
 19 the internet to see what it can find or do you think  
 20 they should either provide the document or say, here's  
 21 the document, you go and look for --  
 22 DR BaMAUNG: I can't comment whether Ken Upham actually  
 23 mentioned where the documents are or what documents  
 24 they're looking for.  
 25 Q. We haven't had a chance to hear from Mr Upham, but can

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1 we leave it then that you do agree at least he should  
 2 have directed them towards it, whether he provided  
 3 a copy or simply told them where to find it on the  
 4 internet?  
 5 DR BaMAUNG: This position has been very difficult for us  
 6 because there are two so conflicting sides to the  
 7 discussion and we've not had an opportunity to hear  
 8 CTSA Upham. So while we do accept there are clear  
 9 pieces of evidence such as the information about no  
 10 documentation or PSIA being given to the site, sometimes  
 11 it's difficult to comment if I can't hear both sides of  
 12 the argument, if you like.  
 13 Q. I'm glad to tell you, you don't have to resolve these  
 14 factual disputes; that's what the chairman is going to  
 15 do.  
 16 I well understand that in this particular area  
 17 you haven't had the ability at least to hear all the  
 18 witnesses give evidence in the same way that you have  
 19 with others, but I am going to ask you some questions  
 20 which just, as it were, give you the facts which I'd ask  
 21 you to just answer the questions on and then the  
 22 chairman can feed that into his process later on.  
 23 Here, in fact, I'm not asking you to deal with any  
 24 facts at all, I'm just asking you: do you think that  
 25 Ken Upham should either have directed Miriam Stone to

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1 where she could find that document or actually given her  
 2 a copy of it?  
 3 DR BaMAUNG: Yes, I do.  
 4 Q. Thank you.  
 5 Let me then ask you the same question about PAS127.  
 6 I know you're familiar with that document. You refer to  
 7 it quite often in the various drafts of your report.  
 8 We've also heard that that document, I think perhaps  
 9 unlike the arena's document, actually appears embedded  
 10 in the PSIA score sheet; is that right?  
 11 DR BaMAUNG: Yes.  
 12 Q. So when one is going through the search and screening  
 13 questions it actually sort of comes up in a box saying  
 14 PAS127?  
 15 DR BaMAUNG: Yes.  
 16 Q. Miriam Stone's evidence, I am not asking you to agree or  
 17 disagree, but her evidence is she had never heard of  
 18 that document, certainly had never received a copy of  
 19 it. Again, do you think that Ken Upham should have  
 20 provided it to her?  
 21 DR BaMAUNG: To answer your question in two parts, yes,  
 22 I think she should have been made aware of it. I'm not  
 23 sure if there's a cost implication with PAS127 or not.  
 24 COLONEL LATHAM: It's £250 or so.  
 25 DR BaMAUNG: In that case the police wouldn't provide it.

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1 The other aspect is that I would have expected both  
 2 Miriam Stone and Ken Upham to have at least looked at  
 3 that document name when they went through the PSIA  
 4 process because it would be shown, as you said, within  
 5 the PSIA document.  
 6 Q. Well, there's another question. I'm going to also -- it  
 7 comes back to some facts which may not be particularly  
 8 clear, but Miriam Stone's evidence is that Ken Upham  
 9 used to sit facing her, looking at his screen, and she  
 10 didn't look at the screen as they went through the form.  
 11 Again, if that were right, would you say that's not  
 12 quite the right way of doing that process?  
 13 DR BaMAUNG: I suppose it could be done in a variety of  
 14 different ways. Certainly the most advantageous way  
 15 would be for both individuals to view the screen and see  
 16 what is written on the screen.  
 17 SIR JOHN SAUNDERS: Can I just ask, this is PAS127?  
 18 MR O'CONNOR: Yes.  
 19 SIR JOHN SAUNDERS: What does it contain?  
 20 DR BaMAUNG: It's searching...  
 21 COLONEL LATHAM: It's the guidance of searching of people  
 22 and their belongings, produced by CPNI.  
 23 SIR JOHN SAUNDERS: As I understand it, it has things like  
 24 going through arches --  
 25 DR BaMAUNG: (Overspeaking) metal detectors, yes.

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1 SIR JOHN SAUNDERS: — whether you are going to have  
 2 handheld things and things like that. I'm not sure  
 3 I heard from Miriam Stone that she wasn't aware of these  
 4 things or did I?  
 5 MR O'CONNOR: Yes, you did.  
 6 SIR JOHN SAUNDERS: She wasn't aware of PAS127, yes, but she  
 7 wasn't aware of these sort of searching tools.  
 8 MR O'CONNOR: I'm sure she was aware of the tools. For the  
 9 reason it's important, perhaps for two reasons, one is  
 10 the experts in their reports have treated that document  
 11 as being at least one of the benchmarks that SMG are  
 12 held to and, secondly, as I've been exploring with  
 13 Dr BaMaung, this is a document which is itself referred  
 14 to in the PSIA form and they are obviously related. So  
 15 my question is simply whether this is a document that  
 16 Ken Upham should have drawn to Miriam Stone's attention  
 17 or provided her with a copy of. And she says —  
 18 DR BaMAUNG: Based purely on Miriam Stone's statement, yes.  
 19 As I say, I can't comment on whether Ken Upham would  
 20 have presented a different picture if he'd been able to  
 21 give evidence.  
 22 Q. I'm going to move on unless there's anything more on  
 23 that.  
 24 Let me move, doctor, to the perhaps more important  
 25 question — certainly it's going to take us a little

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1 longer to talk through — about whether Ken Upham ever  
 2 actually properly explained the limits of his function  
 3 as a CTSA to Miriam Stone or others at SMG and whether  
 4 in fact in his actions he went beyond the scope of that  
 5 function.  
 6 I'm going to — let me give you a health warning  
 7 here, there's going to be a bit more of this, "Let's  
 8 assume on the basis of Miriam Stone's evidence". But  
 9 the starting point I would like to take is an email that  
 10 Miriam Stone sent to Ken Upham, and in fact a BTP police  
 11 officer, after the Charlie Hebdo attack in the very  
 12 beginning of 2015. You're nodding. I think you have  
 13 probably got it in mind?  
 14 DR BaMAUNG: Yes.  
 15 Q. You'll recall then that the essence of her request she  
 16 made to Ken Upham at that stage was: can you come and  
 17 see me, we're very worried about what's happened, we  
 18 want to make sure we're up to date with everything we  
 19 are supposed to know and that we are doing everything  
 20 we can. Those are the words she used. And then —  
 21 well, as an aside, would you agree that that was  
 22 actually very positive behaviour on the part of  
 23 Miriam Stone?  
 24 DR BaMAUNG: Yes. As both Colonel Latham and I have said in  
 25 our report, there were a lot of good points in relation

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1 to SMG and GMP, and what we have tried to do in the  
 2 report is acknowledge good practice, and to be honest,  
 3 I found Miriam Stone's evidence very convincing and the  
 4 things that she said I wouldn't disagree with.  
 5 SIR JOHN SAUNDERS: It could be a matter for me, that,  
 6 I think.  
 7 DR BaMAUNG: Sorry.  
 8 SIR JOHN SAUNDERS: That's all right.  
 9 MR O'CONNOR: That is, certainly. But just to put this in  
 10 context, we've heard something about sites, not specific  
 11 sites, of course, other venues refusing to engage with  
 12 CTSA's or being reluctant to do the items on the action  
 13 plan or go to Griffin and so on. This is an example of  
 14 a venue actually reaching out and saying: please come  
 15 and tell us more.  
 16 DR BaMAUNG: Yes.  
 17 Q. What happened next is certainly something that the  
 18 chairman will have to resolve because Miriam Stone's  
 19 evidence and Ken Upham's evidence is not the same about  
 20 it. Miriam Stone said that Ken Upham came for  
 21 a meeting. This wasn't a PSIA meeting, there was no —  
 22 it wasn't pre-planned, wasn't one of those occasions  
 23 when they went through a spreadsheet. But they talked  
 24 through security arrangements at the arena including in  
 25 the City Room and at the end of it Ken Upham said he was

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1 happy with the arrangements, those were the words she  
 2 used, there really isn't anything for you to do more.  
 3 Let me say straightaway of course we have to accept  
 4 that Ken Upham's advice on that occasion, if that's what  
 5 the chairman finds that he did do, was only as good as  
 6 the information that Miriam Stone provided him.  
 7 For example, to the extent she spoke to him about  
 8 pre-egress checks, and I think that was one of the  
 9 things she said she did speak to him about, then we are  
 10 into the territory her saying that it happened on the  
 11 mezzanine and we know the story behind that.  
 12 But subject to that point about the advice only  
 13 being as good as the information he'd been provided  
 14 with, you'd agree, I think, that Miriam Stone would have  
 15 been entitled to take considerable reassurance from that  
 16 advice that Mr Upham gave?  
 17 DR BaMAUNG: I think the point that Colonel Latham and  
 18 I have made is that the general comments — what we felt  
 19 was that general comments could sometimes be taken as  
 20 tacit approval. A general comment might be that things  
 21 were fine, but from Miriam Stone's email, some of the  
 22 emails after meetings, it's been put in the email in  
 23 a format that says, "We are in a good position, we've  
 24 been reassured".  
 25 I think in the statement of British Transport Police

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1 Superintendent Wylie, he mentioned that at no stage did  
 2 he ever say that he'd said that everything was great.  
 3 And I think what we've tried to do is to look at the  
 4 evidence in that context and, again, the problem is it's  
 5 open to misinterpretation or misunderstanding.  
 6 Some general comment could actually have been taken  
 7 as a tacit approval of "You're doing fine". As I say,  
 8 our problem has been, unless we got the two sides, I  
 9 mean, we have Ken Upham's statement, unless we have  
 10 actually listened to evidence where that could be  
 11 brought out, it's difficult for us to give a definitive  
 12 position on it.  
 13 Q. It is difficult, but let me come back to the point  
 14 I made a minute ago. You're not being asked to resolve  
 15 the difference between what Ken Upham said and  
 16 Miriam Stone said or, for that matter, what Miriam Stone  
 17 said about a meeting she had at the end of 2014 with  
 18 Eddie Wylie. That's not your role. You're simply being  
 19 asked to provide your expert view, assuming a particular  
 20 set of facts.  
 21 I'm asking you to assume that Miriam Stone's account  
 22 is correct and what she said is that at the end of that  
 23 meeting Ken Upham said he was happy with the  
 24 arrangements. That's not tacit approval, is it, that is  
 25 express approval of those security arrangements?

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1 DR BaMAUNG: Well, it's approval.  
 2 Q. We won't argue about words. It's approval.  
 3 But let me move on though, because of course the  
 4 difficulty, and we've all heard evidence from  
 5 Liz Forster, Lucy D'Orsi, that the difficulty is that on  
 6 that assumption, assuming that is what happened,  
 7 Ken Upham had gone beyond the scope of what he should  
 8 have been doing as a CTSA, hadn't he?  
 9 DR BaMAUNG: Yes, his role was to provide advice and  
 10 guidance and not necessarily to sign off on security  
 11 arrangements.  
 12 Q. Yes. However one wants to cut it, and we've heard  
 13 different people explain the limits of that role in  
 14 different ways, but whether one wants to say that  
 15 he was, as it were, signing off someone's security or  
 16 providing advice about operational matters,  
 17 Colonel Latham expressed the view that a CTSA simply  
 18 didn't have the training or the experience to sign off  
 19 a site as complicated and as large as the arena, these  
 20 are all perhaps pointing at the same general point,  
 21 perhaps looking at it from slightly different angles.  
 22 On any view, on the basis of the evidence we've heard,  
 23 Ken Upham shouldn't have simply gone in, looked through  
 24 the arrangements, talked them through with Miriam Stone,  
 25 and said, you don't need to do any it's fine, should he?

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1 DR BaMAUNG: If that happened, no.  
 2 SIR JOHN SAUNDERS: Can you give me an idea of the date of  
 3 this? Tell me whether it's before or after the  
 4 conference in Birmingham.  
 5 MR O'CONNOR: The date of the email is early January 2014  
 6 and the date of the meeting was a week or so later --  
 7 I'm not sure we know the exact date -- and the  
 8 conference in Birmingham was 2016.  
 9 SIR JOHN SAUNDERS: So before 2016?  
 10 MR O'CONNOR: My next point, doctor, we've canvassed  
 11 already, but my point is there's nothing in what  
 12 Ken Upham did or said to alert SMG to the fact that,  
 13 assuming he did give that advice, it really isn't advice  
 14 he should have been giving?  
 15 DR BaMAUNG: No.  
 16 Q. There are various ways perhaps he could or should have  
 17 responded to that email, he might have just said: look,  
 18 if you really want me to advise whether there's anything  
 19 you can be doing, I'm going to need to come in for  
 20 a long time, I'm going to need to look at everything  
 21 you've got. Or he could have just said: that's not my  
 22 job, I'm sorry, I can't do that. I think you agree that  
 23 by giving --  
 24 SIR JOHN SAUNDERS: I think he did agree, thank you.  
 25 They can always change their answers.

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1 MR O'CONNOR: I will move on, sir.  
 2 Let me suggest another response that he might have  
 3 given, one that I haven't touched on so far. Another  
 4 response he might have given is: I'm sorry, if you want  
 5 that sort of help, you're going to have to get it from  
 6 someone else, you need some specialist advice, go and  
 7 see another, let's say, a private security contractor.  
 8 DR BaMAUNG: Yes. I think there were two options he could  
 9 have given, one of which was external advice, the other  
 10 one, being -- as I say, SMG have now got internal  
 11 expertise.  
 12 Q. And this brings us to the criticism that you have  
 13 expressed at paragraph 4.2 of your note, which is:  
 14 "There was no in-house security professional at  
 15 SMG."  
 16 That's a fact.  
 17 DR BaMAUNG: Yes.  
 18 Q. And you described it as a key weakness?  
 19 DR BaMAUNG: That's right, yes.  
 20 Q. We know that SMG, of course, now does have that sort of  
 21 internal advice and I'm sure we can all agree that's  
 22 a good thing.  
 23 DR BaMAUNG: Yes.  
 24 Q. The question is how far it's fair to criticise SMG for  
 25 not having that expertise at the time in 2017 --

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1 DR BaMAUNG: I think if Miriam Stone and James Allen  
2 realised that the expertise was not there and they felt  
3 that counter—terrorism protective security measures were  
4 important, then I think that there was an onus on them  
5 to get that expertise in to be able to have a look  
6 at the site and to understand what the issues are. And  
7 as you say, a site could be extremely complex, such as  
8 the arena, which would be outwith, if you're talking  
9 about crowd density, crowd flow, that has nothing to do  
10 with the CTSA and there are aspects of protective  
11 security that can impact on that, so I think my answer  
12 would be, yes, it would need to be external assistance  
13 or somebody in—house being brought into the  
14 organisation.  
15 Q. They obviously knew they hadn't got that type of  
16 internal advice. You say the onus was on them to go and  
17 get it? Counter—terrorism advice that is.  
18 DR BaMAUNG: If it was outwith the remit of the CTSA, yes.  
19 Q. More particularly perhaps if they knew it was outside  
20 the remit of the CTSA?  
21 DR BaMAUNG: Yes.  
22 Q. And for reasons we've discussed, perhaps they didn't.  
23 Is that a fair point?  
24 DR BaMAUNG: Yes, a fair point.  
25 Q. The chairman raised the question yesterday, I almost

