

OPUS2

Manchester Arena Inquiry

Day 56

January 26, 2021

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1 Tuesday, 26 January 2021
 2 (10.00 am)
 3 Housekeeping
 4 MR GREANEY: Good morning, sir. We can see you and we can
 5 now hear. Just before Mr Cooper starts, can I deal with
 6 timetable for today and indeed the remainder of the
 7 week.
 8 The position is that, for good reason, we have to
 9 finish today no later than 3.50 pm. What that means is
 10 the following: first of all, we will, of course, hear
 11 the balance of the submissions of Mr Cooper on behalf of
 12 the families that he represents; then we'll hear from
 13 Mr O'Connor on behalf of SMG; we will hope to hear from
 14 Mr Gibbs on behalf of British Transport Police at the
 15 end of today; but we will not hear from Mr Horwell on
 16 behalf of Greater Manchester Police now until Wednesday
 17 morning. That, can we warn everyone, gives rise to the
 18 possibility that we will go into Thursday for at least
 19 some of Thursday, but we'd expect in any event to be
 20 finished by lunchtime on that day.
 21 Sir, having given that update, and subject to
 22 anything that you wish to add, we'll invite Mr Cooper to
 23 conclude his submissions.
 24 SIR JOHN SAUNDERS: Right. Thank you, Mr Greaney.
 25 Mr Cooper.

1

1 Closing submissions on CHAPTER 7 (continued)
 2 Submissions by MR COOPER (continued)
 3 MR COOPER: Thank you, sir. Hopefully you can see and hear
 4 me.
 5 Can I reassure you straightaway, I don't intend to
 6 be longer than another 10 minutes or so just to conclude
 7 my submissions to you.
 8 Effectively, what I would like to do now is present
 9 a little preamble to the speeches that you're going to
 10 hear for the rest of the day.
 11 SMG will seek to pray in aid contemporaneous
 12 industry practice and, as they put it themselves, to
 13 assess any weaknesses against those standards, and
 14 ShowSec, as they put in their written submissions, will
 15 pray in aid recognised standards of the time. So for
 16 the next minute or so, I just want to, if I can, assist
 17 the inquiry by reminding the inquiry what were the
 18 recognised standards of the time, what was contemporary
 19 knowledge at the time — and when I say "at the time",
 20 I mean at the time this bomb was detonated — so when
 21 you hear the submissions of SMG, ShowSec and British
 22 Transport Police, hopefully later on today, you will be
 23 able to understand, so far as we can help you, when they
 24 refer to hindsight and contemporary standards, this
 25 should, in our respectful submission, always be in the

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1 forefront of the hearing's mind.
 2 The starting point of course is the national
 3 terrorist threat, the threat level in 2017, severe. As
 4 Lucy D'Orsi explained, severe meant the risk of
 5 terrorist attack was universal across the country, as
 6 highly likely at the arena in Manchester as it was in
 7 venues in London.
 8 In addition to that, UK threat level indicators, of
 9 which SMG and ShowSec were acutely aware, were and
 10 should have been top priority in their mind. They were
 11 aware at the time of terrorist attacks perpetrated
 12 across mainland Europe. Senior executives of both
 13 companies as we have already submitted to you, sir,
 14 corresponded after the aftermath of the attack at the
 15 Bataclan theatre and the Stade de France stadium in
 16 Paris and specifically recorded at the time
 17 contemporaneously, no hindsight there, their awareness
 18 that it was:
 19 "... necessary to review [their] existing plans and
 20 to make sure that they had an up-to-date position on the
 21 threat level."
 22 The same email highlighted vulnerable features
 23 at the Bataclan theatre that terrorists have obviously
 24 identified as a location where there would be a high
 25 density of people and relatively easy access from the

3

1 street. That, sir, in our submission, was the arena
 2 writ large all over it.
 3 So again, please if you will, and I know you will,
 4 bear in mind when we hear the mantra, as we will time
 5 and time again from those that come after me, of
 6 hindsight and contemporaneous practice, this is what
 7 they're talking about.
 8 What was the available guidance at the time when
 9 we're dealing with hindsight and contemporary practice?
 10 As you, sir, heard at some length, SMG and their agents
 11 ShowSec had available to them specialist
 12 counter-terrorism security advice. I won't enter into
 13 the spat as to Ken Upham, but it was there, the advice
 14 was there, and you will be aware of the advice that was
 15 given by him.
 16 Project Argus. That was contemporary. That wasn't
 17 hindsight. On 27 May 2016, the arena events team
 18 attended, as you know, Old Trafford stadium in
 19 Manchester. The training took the form of a terrorist
 20 attack scenario and was talked through by trainers.
 21 That scenario concerned a suicide detonation of a PBIED
 22 within a crowd of those leaving an event. I could go
 23 on, I won't. You know what Project Argus was about,
 24 sir, you are aware of it, and we ask all when they hear
 25 what they are going to hear this morning from CPs to

4

1 follow to remember that when we talk about hindsight and
2 contemporary practice.

3 This learning was not novel at the time, but was
4 emphasised at the time. Those from SMG attended Argus
5 training, they were aware of the importance of the
6 matters. Miriam Stone's learning outcome from the arena
7 tabletop exercise carried out on 17 December 2014
8 contained the following conclusion:

9 "The learning outcomes are based around having
10 a tight belt and a visible presence, catching suspicious
11 activity before things happen, visible and active
12 searches and patrols, and keeping queueing crowds to
13 a minimum."

14 She goes on:

15 "Since stopping the shooting gunman who isn't
16 concerned about the consequences to himself is
17 impossible, making ourselves into a less attractive
18 target in terms of impact and numbers is key."

19 Not hindsight, not later practice, it was
20 contemporary practice. Bear in mind, when you hear the
21 mantra of hindsight and contemporary practice, the
22 premises licence at the time and exactly what that said,
23 what the licence was advising. The licence specifically
24 advised, as you will see, issues that relate
25 particularly to perimeter protection and perimeter

5

1 security.

2 It warns within the licensing regime:

3 "CCTV is only effective if it is properly monitored
4 and maintained."

5 This is the arena licence. This deals with the
6 relevant licensing authority and licensing policy. It
7 deals with the NaCTSO publication "Counter-terrorism
8 Protective Security Advice for Bars, Pubs and Night
9 Clubs", and that document gives the advice I referred to
10 a moment ago, warning about CCTV, warning about proper
11 risk management:

12 "At the centre of effective protective security,
13 understanding and identifying threats and
14 vulnerabilities."

15 We ask you, sir, to have that firmly in mind when we
16 hear for the rest of the day the mantra of hindsight and
17 contemporary practice and we submit on behalf of those
18 we represent it should not be used as a cover for
19 accepting responsibility and accepting accountability
20 which those we represent demand.

21 The facilities management agreement. That wasn't
22 hindsight, that wasn't contemporary practice, that too
23 provided for, amongst other things, a 24-hour 7-day
24 a week security service to be provided by SMG at the
25 time however they wished to propagate it later.

6

1 Sir, we have emphasised throughout our submissions,
2 throughout our questions, the key element here of
3 penny-pinching. It was a systemic issue which cut
4 across the heart of the working practices involving both
5 SMG and ShowSec and served to dangerously limit the
6 quality of protective security provided. Too few
7 SIA-trained operatives were provided. Those monitoring
8 the CCTV were not licensed or properly trained. We
9 could go on and on.

10 The evidence by John Sharkey, when he finally came
11 to give his evidence, is important. He instructed the
12 efficiency—seeking review of the evaluation of
13 stewarding in 2016 following him having joined SMG in
14 2015 and he instructed that further economies be made
15 and found within the arena security provision to offset
16 cost increases by the expansion of the minimum wage
17 protection.

18 Miriam Stone stated in her evidence that it appeared
19 to her that commercial pressures were being given too
20 much weight in the provision of protective security
21 in the arena and the inference was that those pressures
22 were emanating from Mr Sharkey.

23 Penny-pinching has been at the centre of our
24 consideration when we are assisting you and we ask you,
25 sir, that it be at the front and centre of yours.

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1 Can I finally deal, if I may, please with
2 Martyn's Law, which of course we have a particular
3 submission to make on given that we represent
4 Figen Murray, who's been particularly active, and
5 impressively so, as far as that is concerned.

6 We deal with that at part 4 of our submissions,
7 which begin at page 68. Martyn's Law proposes that
8 basic security procedures are put in place at every
9 venue and public space and it does not advocate a
10 one-size-fits-all approach, of course. It's simply
11 about having a plan relevant to the threat.

12 If chapter 7 did nothing else, in our submission, it
13 served to tragically demonstrate that the current
14 security regulatory regime has created an environment in
15 which the UK's biggest entertainment venue operators and
16 security providers can fall far short of the standards
17 of the time, with devastating results, and the need for
18 Martyn's Law is universally, we submit, accepted as
19 acute and pressing.

20 It's often the case that this topic is not without
21 encouraging and supporting words and action, but the
22 evidence heard, we submit, during the course of your
23 inquiry demonstrates nothing more than undue delay and
24 prevarication. We remind you, sir, of the promises or
25 undertakings, we submit as they were, that

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1 Shaun Hipgrave undertook to give you and give us during
 2 my questions of him. We were concerned on behalf of
 3 those we represent and our concern has become equally
 4 grave as time has gone on, but it was all talk and no
 5 action. The Government were good at talking but they
 6 were not very good at action when it came to this
 7 protective measure and particularly Martyn's Law.

8 This seemed to have been exemplified, we submit, in
 9 what we saw from Mr Hipgrave. He told you that there
 10 were delays and delays and delays and some were starting
 11 to hear that the report or the consultation document,
 12 the better expression, was actually on Mr Hipgrave's
 13 desk. We asked him why it had not been distributed,
 14 you'll remember the answer, sir, and you will assess
 15 them. We asked him to indicate what reasons may be for
 16 the non-distribution. One of the reasons was the
 17 necessity, as he put it, of achieving proper
 18 consultation that could not be achieved online. We
 19 asked him, sir, as to where that instruction came from
 20 and where that information came from and was it binding.
 21 We asked him to indicate which ministers were telling
 22 him to delay consultation. He said he would go away and
 23 give the answers to you. To date we have not had those
 24 answers.

25 We asked Mr Hipgrave directly in open forum: please

9

1 bring us back information as to why there is this delay
 2 and particularly why it is sitting on your desk and what
 3 ministers are driving this delay and what ministers are
 4 insisting that online communication would not be
 5 appropriate. He promised to deliver that information,
 6 he has not delivered that information, and we can only
 7 assume that prevarication and delay is coming from the
 8 very heart of Government on this issue.

9 For too long, in our submission, those we represent,
 10 and particularly those at the centre of Martyn's Law,
 11 because it's on that which I am submitting, have been
 12 fobbed off with fine words, have been treated to fine
 13 meetings with tea and biscuits on tap. But the time, in
 14 our submission, for Governmental tea and biscuits over
 15 Martyn's Law and protective security is over. What
 16 Martyn's Law says is needed is needed, in our respectful
 17 submission, now to engage with freely available
 18 counter-terrorism advice and training, to conduct
 19 vulnerability assessments of operating places and
 20 spaces, mitigating risks created by vulnerabilities, to
 21 put in place a counter-terrorism plan, and that local
 22 authorities should plan for problems and threats of
 23 terrorism.

24 We submit in our conclusions to our submissions to
 25 you, those we represent have been utterly disregarded,

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1 we submit, by those responsible for their protection.
 2 For the rest of the week you may be hearing certainly
 3 from a number of CPs, a mixture of hindsight,
 4 contemporary practice and finger-pointing. We submit,
 5 sir, that is no more than a distraction, as much so as
 6 the telephone is that's ringing now.

7 Might I say, taking a moment out of the argument,
 8 I too have been battling with my telephone to make sure
 9 that didn't happen. I will move swiftly on because I'm
 10 coming to the close of my submissions now.

11 It is depressing that organisations, corporate
 12 organisations, who are supposed and expected to be
 13 at the top of their game and leaders in their field were
 14 outwitted by a man who could not even master the doors
 15 to a public toilet.

16 Government delays over COVID, whilst we all
 17 recognise the severity of COVID, are unconvincing.
 18 Those we represent have been given nothing but
 19 Government talk and platitude. They now want action.

20 We conclude this way as far as Martyn's Law and
 21 other steps are concerned as far as your recommendations
 22 are concerned: we make this plea to Government, as far
 23 as Martyn's Law is concerned, and we adopt the words of
 24 Figen Murray during the course of her evidence:

25 "This Government have dithered over the provisions

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1 and the recommendations suggested by Martyn's Law. We
 2 hope to the depths of our soul that there's not another
 3 terrorist atrocity while the Government are still
 4 dithering."

5 Sir, those are our submissions, I hope I was within
 6 10 minutes, and I'm grateful for the indulgence of the
 7 inquiry, conscious as I am of the time.

8 SIR JOHN SAUNDERS: Mr Cooper, thank you. Can I just
 9 mention about Martyn's Law. The detailed assessment of
 10 Martyn's Law is obviously important and will require
 11 some effort as everyone can appreciate. Can I also say
 12 that I did see that Figen Murray had a meeting with the
 13 Security Minister a couple of days ago, on which she
 14 reported that she was satisfied that a great deal of
 15 work was going on in the background. So we can all hope
 16 that that is correct and that her assessment of that is
 17 correct. Thank you for your submissions.

18 MR COOPER: We have a lot of goodwill still to give.

19 There's no doubt about that.

20 SIR JOHN SAUNDERS: Thank you.

21 MR GREANEY: Sir, we will turn next to Mr O'Connor on behalf
 22 of SMG and could we ask him, please, to pick a time
 23 between 11.15 and 11.30 for a break, please.

24 Submissions by MR O'CONNOR

25 MR O'CONNOR: Yes. I will do that.

12

1 Sir, you have our written submissions. I propose to
2 spend most of the next 2 hours or so taking you through
3 what we have said in writing, adding points of emphasis
4 and responding to some of the points made by other core
5 participants in their closing submissions.

6 Before I turn to that, I wish to start by making
7 some general observations and, in doing so, to address
8 some of the particular criticisms that have been made of
9 SMG during the chapter 7 hearings, criticisms that were
10 repeated in oral submissions yesterday, criticisms that
11 are not supported by the evidence you have heard and
12 that are entirely unfair.

13 First, finger-pointing. Yesterday, you were told
14 repeatedly both that SMG has refused to accept its
15 responsibility for security in the City Room and that it
16 has sought to pass the buck and to frustrate your
17 process by blaming others. Neither allegation is true.

18 From the very start of this inquiry, SMG has
19 accepted in a straightforward way that it did have
20 responsibility for security in the City Room. We've
21 explained our understanding of that responsibility and
22 the fact that it was shared with others. Our position
23 was set out in some detail in our opening statement and
24 it has not altered one jot.

25 It is entirely commonplace for an organisation

1 bearing a responsibility such as that which SMG bore in
2 the City Room to discharge it in a way that involves
3 taking advice from and relying on the support of others.
4 That is precisely what happened here. In drawing
5 attention to SMG's engagement with ShowSec, GMP, BTP and
6 others, we have not at all been attempting to pass the
7 buck or merely blame those organisations. We've simply
8 sought to explain how SMG discharged its
9 responsibilities.

10 You would not have been assisted had we not done so.
11 If you are to make well-judged and effective
12 recommendations, an objective that we all share, it is
13 necessary for you to hear the full detail of how all the
14 different moving parts at and around the arena work
15 together. It is for that purpose, and not
16 prevarication, finger-pointing or buck-passing, that
17 we have sought to explain to you SMG's relationship with
18 all the other organisations involved.

19 Second, penny-pinching. Time and again you have
20 been asked to regard SMG as akin to the worst type of
21 Dickensian factory owner, deliberately and cynically
22 sacrificing safety in the interests of squeezing more
23 profit out of the business. It is an easy and striking
24 metaphor, of course, but one that is entirely without
25 foundation in the evidence that you have heard.

1 SMG is, of course, a business, unlike almost all the
2 other CPs in this inquiry. It exists in order to and by
3 making a profit. Like all businesses, or at least all
4 businesses that do not go out of business, it has sought
5 over the years to make its operations efficient and
6 successful.

7 The criticism, what is at the heart of the
8 penny-pinching allegation, is that SMG was not only
9 attempting to be efficient but was deliberately
10 sacrificing safety in the interests of reducing costs.
11 There is simply no evidence that that ever happened. In
12 fact, the inquiry has heard evidence to the contrary.
13 John Sharkey, James Allen and Miriam Stone were all
14 pressed on this and all rejected the notion that safety
15 was compromised for profit.

16 The staffing reviews that you have heard about did
17 not lead to a reduction in staff numbers. In large part
18 because of the safety and security considerations that
19 were raised, in particular by Miriam Stone. Examples of
20 SMG putting safety before profit have been ignored. For
21 example, in his written note on the 2016 staffing
22 review, James Allen recommended that the financial
23 impact of the living wage be dealt with by increased
24 revenues rather than reductions in staffing levels, in
25 part because of the security risks that would have

1 entailed, a recommendation that was accepted by
2 John Sharkey.

3 And you may also recall the evidence about
4 Miriam Stone considering whether ticket scanners should
5 be installed, a measure that would have reduced SMG's
6 costs. Miriam Stone concluded that the installation
7 would have a detrimental effect on the security of the
8 arena because the scanners would replace stewards who
9 perform a security and counter-terrorism function. As
10 a result, the measure was never adopted.

11 In summary, SMG was certainly a business that sought
12 to operate efficiently but it was not a business that
13 put safety before profit. The charge of penny-pinching
14 is unfounded.

15 Another charge made against SMG, a charge of which
16 again we heard much yesterday, is that it had a passive
17 or complacent approach to counter-terrorism security.
18 That is another charge that is entirely misplaced. We
19 accept that having put SMG and its security practices
20 under the microscope, you are likely to find that there
21 are steps that it didn't take that it should have taken
22 and things that it did do that it should have done
23 differently. We venture to suggest that some faults
24 would have been found in any organisation subjected to
25 the degree of scrutiny that the inquiry has quite

1 rightly subjected SMG to in these past months. But
 2 it would be quite unfair and contrary to the evidence to
 3 accept the suggestion that SMG simply did nothing in
 4 response to the known terrorist threat during the months
 5 and years prior to the attack.
 6 Miriam Stone was at the centre of SMG's
 7 counter—terrorism work. You heard her give evidence
 8 over 2 days. You heard about her close relationship
 9 with the GMP expert counter—terrorism adviser, including
 10 contacting him in the aftermath of the Charlie Hebdo
 11 shooting in 2015 and asking him to make a special visit
 12 to the arena to review security procedures in the light
 13 of what had happened. She told him that SMG wanted to
 14 make sure that they were up to date with everything they
 15 were supposed to know and doing everything they could.
 16 You heard the experts and Liz Forster from GMP
 17 praise SMG's proactive engagement with the police
 18 counter—terrorism advisers. Many companies, they said,
 19 were reluctant to engage with the police about
 20 counter—terrorism matters; SMG by contrast actively
 21 sought their assistance.
 22 And to give just one more example, you heard about
 23 the tabletop exercise and the other formal and informal
 24 counter—terrorism training arranged at the arena by
 25 Miriam Stone and others. The experts' view was that the

1 training part of SMG's counter—terrorism programme was
 2 very good.
 3 When you reflect, sir, on the totality of the
 4 evidence, in particular the evidence of Miriam Stone and
 5 whatever else you may conclude about what she or SMG
 6 might have done differently, neither she nor SMG deserve
 7 the criticism of being complacent or passive about the
 8 threat. The evidence simply does not support it.
 9 I do now turn to our written submission, which, as
 10 we have said, focuses on key factual issues relating to
 11 the security arrangements at the arena and, in
 12 particular, on issues that were, to use the inquiry
 13 legal team's terminology, potentially causative in the
 14 sense that had things been different there, there would
 15 have been an increased opportunity to stop Salman Abedi.
 16 We will address causation in a detailed way at the
 17 end of these submissions, but I hope it may be helpful
 18 now to indicate that we agree that the inquiry's focus
 19 in terms of potential causation should be on the four
 20 issues identified at paragraph 4 of the GMP written
 21 submission, which in fact reflect the point that we made
 22 at the end of our own written submissions.
 23 Those four potentially causative issues, we say,
 24 are: first, CCTV monitoring of the City Room; second,
 25 the pre—egress check of the mezzanine; third, the

1 response of Mr Agha and Mr Lawler to Mr Wild's report;
 2 and finally, the absence of BTP officers from the
 3 City Room on egress.
 4 As I say, I will come back to those points at the
 5 end of these submissions.
 6 Sir, in our written submissions we refer by way of
 7 introduction to the generic point that we made at
 8 paragraphs 13 to 34 of our opening statement. I'm
 9 certainly not going to go back to those in any detail,
 10 but we do submit that all of those points remain of
 11 significance following the hearing of oral evidence.
 12 We underline in particular what is said at
 13 paragraphs 22 to 23 of our opening. There is no harm,
 14 we say, in the inquiry testing performance against
 15 a number of different standards so long as there is
 16 consistency and transparency in respect to the standards
 17 that are being applied, and we say by way of example
 18 that the test for causation in ILT's note to which
 19 I referred a moment ago is comprehensible but very far
 20 from the test that would be applied in civil
 21 proceedings.
 22 So it follows from what I have said that we agree
 23 with what is said in the Hogan Lovells written
 24 submissions about different standards at paragraphs 5 to
 25 19 of their submissions. The inquiry can take

1 a flexible approach to evidential standards of proof,
 2 particularly in the context of future recommendations,
 3 but this must be done in a clear and fair way.
 4 As far as standards of practice are concerned, we
 5 submit that the inquiry ought to consider that with
 6 care, contemporaneous industry practice, and it should
 7 make clear whether any identified weaknesses are being
 8 assessed against those standards or whether such found
 9 weaknesses represent forward—looking recommendations
 10 made with the benefit of hindsight.
 11 You have heard Mr Cooper's submissions on industry
 12 practice this morning and I will return to the point in
 13 more detail when I come to address you on different
 14 factual matters but in summary we say that judging any
 15 individual or organisation against contemporary
 16 standards is not a mantra, it is simply an aspect of
 17 fairness.
 18 The starting point in this case, we say, with regard
 19 to the arena, remains the observation of the experts,
 20 which we cited at paragraph 23 of our opening statement
 21 and that Mr Greaney referred to in his own opening
 22 statement, namely, and I quote:
 23 "We have not seen evidence that the security
 24 operation that was in place at Manchester Arena was
 25 dramatically out of step with the operations being used

1 at most other comparable venues."
 2 We have noted in our written submissions — and
 3 I think this arose from a comment you made in the course
 4 of the hearings — that you may wish to criticise the
 5 contemporaneous standards themselves, and of course the
 6 inquiry is permitted to make such a finding so long as,
 7 and we say this is an important caveat, it is supported
 8 by evidence. But if it does so, it should, we submit be
 9 very clear about the type of finding it is making.

10 We also emphasise the submissions that we made at
 11 paragraphs 24 to 26 of our opening statement regarding
 12 hindsight. Hindsight, as Mr Cooper has observed, is
 13 a point which many CPs have addressed in their written
 14 submissions and he is right to say that we regard it as
 15 a significant factor in your deliberations.

16 The inquiry is now very familiar with the extensive
 17 changes that were made in security arrangements at the
 18 arena, including in the City Room, following the attack.
 19 It is also aware from the evidence that's been heard
 20 that those changes were made against the context, first,
 21 of a wide-ranging reassessment by counter-terrorism
 22 police, security professionals and the entertainment
 23 industry of security at venues such as the arena
 24 following the London and Manchester attacks, and also
 25 a willingness on the part of other stakeholders at the

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1 Victoria Exchange complex to cooperate in new and, to
 2 them, disadvantageous security arrangements, that it can
 3 be inferred would not have been present prior to the
 4 attack.

5 The particular point we make about hindsight here
 6 is that in those circumstances the inquiry must take the
 7 greatest care not to permit hindsight to colour its
 8 assessment of the security arrangements that were in
 9 place at the time of the attack.

10 Sir, we have noted in a very different context that
 11 hindsight issues also arise in relation to the expert
 12 evidence because at times the evidence of the experts
 13 did not clearly distinguish between what could be done
 14 in the future and what should have been done at the
 15 time, and we give by way of example the fact that in
 16 their note, at issue 12, one of those lists of factors
 17 that were said to have made Abedi suspicious, a list to
 18 which I will return in due course, one of those factors
 19 was the fact that there had been a change of pace in his
 20 walking and Colonel Latham gave that as a failure of
 21 CCTV training. But in the course of his evidence, he
 22 accepted that this was something that he himself had
 23 only learnt as a relevant factor since the time of the
 24 attack in 2017.

25 Finally on the question of hindsight, and we know

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1 that, as I say, it is a matter that others will address
 2 you on, you have observed that it would be unfair to use
 3 hindsight when making assessment of the actions of
 4 individuals at the time, but, on the other hand, you may
 5 do so for the purposes of making recommendations.
 6 That is plainly the right approach and it is one which
 7 we recommended in our written opening submissions.

8 The harder task, of course, is identifying what is
 9 and what is not hindsight when the events with which
 10 we are all now so profoundly familiar are canvassed.
 11 That is a point which BTP highlight at the end of their
 12 written submissions and which we endorse. The key
 13 message must be to resist the urge at all stages to
 14 allow hindsight to creep back into the analysis.

15 Sir, I now turn to address as a separate issue the
 16 question of counter-terrorism advice provided to SMG by
 17 the CTSA, Mr Upham. By way of introduction, sir,
 18 I merely repeat some of what I said at the very start of
 19 these submissions by way of the context for the dispute
 20 that you will have to resolve regarding the advice that
 21 was given to SMG.

22 The Greater Manchester Police written submissions at
 23 paragraph 17 suggest that what SMG say about this
 24 amounts to no more than an attempt on our part to blame
 25 Ken Upham or Greater Manchester Police for any

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1 deficiencies around the time of the attack. Sir, that
 2 is simply not the correct analysis. The fact is that
 3 SMG is facing criticism for alleged failings in its
 4 security arrangements and in raising this issue we have
 5 simply sought to explain the advice that we sought and
 6 received from counter-terrorism experts prior to the
 7 attack.

8 Sir, we say that your starting point in addressing
 9 this part of the evidential context must be to make
 10 findings about what advice SMG actually received from
 11 GMP CTSA's, and whilst there is some documentary evidence
 12 in this regard, for example the Archibald report and the
 13 PSIA forms completed by Ken Upham, the most significant
 14 advice that was given by the CTSA was, we say, given
 15 orally by Ken Upham to Miriam Stone. And of course,
 16 there are important disputes in the accounts given by
 17 Miriam Stone on the one hand and Ken Upham on the other.

18 You must do your best to resolve those differences,
 19 despite the fact that you've only heard oral evidence
 20 from Miriam Stone. You have also, of course, adduced
 21 written statements, both from Mr Upham and, in the
 22 interests of balance, from Ms Stone, going to the
 23 disputed exchanges and there are some ancillary
 24 documents that exist.

25 We note that you have also heard a considerable

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1 amount of evidence, principally from DAC D'Orsi and
 2 Liz Forster as to what they regard as the proper content
 3 and scope of the advice that CTSA's should give to venues
 4 such as SMG. And whilst this evidence, we say, will be
 5 of obvious importance to any recommendations that you
 6 may make regarding the CTSA or PSIA system, it is not of
 7 any more than contextual value in determining what
 8 advice Mr Upham actually gave to Ms Stone.

9 You must be careful, we say, not to fill the gap
 10 created by Mr Upham's inability to give oral evidence
 11 regarding what he actually said to Ms Stone with the
 12 evidence of others as to what they think he ought to
 13 have said to her. That is particularly so since it is
 14 clear that Mr Upham did not do what his seniors might
 15 have expected him to do in other respects. For example,
 16 in telling SMG about how its PSIA scores compared with
 17 those of other venues and in failing to provide SMG with
 18 PSIA documentation that Ms Stone had requested,
 19 repeatedly requested, and relevant guidance.

20 Sir, the GMP written submissions suggest, as far as
 21 the issue of Mr Upham telling SMG about other PSIA
 22 scores is concerned, that the email evidence really is
 23 insufficient for you to make a finding on that. We
 24 disagree. The Lee Sinnott email that was put in
 25 evidence on this issue is, we say, convincing evidence

25

1 on its own that Ken Upham compared SMG's PSIA score with
 2 that of other venues at that initial 2014 meeting.
 3 There were, after all, only three people present at that
 4 meeting, Lee Sinnott, Miriam Stone and Ken Upham, and
 5 sir, we say you can be confident that when you see
 6 Lee Sinnott reporting on that meeting, that he had been
 7 told about other venue scores, that he must have been
 8 told about that by Lee Sinnott (sic).

9 Another point that has been raised in relation to
 10 Ken Upham's evidence by GMP is the comparison with what
 11 David Scally said that Ken Upham told him. We say, sir,
 12 that you should be very slow to draw inferences about
 13 what Ken Upham said to Miriam Stone from David Scally's
 14 evidence of his own conversations with Ken Upham. If it
 15 was the intention of the inquiry to draw conclusions
 16 from what Ken Upham said to other sites in Manchester,
 17 particularly to contradict the evidence of a live
 18 witness, then David Scally's evidence amounts to
 19 a dangerously small sample from which to conduct that
 20 exercise.

21 There are many reasons why Ken Upham might have
 22 taken a different approach in his discussions with
 23 David Scally to that he took in his advice to the arena:
 24 the length of his engagement was different, he had
 25 a much shorter engagement with David Scally than he had

26

1 with the arena, the individual relationships may well
 2 have been different, the tiering of the sites may have
 3 been different. One could go on, but at least the core
 4 point is that this form of comparative evidence, we
 5 suggest, will not assist you to any degree in
 6 understanding what Ken Upham did or didn't say to
 7 Miriam Stone.

8 Sir, we move on to answer the question whether SMG
 9 misunderstood either its own role or that of the CTSA's.
 10 In terms of the first question, we say SMG did not
 11 misunderstand its own role. It had a clear
 12 understanding of its responsibility for security,
 13 including in the City Room. John Sharkey stated that he
 14 was aware of this responsibility in May 2017.
 15 Miriam Stone agreed that Ken Upham had told her that SMG
 16 must take responsibility for procedures and decisions,
 17 and the experts themselves stated in their report that
 18 SMG acted as though it was responsible for security
 19 in the City Room, and they accepted orally that SMG was
 20 aware of its role and responsibility.

21 Nor, we say, did SMG misunderstand the role of the
 22 CTSA's. SMG understood correctly that the CTSA's
 23 function was to give venues expert advice upon which
 24 those venues could rely in discharging their
 25 counter-terrorism responsibilities.

27

1 Sir, as I touched on at the outset, we say that
 2 taking advice from experts is a common way of
 3 discharging responsibilities and to do that does not
 4 amount to abdicating or delegating responsibility.

5 We ask you to bear in mind in this respect what
 6 you have heard from DAC D'Orsi that Ken Upham was one of
 7 a group of what she described as the most highly trained
 8 counter-terrorism advisers in the country. So given
 9 that status, which was well advertised, it's
 10 understandable that SMG sought and relied upon his
 11 advice. They would have been criticised, we suggest,
 12 had they not done so.

13 On a similar point, reading certain passages, in
 14 particular paragraphs 20 and 21 of the Greater
 15 Manchester Police written submissions, one could almost
 16 gain the impression that in their view the fact that SMG
 17 was a large commercial organisation should have meant
 18 that it didn't need to approach the CTSA's at all. We
 19 say that is an entirely false approach. The fact that
 20 SMG was a commercial organisation, operating a large and
 21 complex venue, did not at all disentitle it from
 22 receiving and relying upon CTSA advice. Indeed, one
 23 only has to recall the fact that the whole purpose of
 24 the CTSA scheme was to provide counter-terrorism advice
 25 to tier 1 and tier 2 sites, many of which would be

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1 significant and commercial organisations like the arena,
2 to realise that this point is a very poor one. In
3 truth, the CTSA scheme was designed to target and
4 provide advice to venues much like the arena, and so we
5 say the arena was entirely entitled to seek and rely
6 upon the advice that they offered.

7 Returning to my submissions — I'm now at
8 paragraph 10 of the written submissions — on the facts
9 that you've heard, it does appear, in particular on
10 Miriam Stone's evidence, that the advice that Ken Upham
11 in fact gave to SMG on counter-terrorism matters went
12 well beyond the advice that his superiors would have
13 expected him to give. SMG assumed that he was entitled
14 to give this advice and that they were entitled to rely
15 on it. There was no reason to think otherwise. There
16 were, for example, no warnings as to the scope of advice
17 to be given by the CTSA, either written or oral.

18 I move to the question of what advice was in fact
19 given by CTSA's to SMG. The answer is that the
20 consistent advice that SMG received from the CTSA was
21 that the security arrangements in the City Room were
22 adequate. The evidence you have heard and seen is of
23 frequent visits and discussions from 2014 and steadily
24 increasing PSIA scores. We ask you to note the
25 following particular points.

29

1 First, the Archibald report which you have seen was
2 probably dated between 2009 and 2011. It recognised the
3 risk of attack from IED or PBIED, but the City Room was
4 not identified as a vulnerability. There was no
5 suggestion of deploying X-ray or walk-through metal
6 detectors, no suggestion of moving the perimeter back.
7 The report said SMG ought to remain vigilant, report
8 suspicious people and undertake training, all of which
9 we say, on the evidence, it did.

10 Following the Charlie Hebdo attack, Miriam Stone
11 emailed Ken Upham and asked for a meeting, stating, and
12 you will recall the terms of the email:

13 "We want to make sure we are up to date with
14 everything we're supposed to know and doing everything
15 we can."

16 She's given oral evidence that a meeting took place
17 at which she and Mr Upham discussed the security
18 arrangements in the City Room in some detail. I will
19 come back to that conversation in a moment, but the net
20 result of that meeting being Mr Upham stating that
21 he was happy with the arrangements and that there really
22 isn't anything more for you to do.

23 It was clear and consistent with contemporaneous
24 reports. Mr Upham's written account of this meeting, by
25 contrast, is problematic, as is his carefully worded

30

1 assertion that he never told SMG that they were doing
2 all they had been advised to do for the reasons Ms Stone
3 gives in her responsive statement, which we've given the
4 footnote to and you have adduced in evidence.

5 Ms Stone had another similar meeting with Mr Upham
6 later in 2015 after the Bataclan attack. He repeated
7 that the security measures in place at the arena were
8 appropriate. Ms Stone's evidence was that he told her:

9 "You're doing all right, your figures are coming out
10 okay or good in fact. Keep doing what you're doing."

11 There's been no evidence, and you may think this is
12 striking, no evidence that Mr Upham proposing changes to
13 the security operation in the City Room that were either
14 rejected or ignored by SMG, nor at any point did
15 Mr Upham enter any note of caution about his ability to
16 give this broad advice or about SMG relying on it.