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1 hesitate to mention it given some of the exchanges that  
2 we've had so far today, but the question of industry  
3 practice.  
4 Was SMG, was the Manchester Arena alone in not  
5 having its own internal counter—terrorism expertise?  
6 DR BaMAUNG: I would say probably that point, no, there were  
7 probably quite a few arenas that didn't have that  
8 in—house expertise.  
9 Q. There is some help we can gain from at least one of the  
10 documents. Can we have, please, Mr Lopez,  
11 {INQ034755/1}. This is a letter — I know you have seen  
12 this, Dr BaMaung — from Lucy Noble, who is the chair,  
13 I think, of the National Arenas Association. Is that an  
14 organisation you're familiar with?  
15 DR BaMAUNG: I have not dealt with them myself.  
16 Q. Do you know anything about them?  
17 DR BaMAUNG: From reading the evidence, yes.  
18 Q. Well, we see, if we look at the second paragraph, that  
19 it's helpfully described as:  
20 "The body which represents 23 of the largest indoor  
21 arenas throughout the UK and Ireland"; yes?  
22 DR BaMAUNG: Yes.  
23 Q. And then if we can go to {INQ034755/2}, please. If  
24 we can zoom in on the bottom half we can see what is  
25 addressed there is this issue of in—house expertise and

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1 reliance on CTSA. What Ms Noble says is:  
2 "To the best of my knowledge, most venues did not  
3 have an in—house security expert to assess  
4 counter—terrorism security measures. They used to  
5 liaise with their local CTSA for specialised  
6 counter—terrorism advice before May 2017."  
7 Then she gives some information about what happened  
8 afterwards.  
9 So the point is, perhaps, doctor, that if this was  
10 a key weakness on the part of SMG or the arena, it was  
11 a weakness that was shared by other large arenas in the  
12 UK at the time?  
13 DR BaMAUNG: Yes, I would agree.  
14 Q. And on one analysis then, it would appear, perhaps, that  
15 other arenas were under the same misunderstanding as the  
16 Manchester Arena and Miriam Stone that they could rely  
17 on CSA's to provide all necessary counter—terrorism  
18 input?  
19 DR BaMAUNG: I suppose it would depend on the actual venue.  
20 For example, just one of the witnesses we have heard  
21 during the inquiry, David Scally, and his understanding  
22 of what the role of the CTSA was at the National  
23 Football Museum. He seemed to have quite a clear  
24 understanding of what the role of a CTSA was, what the  
25 limitations were. I suppose it would also depend on the

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1 individual CSA's for the particular sites. Some might  
2 give direct guidance: we can take it as far as a certain  
3 point and after that point you need to get something  
4 else. That is then up to the venue. So it's difficult  
5 to make a generalisation because I think every site will  
6 have a different type of relationship with the CTSA.  
7 I think another issue is that a CTSA is not part of  
8 a homogeneous group. You will have different levels of  
9 skill sets within CSA's. Some might have crime  
10 prevention backgrounds or whatever. So you might find  
11 that although the standard of training is the same, you  
12 might find some have a real expertise in a particular  
13 area and they're prepared to at least discuss it with  
14 the site.  
15 Q. At least discuss what?  
16 DR BaMAUNG: Security matters with the site.  
17 Q. Are you saying some CSA's would have provided that sort  
18 of general overarching advice?  
19 DR BaMAUNG: They wouldn't have gone into the advice we're  
20 talking about in relation to an expert, but if it came  
21 to certain parts of protective security advice, they may  
22 have a good knowledge of particular parts.  
23 Q. So if they were providing that sort of advice, would it  
24 not be a key weakness for those sites not to have their  
25 own internal advice?

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1 DR BaMAUNG: I think if the advice that was getting provided  
2 wasn't sufficient or if — again, I think it's up to the  
3 site really to decide on what they deem as appropriate  
4 levels of advice. It's up to their own organisations  
5 and their personal risk appetites. Again, all this  
6 issue of risk appetite could have a huge impact on  
7 whether a site is prepared to go for a standard that may  
8 be below what the arena expect or some other site.  
9 Q. Let me move on, Dr BaMaung, because —  
10 SIR JOHN SAUNDERS: Sorry, just before we move on, I'm  
11 just — the in-house expertise and reliance on CTSAs,  
12 that paragraph. In the last sentence, they're  
13 indicating that most of them carried on as before in  
14 May 2017:  
15 "The focus on using internal and CTSA expertise has  
16 continued since May 2017."  
17 Which would rather indicate they had some internal  
18 expertise, wouldn't it?  
19 MR O'CONNOR: Sir, I simply — of course I see the point on  
20 the language. There is a tension there, I can't deny  
21 that.  
22 SIR JOHN SAUNDERS: Okay, thank you.  
23 MR O'CONNOR: Dr BaMaung, we know that Ken Upham knew that  
24 SMG did not have any internal counter-terrorism advice.  
25 DR BaMAUNG: Yes.

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1 Q. The question is: should he have told them that they  
2 ought to have it? I think that you in giving your  
3 evidence earlier this week you essentially agreed that  
4 that was something he at least could have done and  
5 I think you got close to saying he should have done. Do  
6 you think that's right?  
7 DR BaMAUNG: Yes, I think he could have done. Again, it's  
8 difficult without having heard the conversations and the  
9 context of what was said and him giving a view on it.  
10 Q. Well, all right, let's detach it from Ken Upham and  
11 Miriam Stone. You've described an arena like the  
12 Manchester Arena not having internal advice as a key  
13 weakness; yes?  
14 DR BaMAUNG: Yes.  
15 Q. And therefore creating ultimately counter-terrorism  
16 risk?  
17 DR BaMAUNG: Yes.  
18 Q. And the job of CTSAs is to identify things that may  
19 cause counter-terrorism risk and help arenas/venues and  
20 give them advice how to fix those problems?  
21 DR BaMAUNG: Yes, the job of the CTSA is to identify  
22 counter-terrorism protective security vulnerabilities if  
23 you don't have — if you have a drive and it's leading  
24 into a critical part of the building, it needs to have  
25 some measure of protective security around that.

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1 I don't think it's so much the job of a CTSA to say,  
2 "You need to bring in an expert because I can't help  
3 you".  
4 Q. Well, we know they talk about bollards and glass and so  
5 on, and that isn't to minimise the role of the CTSA.  
6 We've heard how well trained they are, the broad nature  
7 of the work they have to do. Perhaps this is a point  
8 for guidance above CTSAs rather than something for CTSAs  
9 to make a judgement on themselves. Really I'm asking  
10 you this with an eye to any recommendations the inquiry  
11 might want to make. What we do, at least on one view,  
12 have is a situation where you've identified what you  
13 call a key weakness, the key weakness which looks as  
14 though it may have been shared by arenas much more  
15 broadly across the country, that is something that  
16 NaCTSO, at least through its CTSAs, would have been  
17 aware of, and yet it isn't saying to those people, at  
18 least it wasn't in this case, "You need to go and get  
19 your own advice". Wouldn't that be something that would  
20 be sensible for them to do?  
21 DR BaMAUNG: I believe NaCTSO's role is to ensure that there  
22 is a minimum standard of protective security advice  
23 provided by the CTSAs using the PSIA tool and other  
24 measures. I don't know whether NaCTSO would look at the  
25 role beyond that and insist that sites have got to have

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1 a security expert. That might be something that the  
2 inquiry may deem that they wish to recommend.  
3 I think NaCTSO look on their role as being to  
4 provide a team of specialists within the police service  
5 who go out and give enough basic counter-terrorism  
6 protective security advice to allow that site to  
7 identify where the key vulnerabilities lie and to help  
8 them to try to identify ways of mitigating against them  
9 such as the PSIA tool.  
10 As we discussed earlier on, the advice that CTSAs  
11 give is not pitched at a high level, it's advice that  
12 can be delivered, not necessarily easily but fairly, and  
13 in a way that's not hugely expensive. A lot of the  
14 advice can actually be delivered at no cost whatsoever  
15 other than the time of the members of staff who are  
16 undertaking the training.  
17 Q. Dr BaMaung, I'm going to move on.  
18 SIR JOHN SAUNDERS: You're not going to move on quite yet.  
19 The trouble with leaving a document on the screen is one  
20 tends to look at it rather more carefully. This is the  
21 trade association of which SMG were a member, as  
22 I understand it.  
23 DR BaMAUNG: Yes.  
24 SIR JOHN SAUNDERS: So there set out are a number of bullet  
25 points which are suggestive of there being responses of

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1 arenas to the 2014 to 2017 attacks when the threat level  
 2 was severe. Therefore it says at the top:  
 3 " ... therefore arenas' security plans and measures  
 4 are reviewed and implemented based on the increased  
 5 threat level. In response to the Paris and Brussels  
 6 attacks, arenas' security measures were reviewed in  
 7 response to the attacks and some measures were increased  
 8 for a period of time... The range of measures  
 9 considered by arenas during this period included any or  
 10 all of the following ..."  
 11 Would you like to read through them and tell me on  
 12 the evidence or the enquiries you have made, in terms of  
 13 the arena itself, which of these did they actually  
 14 introduce?  
 15 (Pause)  
 16 COLONEL LATHAM: I might be faster at answering that  
 17 question if it helps, sir.  
 18 SIR JOHN SAUNDERS: Fine.  
 19 COLONEL LATHAM: They did have some visibility of staff in  
 20 public areas, they did not conduct licensed full bag  
 21 searches --  
 22 SIR JOHN SAUNDERS: Sorry, I really don't want to go through  
 23 all of them. I want you to look through them and tell  
 24 me, if you can, which ones the arena did.  
 25 (Pause)

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1 COLONEL LATHAM: Staff briefings, sir.  
 2 SIR JOHN SAUNDERS: Okay. Do you agree with that?  
 3 DR BaMAUNG: Yes.  
 4 COLONEL LATHAM: May I make another point before we move on  
 5 to the next topic?  
 6 SIR JOHN SAUNDERS: If you don't mind, make a note of it and  
 7 come back when appropriate.  
 8 MR GREANEY: Sir, if Mr O'Connor is moving on to a new  
 9 topic, this would be a good point for a break.  
 10 SIR JOHN SAUNDERS: Is that all right?  
 11 10 minutes.  
 12 (3.08 pm)  
 13 (A short break)  
 14 (3.18 pm)  
 15 MR O'CONNOR: Dr BaMaung, I hadn't quite finished this  
 16 general topic of CTSA's and so on. I have one more short  
 17 series of questions to ask you on it. If I can ask you  
 18 to look at the November note, please, issue 4. If one  
 19 looks at the (i), one of the points you raise there is,  
 20 as you put it:  
 21 "A lack of understanding on the part of SMG's senior  
 22 management that it was ultimately the responsibility of  
 23 SMG to decide what was necessary for security, including  
 24 in the City Room, rather than anyone else."  
 25 That's one of the points that you attribute, you

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1 say, as it were, as adding to this general  
 2 misunderstanding.  
 3 I want to suggest to you that actually there was no  
 4 misunderstanding on the part of SMG about what its  
 5 responsibilities were and these other factors may have  
 6 contributed to this misunderstanding, in particular what  
 7 Mr Upham did or didn't do, really they always knew they  
 8 were responsible for security in the City Room. Can  
 9 I just take you perhaps, first of all, to your own  
 10 report in this regard? Can we go, please, to  
 11 {INQ035611/4}. This is your final report.  
 12 It's the bottom half, please. Paragraph 2. We see  
 13 here, you talk about the responsibility that SMG had and  
 14 you say, four lines down, that it would extend to the  
 15 City Room, and then you said:  
 16 "In our opinion, SMG were responsible for and acted  
 17 as if they felt responsible for the safety and security  
 18 of those in the City Room."  
 19 So there you seem to be saying quite clearly that  
 20 not only were they responsible, but they acted as if  
 21 they were responsible for security in the City Room,  
 22 which is not the same, is it, as here where you suggest  
 23 that there was some sort of misunderstanding?  
 24 DR BaMAUNG: The context of the two comments are just  
 25 slightly different. The comments in relation to the

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1 City Room relate to physical security, the physical area  
 2 within the arena. The comments in relation to  
 3 understanding the role in security is in relation to  
 4 their role after the boundary, if you like, with the  
 5 CTSA was clear. Because to fall back again to this  
 6 example of the National Football Museum, the manager  
 7 there understood the clear delineation between the  
 8 boundary of responsibilities for either CTSA and by his  
 9 own organisation. What we're referring to there was the  
 10 lack of understanding of where the delineation fell  
 11 between the two organisations and an example being the  
 12 emails that Miriam Stone had sent on, that the police,  
 13 both GMP or BTP, find our security is fine.  
 14 It wasn't really up to BTP or GMP to say the  
 15 security is fine. That's what we're actually referring  
 16 to on that.  
 17 Q. Do you recall it being put to Miriam Stone, when she  
 18 gave evidence, that Ken Upham had himself told her, just  
 19 in the same way as we heard about at the National  
 20 Football Museum, Ken Upham had told her that SMG were  
 21 responsible for security and not he and that she agreed  
 22 with that, she said yes, he had said that and she knew  
 23 about that? Do you remember that --  
 24 DR BaMAUNG: I don't recollect that, but if it's in evidence  
 25 I would accept that SMG were aware of their role and

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1 responsibility in relation to security .  
 2 Q. In that case I'm going to move on to the next topic.  
 3 SIR JOHN SAUNDERS: I think that, if I may say so, in view  
 4 of your answers, (i) could have been expressed better.  
 5 DR BaMAUNG: Yes, I think, so.  
 6 MR O'CONNOR: I'm going to move on to the whole question of  
 7 CCTV. Colonel Latham, this is an issue I want to  
 8 explore with you.  
 9 Before I do that, could I just take you back to  
 10 something you said in answering questions from  
 11 Mr Laidlaw this morning? It's just a discrete point.  
 12 You were talking about your work at the O2 and you said  
 13 that you attended, during your time there, about 80% of  
 14 the events that were held at the O2 during that time.  
 15 Can you recall roughly how many events there were every  
 16 year at the O2?  
 17 COLONEL LATHAM: About 220 events a year.  
 18 Q. That would have you attending well over 160 events per  
 19 year?  
 20 COLONEL LATHAM: I haven't done the maths, but that sounds  
 21 reasonable.  
 22 Q. I think you were at the O2 for about a year and a half,  
 23 is that right?  
 24 COLONEL LATHAM: Approximately.  
 25 Q. Something well over 200 events in that time?

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1 COLONEL LATHAM: That sounds about right, yes.  
 2 Q. Thank you.  
 3 Let's come back to CCTV. The first issue I want to  
 4 talk to you about within that subject is the question of  
 5 coverage and obviously blind spots is the other side of  
 6 that coin, is it not? It's clear, and I think you've  
 7 accepted, that there is never going to be a place which  
 8 is entirely covered by CCTV, 100% covered; yes?  
 9 COLONEL LATHAM: Correct.  
 10 Q. When you were giving evidence this morning I think you  
 11 gave the example of the roof as something that wouldn't  
 12 be covered and that's --  
 13 COLONEL LATHAM: That's a poor example.  
 14 Q. It's an example, but is it an accurate example of the  
 15 standard that you're setting? In other words,  
 16 everywhere except things that are really completely  
 17 (overspeaking) --  
 18 COLONEL LATHAM: No, I just think those areas that are  
 19 operationally important, so the areas where the public  
 20 are ... I will go that that far .  
 21 Q. All areas where the public go?  
 22 COLONEL LATHAM: No, because there are some areas which it's  
 23 inappropriate to cover with CCTV.  
 24 Q. You mean toilets, something like that?  
 25 COLONEL LATHAM: That's a good example.