17 Mr Upham's advice was consistent with similar advice
18 that she received from Superintendent Wylie of BTP, who
19 had worked at events at the arena, as you'll recall, and
20 he did not raise either any concerns about the security
21 arrangements. Ms Stone's evidence was that she raised
22 the adequacy of security arrangements with him after the
23 Bataclan attack and received express reassurances. Her
24 oral evidence was that he said:

25 "Nothing has changed in terms of the threat level in

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1 the UK. I know the way you operate, the way things are.
2 You just keep doing what you're doing and keep reminding
3 staff about vigilance, keep reminding people to report
4 things, that kind of thing."

5 We have set out extracts from Miriam Stone's lessons
6 learnt document which, as you'll recall, she drafted
7 in the immediate aftermath of the Bataclan attack at the
8 end of 2015. And just by way of example, one of those
9 extracts which refers to that very conversation with
10 Mr Wylie was as follows:

11 "Our police superintendent (Pennine subdivisional
12 commander of the British Transport Police) with whom
13 we have a very healthy relationship is happy that what
14 we do here is as good as it can be. He's confident that
15 we're doing as much as we can to achieve the best and
16 safest situation for our guests, staff, artists,
17 et cetera, and is not asking us to do anything further."

18 Sir, we've set out another extract from the same
19 document and also a similar extract from the stewarding
20 review the next year, which I won't read. But may
21 I answer the point that is suggested by the Greater
22 Manchester Police submissions at paragraph 71?

23 They suggest that there is little evidence for you
24 to go on in terms of Ms Stone's discussions around this
25 time with Mr Wylie. We say quite the contrary. What

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1 you have in fact is not only her oral evidence but this
 2 contemporaneous record that she made of her discussions
 3 at that time.
 4 Sir, let me now deal with the point that has been
 5 raised to the effect that SMG cannot now rely on the
 6 advice given by Ken Upham because that advice was based
 7 on inadequate or inaccurate information about the
 8 security arrangements in the City Room.
 9 In a line, we accept that there is some force, but
 10 it doesn't bear the full weight that is placed on it.
 11 Ultimately, we say it is not possible to reconcile the
 12 families' submissions that there were serial and serious
 13 shortcomings in the security arrangements at the arena
 14 on the one hand with, on the other, the Greater
 15 Manchester Police submissions that Ken Upham's advice
 16 was correct on the basis of the information that he had.
 17 Sir, both cannot be true.
 18 As far as the precise content of the discussions
 19 between Miriam Stone and Ken Upham — I said I would
 20 come back to this — she gave detailed oral evidence
 21 about these discussions and we invite you in fact, sir,
 22 to remind yourself of the run of that evidence she gave,
 23 Day 31, pages 119 to 124 {Day31/119:1}, including, to
 24 give one example, at page 121 {Day31/121:12}, where she
 25 said this:

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1 "He knew there were people out on the bridge and
 2 then where the Access Control positions are, where the
 3 door staff are. I'm pretty sure we talked about
 4 pre-egress checks or patrols, which positions and
 5 walkabout, which positions are fixed, those kind of
 6 things."
 7 So in a word, sir, we submit there's plenty of oral
 8 evidence that Miriam Stone has given to enable you to
 9 have a grasp of the detail that her conversations with
 10 Ken Upham went into.
 11 We say there's nothing to suggest that Miriam Stone
 12 lied to Ken Upham about the security arrangements, if
 13 that is indeed suggested by any of the other core
 14 participants, nor is it appropriate to speculate about
 15 what she may or may not have said. As I have submitted,
 16 the evidence is there about the nature of that
 17 conversation.
 18 In particular, we submit it is wrong to assume from
 19 the PSIA scores, the high PSIA scores, that Ken Upham
 20 gave for CCTV that Miriam Stone must have told Ken Upham
 21 that there was no blind spot. We say that doesn't
 22 follow at all, bearing in mind, first of all, that
 23 Ken Upham considered that the PSIA scoring only
 24 concerned entry through the arena doors itself and,
 25 secondly, when one looks at the PSIA spreadsheet itself,

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1 it refers only to coverage of key areas and not 100%
 2 coverage.
 3 Sir, having said that, and coming back to my
 4 acceptance that this point does bear at least some
 5 weight, we do accept that, first of all, Ken Upham would
 6 not have had a detailed understanding of the CCTV
 7 operation and, secondly, that he was told that there
 8 were pre-egress checks that took place on the mezzanine.
 9 That, after all, was Miriam Stone's belief at the time.
 10 But if the families are right, we say, that there
 11 should have been comprehensive changes to the security
 12 arrangements in the City Room, and you'll recall that
 13 the phrase "an entirely different regime" was one that
 14 was coined by the experts, so if for example there
 15 should have been an extended perimeter or if it's
 16 different searches of people passing through the
 17 City Room and changes that, as it happens, we understood
 18 the experts did not in the end advocate, then those
 19 matters, we say, are matters upon which Ken Upham had
 20 sufficient information to advise SMG and he ought to
 21 have done so.
 22 Finally on the question of CTSA, we simply note with
 23 regard to the question that arose during the hearings of
 24 ShowSec's presence at CTSA meetings. This was simply
 25 not common practice, not simply at the Manchester Arena

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1 but the evidence suggests anywhere, at the time in
 2 question. At the arena it wasn't suggested by
 3 Ken Upham, there was no NaCTSO guidance on this issue.
 4 Sir, this may be an issue upon which you wish to make
 5 recommendations.
 6 May I turn to another issue, albeit related, and
 7 that is the question of in-house security expertise. It
 8 was repeatedly suggested during the hearings that SMG
 9 ought to have obtained advice from an independent
 10 security expert prior to the attack. SMG does not
 11 accept this is a fair criticism and we make five points
 12 in this regard.
 13 First, since May 2017, SMG has, of course, obtained
 14 its own security advice from a US security contractor,
 15 Guidepost, and has also created a new post of group
 16 security manager. But as I said at the outset, these
 17 developments were driven by the attack itself. The risk
 18 of hindsight is obvious and, we say, must be avoided.
 19 Second, sir, and we now do refer to contemporaneous
 20 industry practice, bearing in mind the submissions
 21 I made earlier, the evidence is that it was not common
 22 practice for a venue such as the arena to have in-house
 23 security expertise prior to the attack. That is the
 24 plain meaning of the passage of Lucy Noble's NAA letter
 25 that was discussed in the course of the experts' oral

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1 evidence. She said the letter reads quite simply:
 2 "Most venues did not have an in-house security
 3 expert to assess counter-terrorism and security
 4 measures."
 5 Sir, you'll recall in the course of the experts'
 6 evidence, you suggested a possible ambiguity in the
 7 final sentence of that paragraph of her letter and we
 8 made a comment about that in the footnote of these
 9 submissions. I'm not going to take you to the letter,
 10 but our submission is that when one reads that paragraph
 11 of the letter in full and in context, really its meaning
 12 is clear and is the one that I have stated.
 13 It is not only Lucy Noble, though. The experts
 14 themselves gave evidence that was consistent with what
 15 she said. They stated that in 2017, to use their words,
 16 there were probably quite a few arenas that didn't have
 17 in-house expertise. And more than that, the evidence
 18 from ShowSec, an organisation that you've heard operates
 19 at around 450 venues around the country, was also that
 20 counter-terrorism advice was expected to come from
 21 CTSA's.
 22 Third point, sir, prior to the attack, SMG was
 23 receiving expert counter-terrorism advice from
 24 Ken Upham, who was known to be, as I have said, a highly
 25 trained expert. He had not entered any reservation

1 about the scope of the advice he could give, far less
 2 making any suggestion that SMG, which he knew had no
 3 internal security expertise, should seek additional
 4 advice elsewhere. The same was true of the
 5 sector-specific NaCTSO guidance.
 6 Sir, you may think that one learning point that has
 7 clearly emerged from the evidence is that the
 8 limitations of CTSA advice should be made clear to
 9 venues and, where appropriate, CTSA's should advise
 10 venues to obtain further specialist help.
 11 The fourth point, sir. SMG sought and received
 12 additional counter-terrorism advice from British
 13 Transport Police, as I have said, and also from ShowSec.
 14 Miriam Stone said that she regarded ShowSec as
 15 possessing counter-terrorism expertise and emphasised
 16 the value to her in that context of ShowSec's experience
 17 of practices in a large number of venues across the
 18 country. We suggest it was apparent from the totality
 19 of the evidence that you have heard on this issue,
 20 including, for example, the Manchester Arena
 21 counter-terrorism awareness document produced by
 22 ShowSec, that, to use Tom Bailey's words, ShowSec
 23 "talked confidently" to SMG about counter-terrorism
 24 matters.
 25 Finally, and from the causation perspective, it is

1 in any event impossible to say what changes any internal
 2 expert would have recommended to SMG prior to the
 3 attack. For example, and as we discuss further below,
 4 the evidence that you have heard is that extended
 5 perimeters were not common prior to the attack and that
 6 CCTV coverage of the mezzanine was not necessary, at
 7 least whilst the McDonald's was open, a point to which
 8 I will return.
 9 Sir, may I now say a few words about SMG's risk
 10 assessment. As we stated in our opening statement, we
 11 accept that there were shortcomings with SMG's written
 12 risk assessment documents. It is the documents that the
 13 experts appear mainly to criticise at issue 7(a) of the
 14 note that they prepared at the end of the evidence.
 15 But sir, we also maintain the point that SMG did
 16 have a system for assessing terrorism-related risks,
 17 which resulted in a baseline set of measures that was in
 18 place at the time of the attack and which were subject
 19 to dynamic review.
 20 The Hogan Lovells written submission and
 21 Mr Atkinson's oral submissions yesterday referred to
 22 Miriam Stone's acceptance that SMG's risk assessment
 23 documentation was flawed, but we note, if one looks back
 24 at the transcript, as we invite you to do, that she also
 25 immediately asserted that there was an effective

1 practical system of assessing risk of the type which
 2 I have described.
 3 By way of context, we repeat paragraph 82 of our
 4 opening statement and the case law that we cited there.
 5 Risk assessment is not an end in itself but a means to
 6 an end. The primary question for the inquiry is the
 7 appropriateness of the security measures themselves.
 8 Sir, we note in this regard that the experts
 9 themselves accepted that it was appropriate to have an
 10 event risk assessment considering crowd behaviour and
 11 a separate risk assessment that considers
 12 counter-terrorism. You will recall that Colonel Latham
 13 said his own practice was not to do a terrorism risk
 14 assessment for each event. The words he used were that:
 15 "There will always be a baseline security operation
 16 and the baseline threat doesn't significantly change
 17 over time. That doesn't quickly change unless the
 18 threat level goes up or suddenly you're hosting a very
 19 contentious act."
 20 We suggest that Miriam Stone's evidence reflected
 21 very much the same practical approach, and we have
 22 quoted what she said, which was this:
 23 "To my mind, all events had a baseline risk,
 24 certainly when it came to things like terrorism. It's
 25 like the counter-terrorism risk was a backdrop and that

1 existed and then the risks that we were looking at are
 2 then in relation to that particular show, about
 3 behaviour and that kind of thing.”
 4 So this baseline that SMG derived was informed by
 5 regular discussions and input from the CTSA’s, from BTP
 6 and from ShowSec. SMG maintained a proactive
 7 relationship with BTP and the GMP CTSA and specifically
 8 reached out to them for advice. And whilst the PSIA
 9 tool is not a risk assessment, and SMG did not have
 10 copies of it, it was, we say, entirely reasonable for
 11 SMG to rely upon the CTSA’s advice on the identified
 12 attack methodologies and other matters to inform its
 13 assessment and baseline measures.
 14 Sir, the backdrop also was subject to ongoing review
 15 based on an ongoing assessment of risk. That is
 16 illustrated by SMG’s response to the Charlie Hebdo
 17 attacks in January 2015 and the Paris attacks in
 18 November 2015. You heard it said yesterday, and indeed
 19 it was asserted in, for example, the Slater & Gordon
 20 written submissions at paragraph 1.8, that SMG did not
 21 review its security operation or otherwise respond to
 22 the 2015 attacks. That, sir, we submit is entirely
 23 wrong as a matter of the evidence you have heard.
 24 The NaCTSO guidance note to which the
 25 Slater & Gordon submissions refer encouraged venues to:

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1 “Review their security plans to ensure that the
 2 measures they should already have in place are still
 3 current and have been tested to ensure staff are
 4 prepared and confident.”
 5 That process of review was precisely what SMG
 6 undertook. Sir, you’ll recall the evidence of
 7 James Allen and Miriam Stone about the series of steps
 8 that were taken in the immediate aftermath of both of
 9 those two attacks. As far as the Charlie Hebdo shooting
 10 in January 2015 is concerned, there was the email to
 11 which I’ve already referred that Miriam Stone sent to
 12 Ken Upham, asking about what it meant for the arena and
 13 asking him to come and discuss it with her, and you’ve
 14 heard the outcome of that meeting and we say,
 15 importantly, the fact that SMG had in fact already taken
 16 the decision to increase Access Control staffing
 17 significantly, which remained in place for a couple of
 18 months.
 19 Again, after the Paris attacks, the Bataclan
 20 attacks, on Friday, 13 November 2015, you will recall
 21 that series of actions that took place. You will recall
 22 the exchange of emails between Mr Harding of ShowSec and
 23 Mr Sharkey over the weekend immediately following the
 24 attack, that exchange leading to the ShowSec/SMG
 25 security review meeting at the arena on Tuesday of the

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1 following week. You’ll recall the evidence that
 2 Mr Allen emailed all SMG staff based at Manchester later
 3 in the week.
 4 Sir, you may wish to remind yourself of that email
 5 because it’s that email that is of some significance to
 6 the suggestion made again in oral submissions yesterday
 7 that SMG’s response focused on internal matters to the
 8 arena rather than, as it were, crowd-facing matters. In
 9 fact, as Mr Allen explained, although that email only
 10 dealt with so-called internal matters, the reason for
 11 that was he was only sending it to SMG staff.
 12 The crowd-facing considerations which had been
 13 discussed at the security review meeting with ShowSec
 14 were raised at the multi-agency planning meeting that
 15 took place later that week and which are recorded in the
 16 minutes of that meeting. There is a reference to the
 17 fact that, as a venue, the arena had reviewed entry
 18 checks and policies, no doubt a reference to the ShowSec
 19 meeting, and that it was aiming to keep queues small in
 20 the City Room and that random searches will increase and
 21 profiling lanes be introduced.
 22 Separately from that, you will recall, as I’ve
 23 already said, that it was in that week that Miriam Stone
 24 had her discussion with Mr Wylie and also produced her
 25 lessons learnt document.

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1 Let me move, if I may to, a new topic, which is that
 2 of counter-terrorism training undertaken by SMG. The
 3 experts’ note suggested that there was no internal
 4 counter-terrorism training programme for SMG. In fact,
 5 we say that there was an internal counter-terrorism
 6 programme, about which you have now heard considerable
 7 evidence, and in general terms, certainly when it came
 8 to their oral evidence, the experts were complimentary
 9 about it.
 10 We have given references in our footnote at the end
 11 of paragraph 26 of our submissions and we quote just one
 12 passage from the experts’ oral evidence, when they said
 13 this:
 14 “The actual training and exercising was well done
 15 and the instances of operationalising through the
 16 reporting of hostile reconnaissance was also noted as
 17 well in the report.”
 18 SMG undertook a significant quantity of
 19 counter-terrorism training prior to the attack, external
 20 and internal, formal and informal. The main criticism
 21 by the experts was a lack of a manual that staff could
 22 refer to in their own time to reinforce this training,
 23 but they did accept that such reinforcement could also
 24 be done through briefings.
 25 The important lessons, what you may think were the

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1 central lessons, which, as it were, flow through the
2 advice which was given to the arena prior to the attack,
3 of being vigilant and reporting things when you see them
4 were repeated for staff over time.

5 We have given a reference to some paragraphs of
6 Ms Stone's witness statement which she adopted in the
7 course of her evidence and we say that those paragraphs
8 really sum up the practical approach that was taken to
9 counter-terrorism training at the arena prior to the
10 attack and as well as -- I'm going to read them now.
11 Ms Stone said this:

12 "The importance of identifying and reporting
13 suspicious behaviour was drummed into staff at every
14 opportunity and was regularly highlighted in briefing
15 meetings. They had plenty of means to do so. Not only
16 did supervisors have radios, but all staff knew where
17 the control rooms were and how to get into them. There
18 were telephones in the box office in the City Room as
19 well as a telephone in the nearby management suite.
20 Staff were frequently knocking on the door of
21 Sierra Control during events and coming in to discuss
22 things. Even when it was busy in Sierra Control, staff
23 would often ask the head of security to step outside to
24 speak to them.

25 "I never witnessed any lack of confidence or

1 awareness in staff reporting raising such matters.
2 Nobody has ever been discouraged from speaking out in my
3 opinion. The number of reports of suspicious activity
4 should be testament to that. For my own part
5 I personally encouraged staff to report anything
6 suspicious or concerning. Staff were given
7 anti-terrorism hotline cards which telephone numbers for
8 reporting suspicious behaviour printed on them and we
9 put posters up on our health and safety noticeboards
10 with the same hotline information. During our training
11 sessions, I even told staff that if they were nervous
12 about calling the police they should call
13 Whiskey Control and explain their concern. I explained
14 that Whiskey Control can focus cameras on to the
15 relevant individuals and will phone the police for them
16 if necessary. I made it clear that if they were in any
17 doubt that they should always report a concern and that
18 nobody would shout if we ended up reporting things to
19 the police all the time."

20 You may think that that evidence is resonant of the
21 other evidence that Miriam Stone gave from the witness
22 box and that it gives a good impression of the approach
23 SMG took to counter-terrorism awareness and training.

24 Sir, we note the conclusion that the experts drew in
25 their report that SMG and ShowSec security staff had

1 sufficient training, confidence, empowerment and support
2 to report suspicious activity and they said that:

3 "We are content that there was a culture of looking
4 for suspicious behaviour and reporting it when
5 identified."