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1 Q. Let's leave those to one side. Beyond that, everywhere  
 2 that the public might go should be covered by CCTV;  
 3 is that your threshold?  
 4 COLONEL LATHAM: I think it would be site dependent.  
 5 Q. Sorry, I was talking over you; what did you say?  
 6 COLONEL LATHAM: I think it would be site dependent.  
 7 Q. Site dependent, in what way?  
 8 COLONEL LATHAM: Each venue would have its own requirements  
 9 for security identified by the risk assessment and the  
 10 operational plan and that would tease out those areas  
 11 where you would need to have not only coverage but what  
 12 type of coverage. For some areas you would only need to  
 13 identify that there were people there, in other areas  
 14 you would need to be able to identify the individual as  
 15 that particular individual .  
 16 Q. Thank you.  
 17 Let's go to a document and look at what that says.  
 18 It's the stadia and arenas guidance, the NaCTSO  
 19 document, which I mentioned to Dr BaMaung a few minutes  
 20 ago.  
 21 {INQ020147/1}, please. Within that document,  
 22 {INQ020147/23}.  
 23 I think we can see -- the passage I am looking at is  
 24 just under the box; can you see that?  
 25 COLONEL LATHAM: Yes.

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1 Q. What it says is:  
 2 "CCTV cameras should cover the entrances and exits  
 3 to your stadium and other areas that are critical to the  
 4 safe management of any event at the stadium and to the  
 5 security of your business."  
 6 COLONEL LATHAM: Yes.  
 7 Q. I think we can leave aside questions of the security of  
 8 your business, can't we, for our purposes? That would  
 9 seem to indicate safes or places where other sort of  
 10 crime might take place.  
 11 COLONEL LATHAM: I'm not sure why we're leaving that to one  
 12 side .  
 13 Q. We're focusing on CCTV for the purposes of public  
 14 safety; would you agree?  
 15 COLONEL LATHAM: I would.  
 16 Q. So we're really looking at:  
 17 "Entrances and exits and other areas that are  
 18 critical to the safe management of an event"?  
 19 COLONEL LATHAM: That's what that paragraph says.  
 20 Q. That's what the NaCTSO guidance says?  
 21 COLONEL LATHAM: That's what it says, yes.  
 22 Q. It seems to be a rather lower threshold than the  
 23 "everywhere the public go" threshold that you were  
 24 describing a few minutes ago.  
 25 COLONEL LATHAM: I think it's probably a better expressed

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1 version of what I said, but it needs to be site specific  
 2 so that one takes into account the peculiarities of the  
 3 venue, peculiarities of how the crowd might tend to  
 4 behave, and where one's risk assessment identifies  
 5 hazards could be.  
 6 Q. Do you agree, Colonel Latham, that this document, this  
 7 NaCTSO guidance, is authoritative in this area?  
 8 COLONEL LATHAM: Yes, the NaCTSO guidance is authoritative.  
 9 Q. So when you approach this issue and indeed other issues  
 10 that you'd been addressing in this inquiry, would you  
 11 agree one needs to look at what NaCTSO or similar  
 12 guidance is saying rather than just, for example, your  
 13 own idea about what you might do if left to your own --  
 14 if you were in charge of your own arena?  
 15 COLONEL LATHAM: I agree that NaCTSO guidance is very  
 16 important and it should be tailored to the venue.  
 17 Q. So what we're looking at, let's take the next stage.  
 18 If we think about the mezzanine, because clearly that's  
 19 an area of concern here, it's not either an entrance or  
 20 an exit to the Manchester Arena, is it?  
 21 COLONEL LATHAM: No.  
 22 Q. So the question is, is it an area that is critical to  
 23 the safe management of an event? Now, will you agree  
 24 that that question, is it critical, brings in an area of  
 25 judgement, doesn't it?

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1 COLONEL LATHAM: It does.  
 2 Q. And I think that's really perhaps a point you were  
 3 making about this question being site dependent.  
 4 COLONEL LATHAM: Yes.  
 5 Q. And one needs to take into account lots of factors to  
 6 decide whether or not it is critical for safety, not  
 7 just desirable or helpful, but critical to have  
 8 a particular area covered by CCTV?  
 9 COLONEL LATHAM: There are lots of factors that bear upon  
 10 that: your risk assessment, your appetite for risk,  
 11 available budget, and other practicalities. But they're  
 12 some of the things that you'd consider.  
 13 Q. Let me suggest another one if one is thinking about  
 14 a particular area: do I need CCTV to cover it, is it  
 15 critical that I have CCTV to cover it? And one would  
 16 think, is it monitored in any other way?  
 17 COLONEL LATHAM: Absolutely. I now see where you are going.  
 18 Q. Forgive me, you may or may not see where I'm going, but  
 19 perhaps you'll let me go there and, if you were right,  
 20 then take some comfort from that. You agree then, that  
 21 the question of whether or not an area (inaudible:  
 22 distorted)?  
 23 SIR JOHN SAUNDERS: Mr O'Connor, I'm really sorry, you're  
 24 leaning up against your mic. I can hear you brushing  
 25 against it rather than the question.

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1 (Pause)  
 2 MR O'CONNOR: Monitoring in another way is one factor to  
 3 bear in mind; yes?  
 4 COLONEL LATHAM: Yes.  
 5 Q. You heard the evidence about the McDonald's on the  
 6 mezzanine?  
 7 COLONEL LATHAM: Yes.  
 8 Q. It was a number of witnesses who gave that evidence, was  
 9 it not?  
 10 COLONEL LATHAM: Yes.  
 11 Q. In summary, what they said was that when that McDonald's  
 12 was open, the mezzanine was a very different place?  
 13 COLONEL LATHAM: Indeed.  
 14 Q. It was busy with McDonald's customers coming and going.  
 15 There was mention that there was actually a toilet up on  
 16 the mezzanine, I think perhaps around the corner from  
 17 the McDonald's, which was used by McDonald's customers  
 18 and people coming up from the station, perhaps before  
 19 the refurbishment.  
 20 COLONEL LATHAM: I recall.  
 21 Q. There were tables with staff coming in and out?  
 22 COLONEL LATHAM: Yes.  
 23 Q. And we also heard that those staff had a radio which  
 24 linked to the Whiskey Control Room? Do you recall that?  
 25 COLONEL LATHAM: I don't recall that particular piece of

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1 evidence.  
 2 Q. I think it was Mr Johnson who gave that evidence,  
 3 perhaps you'll take it from me, and he said that they  
 4 had experience of staff at McDonald's using that radio  
 5 to report problems up on the mezzanine: we've got  
 6 a vagrant, we have something going on here, can you help  
 7 us, and indeed sometimes it would be ShowSec staff who  
 8 would go and help them on those occasions.  
 9 Bearing all that in mind, will you agree that, at  
 10 least while that McDonald's was open, there was less  
 11 need to have CCTV coverage of the mezzanine than perhaps  
 12 afterwards?  
 13 COLONEL LATHAM: If there was a McDonald's member of staff  
 14 guiding security with a radio then, yes, I would agree  
 15 with you.  
 16 Q. And because it wouldn't have been critical to have it  
 17 covered by CCTV because there was at least a level of  
 18 monitoring in other ways?  
 19 COLONEL LATHAM: I do accept there are plenty of ways of  
 20 mitigating a blind spot on CCTV that doesn't involve  
 21 installing a CCTV camera.  
 22 Q. We're going to come on to talk in more detail about  
 23 pre-egress checks, but do you also agree in principle  
 24 that patrols of that nature would provide another sort  
 25 of mitigation which would make it not critical to have

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1 an area covered by CCTV?  
 2 COLONEL LATHAM: Yes.  
 3 Q. Thank you.  
 4 I want to move on and talk about another issue,  
 5 which is about monitoring of CCTV. Your evidence, as  
 6 I understand it, is that the level of monitoring  
 7 required, first of all, 24/7?  
 8 COLONEL LATHAM: Yes.  
 9 Q. And I think I heard you say yesterday that really there  
 10 should be at least one person, preferably two,  
 11 monitoring the CCTV?  
 12 COLONEL LATHAM: I explained the advantages of there being  
 13 two, yes.  
 14 Q. But that is the standard that you're applying?  
 15 COLONEL LATHAM: I don't think that that is a standard  
 16 that's published by NaCTSO. I was simply explaining  
 17 that it is -- if you only have one person monitoring  
 18 CCTV and they're distracted by dealing with an incident,  
 19 then you are no longer proactively patrolling the CCTV  
 20 is only the point I was making.  
 21 Q. I'm sure we can see the value in having two people  
 22 rather than one. There may be a value in having three  
 23 people rather than two. We'll come to this, but it's  
 24 always the case that people monitoring CCTVs are looking  
 25 at a large number of screens, aren't they? Isn't it?

1 COLONEL LATHAM: No, good practice is to work out which  
 2 areas you are most concerned about and you pay most  
 3 attention of those areas.  
 4 Q. It's always going to help, isn't it, Colonel Latham, to  
 5 have more people doing that task?  
 6 COLONEL LATHAM: Yes.  
 7 Q. I don't think you mentioned the importance of having  
 8 that second person in any of your reports; is that  
 9 right?  
 10 COLONEL LATHAM: You may be right about that.  
 11 Q. That's something that you're adding at this stage?  
 12 COLONEL LATHAM: If it's not in the reports then it's  
 13 something that I am adding at this stage, which is my  
 14 observation that a second pair of hands is helpful.  
 15 Q. Can we have a look back at the same document? It's just  
 16 the paragraph underneath, which I suggest sets out the  
 17 test here that NaCTSO are applying. It says:  
 18 "Constantly monitor the images captured by your CCTV  
 19 system or regularly check recordings for suspicious  
 20 activity."  
 21 And so on. First of all, there's nothing there  
 22 about having two people rather than one, is there?  
 23 COLONEL LATHAM: There isn't.  
 24 Q. It seems to be suggesting that there are two alternative  
 25 ways that one can satisfy the NaCTSO approach and

1 that is either by constantly monitoring images or in  
 2 fact by looking at recordings after the event?  
 3 COLONEL LATHAM: I agree.  
 4 Q. Is that something that the arena could have done instead  
 5 of monitoring constantly the CCTV?  
 6 COLONEL LATHAM: I think that appears to be what they were  
 7 doing, but the other guidance, the last thing that you  
 8 showed us on screen about good practice, said proactive  
 9 monitoring of CCTV, so that was a good piece of  
 10 guidance.  
 11 Q. Pause there a minute. First of all, we are looking at  
 12 the same document as we were looking at earlier.  
 13 COLONEL LATHAM: Yes. The NAA good practice guidance,  
 14 I think, included proactive monitoring of CCTV that we  
 15 just looked at.  
 16 Q. I was searching, Colonel Latham, for authoritative  
 17 guidelines and I thought you'd agreed with me that  
 18 NaCTSO guidance is authoritative.  
 19 COLONEL LATHAM: I agree that it is authoritative guidance  
 20 and I agree with the content of this document.  
 21 Q. Thank you.  
 22 SIR JOHN SAUNDERS: Mr O'Connor, have I heard evidence to  
 23 the effect that on a regular basis someone in Whiskey  
 24 Control Room was actually going through and viewing  
 25 recordings which they weren't able to see at the time?

1 MR O'CONNOR: If you have, I haven't heard it, sir. That  
 2 was going to be my next question to Colonel Latham.  
 3 SIR JOHN SAUNDERS: It may be either/or, but neither were  
 4 being done?  
 5 MR O'CONNOR: I wasn't proposing to trawl with this witness  
 6 through the factual evidence that you have heard, sir.  
 7 My submission in due course will be that there certainly  
 8 were people who were watching the CCTV.  
 9 SIR JOHN SAUNDERS: Constantly monitoring?  
 10 MR O'CONNOR: Yes. I'm trying to explore what the threshold  
 11 is and it would appear that here NaCTSO are anticipating  
 12 a rather less intensive approach as being satisfactory.  
 13 Colonel, you can help us with this. You say you  
 14 thought that at the arena there was some sort of  
 15 retrospective checking of recordings. Can you help us  
 16 with what evidence you have in mind about that?  
 17 COLONEL LATHAM: My understanding is we have evidence from  
 18 the Whiskey Control Room that they had the ability to  
 19 look back at CCTV footage and that was capability  
 20 Sierra Control did not have. They could look back at  
 21 historic footage and see what had happened in the past.  
 22 That is in the evidence.  
 23 Q. Colonel Latham, it may be thought to be obvious, but  
 24 a system which makes recordings with CCTV systems  
 25 of course has the capability of looking back?

1 COLONEL LATHAM: Yes.  
 2 Q. And indeed if something goes on or the police come in  
 3 and want to have some footage they can provide it?  
 4 COLONEL LATHAM: Yes.  
 5 Q. But there has been no evidence at all, has there, that  
 6 that was something that was done on a regular basis as  
 7 a way of checking for suspicious behaviour?  
 8 COLONEL LATHAM: No, there isn't, I don't think -- well, I'm  
 9 not sure about that. It certainly was done at times  
 10 because there is -- in the evidence Whiskey Control  
 11 operatives have told us they did that when it was  
 12 necessary.  
 13 SIR JOHN SAUNDERS: I think what we've heard is that if they  
 14 were told about something which had happened at  
 15 a certain time or may have happened, they could go back  
 16 and check it.  
 17 COLONEL LATHAM: Yes.  
 18 SIR JOHN SAUNDERS: And I think we've heard they did do  
 19 that.  
 20 MR O'CONNOR: Exactly. If for example, I can't remember  
 21 whether it actually happened then, but after the Lavery  
 22 incident, if the police had come and they wanted the  
 23 CCTV, they could have had it on that occasion.  
 24 COLONEL LATHAM: Yes. I believe so.  
 25 Q. The way in which Whiskey Control looked out for

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1 suspicious behaviour was not by some sort of routine  
 2 retrospective search of recordings but rather by looking  
 3 at the screens?  
 4 COLONEL LATHAM: I agree with you, but I don't agree that  
 5 they did it all the time.  
 6 Q. Well, there's evidence about that.  
 7 COLONEL LATHAM: There is.  
 8 Q. And I'm going to be submitting, in due course, to the  
 9 chairman written submissions about what he should or  
 10 shouldn't make of the evidence he has heard. I just  
 11 want to stick with this question of thresholds because  
 12 it's quite important, I would suggest.  
 13 COLONEL LATHAM: Yes.  
 14 Q. What this document does seem to suggest is that if one  
 15 has an organisation that is setting out, at least, to  
 16 monitor images constantly, it is actually doing  
 17 something better than another option, which the  
 18 guidelines seem to say would also be okay. Do you see  
 19 the point?  
 20 COLONEL LATHAM: I do see the point.  
 21 Q. And so would you also agree that if in fact the arena  
 22 had been looking back retrospectively after the event,  
 23 it couldn't be criticised for that?  
 24 COLONEL LATHAM: Yes, it could be criticised for that  
 25 because that would not be in line with what their risk

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1 assessment would have told them they should be doing.  
 2 Because to mitigate, for example, a PBIED, we know that  
 3 it is in evidence that one of the mitigations is  
 4 proactive patrolling of the CCTV.  
 5 Q. It would still have been consistent with this NaCTSO  
 6 guidance, but you say not with their risk assessment?  
 7 COLONEL LATHAM: Yes.  
 8 Q. All right. Let me move on, colonel, to another related  
 9 topic, which is training, CCTV training.  
 10 As Mr Laidlaw was questioning you this morning,  
 11 issue 12, I don't ask you to look at it, I'm sure you'll  
 12 recall, the whole question of the way the surveillance  
 13 function was conducted is built on an assertion in your  
 14 note that the training was not adequate. Do you recall?  
 15 COLONEL LATHAM: Yes.  
 16 Q. He was talking about, of course, the training provided  
 17 to the ShowSec operatives. I'm going to ask you about  
 18 CCTV training because that's the SMG role in this.  
 19 We've heard evidence that the Whiskey Control Room  
 20 operatives had their own internal training, you may  
 21 recall the handbook and the various modules that were  
 22 set out in that document. Do you recall?  
 23 COLONEL LATHAM: I do.  
 24 Q. And the evidence that that training included CCTV  
 25 training and also looking out for suspicious behaviour?