6 Sir, you heard evidence about two particular
7 instances of hostile reconnaissance or possible hostile
8 reconnaissance in the days before the attack. The
9 first, you will recall, although in fact it was second
10 in time, Brandon Couper-Phillips on 21 May. As has been
11 said, that incident was not reported to SMG by ShowSec
12 as it should have been, and if the incident is relevant
13 to training at all, we submit it's relevant to ShowSec
14 training.

15 Sir, there's more to say about the other incident
16 involving Jonathan Lavery on 18 May. You will recall
17 Miriam Stone's clear oral evidence that she knew the
18 incident had been reported to BTP and also not to expect
19 a response from them. She explained that was the
20 guidance she had been given about what to expect when
21 she reported such matters to the police.

22 But she also said, importantly, that she did brief
23 this incident at supervisor briefings for the subsequent
24 Take That and then Ariana Grande concerts, and she did
25 so, we submit, that is the briefing, in detailed and

1 appropriate terms.

2 We have seen in written submissions, both from
3 Slater & Gordon and Hogan Lovells, challenges to this
4 account and a suggestion that the briefings did not take
5 place at further concerts and that therefore this
6 amounted to a missed opportunity on the night of the
7 attack. We suggest that that submission should be
8 rejected by you. We have given the footnote reference
9 to Miriam Stone's evidence about this matter and we
10 invite you to go back to it and remind yourself of
11 exactly what she said, in fact, under questioning from
12 Mr Cooper in the main.

13 We submit that when you do so, you will see that she
14 gave extensive oral evidence. Despite being pressed on
15 the matter, she was very clear that she did give
16 detailed briefings at the supervisor briefings regarding
17 the Lavery incident, both at the subsequent Take That
18 concerts and also at the Ariana Grande concert.

19 Moving on, and I'm now at paragraph 30 of my written
20 document. In terms of ShowSec's training to their own
21 staff, they were obliged to provide suitably trained and
22 experienced personnel. They were and are a leading
23 security and stewarding services organisation, with
24 close connections to the UK Crowd Management Association
25 and the Security Industry Authority. Given that

1 context, we say SMG were entitled to place a high degree
2 of trust in ShowSec to provide appropriately trained
3 staff without specifically checking that that was taking
4 place.

5 We also remind you and note that SMG was expressly
6 assured by ShowSec after the November 2015 Paris
7 attacks, you will recall Mr Harding's email, that
8 ShowSec's CT training and information exceeds all
9 guidelines.

10 Sir, we make a similar point about the age of
11 ShowSec staff. SMG paid ShowSec the same rate for staff
12 of any particular grade regardless of their age, and SMG
13 assumed and was entitled to assume that all ShowSec
14 staff were appropriately trained and competent to
15 perform the roles that were allocated to them by ShowSec
16 supervisors.

17 Sir, I'm about to move on to another topic which is
18 fairly lengthy. I think Mr Greaney invited me to have
19 a break at this time.

20 SIR JOHN SAUNDERS: Thank you very much. We'll break for
21 a quarter of an hour. It's exactly 11.15, so back at
22 11.30, please. Thank you very much.

23 (11.15 am)

(A short break)

24 (11.30 am)

1 SIR JOHN SAUNDERS: Mr O'Connor, if you're ready to go,
2 please do.

3 MR O'CONNOR: I'm grateful.

4 Sir, I had reached paragraph 32 of our written
5 document.

6 SIR JOHN SAUNDERS: I'm actually following your speaking
7 note, which is slightly different paragraphs, but I can
8 work that out for myself.

9 MR O'CONNOR: I apologise. The plan had been that the
10 paragraph numbering would be the same.

11 SIR JOHN SAUNDERS: That's absolutely fine.

12 MR O'CONNOR: In any event, sir, I hope we can agree I had
13 reached the start of the section dealing with the
14 adequacy of counter-terrorism security measures and
15 physical arrangements on the night. In this section we
16 address a number of different aspects of security, the
17 first being the question of an extended perimeter.

18 We say the inquiry should not criticise SMG for not
19 having implemented a so-called extended perimeter at the
20 arena as at May 2017 and we make five points in this
21 regard.

22 First, a so-called extended perimeter is not
23 a straightforward or easy measure to adopt. It can, in
24 fact, be a counterproductive security measure which
25 causes additional problems. We have footnoted in this

1 regard the evidence of a number of witnesses,
2 DAC D'Orsi, ACC O'Callaghan and also Liz Forster, and to
3 give you a flavour of that, we would remind you that,
4 for example, Lucy D'Orsi said this:

5 "Consideration should also be given to what impact
6 extending security perimeters would have on security.
7 For example, security checkpoints or searches away from
8 a venue could cause bottlenecks or hold-ups resulting in
9 crowds of people queueing in areas where there is less
10 security mitigation in place than if the crowds were
11 within the footprint of a venue."

12 And to like effect in the course of her oral
13 evidence, Liz Forster simply said that the question of
14 an extended perimeter was a difficult question because,
15 if you pushed a perimeter back, then you're just
16 creating crowds elsewhere.

17 So the first point, sir, is simply this: it isn't an
18 easy answer to anything.

19 Second, the inquiry's experts, and in this second
20 part of my submissions I'll be referring in some detail
21 to the evidence that they gave, we say that in fact on
22 analysis much of the evidence they gave is supportive of
23 SMG's position.

24 This is one example of that. The inquiry's experts
25 stated in the course of their oral evidence that the

1 technique of extending perimeters was, to use their
2 words "not something being commonly discussed in the
3 community prior to the attack".

4 In their oral evidence, and this was Colonel Latham,
5 he went out of his way to say that he was being very
6 specific that he did not recommend or say that SMG
7 should have pushed their perimeter back. So quite
8 a striking piece of evidence in light of some of the
9 submissions you've heard. We've given the transcript
10 references and again we invite you to revisit those
11 references because for all the weight that is put on
12 Colonel Latham's evidence in other respects, it is
13 significant, we say, that he was in fact determined to
14 make his position clear that he was not saying that SMG
15 should have pushed the perimeter back.

16 Third, we make the point that Lucy Noble's letter
17 supported the view that extended perimeters were not
18 common prior to the attack. The quote from her letter
19 is that to her knowledge it was not common practice for
20 venues to have extended perimeters for searching
21 visitors before May 2017.

22 Sir, taking a step to one side for a moment,
23 you will recall that in the context of the reliance to
24 be placed on this NAA letter, the suggestion was made
25 that, if I can put it this way, the NAA might be little

1 more than SMG by another name and that if one looks at
 2 its membership, that's something that would lead you to
 3 place slightly less weight on it.
 4 At the close of the experts' oral evidence before
 5 Christmas, it was suggested by CTI that SMG currently
 6 operates seven of the venues that form the National
 7 Arenas Association and this was calculated as some 33%
 8 of its membership. You said at the time that that could
 9 be corrected if it was wrong. It was wrong. We have
 10 corrected the position. John Sharkey has made and filed
 11 a second witness statement, {INQ039232/1}, and that sets
 12 out the correct position, which is that currently
 13 ASM Global, which is, as you know, SMG's parent company,
 14 operates five of the NAA's 23 venues and that in 2017
 15 that number was four, four of the NAA's venues, and one
 16 of those in fact had only been operated since
 17 1 April 2017, so very shortly before the attack.
 18 So we say that is the accurate position and it does
 19 paint a rather different picture from the one that was
 20 suggested to you when the matter arose in the course of
 21 the oral evidence.
 22 Returning to the series of points about extended
 23 perimeters, fourth, we make the simple point, and it's
 24 one that I made when I was addressing you particularly
 25 on Ken Upham's advice, that neither Ken Upham nor

1 John Archibald ever advised SMG that they ought to have
 2 been creating an extended perimeter in or around the
 3 City Room.
 4 Sir, fifth, the evidence, as you've heard, of
 5 James Allen and Miriam Stone was that they did consider
 6 the possibility of creating an extended perimeter
 7 following the VOX conference, about which you have
 8 heard, in April 2016 but didn't pursue the idea given
 9 the common rights of way across the City Room. They
 10 anticipated strong opposition to this idea from Northern
 11 Rail and other tenants. Public access through the
 12 City Room had been the keystone of the recent station
 13 redevelopment and the McDonald's inside the City Room
 14 was then very much still a going concern.
 15 Events after the attack demonstrated that they were
 16 right to anticipate such opposition. Mansford wished to
 17 maintain access for all the customers of its tenants,
 18 access through the City Room that is. Northern Rail
 19 objected to the City Room closure, even after the
 20 attack, and tenants and the police struggled to accept
 21 the new rules.
 22 That is the context we say, you heard the evidence
 23 about it, that you should consider the question of
 24 James Allen and Miriam Stone's own consideration to
 25 extending the perimeter within.

1 We note the submissions that have been made by
 2 Slater & Gordon and Hogan Lovells about creating small
 3 cordoned-off areas within the City Room. You may recall
 4 that there was some evidence about fencing off or
 5 cordoning off areas around the ticket booths to protect
 6 people queuing at ticket booths from bootleggers or
 7 ticket touts and I think there was possibly some
 8 evidence about creating another secure area near to the
 9 merchandising.
 10 In any event we say that really doesn't help you at
 11 all with this question of whether the City Room as
 12 a whole should have been closed because the objection
 13 there was all to do with the fact that the members of
 14 the public could then not have passed through the
 15 City Room and those smaller cordoned-off areas within
 16 the City Room simply didn't have that effect, therefore
 17 those matters don't take the issue any further.
 18 Just making the last point about extended
 19 perimeters, much of the debate about extending
 20 perimeters has been focused on that last question of
 21 the, if you like, adequacy of James Allen and
 22 Miriam Stone's response to what they heard at the
 23 VOX conference and it has been suggested that they
 24 should have pursued the issue further then. We submit,
 25 though, that when all of the above factors are

1 considered together it can be seen that no criticism is
 2 justified. SMG can hardly be criticised for failing to
 3 pursue a measure that they knew would at best have been
 4 strongly opposed by stakeholders which was not common
 5 practice, which no one at the time suggested they take,
 6 and indeed which the inquiry's own experts do not now
 7 suggest they should have taken.
 8 Moving to the question of walk-through metal
 9 detectors and X-ray machines and so on. The experts'
 10 evidence about the possible use by SMG of walk-through
 11 metal detectors and X-ray machines prior to the attack
 12 was advanced cautiously and on a provisional basis.
 13 Their position appeared to be that they could not say
 14 with confidence that such hardware should have been in
 15 use because they didn't know enough about the practical
 16 issues relating to the City Room. Again, we've referred
 17 in a footnote to the oral evidence they gave in that
 18 respect and we invite you to reflect on that.
 19 Indeed, by the end of the hearing, the experts
 20 seemed to have abandoned. Their November note, you will
 21 see, contains no suggestion either that walk-through
 22 metal detectors or X-ray machines should have been in
 23 place at the arena. Nor, we say, does the evidence in
 24 fact support the criticism that SMG should have
 25 installed any such equipment prior to the attack.

1 First of all, neither Ken Upham nor John Archibald
 2 ever suggested that hardware of that nature should have
 3 been installed. The guidance note, you will recall,
 4 with the name PAS127 refers to metal detectors and X-ray
 5 machines was not sent by Ken Upham to SMG. That much
 6 I think is clear.

7 There was evidence from Liz Forster that she thought
 8 that it was included as a link in the site guidance note
 9 which was a separate, much more general document that
 10 had been sent to SMG, but it is not there and we've
 11 given the references for that.

12 At paragraphs 89 and 90 of their submissions, GMP
 13 have suggested that there is a link to this document,
 14 but we submit that isn't a proper answer to this
 15 question. The PDF document they have referred to in
 16 fact pre-dates PAS127 and isn't in evidence.

17 In any event, perhaps the most important point in
 18 all of this is, first of all, Ken Upham never suggested
 19 walk-through metal detectors or X-ray machines and he
 20 did not provide a copy himself of that document to SMG.
 21 No doubt if he had thought that either were appropriate,
 22 he would have done so.

23 Moving on, and again another reference to the
 24 Lucy Noble letter. Prior to the attack walk-through
 25 metal detectors were not in common use in venues such as

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1 the arena. We have set out that particular quote from
 2 her letter, I won't read it out.

3 Moreover, James Allen himself gave direct evidence
 4 that very similar venues in Birmingham did not have
 5 walk-through metal detectors prior to May 2017. We've
 6 given the reference both to his oral evidence and his
 7 witness statement. We note that the sector-specific
 8 NaCTSO protective security advice for stadia and arenas,
 9 a document that we accept is authoritative and which
 10 I will say a little bit more about as I go on, made no
 11 mention at all either of X-ray machines or of
 12 walk-through metal detectors.

13 Sir, a further point is that installing walk-through
 14 metal detectors would have involved the closing of the
 15 City Room, as in fact is the case since the attack -- we
 16 give the reference to Mike Cowley's evidence in that
 17 respect -- and it would therefore have given rise to
 18 just the same difficulties as the extended perimeter
 19 difficulties to which I've already referred.

20 As far as X-ray machines are concerned, you will
 21 recall that Colonel Latham in the first episode of his
 22 oral evidence suggested that X-ray machines should have
 23 been installed perhaps on the bridge or on the station
 24 concourse at the foot of the bridge. That simply would
 25 not have been a practical possibility, we say, and it

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1 may be that the evidence given in that respect was why
 2 Colonel Latham didn't revisit that issue when he came to
 3 give evidence at the end of your hearings for reasons we
 4 have set out in our note.

5 First of all, X-ray machines located in that way
 6 wouldn't have achieved any practical security benefits
 7 without the installation of further X-ray machines on
 8 other approaches to the City Room, including one in the
 9 Fifty Pence Piece space, and in fact the interests of
 10 safe emergency evacuation would have prohibited the
 11 installation of such machines. You are familiar with
 12 the very tight confined spaces of the footbridge, the
 13 Trinity Way link tunnel and the Fifty Pence Piece space.

14 We have given the references in the footnotes to
 15 evidence to this effect. By way of an example,
 16 Mike Cowley in his oral evidence said this:

17 "The sizing of the link bridge was based on the exit
 18 width required for the egress and evacuation of the
 19 arena, so putting a significant obstruction in the way,
 20 I don't believe that would work."

21 And James Allen in his witness statement said:

22 "The station footbridge is an emergency exit.
 23 It would be a fire hazard to have any immovable object
 24 in that location."

25 Sir, those objections are of course very important

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1 and we note that of course the inquiry is focused on
 2 counter-terrorism risks because of the circumstances of
 3 the attack, but it would be wrong to diminish the
 4 significance of all the other risks with which those who
 5 run the Manchester Arena and similar venues have to
 6 deal. I think in the course of his submissions
 7 yesterday, Mr Atkinson referred to many of those other
 8 risks as mundane. I don't know whether he intended to
 9 include the risk of fire within that description, but
 10 these other risks, even if they are not the focus of the
 11 inquiry's attention, we suggest, are very far from being
 12 mundane.

13 Sir, the final point we make in this regard is also
 14 one made by the witnesses, which is that there were real
 15 doubts about whether members of the public passing
 16 through the City Room or over the link bridge would have
 17 complied with an entirely unenforceable request from
 18 staff to X-ray their bags. We add that the suggestion
 19 made in the Slater & Gordon written submissions,
 20 paragraph 3.4(b), page 39, that what they describe as
 21 a provisional search of clothing and belongings on the
 22 approach to or outside the venue, something they
 23 describe as being a "simple and workable solution", was
 24 nothing of the sort. Imposing such a search regime
 25 would have been impractical for just the reasons that

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1 I've outlined with regard to X-ray machines.
 2 We add that that in fact, the simple and workable
 3 solution proposed by Slater & Gordon was not something
 4 recommended by Mr Upham.
 5 I'll move, if I may, to another of the aspects of
 6 the security arrangements and that is CCTV. Our
 7 submission is that the CCTV arrangements that were in
 8 place on the night were adequate and that they were at
 9 least in line with applicable guidance standards. These
 10 arrangements cannot fairly be criticised from
 11 a counter-terrorism perspective whether with regard to
 12 coverage, monitoring or training.
 13 We do say that as to the standard to be applied to
 14 the questions of coverage and monitoring, the inquiry
 15 should base its analysis on the NaCTSO standards
 16 contained in its contemporaneous and sector-specific
 17 guidance rather than the very much higher standard often
 18 implicit in Colonel Latham's oral evidence.
 19 In questioning, and this is another important part
 20 of his evidence that we invite you to have particular
 21 regard to, Colonel Latham himself accepted that the
 22 NaCTSO standards are authoritative and we invite you to
 23 follow his lead in that respect.
 24 The official guidance in play here is the document
 25 I referred to a few moments ago, the NaCTSO

1 Counter-terrorism Protective Security Advice for Stadia
 2 and Arenas, and the importance of this document to your
 3 inquiry is obvious perhaps and indeed has been
 4 emphasised, for example, in GMP's written submissions.
 5 Before moving on, we do stress the importance of the
 6 inquiry judging the performance of organisations such as
 7 SMG by reference to official standards. Expressions by
 8 the experts of their own standards that are inconsistent
 9 with official standards should be approached with great
 10 caution.
 11 The classic function of an expert is to assist the
 12 court by pointing the court to official standards and
 13 not by substituting his or her own views as to what
 14 should or shouldn't have taken place. That's the way we
 15 put it. In practice, in this case, we would suggest, to
 16 a large extent Colonel Latham's attempt to convert his
 17 own practice at the O2 to standards that should have
 18 been applied at the arena simply failed because the two
 19 sites were not comparable.
 20 There is also a risk of arbitrariness in following
 21 inconsistent standards set by the experts themselves.
 22 We note in that regard Colonel Latham's assertion in the
 23 course of his final oral evidence that the CCTV should
 24 have been monitored by two people. That was different
 25 to the view expressed in his written evidence that there

1 should have been at least one person monitoring the CCTV
 2 and also his own recognition that some venues didn't
 3 practice proactive monitoring at all.
 4 Sir, we say it's the NaCTSO guidance that the
 5 inquiry should treat as authoritative, as Colonel Latham
 6 himself accepted when I pressed him on that point.
 7 Turning sequentially to those questions of coverage,
 8 monitoring and training, and dealing briefly first with
 9 coverage, we make the important point that the guidance,
 10 the NaCTSO guidance, did not require full CCTV coverage
 11 or anything like it. There may, sir, have been an
 12 unwritten, unspoken assumption in all the references to
 13 blind spots that a blind spot on its own was something
 14 that should be avoided because one starts from a premise
 15 of full coverage. Whereas in fact, that simply isn't
 16 the position, and if one looks at the guidance, it tells
 17 a very different story.
 18 We've set out what the guidance says, which is that:
 19 "CCTV cameras should cover the entrances and exits
 20 to your stadia and other areas that are critical to the
 21 safe management of any event at the stadium and to the
 22 security of your business."
 23 So very far from full coverage, what is being
 24 required is:
 25 "Entrances, exits and areas that are critical to the

1 safe management of [an] event."
 2 Colonel Latham agreed when I explored this with him
 3 in his evidence that what is critical is a matter of
 4 judgement and that blind spots, so-called, can be
 5 mitigated in other ways. Mr Cowley gave evidence to
 6 similar effect.
 7 We add that the NaCTSO guidance, which does not
 8 require full coverage by CCTV, is entirely consistent
 9 with the PSIA spreadsheet, which only requires evidence
 10 of coverage of what it describes as "key areas of
 11 a venue". Clearly, there is intended to be
 12 a synchronicity there.
 13 With that in mind, it's not accepted that what has
 14 been described as the blind spot on the mezzanine at the
 15 time of the attack breached this guidance. As a matter
 16 of common sense there will always be corners of any
 17 large venue in which someone can hide. That does not
 18 make these places critical to the safe management of
 19 events at the venue.
 20 The experts were divided on the significance of the
 21 mezzanine. Dr BaMaung said that he did not think the
 22 mezzanine was a critical position for identifying
 23 suspicious activity, although Colonel Latham took
 24 a different view.
 25 But that's not the end of the story as to whether it

1 should have been covered by CCTV because there were
2 other mitigations for observing what was going on on the
3 mezzanine.

4 The McDonald's on the mezzanine was opened until the
5 end of January 2017 and Colonel Latham in his oral
6 evidence accepted that the activity on the mezzanine
7 created by the McDonald's, the presence of the staff,
8 their own watchfulness and so on, as well as the fact
9 that they could and did contact the Whiskey Control Room
10 if they saw anything amiss, was in itself an acceptable
11 mitigation and therefore avoiding the need for CCTV.

12 Sir, we had Mr Cooper stating yesterday that the
13 McDonald's had been closed for 6 months at the time of
14 the attack; we have put it at three. It may be that
15 that factual issue is not the most difficult of those
16 that you will have to determine in this inquiry. We do
17 say the evidence was that it closed at the end of
18 January 2017, so by the time of the attack it had been
19 closed for 3 to 3.5 months.

20 But sir, in the context of this having made
21 a difference to the security measures that were or were
22 not necessary on the mezzanine, we stress the evidence
23 that when the McDonald's closed, it was not as though
24 everyone knew at that stage that all of the activity up
25 there associated with the restaurant had come to an end.

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1 Quite the contrary. The evidence was that there was an
2 ongoing intention to replace the McDonald's with another
3 restaurant that would re-open on that site, and that, as
4 I say, is very important context. We've given the
5 reference to it.

6 Secondly, in terms of other mitigations on the
7 mezzanine, from SMG's perspective it was also relevant
8 that, as far as they understood, ShowSec were in the
9 habit of conducting pre-egress checks on the mezzanine.
10 That's a point I will come back to in a few moments.

11 That's coverage. So far as monitoring is concerned,
12 again we note that the applicable NaCTSO guidance did
13 not require in fact any form of live monitoring. It
14 merely stipulated, to quote:

15 "A requirement to constantly monitor the images
16 captured by your CCTV system or [and we underline for
17 obvious reasons the word 'or'] regularly check
18 recordings for suspicious activity."

19 We note in this regard that the inquiry has received
20 evidence that at least one venue at similar risk to the
21 arena did not undertake any live CCTV monitoring at all.
22 We've given the footnote references and it was to closed
23 evidence so I'm not going to develop factually that
24 point at all, but we do underscore in this context the
25 observation made in the Greater Manchester Police

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1 written submissions at paragraph 104.

2 It's a related point. Due to sensitivity
3 considerations, the inquiry has heard remarkably little
4 by way of detailed comparative evidence of security
5 arrangements at other venues. We do ask you to reflect
6 on that one piece of evidence that you have heard about
7 that other venue not undertaking any live CCTV
8 monitoring at all. We submit it adds a good deal of
9 perspective to this part of this case.

10 In fact, as you've heard, there was live monitoring
11 of the CCTV at the arena. During events, including on
12 22 May 2017, live monitoring was conducted, both by
13 those in the Sierra Control Room and by at least one
14 operator in the Whiskey Control Room. This practice was
15 clearly well above that minimum level set by NaCTSO,
16 which, as I've said, didn't in fact require live
17 monitoring at all.

18 During an event, proactive CCTV monitoring was
19 conducted by an operator in the Whiskey Control Room.
20 Although the Sierra Control Room had priority in using
21 and positioning the cameras, the evidence was that the
22 Whiskey Control Room did proactively monitor screens,
23 including on occasions moving the cameras in order to
24 conduct what they described as sweeps.

25 Sir, there's been some debate about the fact that

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1 the movable camera in the City Room was often focused on
2 the arena doors during an event. Again, we ask you to
3 reflect on whether that is actually an indication that
4 the arrangements fell below the level required by NaCTSO
5 guidance. We would suggest not since that very guidance
6 specified that the entrances and exits to the arena or
7 stadium were a critical area for monitoring.

8 In terms of the exact calibration of what monitoring
9 was or wasn't taking place, we invite you to go back and
10 consider with care the evidence that SMG witnesses in
11 fact gave about these matters. Mike Edwards, who after
12 all was the man in the Whiskey Control Room, stated that
13 there would almost always be an operator monitoring the
14 CCTV screens in the Whiskey Control Room. If the
15 operator was on a break or called away, he said, someone
16 else would take over. He accepted that there could be
17 short periods when nobody was watching, but they would
18 only be short periods. So that, we submit, is an
19 accurate and fair characterisation of the evidence.

20 You've heard other submissions, including for
21 example Slater & Gordon's submissions at paragraph 2.18,
22 where they assert baldly that no person was watching
23 CCTV in the City Room for the purposes of profiling on
24 22 May 2017. Sir, we simply say that's wrong. The
25 evidence is clear. The CCTV was being monitored in the

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1 Whiskey Control Room and you have heard the evidence of
2 Mr Edwards.

3 In the Hogan Lovells submissions they refer to
4 a piece of evidence to the effect that at the end of
5 a performance one of the Whiskey Control room operatives
6 would be asked (inaudible: distorted) few moments to
7 guard a door while the performer came offstage. We say
8 that doesn't take matters any further. You have heard
9 the evidence that there were two full-time staff posted
10 to the Whiskey Control Room, and so one or other was
11 able to monitor the screens even if the other one was
12 called away and if in fact they were both busy, they had
13 the opportunity to ask the Fire Control officer, you
14 will remember, Mr Johnson, to come and assist them. As
15 we say in our written submissions, Mr Johnson himself
16 gave evidence that there would always be one person
17 monitoring the CCTV in the Whiskey Control Room.

18 We have also just drawn your attention to
19 Miriam Stone's oral evidence about the interplay between
20 the Whiskey Control Room and the Sierra Control Room,
21 the use of cameras, which rather belies the suggestion
22 that the Whiskey Control Room didn't have any effective
23 involvement in the positioning of cameras for their own
24 purposes. What she said was this:

25 "As you say, during a show, those cameras are not

1 being used and they [by which she means the Whiskey
2 Control Room] will frequently say, 'I'm just going to
3 take the cameras', or, 'I just need the cameras for
4 a second', or, 'I'm just going to do a sweep of X area
5 or Y area'. That's regular. It's not that it's a show
6 and therefore they have no control over the cameras at
7 all."

8 We also add a point that you have been reminded of,
9 which is that Mike Edwards, who was himself on duty
10 in the Whiskey Control Room, was aware of the blind
11 spot, so-called, on the mezzanine. So that's the
12 question of monitoring.

13 Moving on to that third issue of training, we say
14 at the start that it's accepted that there was
15 a technical requirement for at least the Whiskey Control
16 Room operators using the CCTV equipment to hold an SIA
17 CCTV licence. That wasn't the licence they held. So
18 for that technical reason they should have done. But we
19 ask you to investigate the matter as well as a question
20 of substance, and on the question of substance we say
21 there is no reason to think that the in-house CCTV
22 training provided to Whiskey Control Room operators was
23 not adequate.

24 On that latter issue, we again refer to the oral
25 evidence that Colonel Latham gave because he says, and

1 we've given the footnote reference, that he did not
2 regard the lack of SIA training on the part of Whiskey
3 Control Room operatives as being, as it were,
4 a substantive basis on which to question the adequacy of
5 their training. He made it clear, because I asked him
6 the question, that he only regarded it as a technical
7 deficit. He said that informal in-house training can be
8 just as good as SIA training and it's clear, we say,
9 from the evidence before the inquiry that the SIA
10 training, that there was that technical requirement for,
11 was extremely basic and did not, for example, include
12 any training relating to hostile reconnaissance.

13 Sir, the Hogan Lovells written submissions,
14 paragraph 76, refer to the fact that the SIA course did
15 have content on recognising IEDs. That is the case.
16 But we maintain the submission that this part of the
17 course still was very basic and would have been unlikely
18 to have added to the knowledge that Whiskey Control Room
19 staff had gained, both from their internal training and
20 also, so an extra point to note, it was common ground
21 I think that all those Whiskey Control Room staff, even
22 though they didn't have SIA CCTV licences, did hold SIA
23 door supervisor licences. That training appears to us,
24 looking at Mr Holyland's statement, to include a common
25 training unit, which included identifying behaviours

1 that could indicate suspicious or terrorist activity.

2 We've given the reference to Mike Cowley's evidence
3 to the effect that SMG's internal CCTV training was
4 extensive and mentored, and we have also noted the fact
5 that the experts themselves in their report concluded
6 that the FM security staff in the Whiskey Control Room
7 were trained in the operation of CCTV system and also
8 the identification of suspicious activity.

9 Before I move away from CCTV, two final points on
10 that. First, it is quite wrong to suggest, as the
11 Slater & Gordon submissions do at paragraph 1.11, and we
12 note also a similar point in the Hogan Lovells
13 submissions at paragraph 79, that the fact that further
14 cameras covering the mezzanine were not installed until
15 some time after the attack, to use Mr Cooper's word,
16 blighted the security capability at the arena for the
17 intervening period.

18 As the inquiry is well aware, for all events after
19 the attack, the City Room was closed to the public and
20 all who entered it were subject to thorough search. In
21 other words, it was a sterile area. This fundamentally
22 altered the risk analysis within the City Room, as
23 Colonel Latham accepted in his oral evidence on Day 43,
24 page 229, line 23 {Day43/229:23}.

25 At paragraph 1.11 of their written submissions,

1 Slater & Gordon speculate as to the age of the CCTV
 2 system, which is not, we understand, something that's
 3 really been explored in evidence. Of course, a system
 4 has been in place since the arena opened, but it is
 5 obvious, we suggest, that the equipment that Greater
 6 Manchester Police seized and analysed on the night of
 7 the attack, the CCTV system, was not over 20 years old.
 8 There's nothing indeed to justify the suggestion made by
 9 Hogan Lovells at paragraph 77 of their written
 10 submissions that the CCTV equipment itself was
 11 inadequate for any reason. Nothing like this was
 12 canvassed with the experts in their oral evidence. But
 13 we note that their report did say, I quote:
 14 "From our examination of evidence presented to us,
 15 the CCTV system employed on 22 May would appear to have
 16 been adequate to monitor suspicious behaviour by persons
 17 who are covered by the system if the system was being
 18 proactively used."
 19 And that is {INQ035611/80}.

20 That's all I wanted to say about CCTV systems and
 21 I turn to address the question of staffing. I made
 22 at the start the general point that SMG is a commercial
 23 organisation and therefore it will inevitably seek to
 24 operate on an efficient basis and I have made the point
 25 at some length at the start that there is no evidence

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1 that SMG went further than that and compromised safety
 2 for profit.
 3 You heard detailed evidence about the various
 4 staffing reviews that took place. You will recall,
 5 I have already mentioned it, James Allen's
 6 recommendation that the financial impact of the living
 7 wage should be dealt with by increased revenues rather
 8 than staffing cuts. Sir, the very fine detail of which
 9 staff were present where and when we suggest can confuse
 10 as much as illuminate and the most illuminating and
 11 reliable evidence on this general question of staffing
 12 changes as a result of the staffing reviews, we suggest,
 13 came from Miriam Stone, who was intimately involved in
 14 staffing before, during and after those reviews.
 15 In the course of her oral evidence, Mr Greaney asked
 16 her the simple question:
 17 "Were the numbers of stewards cut in the aftermath
 18 of this exercise?"
 19 By which he meant the staffing review. Ms Stone
 20 gave the answer "no". Mr Greaney said:
 21 "So again, you've been successful in pushing back?"
 22 And she said:
 23 "In fact, they slightly increased it."
 24 Three particular criticisms have been made in
 25 relation to staffing on the night of the attack: first

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1 of all, the question of bag checks being conducted by
 2 unlicensed stewards; second, the suggestion that there
 3 should have been additional Access Control staff on
 4 duty; and, third, the argument that anti-bootlegging
 5 operatives should have been made part of the security
 6 team.

7 As far as the bag check issue is concerned, the
 8 inquiry has heard extensive evidence on that issue and
 9 we make the following points. It's now clear that the
 10 practice of stewards conducting bag checks was a breach
 11 of the SIA rules, although it is fair to say that even
 12 when they came to give evidence to the inquiry, the SIA
 13 witnesses were less than certain on this point.

14 The evidence of the SIA was that the breach was
 15 ShowSec's responsibility, a responsibility that ShowSec
 16 has accepted. We've given you the reference for the
 17 oral evidence in that regard. And we note, in addition,
 18 that ShowSec's service delivery management document for
 19 the arena included, as part of the specified duties, the
 20 ShowSec head of security ensuring relevant legislation
 21 is adhered to on the event day.

22 Sir, you will recall the part of the evidence and
 23 the email chain showing that Miriam Stone had researched
 24 this issue and had been unable to find an answer. She
 25 had expressly sought evidence from ShowSec, who provided

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1 the staff in — sorry, she sought advice from ShowSec,
 2 who provided the staff in question, that they were
 3 authorised to conduct SIA training and were a member of
 4 the SIA's Approved Contractor Scheme. ShowSec, as
 5 you will recall, never responded to that request for
 6 advice despite, as we now know, having had extensive
 7 discussions both internally and with the SIA.

8 It is now suggested by Hogan Lovells in their
 9 written submissions, paragraph 38, and orally yesterday,
 10 that one possible conclusion out of all this is that
 11 ShowSec did respond and, as Hogan Lovells put it,
 12 advised SMG of the correct position and both companies
 13 agreed tacitly or otherwise to continue to use stewards
 14 inappropriately.

15 Sir, that suggestion of dishonesty on the part of
 16 SMG should not be accepted by you and in fact it should
 17 never have been made for the simple reason that it was
 18 not put to our witnesses. Mr Atkinson yesterday gave
 19 you a list of reasons why you might infer collusion and
 20 dishonesty on the part of Mr Allen and Ms Stone. Had he
 21 wished to pursue those serious allegations, he could and
 22 should have raised those points with those individuals
 23 and given them an opportunity to answer.

24 He chose not to do so, with the consequence that
 25 there is no evidential foundation and it would not be

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1 fair for you to make the finding that he seeks.
 2 We add that there is no evidence that SMG used
 3 stewards to check bags in order to save money. It was,
 4 after all, SMG who had queried the position with ShowSec
 5 in the first place and John Sharkey stated in evidence
 6 to you that, to use his words:
 7 "Saving money at the expense of breaking legislation
 8 isn't something we would have done."
 9 We do therefore submit that it is not accepted that
 10 any wider inference can be drawn from this episode
 11 regarding SMG's approach to security in general.
 12 SIR JOHN SAUNDERS: Mr O'Connor, forgive me for
 13 interrupting, I will not do it again. It's just a point
 14 which actually was not made by the families, but is
 15 a point that I do have in mind and you should be aware
 16 of, and if you want to put in further written
 17 submissions about it, I'm quite happy to see them.
 18 The requirement to have SIA-qualified staff doing
 19 bag checks is a condition of the licence, it's
 20 a condition therefore that SMG specifically have and
 21 which Mr Allen, also in his position on the licence,
 22 would have to respond to. It's simply not possible to
 23 delegate a licence responsibility like that to someone
 24 else and it remains the duty of SMG, as the licence
 25 holder, to ensure they complied with the conditions.