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1 COLONEL LATHAM: Yes.  
 2 Q. Setting that to one side, as I understand your evidence,  
 3 your suggestion is that those staff should have received  
 4 SIA CCTV training? We know they didn't receive that  
 5 training, at least previously, and so you're saying that  
 6 the informal in-house training was not good enough, they  
 7 should have had the CCTV training provided by the SIA?  
 8 Have I understood your position?  
 9 COLONEL LATHAM: My understanding of the evidence was that  
 10 they should have had CCTV SIA licences and hence my  
 11 comment.  
 12 SIR JOHN SAUNDERS: I think it's a legal requirement which  
 13 you're suggesting rather than the adequacy of the  
 14 training?  
 15 COLONEL LATHAM: Yes, sir.  
 16 MR O'CONNOR: That will save time if that's the position.  
 17 So you're not saying that the SIA training would have  
 18 equipped them better to do their job, you're saying that  
 19 they should have met that important but technical  
 20 requirement? Is that as far as you're putting it?  
 21 COLONEL LATHAM: That's as far as I'm going.  
 22 Q. Then I can move on and, just for your note, sir, and I'm  
 23 not going to take you to it then, there is indeed  
 24 a passage in your report, is there not, colonel, where  
 25 you say that in fact SIA training and informal in-house

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1 training can be just as good as each other?  
 2 COLONEL LATHAM: Yes, I would support that.  
 3 Q. Let me move on then, colonel, to another related issue,  
 4 which is just this question of whether in fact  
 5 Salman Abedi should have been spotted or might have been  
 6 spotted by CCTV operators on the various occasions that  
 7 we've discussed, both on the 22nd and prior to that.  
 8 This is, I think, at least to start with, issue 12.  
 9 I haven't made a note of this one. Yes, issue 12.  
 10 Issue 12 is the one that covers the reconnaissance phase  
 11 and then there's issue 14 which talks about the 22nd.  
 12 We can see, colonel, from issue 12, you're not  
 13 saying, are you, that on those reconnaissance trips, and  
 14 I think it's the same for the earlier stages of the  
 15 22nd, you're not saying that he should have been  
 16 spotted, you're really just saying that he might have  
 17 been spotted had the training been different? Is that  
 18 right?  
 19 COLONEL LATHAM: That's correct.  
 20 Q. Does that really follow from the explanation you have  
 21 just given? Because you've accepted that the in-house  
 22 training that the Whiskey Control Room operatives  
 23 received was just as good as the SIA training that they  
 24 might have received.  
 25 SIR JOHN SAUNDERS: I think he said it was capable of being.

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1 I don't think he said it was. Do you know what the  
 2 in-house training was?  
 3 COLONEL LATHAM: No, sir.  
 4 SIR JOHN SAUNDERS: No. I think he is saying it could be.  
 5 COLONEL LATHAM: My point was not that Abedi would have been  
 6 seen, because that would have required somebody to have  
 7 been looking at him at that time and it would be  
 8 unreasonable to expect that everybody would be looking  
 9 everywhere all of the time. So I think my point was  
 10 that there were opportunities if somebody had been  
 11 looking at him, they might have concluded that he was  
 12 curious enough to be interacted with.  
 13 MR O'CONNOR: If someone had been looking at him -- and  
 14 there you're talking about the fact that any operator  
 15 can't be looking everywhere at once?  
 16 COLONEL LATHAM: I am.  
 17 Q. If someone had been looking at him then there might have  
 18 been a situation where they thought he was suspicious?  
 19 COLONEL LATHAM: Yes. But it's also possible to identify  
 20 where the best places to look are and the sorts of  
 21 things that one should be looking for, and that  
 22 increases one's chance of spotting somebody who might be  
 23 suspicious.  
 24 Q. You have listed -- my copy of this document has page 7  
 25 at the bottom of every page, which hasn't been very

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1 helpful. It's page 10, I think, because I renumbered  
 2 them. At the end of that paragraph in any event, at the  
 3 top of that page --  
 4 COLONEL LATHAM: Sorry, which paragraph are we looking at?  
 5 Q. I'm still looking at issue 12, but over the page, so  
 6 immediately above issue 13.  
 7 There you have listed a series of factors which you  
 8 say ought to have or perhaps might have led the security  
 9 staff, and in this case CCTV operators, to have thought  
 10 there was something curious, to use your word, about  
 11 Abedi: change of pace, wearing headgear, using two  
 12 mobile phones at a time, watching the queue, and walking  
 13 in the direction of the crowd; yes?  
 14 COLONEL LATHAM: Yes.  
 15 Q. Of course, this is one of those areas where the chairman  
 16 will make his own decision. He has access to the same  
 17 material we do. I'm going to take you through a few of  
 18 those points just for a few minutes. Before I do, I'm  
 19 going to suggest a few matters of approach that you may  
 20 agree with.  
 21 First of all, obviously, we must avoid hindsight  
 22 looking at this footage, must we not?  
 23 COLONEL LATHAM: Yes.  
 24 Q. Looking at these photographs, knowing what we know,  
 25 there is a constant temptation to project on to those

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1 who were monitoring the CCTV at the time the knowledge  
 2 that we now have, but clearly we have to avoid that?  
 3 COLONEL LATHAM: And we have both tried hard to make sure  
 4 that we have done so.  
 5 Q. Secondly, and this is a point we've touched on, one has  
 6 to remember at all times that that CCTV operator we've  
 7 got in mind is looking at -- has available to look at  
 8 a whole range of screens, I think over 80 screens in the  
 9 Whiskey Control Room -- I take your point about  
 10 selection, but still a large number of screens, and he  
 11 can't possibly look at them all at the same time.  
 12 COLONEL LATHAM: No, which is why it's so important to  
 13 predict where hostile reconnaissance could happen and to  
 14 look in those areas.  
 15 Q. And indeed, a similar point, we have the luxury of  
 16 looking at this footage in slow time, we can rewind,  
 17 look at it again, sit staring at it for a little while,  
 18 but that person is looking at it all in real time?  
 19 COLONEL LATHAM: Of course.  
 20 Q. Would you also agree that the whole science of  
 21 behavioural detection and training for CCTV in this  
 22 field has moved on a lot even since 2017?  
 23 COLONEL LATHAM: Absolutely.  
 24 Q. I know you have been personally involved in that.  
 25 COLONEL LATHAM: I have.

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1 Q. So there are now training courses really focusing on  
2 this very point we're now discussing which didn't exist  
3 in the past?  
4 COLONEL LATHAM: The principles did exist, but the training  
5 has changed, that's right.  
6 Q. Still, one must avoid projecting back knowledge and  
7 understanding and practice (overspeaking)?  
8 COLONEL LATHAM: Indeed. And this is something that we have  
9 both been very careful to do.  
10 Q. Finally, colonel, the question of behaviour that is out  
11 of the ordinary or unusual, which is at the heart of  
12 what we're talking about, is always going to be context  
13 specific, is it not?  
14 COLONEL LATHAM: Yes, it is, so the people at the arena  
15 would know what normal looks like and would therefore be  
16 better at spotting abnormal, and of course -- yes, I'll  
17 stop there.  
18 Q. Precisely. That's a point I was going to come back to.  
19 As we have said, the operator at the arena that  
20 we're thinking of will be looking at more than one  
21 screen in real time and will presumably be wanting to  
22 look and to vary his or her focus to try and pick up as  
23 much as possible?  
24 COLONEL LATHAM: Yes.  
25 Q. So if we look at that list, just in general terms, that

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1 you've provided us, colonel. Is there a danger that in  
2 setting out these characteristics or features of  
3 behaviour, you are in a sense aggregating a whole series  
4 of points that, fair enough, one can see in the footage,  
5 but that in reality an operator would never have seen,  
6 not only not all, but not even necessarily more than one  
7 or two of those points, simply because of the way in  
8 which they were conducting their job, it being in  
9 real time, several screens and so on?  
10 COLONEL LATHAM: Yes, I would agree with that.  
11 Q. So when we look at this list, we have to think of them  
12 individually, say, rather than building a picture of  
13 someone doing all of those things?  
14 COLONEL LATHAM: A good practice is to do CCTV patrolling,  
15 and part of that would involve picking out individuals  
16 who could be curious and following them along. So it  
17 may be that somebody would see one, two, more of these,  
18 or as you say, just a single one.  
19 Q. Just looking at them, change in pace?  
20 COLONEL LATHAM: Yes.  
21 Q. Is that really suspicious or curious or out of the  
22 ordinary?  
23 COLONEL LATHAM: It is a known indicator, but I learned that  
24 post attack. When I've looked at the footage, there is  
25 a point where you can see that he slows down

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1 significantly when he is walking past security. That is  
2 a change in behaviour going from fast to slow to fast is  
3 a change in behaviour and it's changes in behaviour or  
4 it's behaviour that is being looked for, not profiling  
5 of people. So any change of behaviour is something that  
6 could draw the attention of someone who's looking for  
7 hostile reconnaissance.  
8 Q. And that is something that you've learned since 2017?  
9 COLONEL LATHAM: The change in pace is something that has  
10 come to my attention since 2017, but not the fact that  
11 you're looking for changes in behaviour, which has  
12 always been a part of countering a hostile recce.  
13 Q. At the risk of suggesting the obvious, there are any  
14 number of reasons why someone walking along the link  
15 bridge, walking through a public area near a train  
16 station might change their pace?  
17 COLONEL LATHAM: Yes, or turn around, I agree.  
18 Q. Having two phones. I think you said yesterday, or the  
19 day before, that that was an indicator to you of  
20 criminality. Again, there are any number of reasons  
21 these days why people, perhaps particularly young  
22 people, might have two phones?  
23 COLONEL LATHAM: Well, we're talking about 2017. The police  
24 noted that on their slide show and I agree that many  
25 people would have two phones. My experience is that

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1 sometimes people who have two phones are up to no good  
2 and when one is looking for people who could be hostile,  
3 one is looking for anything that stands out that would  
4 draw one's attention. That is one of the things that  
5 would draw my attention or draw my staff's attention  
6 because to me that is unusual. But it may be that at  
7 Manchester Arena in 2017 it wasn't unusual, although  
8 I don't recall anybody else doing it on the footage  
9 I have seen.  
10 Q. What about walking against the direction of the crowd?  
11 Isn't that something which is, if you like, inherent  
12 in the nature of space that we've all come to learn  
13 about in the last few months? We have people walking  
14 towards the train station, walking away from the train  
15 station, going to concerts, going bowling, using the  
16 City Room as a cut-through.  
17 COLONEL LATHAM: I can take you to a still of the City Room  
18 where there's queues and he's standing watching the  
19 queues and he walks away. He's the only person walking  
20 in that direction. That is something that would be  
21 observed to be unusual behaviour and could draw one's  
22 attention and I think the supervisor in the City Room  
23 agreed on that point.  
24 Q. Just in general terms, let me press you. The chairman  
25 used an example of Wembley Stadium. We can all imagine

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1 either at the beginning or at the end of the match  
 2 people thronging in one direction or the other and one  
 3 can quite see that someone walking against the crowd  
 4 there would be unusual and curious, to use your word,  
 5 but here we have by definition, don't we, people who are  
 6 always going to be going in different directions through  
 7 the City Room?  
 8 COLONEL LATHAM: He's not transiting through the City Room,  
 9 he's walking into the City Room, standing and looking at  
 10 the crowd, and walking away. That seems to be unusual  
 11 behaviour. And he was conducting hostile recce.  
 12 Q. Well, in hindsight we know that.  
 13 COLONEL LATHAM: In hindsight we know that.  
 14 Q. Let's just pause there. Do you think that on that  
 15 particular example, there's any risk that you started  
 16 from your conclusion, your knowledge, if you like, of  
 17 what he was doing and worked backwards?  
 18 COLONEL LATHAM: No. We've taken great care not to exhibit  
 19 hindsight bias and we've tested all of our thoughts  
 20 against each other repeatedly over time.  
 21 Q. Let me move on, staying with CCTV though.  
 22 Issue 14, which is the issue that's focused on the  
 23 22nd. You list another — there's another list here,  
 24 isn't there, of matters that you say would have drawn  
 25 Mr Abedi to someone's attention?

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1 COLONEL LATHAM: Yes.  
 2 Q. Again, from SMG's point of view, we are focusing on what  
 3 would have drawn the attention of a CCTV operator rather  
 4 than someone who was there in the City Room itself; yes?  
 5 COLONEL LATHAM: I understand that is what you're asking me  
 6 about now.  
 7 Q. That's the context?  
 8 COLONEL LATHAM: I understand that.  
 9 Q. So we can immediately see, for example:  
 10 "4, looking nervous."  
 11 That's not something on a CCTV someone would ever  
 12 manage to see, is it?  
 13 COLONEL LATHAM: Not in this case, no.  
 14 Q. Similarly, even more obviously perhaps 7, that may be  
 15 something that was known to people on the ground, the  
 16 ShowSec staff, but not a CCTV operator in the Whiskey  
 17 Control Room?  
 18 COLONEL LATHAM: No, they hadn't been told.  
 19 Q. And what about 5? The timings we are talking about here  
 20 is once the show has started and before it's ended, so  
 21 fitting the audience profile. They are inside at that  
 22 stage, so how does that help us?  
 23 COLONEL LATHAM: That hasn't come from me, that's been said  
 24 in many places in evidence, other people saying he  
 25 didn't fit the audience or parental profile. There are

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1 other people who use the City Room and it was sparsely  
 2 occupied through most of the concert and during some of  
 3 the times when he was there and the people that were  
 4 there, a lot of them, were there connected with the  
 5 event and he didn't fit that profile is the point that  
 6 I'm making there.  
 7 Q. Yes, it is. If we look back, it says:  
 8 "In the experts' view Salman Abedi did look  
 9 suspicious because he did not fit the audience profile."  
 10 So it may be something that other people have said,  
 11 but it's something that you are saying?  
 12 COLONEL LATHAM: Yes, it is.  
 13 Q. And I'm asking you why.  
 14 COLONEL LATHAM: Based on the evidence that we have read,  
 15 that has led us to conclude that Salman Abedi looked  
 16 suspicious for the reasons that we have written there.  
 17 Q. At a time when the audience for a show is entirely  
 18 inside the arena, why is it that someone not fitting the  
 19 audience profile outside in the City Room is suspicious?  
 20 COLONEL LATHAM: For the reasons that I have written in this  
 21 list, which I could read out, but that would waste time,  
 22 I'm sure.  
 23 Q. We can look at other things in the list, but I'm asking  
 24 about this item because this is your methodology, is it  
 25 not?

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1 COLONEL LATHAM: The fundamentals of the theory of defeating  
 2 hostile reconnaissance is deny, detect, deter, and in  
 3 this area we're talking about detect. And in the 2017  
 4 guidance, which SMG were aware of, and they were shown  
 5 at the Argus Stadia presentation, talked about detecting  
 6 people and one of the ways you detect people is you look  
 7 for people who stand out and don't fit the demographic.  
 8 Q. That is the very point I'm trying to ask you about. The  
 9 audience are inside the arena. So why is it the fact  
 10 that he doesn't fit the audience profile makes him  
 11 curious in the least standing outside that venue at that  
 12 time?  
 13 COLONEL LATHAM: No, he doesn't fit the parental profile and  
 14 he doesn't fit the audience profile. You have plenty of  
 15 people who go to music venues who fit the profile but  
 16 don't have tickets, couldn't get in, et cetera. So you  
 17 would have audience profile people around, sometimes, at  
 18 concerts, and parental profile people around, and he  
 19 didn't fit those two profiles.  
 20 Q. I'm going to move on.  
 21 Two of the other issues that you mention here are  
 22 the fact that he's wearing headwear and that he was  
 23 overdressed for the weather.  
 24 COLONEL LATHAM: Yes.  
 25 Q. I just want to look at a few of the photos and explore

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1 that with you. Can we start with {INQ020160/50}.

2 I don't think we need to zoom on in these. You can

3 see them clearly, can you?

4 COLONEL LATHAM: Mm.

5 Q. Help us then, colonel: why does the fact that

6 Salman Abedi is wearing a cap make him suspicious?

7 COLONEL LATHAM: Because in my experience at venues such as

8 this, unless they are wearing headwear for a religious

9 reason, we don't allow people to come into the venue

10 without taking their hat off because we want to get

11 their face on camera and it's also part of our deterrent

12 message, and we know that people who are up to no good

13 often wear headwear in order to disguise their identity.

14 For those reasons, when one is looking out for somebody

15 who could be suspicious, wearing a hat is one of the

16 things that would draw them to a security officer's

17 attention if they were looking for hostile

18 reconnaissance.

19 Q. Young men who wear trainers also often wear caps, don't

20 they?

21 COLONEL LATHAM: They do.

22 Q. And this is not someone coming into the venue, at least

23 at this stage, it's someone who is walking along the

24 link bridge, he could be going into Manchester city

25 centre, he could be going to the go-kart centre, he

225

1 could be going to the car park. Are you really

2 suggesting that that fact on its own, which, as you've

3 accepted may be the only thing the operator saw, the

4 fact that this young man is wearing a cap is something

5 that you say should have alerted the operator to

6 something suspicious about this man?

7 COLONEL LATHAM: No, sir, you've said something that

8 I didn't say there. What I have said is that an

9 individual wearing a hat who's observed by a security

10 officer who's looking for hostile reconnaissance is

11 likely to have attention drawn to himself, and that

12 would then be — if attention is drawn to a person who's

13 wearing a hat, then greater attention might be paid to

14 them in order to reassure oneself that that's perfectly

15 normal, we see that all the time — or he seems to be

16 a bit overdressed as well, so that draws more attention.

17 Q. Overdressed, colonel?

18 COLONEL LATHAM: This is what other people have said in

19 evidence.

20 Q. We are not asking — I'm interested in your view.

21 You've prepared a document which sets out what you

22 understand to be your expert opinion about these

23 matters. So let's leave to one side what other people

24 have said and let's focus on your expert view. You've

25 already explained why in your expert view wearing a cap

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1 in the middle of Manchester is suspicious. Let's look

2 at the question of him being overdressed. He's got

3 trousers on and a long-sleeved top. Just looking around

4 and behind him, so do most other people seem to have

5 trousers, sleeves, tops, do they not?

6 COLONEL LATHAM: You seem to have suggested that the fact

7 that many other people in their evidence have described

8 him, who had a better view of him than I have here, that

9 they described him as being overdressed for the weather

10 is something that I should exclude from my opinion.

11 I may have misunderstood a legal point.

12 Q. We have exactly the same view of him as the CCTV

13 operator. In fact we've got a rather better view

14 because we're standing looking at it for several

15 seconds.

16 SIR JOHN SAUNDERS: Let's restrict the question. If you

17 were a CCTV operator, because that's simply not what 12

18 is to do with — sorry, 14. If you're a CCTV operator

19 and you see him on that, would you conclude from that

20 view only that he's overdressed?

21 COLONEL LATHAM: No.

22 SIR JOHN SAUNDERS: Right. Would you actually conclude he's

23 suspicious because he is wearing a hat at that

24 particular location?

25 COLONEL LATHAM: No.

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1 SIR JOHN SAUNDERS: So we are talking about anybody rather

2 than simply CCTV operators. We may need to limit our

3 questions to make sure this relates to CCTV.

4 MR O'CONNOR: You appreciate why CCTV operators are a focus.

5 SIR JOHN SAUNDERS: I know that SMG are focused on that,

6 I do understand that.

7 MR O'CONNOR: Let me quickly take you to two or three other

8 photos to give you some context, Colonel Latham.

9 Could we move in the same document on to

10 {INQ020160/115}, please? Does he look overdressed in

11 comparison to other people in that shot, Colonel Latham?

12 COLONEL LATHAM: No.

13 Q. {INQ020160/118}, please. In that photograph?

14 COLONEL LATHAM: No.

15 Q. {INQ020160/130}, please. We obviously have a very poor

16 sight of him, albeit the same sight as the CCTV

17 operator. Look at the other people in the City Room,

18 dressed in black, sleeves, looks like a jacket or

19 a coat, trousers. Is Salman Abedi overdressed in

20 comparison to the other people in that picture, colonel?

21 COLONEL LATHAM: The CCTV operator wouldn't conclude that,

22 I would say.

23 Q. Thank you.

24 Moving on, you've agreed with me that every venue is

25 different and that the CCTV operators at a particular

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1 venue will have their own understanding of what's usual  
 2 and what isn't. Correct? And we heard the evidence of  
 3 Mr Edwards, who in May 2017 had been a Whiskey Control  
 4 operator for 11 years, that because of his experience of  
 5 illegal merchandise sellers, people hanging round with  
 6 large backpacks were not out of the ordinary, not  
 7 suspicious. Again, ultimately it'll be a matter for the  
 8 chairman, but given what you have said, would you not  
 9 agree that that is, at the very least, an important  
 10 factor to bear in mind?  
 11 COLONEL LATHAM: I accept that's an important thing to bear  
 12 in mind.  
 13 Q. I think just lastly, colonel, and it's on a slightly  
 14 separate point, but still related to the CCTV question,  
 15 you were asked by Mr Cooper whether it would surprise  
 16 you that the blind spot that we know about was not  
 17 covered by CCTV until much later, after the attack, in  
 18 fact earlier this year; do you recall that?  
 19 COLONEL LATHAM: Yes.  
 20 Q. And you said that it would surprise you and then these  
 21 words, "If not corrected by other mitigations".  
 22 COLONEL LATHAM: Yes.  
 23 Q. In fact, if it was the position that at every event  
 24 at the arena since the attack the entire City Room  
 25 including the mezzanine was a sterile area from well

1 before ingress until well after ingress with no one  
 2 being allowed in without being searched, is that the  
 3 sort of mitigation you'd have in mind?  
 4 COLONEL LATHAM: Yes.  
 5 Q. And going back to where we started with this, that would  
 6 be a factor, would it not, as to whether in fact a CCTV  
 7 camera of that nature was needed?  
 8 COLONEL LATHAM: That would be a factor.  
 9 SIR JOHN SAUNDERS: Are you leaving that?  
 10 MR O'CONNOR: I am.  
 11 SIR JOHN SAUNDERS: To avoid someone else asking the  
 12 question later on, one of the matters you rely on and  
 13 actually one of the matters witnesses rely on quite a  
 14 lot is that he remained in the City Room for an extended  
 15 period of time. Is that something that you would expect  
 16 to be picked up by a CCTV operator or is it  
 17 realistically not a possible thing to pick up? And I am  
 18 not leading you in any direction at all. So I want your  
 19 view, please.  
 20 COLONEL LATHAM: In all of the venues that I have worked in,  
 21 loitering is something which is not wanted by the venue  
 22 operators, whether that's the House of Commons or  
 23 Westfield or anywhere: if you're not spending money,  
 24 then we don't really want you there. So loitering would  
 25 be something that would be looked out for and people

1 would be moved on.  
 2 SIR JOHN SAUNDERS: Okay. Obviously, you ask anything you  
 3 want to, Mr O'Connor.  
 4 MR O'CONNOR: I used the words hanging around, but  
 5 if we look back at the evidence of Mr Edwards, he said  
 6 it wasn't unusual for merchandise sellers with rucksacks  
 7 to loiter, if you want to use that word, or hang around  
 8 for periods of time. That would also be a factor that  
 9 would need to be fed in, do you agree?  
 10 COLONEL LATHAM: Yes.  
 11 Q. I'm going to move on and ask you a few questions about  
 12 a different issue, which is pre-egress checks on the  
 13 mezzanine. You have stressed -- and I'm now going back  
 14 to your reports and also the evidence that you gave  
 15 in October and I think the evidence you've given in the  
 16 last hour or so -- that what you describe as  
 17 a counter-terrorism sweep is not a sophisticated  
 18 exercise, it doesn't require special equipment or indeed  
 19 a particularly high level of training; do you agree?  
 20 COLONEL LATHAM: Yes.  
 21 Q. It is in fact a patrol that is looking out for  
 22 suspicious items and individuals and really there's not  
 23 much more to it than that?  
 24 COLONEL LATHAM: I have described it as a simple act that  
 25 should be second nature to all SIA officers.

1 Q. Thank you. Do you also agree that we are not yet at the  
 2 question of where these pre-egress checks took place,  
 3 but the practice of the pre-egress checks at the arena  
 4 was to look out for suspicious matters, individuals or  
 5 objects and so therefore did, at least in principle,  
 6 fall within your definition of a counter-terrorism  
 7 sweep?  
 8 COLONEL LATHAM: Yes, it was doing that amongst other  
 9 things.  
 10 Q. You describe the mezzanine in issue 15 -- and it's not  
 11 necessary to go to it -- your words, an obvious place to  
 12 look for suspicious behaviour; yes?  
 13 COLONEL LATHAM: Yes.  
 14 Q. And a potential source of danger to those in the  
 15 City Room?  
 16 COLONEL LATHAM: Yes.  
 17 Q. You will recall the evidence of Miriam Stone, that is  
 18 certainly common ground as far as she was concerned. Do  
 19 you recall she referred to the HOT principles with  
 20 regard to the mezzanine --  
 21 COLONEL LATHAM: Yes.  
 22 Q. -- floor? And you also recall her evidence about the  
 23 incident at Disney on Ice --  
 24 COLONEL LATHAM: I do.  
 25 Q. -- where a suspicious package was indeed found on the

1 mezzanine floor.  
 2 Do you agree that for those same reasons, including  
 3 the Disney on Ice episode, it would have been obvious to  
 4 ShowSec staff that the mezzanine floor was an obvious  
 5 place to look for suspicious behaviour?  
 6 SIR JOHN SAUNDERS: I think that may be a matter for me,  
 7 should or would have been obvious. Is that not a matter  
 8 for me as a question of fact? I am quite happy for you  
 9 to say work on that basis if that finding of fact is  
 10 made, if you like, if you're going on to ask another  
 11 question.  
 12 MR O'CONNOR: No, I am going to ask another question, sir,  
 13 but I will happily leave that one where it was.  
 14 Can I ask you, colonel, the mezzanine comes up in  
 15 one or two of these issues, and could I ask you to go to  
 16 issue 10(vi). What you say here is that:  
 17 "The breakdown in communication between SMG and  
 18 ShowSec about whether pre-egress checks included the  
 19 City Room mezzanine..."  
 20 Pausing there, I may come to ask you a few more  
 21 questions about that breakdown in communication, but we  
 22 all know something of that nature happened. But then  
 23 this:  
 24 "... indicates a general lack of clarity about what  
 25 was required."

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1 I just press you on that a little bit. First of  
 2 all, no doubt we can agree that there was a need for  
 3 clarity, yes, given the significance of these checks?  
 4 You may well have criticised the practice if, for  
 5 example, pre-egress checks were simply done on an oral  
 6 basis, you go there, you go there, because that would  
 7 have led to obvious scope for confusion and you would  
 8 have said there is a lack of clarity there; yes?  
 9 In fact, as we know, and I'm not going to bring it  
 10 up on screen because we all have it vividly in our  
 11 mind's eye, this was not a process that was conducted  
 12 orally, was it?  
 13 COLONEL LATHAM: No.  
 14 Q. The checks were written down, clearly?  
 15 COLONEL LATHAM: They were.  
 16 Q. The route was stated and there was a requirement for  
 17 whoever was conducting the check to confirm in writing,  
 18 not even just for every check, but for every part of  
 19 every check, that they had been done?  
 20 COLONEL LATHAM: I agree.  
 21 Q. So obviously these things fall on the spectrum, but  
 22 would you not agree that in fact the pre-egress checks  
 23 were set out with a high degree of clarity and  
 24 assurance?  
 25 COLONEL LATHAM: I would agree that they were set out

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1 clearly.  
 2 SIR JOHN SAUNDERS: Tell me, isn't the wider point which is  
 3 being made here, and from the evidence we have heard,  
 4 that SMG are saying, this is in effect  
 5 a counter-terrorism sweep of the area they're coming out  
 6 to, whereas the evidence from the ShowSec people has  
 7 been: what we understood was we were checking the egress  
 8 routes were clear, and therefore it does seem like both  
 9 were operating on different bases?  
 10 It seems to me that's a wider point which is being  
 11 made there rather than simply the clarity of the  
 12 document; am I right?  
 13 COLONEL LATHAM: Yes, sir.  
 14 SIR JOHN SAUNDERS: I'm not putting anyone to blame but that  
 15 seems to have been the general level of understanding.  
 16 MR O'CONNOR: Sir, it's probably a matter for submission in  
 17 due course, but since you raise it, there are two points  
 18 here. One is the task to be performed and the other is  
 19 where it's to be performed.  
 20 SIR JOHN SAUNDERS: And what it's meant to achieve.  
 21 MR O'CONNOR: Quite, which may -- well, that may touch on  
 22 both, I suppose. Certainly, sir, we will be submitting  
 23 in due course, as far as the task to be performed,  
 24 everyone was clear that it did include looking out for  
 25 suspicious matters and really one is asked that that

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1 leaves you with the question of where it should have  
 2 happened but I don't want to get into --  
 3 SIR JOHN SAUNDERS: And one can draw the inference maybe  
 4 from what is actually set out on the note that anyone  
 5 reading it would realise the purpose of it went beyond  
 6 simply checking whether egress routes were clear or not,  
 7 but that is a matter for submission and argument.  
 8 MR O'CONNOR: It is.  
 9 I want to come on, though, colonel, to -- I took to  
 10 you this question of clarity. I want to come on to this  
 11 other point that you raised, which is, if you like,  
 12 about responsibility and SMG's share, as I think you put  
 13 it, of the responsibility for the breakdown in  
 14 communications.  
 15 Let me put it this way. You have given evidence  
 16 in the last couple of days on other issues, I think more  
 17 than one, where you would say a starting point is to  
 18 trust your provider? I think you were talking about the  
 19 ShowSec training at the time, but presumably you'd agree  
 20 that that same principle is an appropriate starting  
 21 point here, that SMG --  
 22 COLONEL LATHAM: Yes, I think that in a healthy  
 23 relationship -- you shouldn't have a relationship if you  
 24 don't trust your supplier.  
 25 Q. No, and so the way in which you explained it in relation