1 I make that point -- obviously it's a mitigation,
 2 clearly, if you get someone who's perfectly responsible
 3 and you say, "Right, you do it", and they say, "It's
 4 fine, it's no problem, we have done it". But I'm not
 5 sure that the responsibility -- so it may therefore
 6 arise that more careful checks should have been made by
 7 SMG and I will obviously give you the opportunity to
 8 deal with that subsequently or now if you wish.
 9 MR O'CONNOR: Sir, I'm grateful. If I may, I will take you
 10 up on your offer of reflecting on that point and making
 11 further submissions in due course if we wish. You'll
 12 appreciate, and I think it's clear from the way you have
 13 put it, that isn't quite the point I have been
 14 addressing so far, but it is clearly a further point
 15 that arises in this context.
 16 SIR JOHN SAUNDERS: Yes.
 17 MR O'CONNOR: I'm grateful to you for raising it and it's
 18 one that we will reflect on.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR O'CONNOR: Sir, I'm now looking at what is, at least for
 21 me, paragraph 49 of our written submissions, where we
 22 make the short point that we don't accept essentially
 23 that safety was sacrificed for profit.
 24 We refer to John Sharkey's evidence to that effect
 25 and we also quote the passage from the staffing review,

1 where Miriam Stone objected to or didn't agree with the
 2 proposed use of ticket monitoring/ticket checking
 3 devices. That was the episode that I referred to in my
 4 opening remarks.
 5 Sir, moving on, as far as the number of Access
 6 Control staff is concerned, the second issue, we say
 7 simply that SMG specified the requirement for random
 8 searching and there is no evidence that ShowSec ever
 9 told them that the two Access Control staff posted to
 10 the City Room were inadequate to perform this function.
 11 Moving to the third point that I identified, that of
 12 the anti-bootlegging operatives, we submit there's no
 13 force in the experts' suggestion that those operatives
 14 should have been made part of the security team. As
 15 Miriam Stone explained, she simply knew nothing about
 16 these individuals. They were booked by the promoter,
 17 not by SMG, and were deliberately recruited from out of
 18 town because of the connections between bootleggers and
 19 organised crime. She didn't know what training they'd
 20 received and they'd not been vetted, and indeed against
 21 those problems, Colonel Latham agreed that it was not
 22 appropriate to rely on them as part of the security
 23 operation, nor did he say that the bootlegging team
 24 should be drawn from the arena's own staff.
 25 Sir, we add that there is no causative link in any

1 event between any of these three staffing issues and
 2 what took place at the attack. The bag checking and
 3 Access Control staff were on duty at ingress when Abedi
 4 was not in the City Room and the evidence has shown that
 5 the anti-bootlegging team were able to, and did, liaise
 6 with the police about anything that gave rise to
 7 concern.
 8 On a related point, we do say that the
 9 Slater & Gordon submissions are entirely incorrect to
 10 assert -- and this is paragraph 1.36 of their written
 11 submission -- that on the night of 22 May there were no
 12 security staff with responsibility for:
 13 "... profiling those members of the public who did
 14 not approach the arena doors and neither was any
 15 individual tasked with profiling those who travelled
 16 along the overbridge."
 17 Sir, focusing, as we must, on the possibility of
 18 profiling Abedi, ShowSec SIA staff Agha, Lawler,
 19 Middleton, Perry and Beak were all on duty in the
 20 City Room and/or on the bridge at the relevant times.
 21 Agha and Lawler did profile Abedi on several occasions.
 22 Beak would have profiled him had he undertaken his
 23 pre-egress checks correctly, and Middleton and/or Perry
 24 no doubt would have done so had Agha reported to them
 25 what Mr Wild had told him as he should have done.

1 I turn to deal with the question of British
2 Transport Police as part of the security arrangements.
3 We say at the start it is accepted that there should
4 have been better liaison at the planning level between
5 SMG and BTP. We say at the planning level because, as
6 you will recall, there was plenty of evidence of very
7 successful liaison at a lower level between the two
8 organisations. You'll remember, for example, Mr Johnson
9 saying that BTP staff and his staff liaised on a daily
10 basis, coming into the Whiskey Control Room, speaking to
11 each other and so on.

12 But the inquiry has heard that liaison at the
13 planning level has improved considerably since the
14 attack. We do say, as we set out in our written
15 submissions, that there isn't really any causative bite
16 to this question since, first of all, the evidence was
17 that SMG understood that four BTP officers would be
18 allocated during an event and one of them was normally
19 located in the City Room at egress. That was the
20 evidence of Miriam Stone.

21 Secondly, had there been liaison between, let us
22 say, Miriam Stone and Sergeant Wilson prior to the
23 concert, she would presumably have been told by him that
24 four officers were attending with at least one in the
25 City Room at ingress — it was after all his briefing —

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1 and that would have been in line with her expectation.

2 When one then turns to see the experts' view of all
3 this, they have stated that that number would have been
4 adequate and so there would have been no question of
5 criticising Ms Stone for not asking BTP to provide
6 a greater number of officers.

7 The experts have also referred to the possibility of
8 SMG paying BTP for extra officers to attend to conduct
9 counter-terrorism duties in the public spaces outside
10 the arena. We respectfully submit this issue is
11 something of a red herring for two reasons. First of
12 all, it simply doesn't arise on the facts because, as
13 I have just stated, the experts have made it clear that
14 they consider the number of BTP officers briefed to
15 attend the arena and the presence in the City Room on
16 the night of the attack to be sufficient, and secondly,
17 the suggestion on the part of the experts misunderstands
18 the nature of paid-for special police services, and sir,
19 we then set out the central principle. First of all
20 quoting from the guidelines, the heart of it being the
21 police cannot charge for services which fall within
22 their ordinary public duty, and we've also given you
23 a quote from Lord Dyson. It was in fact in the
24 Leeds United case in the Court of Appeal, all of which
25 is to that effect and I won't quote now.

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1 We have also referred to the fact that
2 ACC O'Callaghan when he gave evidence accepted those
3 principles, he agreed that CT policing that is necessary
4 to protect the public cannot be special police services
5 and the police force is not allowed to charge for such
6 services. So we say that what it boils down to is that
7 once BTP had assessed what level of counter-terrorism
8 policing was required there was simply no question that
9 it could then charge SMG for undertaking that policing,
10 including policing within the arena, for example the
11 extra provision following the Jehovah's Witness
12 incident. You'll recall the occasion on which Mr Wylie
13 came and stood in the Sierra Control Room.

14 We also in this context note in passing that
15 Hogan Lovells are wrong to submit, paragraph 46 of their
16 submissions, it's a point Mr Atkinson repeated orally,
17 that James Allen said he was unaware of the possibility
18 that SMG could pay for policing services. That is not
19 a fair summary of the evidence that he gave. We've
20 given the — in fact, the Hogan Lovells submissions give
21 the transcript reference and we say that the passage
22 referred to really included Mr Allen saying he believed
23 that only special police services could be paid for and
24 he was right about that.

25 On a related point relating to BTP, the inquiry may

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1 wish to make recommendations regarding the future
2 policing of the arena and insofar as SMG's views on the
3 subject are relevant we say this. First of all,
4 we would support BTP continuing to provide day-to-day
5 policing at the arena. SMG has developed a strong
6 relationship with BTP and the routine presence of BTP
7 officers at the station is a significant factor in
8 favour of continuing the present arrangement. There are
9 also practical and strategic advantages in the force
10 that has responsibility for security at the station,
11 BTP, having the same responsibility for the
12 Victoria Exchange complex.

13 Second, SMG now receives counter-terrorism advice
14 jointly from BTP and GMP CTAs. We would wish that
15 arrangement to continue.

16 We add as a final point that we are of course aware
17 that the question of policing an emergency at the arena
18 will be considered by you in chapter 10 and therefore
19 SMG offers no view on that issue now.

20 I turn to address the question of pre-egress checks.
21 Before going into detail, may I make a series of general
22 points on the question of patrolling at the arena,
23 mainly in response to oral submissions from Mr Cooper
24 yesterday.

25 The first point, and it's simply a correction — and

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1 I suspect that Mr Laidlaw may have something to say
 2 about this as well. Mr Cooper mentioned in the course
 3 of his submissions the suggestion that ShowSec were
 4 a signatory to the facilities management agreement.
 5 They also referred to that point in their written
 6 submissions at paragraph 1.19. Sir, that is simply an
 7 error. It arises from the way in which the documents
 8 were uploaded on to Magnum. What seems to have happened
 9 is that at least one version of the facilities
 10 management agreement on Magnum had, in error, attached
 11 to it the last few pages of the stewarding services
 12 agreement. It's actually fairly obvious if one looks at
 13 the internal pagination, so on that document, at least
 14 if one looks at the last page, one sees ShowSec's
 15 signature, but it is an error that I think was corrected
 16 within the Magnum process itself, and certainly from our
 17 point of view there is no question of ShowSec having
 18 been a signatory to the facilities management agreement.
 19 Sir, on the point of substance, it is certainly true
 20 that during events, when they were on duty, ShowSec
 21 staff patrolled locations around the arena complex
 22 consistent with their agreement with SMG. These were
 23 the pre-egress checks. It is clear from, for example,
 24 the ShowSec CT awareness document that ShowSec were
 25 aware that these patrols, their own pre-egress checks,

1 were taking place in substitution of the Deister patrols
 2 that the Whiskey Control officers would have conducted
 3 on dark days.
 4 It is not the case, it is not correct to say, as
 5 Mr Cooper said yesterday, that there were fewer patrols
 6 during events than on dark days. As you have heard,
 7 there were typically three or four pre-egress checks
 8 that were conducted by ShowSec staff during the course
 9 of an event. So if one wants to do the arithmetic, the
 10 number of ShowSec patrols during an event exceeded the
 11 target for patrols to be carried out by Whiskey Control
 12 Room staff during an equivalent period on a dark day,
 13 and of course, unlike Whiskey Control Room patrol
 14 officers, ShowSec staff carrying out patrols then
 15 remained in the areas that they were patrolling and
 16 carried out other duties there.
 17 Returning more precisely to the question of
 18 pre-egress checks, we say it is clear that the
 19 pre-egress checks conducted by ShowSec did include
 20 a search for suspicious items and individuals and
 21 therefore fell within Colonel Latham's definition,
 22 you'll recall from his report, of what he described as
 23 a CT sweep.
 24 We've given some footnote references to the evidence
 25 of ShowSec staff, but to remind you, Mr Middleton said

1 that he told his staff to look out for anyone suspicious
 2 during pre-egress checks. He said that during the
 3 briefing and indeed before sending them off to do the
 4 checks.
 5 Mr Perry said that he would look out for suspicious
 6 behaviour during pre-egress checks, as did Jordan Beak.
 7 We say it is also clear that the written instruction
 8 for the City Room pre-egress checks expressly included
 9 a search of the mezzanine. Sir, you may think that the
 10 question of what that form said, what it meant, is
 11 really a matter for you to determine, but for what it's
 12 worth, we've given references to Jonathan Lavery,
 13 David Middleton and Tom Rigby all accepting as much
 14 in the course of their oral evidence and indeed
 15 Colonel Latham the same.
 16 It is also of course clear now, having heard the
 17 evidence, some but not all ShowSec staff were not in the
 18 habit of searching the mezzanine and we know that
 19 Jordan Beak did not do so on the night.
 20 The experts have described what they call
 21 a breakdown in communications about whether the
 22 pre-egress checks included the mezzanine. It is not
 23 accepted that ShowSec's failure to carry out their
 24 written instructions in relation to the mezzanine
 25 resulted from a breakdown in communication on the part

1 of SMG. Any breakdown was internal to ShowSec and
 2 entirely of its own making.
 3 We ask you to bear in mind the following points.
 4 SMG's system entailed highly specific written
 5 instructions and frequent feedback on the performance of
 6 the checks. There was a requirement to sign for each
 7 stage of each check on forms that were returned to SMG
 8 at the end of each event and a requirement to radio
 9 Sierra Control on completion of each check. Had ShowSec
 10 followed this process properly rather than signing for
 11 checks that they had not conducted, then SMG would have
 12 been alerted to the problem.
 13 We say SMG was entitled to rely on this system to
 14 highlight problems just as, for example, Tom Rigby said
 15 that he would not specifically brief supervisors that
 16 pre-egress checks needed to be thorough as that
 17 requirement was, to use his words, quite clear from the
 18 briefing sheet.
 19 We submit that ShowSec knew that the purpose of the
 20 checks was broader than simply ensuring that the egress
 21 routes were clear and the Disney on Ice episode, when
 22 you'll recall a suspected IED was found on the mezzanine
 23 level, and in which ShowSec staff, including Tom Rigby,
 24 had been involved, gave a vivid example of why the HOT
 25 checks on the mezzanine were needed.

1 There's no question that the mezzanine was beyond
 2 ShowSec's jurisdiction or operational area. You have
 3 heard evidence that ShowSec staff routinely went up on
 4 to the mezzanine, for example at the request of
 5 McDonald's, and they were known to do so by SMG.
 6 Nor, sir, and this is an important point, did the
 7 evidence heard by the inquiry — inevitably of course
 8 from only a handful of ShowSec staff, but their evidence
 9 did not support the idea that there was a universal
 10 practice of not conducting pre-egress checks on the
 11 mezzanine. It was apparent from Mr Lavery's evidence,
 12 first of all, that he conducted pre-egress checks on the
 13 mezzanine and, secondly and rather more importantly, the
 14 reason he did that was because he had been told to do so
 15 by others within ShowSec. So not a universal practice
 16 in our submission.
 17 Finally, you will recall the witness statement from
 18 Lucy Hunt to the effect that this very part of this very
 19 check sheet had been reviewed by her and Tom Bailey in
 20 2015. It must have been discussed because the content
 21 of the City Room check was altered as a result of that
 22 meeting consequent on the station renovation.
 23 Tom Bailey did not raise any confusion at that meeting
 24 or state that ShowSec didn't carry out the checks as
 25 specified. It's clear from Lucy Hunt's statement that

1 had he done so, the matter would have been taken
 2 seriously and she says it would have been elevated to
 3 Miriam Stone and possibly James Allen. So following
 4 that meeting, we submit, SMG were entitled to assume
 5 that the checks were being carried out as per the
 6 written instruction.
 7 Sir, of course it is always possible to say that
 8 more could have been done and indeed in his oral
 9 submissions yesterday Mr Atkinson said just that. He
 10 criticised SMG for failing to check that the pre-egress
 11 checks were being conducted. And perhaps, sir, we say
 12 this is a moment where you must warn yourself against
 13 the dangers of hindsight. Because we do submit, for the
 14 reasons I've given, that in fact this particular corner
 15 of ShowSec's duties at the arena was already one where
 16 there was a very high degree of built-in assurance:
 17 written instructions, a requirement to sign that each
 18 particular check had been done, the review meeting
 19 between Lucy Hunt and Tom Bailey, and so on.
 20 Sir, we do say that whatever may have been said had
 21 other types of instruction or other duties not been
 22 performed as expected, here the position is rather
 23 different and that there was already a really very high
 24 level of built-in assurance.
 25 The next three short sections of our written

1 submissions, I am not proposing to dwell on simply
 2 because others have not done so either. We have given
 3 you written submissions relating to the issues of canine
 4 support, also the running of two control rooms, and
 5 finally defensive communications, and Mr Weatherby did
 6 briefly mention defensive communications, so perhaps all
 7 I need to say on that issue is that it is apparent from
 8 the documentation that that is an issue that Ken Upham
 9 dealt with and discussed with the arena and indeed noted
 10 their website gave them marks on the PSIA form for it.
 11 And also to the extent the experts suggest that the "See
 12 it, say it, sort it" campaign should have been deployed
 13 at the arena, the evidence suggests that that campaign
 14 was initiated either at or around the time of the attack
 15 or even possibly after it, so there may not be much
 16 force in that suggestion.
 17 I am not proposing to develop those submissions any
 18 further, so I can turn finally to the question of
 19 causation and those four headline points that
 20 I mentioned right at the start of my submissions.
 21 We start then with the causation issues around CCTV
 22 coverage in the City Room. We've submitted already that
 23 the CCTV system at the arena and in particular at the
 24 City Room satisfied, and in some respects considerably
 25 exceeded, the applicable standards, the NaCTSO

1 standards, both as to coverage and monitoring and
 2 training.
 3 Here, we make the additional submission that there
 4 was in any event nothing about Salman Abedi's dress or
 5 conduct on any of his visits to the City Room that would
 6 have made it even reasonably likely that a CCTV operator
 7 would have identified him as suspicious and instigated
 8 further action. We note that the highest the experts
 9 appeared to put this issue in the document they provided
 10 at the end of the oral hearings was that Salman Abedi
 11 might have been identified as suspicious. We say that
 12 even that is putting it too high. In truth, there was
 13 no realistic possibility of him being identified as
 14 suspicious.
 15 In considering this issue, it is critical that the
 16 inquiry bears in mind first of all the importance of
 17 avoiding hindsight. We make no apology for reminding
 18 you of that issue. There is such a danger, given the
 19 focus and the repeated nature of all of our watching of
 20 those stills, looking at the footage, looking at it
 21 again and again and again, as others have observed in
 22 their written submissions, all the time of course
 23 knowing what we're looking for, that even subconsciously
 24 one may fail to sufficiently put oneself in the position
 25 of a CCTV operator looking at it every evening for the