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1 to the ShowSec training was you trust them until you  
 2 start to see evidence that it's going wrong?  
 3 COLONEL LATHAM: That is what I said.  
 4 Q. In another context you have criticised the lack of what  
 5 you describe as a positional note for Mr Agha setting  
 6 out his responsibilities in writing. That was present  
 7 here, the written explanation of what was required.  
 8 You've made the point about long-standing relationships,  
 9 there's a need to review and refresh and make sure that  
 10 people understand what is expected.  
 11 COLONEL LATHAM: Yes.  
 12 Q. You'll have seen the evidence about the review meeting  
 13 that was held, I think from memory in 2015, between  
 14 Tom Bailey and Lucy Hunt where they did indeed go  
 15 through these check sheets.  
 16 COLONEL LATHAM: I recall.  
 17 Q. And they talked about whether they needed to be amended  
 18 in light of the refurbishment. Isn't that the type of  
 19 meeting you're describing to review what's going on and  
 20 refresh the understanding?  
 21 COLONEL LATHAM: Yes, it is, but I would go a bit further  
 22 about this — a general discussion about what we're  
 23 doing and talking the whole of the operation through on  
 24 a regular basis with all of the managers, that is  
 25 something else that I also envisage, but what you

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1 describe is also good practice.  
 2 Q. So it's at least a part of fulfilling that requirement  
 3 that you describe of reviewing, refreshing, making sure  
 4 you understand what's going on?  
 5 COLONEL LATHAM: It is part of it.  
 6 Q. As we have heard, as it happens, Mr Bailey didn't  
 7 volunteer the fact that the checks weren't being done.  
 8 COLONEL LATHAM: (Witness nods).  
 9 SIR JOHN SAUNDERS: Mr O'Connor, I don't want you to leave  
 10 this without a fairly obvious point being made for you  
 11 and the witness to consider. It does appear, therefore,  
 12 if we take the 2015 discussion, that from 2015 at least  
 13 until 22 May 2017, ShowSec were, it would appear, on  
 14 a regular basis simply looking from the bottom of the  
 15 stairs upwards.  
 16 COLONEL LATHAM: Yes, sir.  
 17 SIR JOHN SAUNDERS: In a proper relationship between SMG and  
 18 ShowSec, would you expect SMG to remain ignorant of that  
 19 fact over a two-year period?  
 20 COLONEL LATHAM: No, sir.  
 21 SIR JOHN SAUNDERS: I do that so you can ask questions about  
 22 it, Mr O'Connor, if you wish. It's a point which has  
 23 certainly occurred to me.  
 24 MR O'CONNOR: I won't pursue the point, sir.  
 25 I want to move on to another subject, which is

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1 training, and for that, Dr BaMaung, I'll come back to  
 2 you. This is issue 9.  
 3 Again, doctor, you have plenty of positives to say  
 4 about SMG's counter-terrorism training; is that right.  
 5 DR BaMAUNG: Yes. There's a fair number of points.  
 6 Q. You've already referred to them, I don't want to go back  
 7 over them. What you do say is that:  
 8 "There was no internal counter-terrorism training  
 9 programme for SMG. They had a good exercising  
 10 programme, they attended the exercises provided by the  
 11 police, but had no documented process for reviewing what  
 12 they had learned and applying this specifically to the  
 13 arena."  
 14 I want to take you, I hope fairly briefly, to some  
 15 evidence, some references, and see if you'll agree with  
 16 me that there was training of the type you describe.  
 17 First of all, in fact you have already mentioned it,  
 18 the tabletop exercises. There were internal tabletop  
 19 exercises, weren't there?  
 20 DR BaMAUNG: I believe they were done between ShowSec, SMG  
 21 and I'm not sure, if it was one more than one occasion,  
 22 but the police were invited along to some.  
 23 Q. Certainly they were written jointly between Miriam Stone  
 24 and, I think, Tom Bailey.  
 25 DR BaMAUNG: Yes, yes, that's correct.

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1 Q. They are the ones we have in mind. They were certainly  
 2 internal counter-terrorism training, were they not?  
 3 DR BaMAUNG: Yes, that's right.  
 4 Q. And you'll recall Miriam Stone's evidence that some of  
 5 the learning or information that she acquired from  
 6 external training was then fed back into those tabletop  
 7 exercises?  
 8 DR BaMAUNG: Yes.  
 9 Q. Is that not one demonstration of the point you're  
 10 raising here about a word you have used in your report,  
 11 dissemination?  
 12 DR BaMAUNG: That's one aspect of training. I'd say that's  
 13 good training, exercising. The other part is a  
 14 written-down training programme that is probably similar  
 15 to the concept of ShowSec's, where staff can go in at  
 16 their own time, whatever, and actually review stuff.  
 17 Because an exercise is really, really powerful as  
 18 a training tool, but the difficulty is the retention of  
 19 the knowledge and the learning points unless they're  
 20 reinforced again and again.  
 21 Q. So the criticism really comes to the fact that the  
 22 process wasn't a documented one, and I'm going to take  
 23 you to some other points, but they will all be of an  
 24 informal, occasional character, and is your point that  
 25 there really needed to be something more —

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1 DR BaMAUNG: Not documented and potentially some substantial  
 2 product. There'd be a manual or an online training  
 3 programme that can be refreshed by staff. I'm aware  
 4 that there has been the use of learning from other  
 5 events and brought in, especially Griffin and Argus, and  
 6 brought in and incorporated into the exercise, products,  
 7 the knowledge base of SMG. What I'm actually referring  
 8 to is a substantial product that can then be used by all  
 9 members of staff in their own time, not necessarily tied  
 10 down to a Project Griffin or a Project Argus, and  
 11 I think the training that was delivered by SMG was  
 12 annual and not all of it was necessarily CT. So  
 13 potentially a gap of even 6 months or so without some  
 14 form of reinforcement could potentially allow some  
 15 knowledge leakage within individuals.  
 16 Q. The tabletop exercises were annual, and the evidence  
 17 from Miriam Stone was that they would always have some  
 18 touch point in counter—terrorism, although you're right  
 19 they wouldn't always be focused only on  
 20 counter—terrorism.  
 21 DR BaMAUNG: I think there was one with a sinkhole, I'm not  
 22 sure of the full —  
 23 Q. Yes, that's right. That was what she gave the about.  
 24 If we could go to it, please, Mr Lopez. {INQ025137/1}.  
 25 She gave evidence about this document. Yes. If we look

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1 at the top, you see this is the speaking note. The  
 2 preamble for the evening is to include terrorism but  
 3 we are not going to focus on that as such:  
 4 "Remember that when we do a tabletop exercise the  
 5 plans, solutions and experiences should be transferable  
 6 to any situation."  
 7 So at the very least there's a reminder there, and  
 8 I think there was a reference to a terrorist incident  
 9 happening at the same time. The point is that at the  
 10 very least there's a reminder that terrorism is  
 11 important and to keep everyone aware of it.  
 12 You've mentioned the Griffin training, which of  
 13 course was arranged with Ken Upham. Do you recall the  
 14 evidence that Miriam Stone had in one of her statements  
 15 about a particular document that was prepared for the  
 16 food and beverage staff about what to do in an  
 17 emergency?  
 18 DR BaMAUNG: I think that was restricted solely to the food  
 19 and beverage staff.  
 20 Q. It was. But again, is that not an example of, if not in  
 21 a sort of within the context of a programme, bringing  
 22 training, written training, assistance being provided to  
 23 staff?  
 24 DR BaMAUNG: I would agree with that. But I think the  
 25 problem there is that the good example of training is

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1 restricted to one particular department not through the  
 2 whole organisation. Because I think some of the content  
 3 was very good, but why was it not shared with the CCTV  
 4 team? That was one of the questions I would probably  
 5 ask myself if I was —  
 6 Q. We may be in a glass half full or glass half empty  
 7 situation.  
 8 DR BaMAUNG: Yes.  
 9 Q. There was something that you think was a positive  
 10 training even if it wasn't shared amongst everyone  
 11 in the building?  
 12 DR BaMAUNG: I wouldn't call it a whole training programme,  
 13 but yes, the information in it was relevant.  
 14 Q. Let me just remind you of a couple of other points  
 15 Miriam Stone made in one of her witness statements.  
 16 This is Miriam Stone's second statement.  
 17 {INQ034752/11}. It's paragraph 41. Miriam Stone says:  
 18 "When we had the opportunity, ShowSec staff and  
 19 I would also conduct on—the—spot mock exercises, for  
 20 example we would run mock [redacted] searches to test  
 21 staff competency. This was usually done in the period  
 22 of time between shows on a double show day."  
 23 So perhaps not part of a formal programme of  
 24 training (overspeaking).  
 25 DR BaMAUNG: I think during the report Colonel Latham and

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1 I acknowledged that the actual exercising part of SMG's  
 2 programme was very good. I suppose you could compare it  
 3 with Griffin and Argus, both have an individual role  
 4 within the wider holistic counter—terrorism picture and  
 5 I would say that if you used that comparison, SMG were  
 6 excellent at Argus and in some aspects good with  
 7 Griffin. But what the issue with Griffin is that's not  
 8 an exercise—based counter—terrorism programme, it is  
 9 more a learning—based one because there's no tabletop  
 10 exercises given for Griffin, it's the imparting of  
 11 counter—terrorism advice to members of staff. I think  
 12 that's where we're coming from.  
 13 If a member of staff wanted to get — they might  
 14 have done an exercise that was really well—run, they've  
 15 remembered the learning points, but then 2 months down  
 16 the road they're thinking, what are the learning points  
 17 again, that's where the advantage would be if there was  
 18 a product that was available for all, and they could go  
 19 back to that product and say, there are the learning  
 20 products from that exercise, be it hostile  
 21 reconnaissance or bomb awareness.  
 22 Q. The most important lesson, perhaps, from all of those  
 23 types of counter—terrorism exercises is: be vigilant,  
 24 report things when you see them?  
 25 DR BaMAUNG: Yes.

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1 Q. I want to go to one other reference in this statement.  
 2 {INQ034752/13}. If we can enlarge the middle of the  
 3 page. Miriam Stone says:  
 4 "The importance of identifying and reporting  
 5 suspicious behaviour was drummed into staff at every  
 6 opportunity. It was regularly highlighted in briefing  
 7 meetings. There were plenty of means to do so."  
 8 And so on. She describes in paragraph 49 how staff  
 9 were frequently knocking on the door of the Sierra  
 10 Control Room. Then at paragraph 50 this:  
 11 "Nobody has ever been discouraged from speaking out,  
 12 in my opinion. The number of reports of suspicious  
 13 activity should be testament to that. For my own part,  
 14 I personally encouraged staff to report anything  
 15 suspicious or concerning. Staff were given  
 16 anti-terrorism hotline cards which had telephone numbers  
 17 for reporting suspicious behaviour printed on them. We  
 18 put posters up on our health and safety noticeboards  
 19 with the same information. During our training sessions  
 20 I even told staff if they were nervous about calling the  
 21 police, they should call Whiskey Control and explain  
 22 their concern. I explained Whiskey Control could focus  
 23 cameras on them. I made it clear if they were in any  
 24 doubt they should always report a concern and that  
 25 nobody would shout if we ended up reporting things to

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1 the police all the time."  
 2 I think that's actually the sort of encouragement  
 3 that Colonel Latham was talking about yesterday?  
 4 DR BaMAUNG: Yes, I think probably some of these actions  
 5 were from the PSIA because there's a whole issue about  
 6 awareness. I'm not sure if the message ties in —  
 7 correct me if I'm wrong — I thought the process was to  
 8 advise supervisors and then a decision would be made to  
 9 contact the police by the supervisors and management  
 10 rather than encouraging staff to phone 999 direct.  
 11 SIR JOHN SAUNDERS: Maybe different times to do it. That  
 12 may be when they're off duty or coming on duty,  
 13 something like that. Certainly as I understood it,  
 14 people were not encouraged to do things on their mobile  
 15 phone while working.  
 16 MR O'CONNOR: In any event, without looking at the detail,  
 17 I want to come back to this point. I understand that  
 18 I think what you're saying is it would have been  
 19 desirable if there was a sort of package, but don't we  
 20 see from these various references I have taken you to  
 21 that there were, albeit perhaps informal, repeated  
 22 sessions at the arena where these important lessons were  
 23 repeated for staff over time?  
 24 DR BaMAUNG: Yes, I think in the report we've acknowledged  
 25 the actual training and the exercising was well done and

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1 that the instances of operationalising that through the  
 2 reporting of hostile reconnaissance was also noted as  
 3 well in the report.  
 4 I would still say there is a benefit in having  
 5 a properly structured training programme alongside that,  
 6 because I don't think you can do one without the other.  
 7 You can have a great training programme but unless that  
 8 information is regularly reinforced and disseminated —  
 9 it can be done through briefings, I totally agree, but  
 10 it's good to have behind that some form of documentation  
 11 or training manual that staff can go to in their own  
 12 time if they want to back that knowledge up.  
 13 Q. Would it be fair, just to finish this, by saying that  
 14 you are applauding the substance of a lot of what SMG  
 15 were doing but you're saying it should have been perhaps  
 16 better formalised?  
 17 DR BaMAUNG: Yes. I would agree that the exercising and the  
 18 reporting of hostile reconnaissance, although that was  
 19 done certainly by ShowSec staff, but certainly the  
 20 exercising and training was well-run.  
 21 Q. All right. I want to move on to another topic which  
 22 I hope we can take quite briefly, which is the whole  
 23 question of police at events. Again it's a question for  
 24 you, I think. The focus is here on issue 8, where you  
 25 say in your document that SMG and ShowSec did not liaise

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1 closely enough with BTP. Mr Gibbs explored this with  
 2 you yesterday. There was, was there not, a strong  
 3 day-to-day relationship —  
 4 DR BaMAUNG: Yes, a very good informal relationship between  
 5 the operational staff at the railway station and the  
 6 likes of the CCTV personnel.  
 7 Q. And a criticism you make was that the liaison, perhaps  
 8 at a planning level, should have been closer?  
 9 DR BaMAUNG: Yes.  
 10 Q. And there is evidence that that liaison has now improved  
 11 since the attack, do you agree?  
 12 DR BaMAUNG: Yes, I believe it's significantly changed since  
 13 the attack.  
 14 Q. Liaison, I am sure you will agree, is a two-way street?  
 15 DR BaMAUNG: (Overspeaking).  
 16 Q. So really you agree the learning point here is not about  
 17 one organisation telling the other one what it should be  
 18 doing but rather there should have been better joint  
 19 planning and working?  
 20 DR BaMAUNG: Yes, I believe that the responsibilities don't  
 21 lie slowly with ShowSec, I believe it also lies with  
 22 British Transport Police as well, and the two  
 23 organisations together would have developed a better  
 24 relationship.  
 25 SIR JOHN SAUNDERS: I think you said ShowSec rather than

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1 SMG, just to correct things.  
 2 DR BaMAUNG: Sorry, yes.  
 3 MR O'CONNOR: I understand.  
 4 Just if we focus in for a moment on 22 May, bearing  
 5 in mind what you have said about the planning liaison.  
 6 If there had been better planning liaison between BTP  
 7 and SMG in the run-up to that event, if for example  
 8 Miriam Stone had spoken to Inspector Wedderburn or  
 9 Sergeant Wilson, what Miriam Stone would have been told  
 10 is: we are planning to have four police officers at the  
 11 arena, plus one PCSO who doesn't count because he's  
 12 attached to one of the others, and one of them is going  
 13 to be posted in the City Room at egress. And that would  
 14 have been in line, would it not, with the evidence we've  
 15 heard about what SMG would have expected at an event?  
 16 DR BaMAUNG: Yes, based on that document, although I can't  
 17 comment on the difference between that document and then  
 18 the lists made up at a later stage about what was  
 19 actually deployed.  
 20 Q. Right. Just sticking with that for the moment, assuming  
 21 that that was the information that was provided, as  
 22 I read your note, that would be a number of police  
 23 officer deployments and so on that you would have  
 24 considered to be reasonable?  
 25 DR BaMAUNG: Yes.