1 first time, only once, and not knowing what to look for.
 2 As I say, we make no apology for reminding the
 3 inquiry of being sure that it takes all of those matters
 4 into account in the context of avoiding hindsight as
 5 well as the point we make in writing, which I've already
 6 referred to, about the fact that, for example, in terms
 7 of walking at a different pace, there have been
 8 developments in the science, if you like, of behavioural
 9 detection training since 2017.
 10 The second introductory point we make and ask you to
 11 bear in mind is the fact that CCTV operators could never
 12 be expected to aggregate all or even some of the
 13 suspicious factors listed in the experts' note under
 14 issues 12 and 14. They, as I've said, were watching in
 15 real time, they would have been trying to monitor at
 16 least several small screens at once, which may or may
 17 not have included that showing Abedi, and even if they
 18 did catch sight of Abedi they wouldn't have watched him
 19 to the exclusion of other things and therefore
 20 inevitably would have missed some of his conduct.
 21 We add a further point by way of preliminary
 22 observation and it's this: we say the inquiry must not
 23 equate the position of a CCTV operator on the night of
 24 the attack with an observer who was actually in the
 25 City Room, for example Mr Lawler or Mr Wild. For

1 obvious reasons, some of which I have already expanded
 2 on, CCTV operators necessarily have a more limited, less
 3 immediate appreciation of individuals than do those who
 4 are actually on ground and we say that's a further
 5 factor you will need to bear in mind in considering
 6 these matters.
 7 Moving on in our written submissions, some of the
 8 factors identified by the experts would not have been
 9 apparent to a CCTV operator as opposed, for example, to
 10 someone who was actually in the City Room. We give the
 11 examples of looking nervous or others thinking that he
 12 looked suspicious, in other words receiving a report to
 13 that effect from someone like Mr Wild.
 14 Sir, another of the factors listed by the experts,
 15 that is being overdressed for the weather, was simply
 16 inaccurate and many of the remaining factors were not in
 17 truth indicative of anything out of the ordinary, far
 18 less suspicion, for example wearing headwear, walking
 19 against the crowd, having two mobile phones and not
 20 fitting the audience or parental profile.
 21 Sir, you will of course have to consider yourself
 22 whether Abedi was suspicious and, if so, in what respect
 23 and to what degree. Those are extremely nuanced and
 24 perhaps difficult questions that we say are ultimately
 25 questions of judgement for you. They are matters of

1 common sense and impression, at least as much as they
 2 are matters of expert evidence.
 3 Just referring for a moment to those lists of
 4 so-called suspicious characteristics that were given
 5 in the experts' note, those lists were referred to
 6 yesterday in oral submissions simply as though they were
 7 established facts, and Mr Atkinson asserted orally, as
 8 he did at paragraph 1 and at the very outset of his
 9 written submissions, that Abedi was "obviously
 10 suspicious and out of place in the City Room", almost as
 11 though that was an article of faith that was beyond
 12 question.
 13 Sir, we know that you will treat this compendious
 14 question as one that requires careful analysis and, in
 15 particular, it is wrong to refer, as many
 16 representatives did yesterday, to Colonel Latham's list,
 17 written list, without also having regard to his oral
 18 evidence in which he accepted the limited weight that
 19 could be put on many of the factors that he had included
 20 in his list.
 21 We give some examples there. We say you will see
 22 when you look again at this part of the transcript of
 23 his evidence that he agreed that CCTV would not pick up
 24 if someone looked nervous or not. He accepted that he
 25 did not think that Abedi looked overdressed in the

1 images that one could see, at least in comparison to
 2 other people also visible in the images.
 3 He said that he would not have concluded that Abedi
 4 was suspicious for wearing a hat and, as I've mentioned
 5 now, he accepted that the whole question of a change in
 6 pace was something that became understood after the time
 7 of the attack.
 8 So the high point for the argument that Salman Abedi
 9 looked suspicious on 22 May was that he was carrying
 10 a large rucksack and remained on the mezzanine for
 11 a period of time. But here, sir, and this is a point we
 12 do emphasise, the viewpoint of those who were
 13 experienced in observing the City Room is critical and
 14 that again is a matter that Colonel Latham accepted.
 15 We've given the footnote, Day 43, page 217 of his
 16 evidence {Day43/217:1}.
 17 Mr Edwards, who was on duty in the Whiskey Control
 18 Room that night, had been working in that role for
 19 11 years. He was used to seeing merchandise sellers
 20 carrying big, heavy backpacks, so he did not regard that
 21 as out of the ordinary or suspicious. He was also
 22 familiar with such people turning up before the end of
 23 the event and then waiting, presumably before they
 24 started selling to the departing audience.
 25 Mr Edwards also said that if he saw someone going up

1 the stairs to the mezzanine and then not reappearing, he
 2 wouldn't regard that as suspicious because he would
 3 assume they'd gone into the call centre. It is this
 4 evidence, we say, the evidence of Mr Edwards, who knew
 5 better than anyone else what it was reasonable to
 6 expect, what was ordinary in the City Room, what might
 7 be out of the ordinary, that we say you should bear
 8 particularly in mind, sir.

9 And by contrast, the "spot the backpack" game, as he
 10 put it, that Colonel Latham played in the course of
 11 reviewing only a few days, at most, of CCTV evidence of
 12 the City Room does not carry, we submit, any weight. If
 13 one reviews the transcripts of his evidence, we suggest
 14 that Colonel Latham himself recognised that.

15 So sir, bearing all those varying factors in mind,
 16 we submit that in fact it is inherently unlikely that
 17 any CCTV operator monitoring the City Room on the
 18 evening of 22 May 2017 would have paid any particular
 19 regard to Salman Abedi, far less considered him
 20 sufficiently suspicious to instigate further action.

21 Moving to the second heading, Jordan Beak. We
 22 submit by contrast the inquiry will be able to conclude
 23 with a high degree of confidence that had Jordan Beak
 24 gone up on to the mezzanine in the course of conducting
 25 his final pre-egress check at about 22.15, he would have

1 both seen Salman Abedi and considered him sufficiently
 2 suspicious to take further action.

3 We make the following points in that regard. First
 4 of all, and as I've already mentioned, it was widely
 5 acknowledged that a pre-egress check not only involved
 6 ensuring that the egress routes were clear but also
 7 a search for suspicious individuals or objects.

8 Secondly, Jordan Beak would have walked right past
 9 Salman Abedi. Unlike a CCTV operator, he would have
 10 seen him close up, he would have been able to speak to
 11 him. There is ample evidence from those who were in
 12 close proximity to Abedi at about that time that he
 13 looked nervous and/or suspicious.

14 There is also a real likelihood, we say, that had
 15 Jordan Beak walked along the mezzanine in the course of
 16 his pre-egress check at about that time, Mr Wild himself
 17 would have raised his concerns about Abedi with him,
 18 either instead of or perhaps in addition to speaking to
 19 Mr Agha.

20 I turn to Mr Agha and Mr Lawler. We submit,
 21 shortly, that the causative impact of the failure by
 22 Mr Agha and Mr Lawler to report Mr Wild's concerns about
 23 Salman Abedi is even clearer than that of Mr Beak.
 24 Given the concerns expressed by Mr Wild, it was quite
 25 obvious that a report needed to be made either to

1 a supervisor or to the Sierra Control Room.

2 As to Mr Agha, there is no need to grapple, we
 3 submit, with the issue of whether he should or could
 4 have left his post. On the assumption that he felt
 5 bound to stay where he was, he could have directed
 6 Mr Wild to a colleague or attracted the attention of
 7 Mr Middleton or Mr Perry simply by raising his arm and
 8 leaving it raised or by calling across to one or other
 9 of them. So in a similar vein, we submit that the
 10 analysis at paragraph 87 of the Hogan Lovells
 11 submissions about whether he could have used a mobile
 12 phone or a static phone is really nothing to the point.
 13 He could, he should, have simply raised his arm or
 14 raised his voice.

15 Similarly, with Mr Lawler, the question of the
 16 emergency button on the radio is really neither here nor
 17 there. There is overwhelming evidence that Mr Lawler
 18 could have got through on his normal radio channel had
 19 he kept trying for more than a minute or so. And even
 20 more simply, and more appropriately perhaps, if, as he
 21 suggests, he was concerned about relaying an
 22 objectionable message, he could simply have walked a few
 23 paces across to Mr Middleton, who he himself described
 24 in evidence as "a very approachable supervisor".

25 So as far as the fourth point, BTP, is concerned, we

1 simply endorse the observations made by the experts
 2 in the second paragraph of their note under issue 17.
 3 We add that their analysis as to what would have
 4 happened had PC Corke been present in the City Room on
 5 egress in fact applies equally to the presence of any of
 6 the BTP officers on duty that night.

7 Sir, we address very shortly a fifth question: what
 8 if Abedi had been reported to the Sierra Control Room?
 9 As far as that is concerned, sir, you heard the evidence
 10 of Miriam Stone, what she would have done. That
 11 evidence was largely adopted by the experts in their
 12 note under issue 16 and we say no more about that.

13 Sir, in closing my submissions, and as we have
 14 already stated, the evidence that the inquiry has heard
 15 has necessarily focused on the procedures and security
 16 arrangements in place at the arena in May 2017.
 17 However, we are sure that the inquiry will not lose
 18 sight of the considerable changes that have been made
 19 since the attack and you will recall in this context
 20 that Lucy D'Orsi described the Manchester and London
 21 attacks of early 2017 as, in her words:

22 "A watershed moment for UK society, the emergency
 23 and intelligence services and, in particular,
 24 Counter-terrorism Policing."

25 The changes that SMG have made as a result of that

1 watershed moment include changes to the security and
2 risk assessment process as well, of course, as radical
3 changes to the physical security measures of the arena,
4 changes that have been implemented in many similar
5 venues across the country since the terrible events of
6 22 May 2017.

7 Sir, at the outset of this inquiry we assured you
8 that SMG was committed both to assisting you and your
9 team in the inquiry's work and also to continuing
10 a process of learning lessons from the attack. We
11 remain committed to both those things and will of course
12 look urgently at implementing any further changes that
13 you may recommend in your report.

14 Our sympathies remain with all those who lost loved
15 ones or who were themselves injured by Salman Abedi's
16 murderous actions. We know that we share with you and
17 your team a determination to ensure that entertainment
18 venues across the country, including the
19 Manchester Arena, are made as safe as they can be from
20 any future terrorist attack.

21 I'm grateful.

22 SIR JOHN SAUNDERS: Thank you very much, Mr O'Connor. I'm
23 grateful, thank you, and for your impeccable
24 timekeeping.

25 Mr Greaney.

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1 MR GREANEY: Sir, I was going to raise just three short
2 matters before we break for lunch. First of all, and
3 this may explain Mr Cooper's appearance on the screen as
4 well, we have received a concern expressed that
5 Mr O'Connor has gone well outside of his allocation.
6 Can I assure those who have a concern that he has been
7 almost precisely within his allocation, indeed he's
8 I think 5 or 10 minutes under his allocation of
9 2.5 hours.

10 Secondly, things have gone rather quicker this
11 morning than we had anticipated, by which we mean, no
12 criticism at all, in fact we mean the opposite. That
13 means that this afternoon we will certainly invite
14 Mr Gibbs to address you on behalf of British Transport
15 Police. However, notwithstanding that he is likely, as
16 we understand it, to conclude his submissions, as we
17 understand it, before 3 pm, we will not be asking
18 Mr Horwell to start his submissions today, and that is
19 for three reasons.

20 First of all, yesterday evening I assured Mr Horwell
21 on the basis of my understanding of the timetable at
22 that stage that he would not be called upon until
23 Wednesday morning and I would not wish to go back on
24 that assurance.

25 Secondly, people will in any event have heard what

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1 I had to say about the timing of GMP's submission when
2 I addressed you first thing this morning and they may
3 have made their arrangements on that basis.

4 Thirdly, in any event, it seems to us that there is
5 a real chance that if Mr Horwell were to start his
6 submissions this afternoon, he would not complete them,
7 which would be undesirable.

8 The third short matter refers back to the matter
9 that Mr O'Connor has undertaken to provide short written
10 submissions in respect of, namely the issue that you
11 raised during the course of his oral address. We've
12 received a communication from Mr Cooper, a most helpful
13 indication, that in the course of Slater & Gordon's
14 written arguments they made express reference to
15 a breach or potential breach of the licence of SMG at
16 their paragraph 2.13(a) and we have no doubt that
17 Mr O'Connor will want to read that particular part of
18 Mr Cooper's submissions again and address it in his
19 further written submissions to the extent that he feels
20 necessary.

21 Sir, having made those remarks and subject to
22 anything that you wish to say or indeed anyone else
23 wishes to say, we would invite you to direct that we
24 break now until 2 o'clock, although I can see Mr Gibbs
25 has appeared on the screen. It may be that he wishes to

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1 say something.

2 MR GIBBS: Just that if it helps, I think I'll be about
3 35 minutes.

4 MR GREANEY: That's very helpful, Mr Gibbs, but
5 notwithstanding that, nonetheless we will still not
6 invite Mr Horwell to start today, sir. We hope that
7 seems the fair way to deal with things.

8 SIR JOHN SAUNDERS: Absolutely. I know commitments have
9 been made to people and arrangements have been made on
10 the basis of how long things would take. I personally
11 find listening to detailed submissions, which we're
12 doing over BlueJeans, is not as easy as doing them face
13 to face, to keep the concentration level when actually
14 watching a screen, so I am perfectly happy to finish
15 earlier. I am grateful for people's submissions.

16 Mr Cooper, it may well be that I have picked up the
17 point that I made to Mr O'Connor from your submissions.
18 I obviously, as I've said, have read them all, so it may
19 have come from that, but I took the point. Anyway,
20 anyone who wishes to make any further written
21 submissions about that can do so. My understanding
22 would be that it is not a delegatable responsibility,
23 it's a responsibility which is given to the company
24 under the premises licence. Anyway.

25 MR COOPER: I'm grateful.

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1 SIR JOHN SAUNDERS: We will break until 2 o'clock and it
 2 will be a relatively short afternoon, for which if
 3 anyone needs an apology, I apologise, because actually
 4 it is I who have to have another Zoom hearing at
 5 4 o'clock, which has meant that we've had to alter
 6 what was the timetable.
 7 Thank you. 2 o'clock.
 8 (12.58 pm)
 9 (The lunch adjournment)
 10 (2.00 pm)
 11 SIR JOHN SAUNDERS: Good afternoon. Mr Gibbs, the floor is
 12 yours.
 13 MR GIBBS: Thank you very much. Can I ask, do you have our
 14 written submissions in front of you?
 15 SIR JOHN SAUNDERS: I do, they are absolutely in front of
 16 me, yes.
 17 Submissions by MR GIBBS
 18 MR GIBBS: Good. You'll see that I have taken literally
 19 your request that we should focus on the issues
 20 identified by your legal team in their note of
 21 30 November. I'm conscious that your core thinking
 22 about chapter 7 will already be well developed. To
 23 state the obvious, you'll have been keeping a running
 24 record, I know, of potential factual findings and
 25 potential recommendations as the evidence was being

1 adduced.
 2 And at the same time your solicitor and your counsel
 3 team will have been keeping a note of the document and
 4 transcript references which you might want to refer to
 5 later when you would come to draft this first part of
 6 your report. The excerpts and the references in our
 7 written closing submissions are suggestions for
 8 inclusion in that list of documents. I'm not going to
 9 go to any of them now, if you'll forgive me, because
 10 they're on the page for you.
 11 Before clearing the decks with some concessions and
 12 some changes made, may I emphasise that we continue to
 13 make no criticism of any other core participant. I know
 14 it has been suggested that people are blaming each
 15 other. We simply are not. In particular, we've said
 16 nothing detrimental about either SMG or ShowSec or any
 17 of their employees. At least I don't think we have, and
 18 if we have, it must be unintentionally.
 19 Can I reassure you that that's the approach that
 20 we will be taking in chapter 10 as well, where I expect
 21 BTP to have nothing detrimental to say about the
 22 Ambulance Service or GMP or the Fire Brigade or any of
 23 the individuals from those other organisations.
 24 To repeat the well-established concessions, there
 25 are five perhaps principal concessions you may think in

1 chapter 7. Firstly, BTP had no written risk assessment
 2 for this concert, which was considered in public order
 3 and crime terms to be a low-risk event.
 4 Secondly, the duty sergeant's instructions, whether
 5 they be face to face or by telephone or reinforced
 6 in that email, were not followed.
 7 Thirdly, there was no BTP officer on Victoria
 8 Railway Station at 21.31 when the bomber walked from the
 9 tram platform to the lift. There had been combinations
 10 of officers on the platforms and on the concourse
 11 earlier and there were two officers again there only
 12 4 minutes afterwards, I think, but at 21.31 there was
 13 none.
 14 Fourthly, there was no BTP officer in the City Room
 15 after 10 o'clock. As you know, there had been for the
 16 previous quarter of an hour and there had been at
 17 ingress and there had been at times in between, but
 18 after 10 o'clock there wasn't.
 19 Fifthly, for chapter 7 purposes, PC Corke was not at
 20 Victoria in time for egress, as had been planned.
 21 So if those are the five major concessions or most
 22 significant concessions, can I turn then to five
 23 significant changes which have been made since then,
 24 which reflect those concessions. You'll remember that
 25 ACC O'Callaghan gave evidence about these.

1 Five of them. Firstly, there are now monthly
 2 meetings between SMG and BTP which are dedicated to
 3 reviewing arena events. Those meetings are documented,
 4 they generate monthly reports which are incorporated
 5 into BTP's risk assessment for its policing provision so
 6 that the entire process is now auditable and can be
 7 checked for effectiveness.
 8 Secondly, the allocation of officers to arena events
 9 is now governed by a four-tier system of risk
 10 evaluation. What this means is that an event commander
 11 and/or a full Gold/Silver/Bronze command structure is
 12 put in place for all events which carry a heightened
 13 level of risk and every such deployment is supported by
 14 a full operational order.
 15 Thirdly, sergeants now share the same shift patterns
 16 as the officers whom they are briefing and supervising
 17 for arena events. You'll remember that back in 2017,
 18 there was a different regime which was based on
 19 a different philosophy of continuity by overlap.
 20 Fourthly, the briefings which are given now to
 21 officers at the arena contain a specific counter-terror
 22 awareness component and a detailed review of the risk
 23 level and of any information or intelligence that there
 24 may be about the event, and this feeds in, for instance,
 25 to any key areas of patrol which need to be specifically

1 allocated.