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1 Q. And of course, and this may be the point you're making,  
 2 that is always subject to the possibility that one or  
 3 more officers might be called away because of other  
 4 emergencies elsewhere?  
 5 DR BaMAUNG: That's correct, yes.  
 6 Q. And that would be outside SMG's control?  
 7 DR BaMAUNG: Yes.  
 8 Q. Mr Gibbs mentioned briefly with you the question of  
 9 paying for police, but is this where we come to the  
 10 context of the evidence you've given about the really  
 11 rather unusual, I think you have used the word unique,  
 12 situation at the arena and the Exchange Complex with  
 13 BTP's particular responsibility for there?  
 14 DR BaMAUNG: Yes, I would agree with that.  
 15 Q. And you heard the evidence of Mr O'Callaghan, who said  
 16 that, as we've seen in evidence, there were occasions  
 17 where BTP were paid to go inside the arena, what we know  
 18 as special police services?  
 19 DR BaMAUNG: Yes, from reading his statement and some other  
 20 documentation, it would appear that the paid deployment  
 21 was in police serials (?) and PSUs, police support units,  
 22 which have a disorder connotation.  
 23 Q. He also said that there was no question that BTP would  
 24 charge for conducting counter-terrorism policing, in  
 25 fact, in the City Room or in the arena?

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1 DR BaMAUNG: Normal patrols, yes.  
 2 Q. Sorry?  
 3 DR BaMAUNG: You're talking of just the normal officers?  
 4 Q. Yes. I'm going to move on to anti-bootlegging, and  
 5 I think this is probably an issue that Colonel Latham,  
 6 you raised, or at least has been dealt with through you.  
 7 The issue is whether SMG should have brought the  
 8 anti-bootlegging team into the security team, if that's  
 9 the right language.  
 10 The position as at 2017, I'm going to come on to the  
 11 example or the analysis you made by reference to what  
 12 happened at the O2, but if we focus on what was going on  
 13 in Manchester in 2017 first, the evidence we have heard  
 14 is that the anti-bootlegging teams were hired by the  
 15 tour or the promoter. I possibly still don't quite  
 16 understand the difference between those two things.  
 17 COLONEL LATHAM: Yes.  
 18 Q. SMG simply didn't know who those individuals were or  
 19 what training they'd had. That was Miriam Stone's  
 20 evidence; do you recall?  
 21 COLONEL LATHAM: Yes.  
 22 Q. She had no control over them, didn't know where they  
 23 would be during the evening. On that basis, do you  
 24 agree that against that set of facts it wouldn't be  
 25 appropriate to make them part of your security team, as

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1 you couldn't rely on them, could you?  
 2 COLONEL LATHAM: Not against that set of facts, no.  
 3 Q. And also, I am going to come to your set of facts in  
 4 a moment, but quite an important point, it wouldn't be  
 5 appropriate, would it, to certainly give people like  
 6 that a radio because that would allow them, as it were,  
 7 access to your own security?  
 8 COLONEL LATHAM: No, it wouldn't, not in the circumstances  
 9 you've described.  
 10 Q. Finally on that, of course we know that one of the  
 11 points on the action plan that SMG were pursuing was the  
 12 whole question of vetting of employees. There wouldn't  
 13 be much point vetting employees and then just giving  
 14 radios to people you didn't know; do you agree?  
 15 COLONEL LATHAM: I agree.  
 16 Q. Let's come to what you were raising, which is that  
 17 actually the anti-bootlegging staff should be drawn from  
 18 the arena's own staff or they should be locally based.  
 19 I think that's what you were saying.  
 20 COLONEL LATHAM: No, that isn't the point of what I'm  
 21 saying. I'm saying that when one conducts a risk  
 22 assessment, and then looks for the mitigations that are  
 23 required, obviously it's important to keep costs down,  
 24 and so if one looks at the operation in the round, when  
 25 one looks for, how can I mitigate these risks in the

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1 most cost-efficient manner, and one way of doing that is  
2 looking at what staff have I got on the ground who are  
3 doing something other than a central security role and  
4 saying, could I make them part of the operation. That  
5 would follow on from the risk assessment and the attempt  
6 to mitigate risks.

7 I then utilised the point that that was one thing  
8 that was done at the O2 at the time and helped with the  
9 operation at the time. That's the point I was making.

10 Q. If you'll forgive me, the facts, as they were, that  
11 we were just discussing, was the people doing that work  
12 were entirely unsuitable to be made part of the security  
13 team and I think you have agreed with me about that. As  
14 I understood it, your solution was to say, no, the  
15 anti-bootlegging will not be these people from outside  
16 but rather will be drawn from the O2's own staff? Is  
17 that what you were saying?

18 COLONEL LATHAM: The O2 was a different contractor who  
19 didn't work for me, they worked for somebody else, but  
20 they did work for the O2, so I just got them to join in  
21 with my staff. But the point I was making wasn't that  
22 those individuals who were at Manchester Arena doing  
23 that function should have been part of the security  
24 team, my point was if you do a risk assessment and  
25 identify the risks that need to be mitigated, and then

1 look at the assets that you've got all over, one might  
2 have concluded, or might not, that that could be part of  
3 your plan, could be part of your layered defence in the  
4 same way that you could include parking people, if  
5 you've got a car park, and have them as part of your  
6 layered plan.

7 SIR JOHN SAUNDERS: Don't let's go down other lines as well.  
8 Did the O2 make it a condition? Ariana Grande was due  
9 to be going to the O2, but would she have had to have  
10 used O2-employed people to do the merchandising?

11 COLONEL LATHAM: Yes.

12 SIR JOHN SAUNDERS: It's just a suggestion as a way of  
13 incorporating it within the same --

14 MR O'CONNOR: Colonel, from what you're saying, you had  
15 those people already employed, subcontracted, whatever  
16 the relationship was, with the O2.

17 COLONEL LATHAM: Yes.

18 Q. I just want to remind you, I don't know if you remember,  
19 because there was a particular issue with  
20 anti-bootlegging teams and Manchester that Miriam Stone  
21 gave evidence about. Do you recall she said that in  
22 fact it was the practice to have the anti-bootlegging  
23 teams to be provided by people who lived away from  
24 Manchester, they deliberately wanted people who were  
25 external, because the bootleggers themselves were linked

1 to organised crime and could actually make serious  
2 threats and intimidate people, particularly if they  
3 lived locally?

4 COLONEL LATHAM: Yes.

5 Q. So there is a problem, is there not, if you have  
6 a situation like that where for good reason you are  
7 using anti-bootlegging teams from outside the area who  
8 don't have anything to do with the arena, are we not  
9 back to that same problem, which is that it is actually  
10 not practical --

11 COLONEL LATHAM: That problem, unfortunately, does exist.  
12 In don't know where they live, the anti-bootleggers at  
13 the O2, but I do know they face significant threat,  
14 which they had to handle, and the manager of their  
15 company also faced threats and they managed it. I can't  
16 take you through the detail because I don't know the  
17 detail of how they managed it but that threat did exist  
18 and it did exist at the O2 as well.

19 Q. Maybe it did, we don't know the detail, I'm sure you  
20 agree, but perhaps I'll just leave it here. There was  
21 a perfectly reasonable decision, on its face, taken for  
22 anti-bootlegging teams to be drawn from away from  
23 Manchester?

24 COLONEL LATHAM: I agree.

25 Q. And there was perhaps not an awful lot the arena could

1 do to stop tours hiring bootlegging teams of that  
2 nature, do you agree?

3 COLONEL LATHAM: What was your final point, please?

4 Q. Would it in fact have been a practical proposition for  
5 the arena to have tried to forbid a tour from bringing  
6 in their own bootlegging teams from outside?

7 COLONEL LATHAM: I can only observe that that is what we did  
8 at the O2. I'm not aware that acts brought their own  
9 anti-bootlegging operation, and ours was very effective.

10 Q. I'm going to leave it there, because I have 10 minutes  
11 and a few more issues I want to cover.

12 Dogs, briefly, issue 8. The comment is it would  
13 have been useful to have had dogs as part of the  
14 security operation. I think this is probably an issue  
15 for you again, colonel.

16 COLONEL LATHAM: Yes.

17 Q. This is an issue we may be only be able to cover in part  
18 in this hearing. You will see why. In your report,  
19 colonel, we can go to it if necessary, let me see if  
20 I can do it without going to it, there's a paragraph in  
21 your report where you make two criticisms. One is that  
22 the single explosive dog that was used at the arena was  
23 not sufficient and you say that there ought to have been  
24 more than one dog to be used in the arena.

25 And the second point is you say the dog should have

1 been used not only for searching the arena but also for  
 2 searching people?  
 3 COLONEL LATHAM: You have paraphrased it but I'm familiar  
 4 with the paragraph.  
 5 Q. You don't say all of that in this document. Can you  
 6 help us with whether you are pursuing one or other or  
 7 both of those criticisms or in fact something different?  
 8 COLONEL LATHAM: So what I said in the final report -- what  
 9 we said jointly in the final report stands. It is  
 10 useful to have sniffer dogs at crowded venues for the  
 11 obvious reason, but also for a less obvious reason that  
 12 if you find a suspicious package and you have a sniffer  
 13 dog, then you can use that dog to give yourself a high  
 14 degree of certainty that you don't need to evacuate the  
 15 venue. If you don't have a sniffer dog, you either have  
 16 to call the police and stop the show or somebody has to  
 17 go and rummage around in it. It's preferable in my view  
 18 to use a dog than to do the rummage search. But the  
 19 rummage search is something which is done commonly in  
 20 the business. Did that answer your question?  
 21 Q. Let's see. The arena did use sniffer dogs, it wasn't --  
 22 as I understood your criticism it wasn't that there was  
 23 no sniffer dog, because there was one. Your criticism  
 24 is there should have been more than one.  
 25 SIR JOHN SAUNDERS: There was no sniffer dog used on the

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1 night of 22 May, was there?  
 2 COLONEL LATHAM: There was one used, yes.  
 3 SIR JOHN SAUNDERS: All the time?  
 4 COLONEL LATHAM: Just backstage in the Ariana Grande area.  
 5 SIR JOHN SAUNDERS: If a sniffer dog had been used to do  
 6 a CT search and walked past Salman Abedi, would a dog  
 7 have sniffed out a bomb?  
 8 COLONEL LATHAM: Yes, sir.  
 9 Q. In that case can we go to Miriam Stone's -- Mr Lopez, it  
 10 is {INQ034752/1}.  
 11 You'll recall the two points that I raised,  
 12 Colonel Latham. What these paragraphs, paragraphs 80  
 13 and 81, record is that as far as the first criticism,  
 14 which is that one dog is not sufficient, in fact the  
 15 people who provide the dog and indeed BTP's search  
 16 experts have said that one dog is perfectly sufficient  
 17 to do the task. Do you see that?  
 18 COLONEL LATHAM: I can see that.  
 19 SIR JOHN SAUNDERS: That must be dependent on the task. If  
 20 you've got to have one backstage, if you're going to use  
 21 another to do a sweep, you need more than one dog.  
 22 MR O'CONNOR: Sir, I'm not sure --  
 23 SIR JOHN SAUNDERS: It's a matter of common sense isn't it?  
 24 COLONEL LATHAM: I can easily answer this. I think this  
 25 statement amounts to somebody from BTP saying, you

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1 shouldn't be using dogs to search venues or crowds, and  
 2 that is simply wrong. It is good practice to use  
 3 sniffer dogs, as I will call them, as crowded events.  
 4 Each handler should have more than one dog because dogs  
 5 get tired and the more that you can have, the better  
 6 it is. That is simply -- that is in NaCTSO guidance,  
 7 it's commonly known. I don't know why this BTP officer  
 8 would be wrong about that. And I know that you know  
 9 what the operation was and the quantities at the O2, so  
 10 I don't need to talk about them here.  
 11 Is that sufficient, sir, or Mr O'Connor?  
 12 MR O'CONNOR: Let me leave this in this way. I'm not going  
 13 to explore this more because there are operationally  
 14 sensitive issues that have been redacted and I can't do  
 15 that without going into those matters, but, sir, I am  
 16 sure I can leave it to you.  
 17 There is the redacted page of the statement and in  
 18 paragraph 81 there's a reference to an email which I'm  
 19 not going to bring up because that's, I think, almost  
 20 entirely redacted.  
 21 SIR JOHN SAUNDERS: I will make sure I have read the  
 22 unredacted version of it.  
 23 MR O'CONNOR: So you will be able to see where the land lies  
 24 from looking at those documents.  
 25 I am just going to take you -- I think, finally,

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1 there are a few points relating to matters that arose in  
 2 evidence yesterday.  
 3 First of all, and this is a point for you, colonel,  
 4 you'll recall that there was some debate about the  
 5 follow-up to the Lavery incident and a question, I think  
 6 it may have been in answer to questions from Mr Cooper,  
 7 about the extent to which what the follow-up was, in  
 8 particular whether Miriam Stone briefed the incident on  
 9 following nights and, if so, exactly what the terms of  
 10 that briefing were. Do you recall?  
 11 COLONEL LATHAM: Yes.  
 12 Q. Let's go to the transcript, please. Mr Lopez,  
 13 if we may, it's Day 31, page 56, line 9 {Day31/56:9}.  
 14 It's one of those transcript references which goes  
 15 on rather. If we pick it up at line 9, Ms Stone is  
 16 being asked about the briefings she gave on other  
 17 events. She had talked about the briefing at Take That,  
 18 but then she's being asked to focus on the brief she  
 19 gave at the Ariana Grande concert and perhaps the best  
 20 thing is if we read it to ourselves.  
 21 (Pause)  
 22 Perhaps we can go on to the next page {Day31/57:1}.  
 23 COLONEL LATHAM: I think in this case, I may have been at  
 24 cross-purposes and I apologise for this. I think I was  
 25 thinking of the Brandon Couper-Phillips, those similar

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1 events, which I recall was not briefed. And if I've  
 2 made that inaccurately to the inquiry, I apologise for  
 3 that.

4 Q. Let's leave it like that. You've read the briefing that  
 5 Ms Stone gave after the Lavery incident and will you  
 6 agree that that was an appropriate and detailed briefing  
 7 that she gave?

8 COLONEL LATHAM: Yes.

9 Q. The Brandon Couper—Phillips situation. I think the  
 10 evidence was that in fact, because of the way in which  
 11 he reported it or rather didn't report it, it simply was  
 12 left on a document and it was not actioned.

13 COLONEL LATHAM: Yes.

14 Q. Finally, two other points. Again, arising from matters  
 15 that were raised. The last document, Mr Lopez, could  
 16 we have, please, {INQ025576/1}.

17 There was a question that arose about the process,  
 18 SMG process, for updating stakeholders about events.  
 19 This was touched on by Inspector Wedderburn this  
 20 morning. I think it was when Mr Gibbs was asking  
 21 questions. He said that as well as the six—monthly  
 22 multi—agency meetings, there were more frequent emails  
 23 that went out to the police, the council, and others,  
 24 and you said that you hadn't seen evidence of that. Do  
 25 you recall?

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1 COLONEL LATHAM: I don't recall evidence of that, but I'm  
 2 sure you'll show me some.

3 Q. Let's go to it. {INQ025576/12}, paragraph 45. What  
 4 Miriam Stone says, and this is her statement:  
 5 "Every 4 to 6 weeks, SMG send out the arena's event  
 6 schedule to external organisations."  
 7 She lists which organisations are involved.

8 COLONEL LATHAM: I accept that that's there.

9 SIR JOHN SAUNDERS: And we were told this morning that that  
 10 happened — I'm not sure you could hear that evidence —  
 11 because the events change and therefore they need to be  
 12 updated.

13 COLONEL LATHAM: I gave that piece of evidence —

14 SIR JOHN SAUNDERS: I thought it was the female inspector  
 15 who give that evidence.

16 COLONEL LATHAM: I also said that —

17 MR O'CONNOR: It's late in the day.  
 18 Within this same statement, do you remember there  
 19 was reference during your evidence yesterday, colonel,  
 20 about the GMP arena contingency plan being out of date  
 21 and you referred, I think it was actually in the context  
 22 of licensing, to the fact that the arena staff had not  
 23 pushed that process forward of amending or —

24 COLONEL LATHAM: I think that would have been Dr BaMaung.

25 DR BaMAUNG: Yes. It was the contingency plan that

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1 I referred to because there was a contingency planning  
 2 that was out of date or due for renewal, which sat  
 3 initially with the territorial division that covered the  
 4 arena, and once there was the aggregation of two  
 5 territorial divisions, I believe one of the members of  
 6 the emergency planning team retired or left. That's  
 7 when PC Hughes took that over and there was a link—in  
 8 with BTP where there was a need to communicate with BTP  
 9 to get a joint plan to cover both Victoria Station and  
 10 the arena.

11 Q. That's exactly right. It was you that was giving  
 12 evidence, doctor, but I think maybe the colonel said  
 13 he hadn't seen that the arena themselves had played  
 14 their part in trying to —

15 DR BaMAUNG: I think Miriam Stone was in discussion at one  
 16 point with Katrina Hughes at one point and from my  
 17 recollection of Katrina Hughes' statement, she was  
 18 waiting for a document from Miriam Stone and she got it  
 19 via BTP because Miriam Stone had shared some  
 20 information.

21 Q. Let me for the record — sorry, I didn't mean to  
 22 interrupt you, doctor.

23 DR BaMAUNG: That's my recollection.

24 Q. Let me take you, and this is the last reference, to  
 25 {INQ025576/23} in this same document, please. It's

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1 paragraph 86. The bottom half, please. We see, don't  
 2 we, Miriam Stone describing attending the  
 3 Project Sherman that we've heard plenty about, the  
 4 exercise. And then she says at the bottom:  
 5 "Following the exercise we were asked to provide  
 6 feedback. As part of the feedback we commented that  
 7 when working through the scenario there had been no  
 8 attempt to contact arena staff. Following the exercise  
 9 I also spoke to a representative of GMP about their  
 10 contingency plan which had been due to be reviewed in  
 11 June 2016. I went up to the top table during the break,  
 12 showed them a copy of our contingency plan and  
 13 I explained to them that it was not up to date."  
 14 She then explains the exchange of correspondence or  
 15 emails with Katrina Hughes that you referred to,  
 16 Dr BaMaung, and I think what she said is that she was  
 17 waiting for a response from Katrina Hughes.

18 DR BaMAUNG: Yes. I think there may have been  
 19 a miscommunication in that both were waiting for the  
 20 other to do —

21 SIR JOHN SAUNDERS: Anyway, SMG were being proactive in  
 22 getting a contingency plan, as was obviously sensible.

23 MR O'CONNOR: Those are all my questions.

24 SIR JOHN SAUNDERS: Have either of you got comments on  
 25 questions which you were not able to answer that you

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1 think would be helpful?  
 2 COLONEL LATHAM: I think I have three, sir. I will do them  
 3 very briefly .  
 4 I was asked about my criticisms of supervision  
 5 in the City Room and what did not spring to mind, that  
 6 now has, is there was also the issue of 1 in 10 bags, or  
 7 whatever that figure is, and the supervision of access  
 8 control and those are other things in City Room which,  
 9 in my opinion, were not as well supervised as they could  
 10 have been, which is what I would have said.  
 11 When I was asked by Mr Laidlaw about your question  
 12 about whether that was a balanced view and I said, yes,  
 13 what I should have said is we feel that it is a balanced  
 14 view.  
 15 I may have one more, but I will hand over to  
 16 Dr BaMaung.  
 17 DR BaMAUNG: Mr O'Connor mentioned the topic of constant  
 18 monitoring on the CCTV. The comment I would have made  
 19 is that on non—event days there would have been constant  
 20 monitoring through Whiskey Control, but with control  
 21 being handed over to Sierra Control on event days, the  
 22 staff within Sierra Control have themselves said they  
 23 wouldn't be constantly monitoring the CCTV, so without  
 24 the ability to move the cameras, the effectiveness of  
 25 having individuals at Whiskey Control would be diluted

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1 because they couldn't actually control the movement of  
 2 the cameras.  
 3 SIR JOHN SAUNDERS: Again, just to put a balanced view of  
 4 the evidence, I hope, the evidence was that on event  
 5 days, if event control, Sierra Control, wanted Whiskey  
 6 to take over particular cameras, control could be handed  
 7 over. I think what may be an issue which may certainly  
 8 concern me is that Sierra Control would always — the  
 9 main one they used was a movable camera which is the one  
 10 that actually covered the mezzanine area and that was  
 11 the one that they wished to use in Sierra Control  
 12 because that covered the egress and the ingress, which  
 13 they were most interested in.  
 14 Thank you for that.  
 15 COLONEL LATHAM: My final point was when Dr BaMaung was  
 16 asked about the relationship of SMG and the CTSA,  
 17 I would have wanted to contribute that SMG, I would have  
 18 hoped, would look at the licence, see their  
 19 responsibilities, conduct a risk assessment, and then  
 20 conclude that perhaps they did need a security expert.  
 21 SIR JOHN SAUNDERS: Thank you.  
 22 Mr Greaney, I said that I would give an opportunity  
 23 for you to talk to the representatives of the family  
 24 groups who are here and see if there are any particular  
 25 areas they would want to have explored and I will

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1 therefore rise for perhaps no more than 5 minutes.  
 2 MR GREANEY: Sir, can I say that I have consulted those most  
 3 directly affected by the questioning today. There are  
 4 three issues I am asked to raise. It will take 10 or  
 5 15 minutes. We are at the very edge of the  
 6 stenographer's ability to keep up.  
 7 SIR JOHN SAUNDERS: There's an opportunity for you, if  
 8 you haven't talked to Mr Greaney, for you to do that.  
 9 Thank you very much.  
 10 (5.00 pm)  
 11 (A short break)  
 12 (5.10 pm)  
 13 Further questions from MR GREANEY  
 14 MR GREANEY: Sir, issue 1 I raise on behalf of Mr Weatherby  
 15 and his team. It requires me to direct a small number  
 16 of questions to Colonel Latham.  
 17 Is there a body called the National Arenas  
 18 Association?  
 19 COLONEL LATHAM: Yes.  
 20 Q. Is that body the forum for managers of concert and event  
 21 venues in the UK with a minimum indoor seated capacity  
 22 of 5,000?  
 23 COLONEL LATHAM: I don't know about the seating capacity,  
 24 but that sounds accurate.  
 25 Q. I have taken it from their website, so let's proceed on

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1 the basis that it is.  
 2 SIR JOHN SAUNDERS: A capacity of 5,000+?  
 3 MR GREANEY: An indoor seating capacity of at least 5,000.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GREANEY: It appears from the website that 22 venues are  
 6 currently members, again does that sound —  
 7 COLONEL LATHAM: That sounds about right, yes.  
 8 Q. Was it a not dissimilar number, if not an identical  
 9 number, in 2017?  
 10 COLONEL LATHAM: I don't know the answer to that question.  
 11 Q. The final point I am going to come to is about this  
 12 request proceeds on the basis that this number was not  
 13 dissimilar in 2017.  
 14 The research by Mr Weatherby's team suggests, and  
 15 according to my checks suggests correctly, that SMG  
 16 currently operates seven of those 21 venues. I'll  
 17 identify those: it's the Metro Radio Arena in Newcastle,  
 18 the First Direct Arena in Leeds, the Manchester Arena  
 19 of course, the Bonus Arena in Hull, the SSE  
 20 Wembley Arena in London, the SSE Hydro Arena in Glasgow,  
 21 and P&J Live in Aberdeen. I don't know whether you are  
 22 or are not in a position to confirm that. I suspect  
 23 not.  
 24 COLONEL LATHAM: I can't confirm that. I do know of one  
 25 other organisation that is a member.

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1 SIR JOHN SAUNDERS: Mr O'Connor, no doubt that can be  
 2 checked and corrected if it's wrong.  
 3 MR GREANEY: Of course. Mr O'Connor must have an  
 4 opportunity to check, given the stage at which it has  
 5 been reached.  
 6 What we'll need to know, of course, is not just how  
 7 many venues SMG operates but, because of the point I am  
 8 coming to, how many it operated in 2017. But if it  
 9 operated the same number of venues in 2017, seven, and  
 10 if there were the same overall members in 2017, 21, it  
 11 means that SMG operated a sizeable percentage, namely  
 12 33%, of the NNA venues?  
 13 COLONEL LATHAM: Yes.  
 14 Q. I suspect this isn't really a question for you, but  
 15 really it is just context for you. What we understand  
 16 Mr Weatherby will wish to submit or draw your attention  
 17 to: if that percentage is the percentage not just now  
 18 but in 2017, that is or may be relevant to the  
 19 significance of NAA guidance given SMG's apparent  
 20 prominence within that body and, moreover, the  
 21 significance of industry practice more generally so far  
 22 as it relates to SMG given their prominence within the  
 23 arena sector. But as I have made plain, and as  
 24 Mr Weatherby has accepted in the conversation I have  
 25 just had with him, very fairly, the point of course is

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1 dependent upon what the figures actually were in 2017.  
 2 SIR JOHN SAUNDERS: Okay.  
 3 MR GREANEY: Issue 2.  
 4 SIR JOHN SAUNDERS: Sorry, does that relate to the letter we  
 5 saw from the chairman of the NAA?  
 6 MR GREANEY: Yes, it relates to two things. First of all,  
 7 some NAA guidance was introduced earlier today -- I have  
 8 got the reference if that helps -- and secondly, there  
 9 is the question of industry standard.  
 10 SIR JOHN SAUNDERS: Thank you.  
 11 COLONEL LATHAM: That NAA guidance was provided at the  
 12 request of Mr Sharkey.  
 13 MR GREANEY: Yes. Issue 2 is an issue that's been raised by  
 14 Mr Atkinson and his team. It's simply to draw your  
 15 attention to something, sir. Mr Atkinson is keen,  
 16 understandably so, that you should have the reference to  
 17 the part of the premises licence for the arena that  
 18 required staff to have written instructions as to their  
 19 roles and which is, it is suggested, therefore of  
 20 relevance to the experts' views about the instructions  
 21 that were given to Mr Agha.  
 22 I think I have found the correct reference. It's  
 23 {INQ035447/1}. You'll no doubt be pleased that we are  
 24 ending chapter 7 with another look at the premises  
 25 licence. Could we have {INQ035447/9} on the screen?

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1 We're going to look at paragraph 91.  
 2 Mr Atkinson would wish you to have regard to the  
 3 whole of that, sir, but in particular the sentence, the  
 4 penultimate sentence:  
 5 "They [so staff], particularly stewards, should  
 6 receive continual and ongoing training and be informed  
 7 in writing what their duties are, how to effect them,  
 8 and from whom to seek advice if in doubt."  
 9 SIR JOHN SAUNDERS: Okay. The only issue which would arise  
 10 with that is because the premises licence applies to the  
 11 actual premises themselves, whether that would relate to  
 12 people only working in the arena itself or to people in  
 13 the City Rooms and I don't propose to be giving you the  
 14 answer to that.  
 15 MR GREANEY: Nor am I going to suggest the answer. It may  
 16 be that Mr Atkinson will have it in due course.  
 17 Issue 3 is an issue I raise at the request of  
 18 Mr Gibbs, although, as he'll appreciate, I won't raise  
 19 it in precisely the same terms that he has addressed it  
 20 with me. It refers to the evidence given very much  
 21 towards the questions posed by Mr O'Connor, which  
 22 provoked Colonel Latham to indicate that he had  
 23 interpreted a statement, I believe Miriam Stone's  
 24 statement, as amounting to the proposition that someone  
 25 from BTP was saying that you shouldn't use sniffer dogs

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1 to search or consider people at a concert. And the  
 2 position of BTP is that that is wrong, I am not invited  
 3 to pose any question of Colonel Latham, but simply to  
 4 invite you, sir, to have regard to the underlying email  
 5 itself, the reference is {INQ034760/1}.  
 6 SIR JOHN SAUNDERS: So this was a redacted document, which  
 7 I was invited to look at what was redacted, including  
 8 the email, which I'm told is heavily redacted?  
 9 MR GREANEY: Yes. The suggestion is going to be that BTP  
 10 have said no such thing.  
 11 Sir, those are the three issues, but finally, may  
 12 I deal with a matter of administration, which is very  
 13 short. A total of 23 witness statements will be  
 14 published on the inquiry website today or tomorrow in  
 15 lieu of being read. They will therefore be available to  
 16 be relied upon by core participants, by the inquiry  
 17 legal team, sir, and also by you. Can I indicate that  
 18 all core participants are aware that we intend to adopt  
 19 that approach.  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 MR GREANEY: Sir, subject to crossing some Ts and perhaps  
 22 some formal evidence, we're now at the end of chapter 7  
 23 and we will commence chapter 8 at 9.30 on Monday  
 24 morning.  
 25 SIR JOHN SAUNDERS: Does anyone else want or need to say

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1 anything?  
 2 I'm very grateful to both of you, you've done a huge  
 3 amount of work, you've been giving evidence now for  
 4 a long period of time, which I know is very stressful ,  
 5 and I'm grateful to all advocates for keeping strictly  
 6 to the time limits. I don't think anyone has suffered  
 7 as a result of that, I certainly hope they don't think  
 8 they have, or been stopped from saying anything.

9 Can I indicate this, too, please, just to remind  
 10 everybody who is attending these hearings. The COVID  
 11 level is still at critical . We can still be disrupted  
 12 by it if people don't take, as I am sure they will, huge  
 13 care, and none of us would like to see the inquiry being  
 14 disrupted.

15 MR GREANEY: Thank you very much indeed, sir.  
 16 SIR JOHN SAUNDERS: Thank you very much. See you on Monday.  
 17 (5.20 pm)

18 (The inquiry adjourned until 9.30 am on  
 19 Monday, 7 December 2020)  
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