2 Fifthly, of the changes, for events which are graded

3 amber or above, the event commander on the ground is on

4 the ground at Victoria and is in contact by mobile

5 telephone with whomever is the event security lead that

6 day for the arena. They have each other's mobile

7 telephones and the system ensures that that's the first

8 thing they do when they are both there together.

9 Sir, we hope that these changes are all concrete

10 improvements, that's the purpose of instituting them,

11 and are indicative of learning rather than of

12 complacency. You'll remember on that subject that

13 Lord Kerslake's review directed no specific

14 recommendations at BTP, but nonetheless BTP performed an

15 internal review based on the learning points in the

16 Kerslake Report which it identified as resonating with

17 its own operations. There were several of them. That,

18 in my submission, wasn't a complacent thing to do

19 either.

20 But of course, it doesn't end there. Just because

21 a police force has thought hard about what changes might

22 be needed and has come up with particular improvements,

23 it certainly doesn't mean that a fresh pair of eyes

24 won't identify further advances, and as we said at the

25 outset, if anyone can do that, it's you, and BTP looks

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1 forward to any recommendations which you may be able to

2 make.

3 As for the timing of the enactment of those, the

4 changed arrangements I just described are obviously not

5 being used while the arena is closed for COVID, but if

6 you were to have published your chapter 7

7 recommendations before the arena re-opened, obviously we

8 at BTP would look to act on them very swiftly. I don't

9 know when it will re-open, I don't suppose any of us

10 does.

11 Having dealt with some concessions and some changes,

12 may I turn next to some potential recommendations.

13 Mr Welch, who took the lead for the bereaved on the

14 subject of BTP, invited two particular recommendations.

15 One was about primacy, which I'll come to in just

16 a moment. The other was to encourage joint training,

17 particularly about terrorism on sites where

18 responsibility for security and public safety is shared

19 between organisations. I hope I've done justice to his

20 suggestion.

21 May I immediately embrace that as a good idea. What

22 I think, but he would tell you, Mr Welch was stressing

23 was the advantage of holding that joint training on

24 site, and we agree with that. But what I'm not sure

25 about is whether the suggestion is that the training be

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1 in desktop format, which you'll understand, or by way of

2 fully simulated exercise. I know you'll remember that

3 BTP already makes available desktop training to its

4 partners, like SMG and Northern. I dealt with this

5 briefly in our submissions at paragraph 6(j). I think

6 that training is accepted to be a high quality product.

7 On the subject of fully simulated exercises, may

8 I just sound a note of caution. I don't want to be

9 negative, but may I sound this note of caution. That

10 can be done, but it's a massive step up in terms of

11 logistics and resources. It's not impossible, but, for

12 instance, at the arena, it would probably involve

13 closing the railway station and other businesses. It's

14 a very big undertaking. There's no doubt it would be

15 a valuable learning exercise for anyone participating in

16 it wherever it were conducted, but I'm just pausing

17 before concluding whether it's realistic as

18 a recommendation for all sites where responsibility for

19 security and public safety is shared between

20 organisations and therefore all those other Home Office

21 forces who would be impacted by it. I don't know

22 whether you'll think that might need to be the subject

23 of some further enquiry.

24 That potential recommendation suggested by Mr Welch

25 is just one of those areas where you may not have the

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1 comparator evidence which would enable you to make

2 a hard-edged recommendation with confidence about its

3 feasibility, I submit. That sounds negative, it's not

4 intended to be. What it means is that notwithstanding

5 the amazing range of evidence which has been gathered by

6 your team and the tireless skill with which it has been

7 marshalled and presented to you and to all of us, there

8 are inevitably areas at the margin which it hasn't been

9 possible to cover which might be impacted by

10 recommendations. Comparator evidence, for instance,

11 from Home Office forces, which might have provided an

12 external scale against which to measure BTP's

13 performance at the arena.

14 If you were to make recommendations of general

15 application, again to state the obvious, forgive me,

16 they would plainly need to fit other cities and other

17 forces. I asked Dr BaMaung about Glasgow, but the more

18 obvious examples might be Birmingham and London.

19 I know, we all know, that you have a huge licensing

20 experience to draw upon from all over the country of all

21 sorts of venues, but at the moment we haven't explored

22 from a policing point of view specifically, to take the

23 most obvious example, the West End of London. We don't

24 know, I don't know, what arrangements were thought

25 proportionate and practical and reasonably necessary

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1 in the West End of London every night of the week when
 2 entertainment audiences in their thousands were
 3 disgorging from multiple exits into public spaces full
 4 of blind spots, how many officers were allocated there
 5 from ingress to egress, what briefing they were given,
 6 what supervision they were given. One could go on.
 7 Primacy is an even bigger subject and I don't know
 8 if you may prefer to wait until after chapter 7 before
 9 finishing your thinking about that. In our opening
 10 statement in September we welcomed any recommendations
 11 that you might have on this subject. I suggested then
 12 that this could be seen, I'm sure there are different
 13 ways of dividing it up, but this could be seen as
 14 a five-part question rather than a simple all or nothing
 15 because the arena and the station complex engages
 16 a number of different policing roles.
 17 My submission is that this is not a straightforward
 18 issue at all, that one could make a respectable case for
 19 different arrangements or blends of arrangements, which
 20 case would be, if not compelling, at least plausible,
 21 but there's no necessary right or wrong answer here.
 22 Back in September I split up the policing roles
 23 into the following five. I don't know whether they're
 24 the right ones, but you'll decide. I'm sticking with
 25 the five for now.

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1 (1), CTSA advice. (2), contingency planning. (3),
 2 day-to-day policing. (4), event policing. (5),
 3 responding to a terrorist attack.
 4 Two of those, contingency planning and responding to
 5 a terrorist attack, will certainly be the subject of
 6 evidence and examination in chapter 10 shortly.
 7 On the other three, you've heard once already from
 8 ACC O'Callaghan, and when he returns to the box I know
 9 that he'll be able to give you an update on the
 10 discussions which have taken place between the two
 11 forces since then.
 12 About CTSA advice, our submissions in writing are at
 13 paragraphs 41 to 44. I wasn't going to repeat them.
 14 You've got them there.
 15 About day-to-day and event policing, I don't want to
 16 give evidence that should come from Mr O'Callaghan, but
 17 before hearing from him again it might be reasonable to
 18 work on the basis that, whatever the final division of
 19 labour, a formal memorandum of understanding will be put
 20 in place, plans will be written to reflect that
 21 memorandum, those plans will be tested, and included
 22 within the memorandum of course would be the
 23 arrangements for information sharing between the two
 24 forces and with SMG and with ShowSec. On that subject,
 25 we've made submissions in writing at paragraphs 88 to 92

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1 and I wasn't going to repeat those either.
 2 As has been said during the evidence, there are
 3 others involved, it's not just GMP and BTP, most notably
 4 Network Rail and SMG, and you saw in writing, and you've
 5 heard from Mr O'Connor this morning, that SMG has
 6 a preference about that, which preference may reflect
 7 the quality of the relationship between SMG and BTP over
 8 many years of working together.
 9 Again, on that subject, without getting into the
 10 detail, we invite you to conclude that the last thing
 11 that that relationship evidences is apathy or
 12 complacency, which are easy words to use. But rather,
 13 you may think, on a fair view of the evidence, what is
 14 revealed is a relationship of regular, attentive contact
 15 at all levels of seniority, from senior management down
 16 to staff on the ground.
 17 It wasn't a relationship that was incapable of
 18 improvement, as Mr O'Connor has conceded this morning
 19 and as I echo, but it was, I submit, a conscientious,
 20 productive relationship of a sort very different from
 21 the many dysfunctional situations which Dr BaMaung would
 22 have seen, as he confirmed to us, in Strathclyde and
 23 which you will have seen a hundred, a thousand times in
 24 licensing cases up and down the country. It was the
 25 very opposite of that.

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1 Having said something about concessions and about
 2 changes and about recommendations, may I just add to our
 3 written submissions in three other areas only. They are
 4 briefing and supervision, the 2014 report, and the
 5 what ifs.
 6 Briefing and supervision. Sergeant Wilson's
 7 briefing has been the subject of detailed debate, much
 8 of which debate took place after he left the witness
 9 box. I invite you at this stage just to cast your mind
 10 back, I know you've seen a lot of witnesses, to
 11 Sergeant Wilson, one of the very first witnesses who
 12 gave evidence, and to ask yourself whether he presented
 13 as a careful professional witness, certainly not
 14 a complacent or an apathetic officer, and whether,
 15 either face to face or by telephone call or reinforced
 16 by his email, the reality isn't that he gave the
 17 Victoria officers the instructions which they needed in
 18 order to police the railway station and the concert that
 19 night.
 20 Rhetorically, did he not take care to identify the
 21 right times and the right places for specific
 22 positioning? Did he not identify the right period, the
 23 downtime, for refreshment breaks and instruct that they
 24 be staggered? Did he not confirm what turns out to have
 25 been the right number of officers on the ground at the

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1 complex that night?
 2 We've said more about this in our written
 3 submissions, may I give you the reference: paragraphs 10
 4 to 15, 19, and 27 to 30. Again, I'm not going to read
 5 them out.
 6 On the question of briefing, may the question be
 7 whether it was reasonable for Sergeant Wilson to expect
 8 that the officers whom he was deploying to Victoria
 9 could decide for themselves which of them would go where
 10 at the moments of in and out, depending of course what
 11 had been happening on the site in the meantime and what
 12 the other policing requirements were? Was it reasonable
 13 for him to expect that they could decide that between
 14 themselves? Because the criticism is that he should
 15 have told each of them individually where he or she
 16 should be. You know what our answer is.
 17 Separately from the adequacy of his briefing is the
 18 question of Sergeant Wilson's supervision of the
 19 Victoria officers. For the debate about whether having
 20 briefed them he should then have himself policed them,
 21 I refer you to paragraphs 20 to 26 of our written
 22 submissions.
 23 If I could summarise it in a phrase or in
 24 a question, does it come to this: was it reasonable for
 25 Sergeant Wilson, as duty sergeant for Manchester, to

1 expect that his officers would follow his instructions?
 2 Unless again spontaneous demands upon them supervened
 3 over those instructions, if they were called away
 4 somewhere, for instance, was it reasonable for him to
 5 expect that they would follow his instructions? And if
 6 a supervening event occurred, if the officer was called
 7 away or was detained unavoidably, was it reasonable for
 8 Sergeant Wilson to expect that any officer affected
 9 in that way would inform him of the difficulty so that
 10 fresh or amended instructions could be given?
 11 We submit the answer to both questions is yes, it
 12 was reasonable, and you will say.
 13 The reason we say it was reasonable, put at its
 14 simplest, is that's how police hierarchy works and
 15 expectations may of course be different in other walks
 16 of life and when considering others, I know that in the
 17 usual fair way, you will take account of the fact that
 18 there may be a difference between what it's reasonable
 19 for a supervisor to expect of casual security staff on
 20 the one hand and what it's reasonable to expect of
 21 full-time highly trained professional people on the
 22 other. The officers at Victoria have, we submit to you,
 23 been very frank about what happened.
 24 The second of my three supplementaries is Police
 25 Constable Wood's 2014 tactical report. A lawyer's eye

1 will always be caught by a document which suggests
 2 inconsistency, and if the eye is caught at the last
 3 minute there's a particular risk, we submit, without
 4 getting into too much GCSE psychology, there's
 5 a particular risk of overvaluing the document. This
 6 will have happened to all of us at one time or another.
 7 I offer for your consideration the thought that this
 8 may have happened again here so that reflecting on the
 9 document now at your leisure, you will notice three
 10 things at least about it. Firstly, it does indeed
 11 relate to an earlier configuration of the site -- in
 12 fact, the site, without its transforming and dominant
 13 feature, the overbridge that links the two.
 14 Secondly, it's a report, not a plan (inaudible:
 15 distorted).
 16 Thirdly, on the evidence, it was never used and was
 17 quickly superseded by the major development at the site,
 18 by the building of the overbridge, and it is true that
 19 a post-conversion equivalent was never produced. So it
 20 was never, as it were, repealed and replaced; it was
 21 simply never used and abandoned.
 22 It's the paragraph about numbers in this document
 23 which has prompted some submissions, quite properly to
 24 you, yesterday, submissions to the effect that there
 25 can't have been enough officers at the Ariana Grande

1 concert because this report from 2014 would have
 2 recommended more. Those submissions overlook
 3 Dr BaMaung's evidence completely.
 4 You will remember that Dr BaMaung's straightforward
 5 conclusion was, as I think you reminded him while he was
 6 in the witness box, that the number of BTP officers
 7 allocated to this concert, in other words if PC Corke
 8 had been present, the number of BTP officers allocated
 9 to the concert was adequate. And what Dr BaMaung had
 10 done, without this pre-conversion report to, one might
 11 say, distract him, was that he'd sat down to work out
 12 what from his point of view and with his Strathclyde
 13 experience would have been required.
 14 His conclusion now, just like the conclusions of
 15 Inspector Wedderburn at the time and of Sergeant Wilson
 16 at the time, was that the rostered deployment of five
 17 was adequate for this event. You can see on the
 18 rostering email of Sergeant Ryan that it wasn't
 19 dissimilar from the rostering at similar equivalent
 20 events. What this meant, perhaps reassuringly, was that
 21 Dr BaMaung's assessment coincided with the practical
 22 experience of BTP across hundreds of events of different
 23 shapes and sizes and audience profiles in the years
 24 since the overbridge had been built.
 25 Not all entertainment events require a policing

1 presence, I submit, and this was what perhaps
 2 ACC O'Callaghan was trying to explain in evidence, which
 3 may, you may think, have been misunderstood by some;
 4 perhaps it wasn't immediately easy to follow at the
 5 time. What is required, so whether policing and what
 6 policing, numbers, complexion, will depend upon the
 7 event and it will depend upon the event and its size and
 8 the profile of the audience and it will depend upon the
 9 information and intelligence that touches the event.

10 ACC O'Callaghan properly understood, I suggest, is
 11 not saying, was not saying, that events like the
 12 Ariana Grande concert didn't require policing. That
 13 would fly in the face of BTP's practice because, as
 14 you will have noted, BTP always provided policing to
 15 events at the arena. The size and complexion of their
 16 deployment to each event reflected the discussions which
 17 they had had with SMG about that particular event. As
 18 I have already said, they often didn't have a written
 19 risk assessment, but on the evidence, you may think,
 20 they always thought about risk, conscientiously, in
 21 consultation with SMG, whose meetings they attended
 22 well, sharing information in both directions,
 23 recalibrating their thinking and their rostering in the
 24 light of any fresh information or intelligence as it
 25 arose. That, in my submission, is what the evidence

1 suggested.
 2 Written risk assessments. I'm not going to repeat
 3 out loud our submissions about them. You've got them in
 4 paragraphs 1 to 9 and, in particular, in the form of
 5 some rhetorical questions at paragraph 7. You won't
 6 remember, but the reason I asked those questions, you
 7 may see them now at paragraph 7, was to try to set the
 8 BTP evidence in a broader context and to see to what
 9 extent there might be a standard across other forces
 10 against which one could measure BTP's thinking and what
 11 the practical ramifications of particular conclusions or
 12 recommendations might be for other forces. Because,
 13 of course, BTP would not be the force, if conclusions or
 14 recommendations were general, most affected by them.

15 Lastly, the question of the what ifs. You've heard
 16 a lot of opinion and speculation about what might have
 17 happened if different people had been in different
 18 places at different times, none of it inappropriate. As
 19 you have read, our principal submission on this subject
 20 is not that it would have made no difference but rather
 21 that there is a big gap between "may have" and "would
 22 have".

23 Whereas "may have" will be a reasonable conclusion
 24 in many of the areas where you've heard "what if"
 25 evidence, we submit, "would have" is a very strong

1 conclusion and imposes, we suggest, a much higher
 2 standard of proof.

3 As you know, this arises most controversially for
 4 BTP in the case of Police Constable Corke's
 5 non-attendance for egress. Under issue 17 of the note
 6 which Dr BaMaung and Colonel Latham provided in
 7 conversation, I think, with your team on 24 November,
 8 they gave a mixture of "may have" and "might have" and
 9 "should have" and "would have". I tried to test the
 10 status of that evidence by asking questions -- and
 11 I know you have the point that I was getting at, not
 12 necessarily that you agree with it but that you have the
 13 point in any event because you intervened to say so.

14 I've stepped away in our written submissions from
 15 the "would have" and I have made some more modest
 16 propositions and I simply offer them for you to say
 17 whether they are realistic or whether they are overly
 18 cautious. They're in the language of "may have".

19 (a) If PC Corke had attended the arena by about
 20 10 o'clock, as Sergeant Wilson reasonably expected him
 21 to, he or another officer may have made their way to the
 22 City Room for egress, as directed by the sergeant.

23 (b) Whether he or another officer would actually
 24 have done that, gone to the City Room, may have depended
 25 on a number of things, including what else was happening

1 at the time, what enquiries had been made of him by
 2 members of the public or by the arena staff or by
 3 ShowSec staff or by railway staff.

4 (c) If Mr Corke or another officer had been in the
 5 City Room for egress, they may, for a time at least,
 6 have gone up to the mezzanine level near JD Williams,
 7 certainly Mr Corke had done that in the past.

8 (d) If an officer had been on the mezzanine level
 9 near JD Williams, Mr Wild may well have reported his
 10 concerns to that officer, may very well.

11 (e) What that officer may have done with such
 12 a report is very hard to say, but they may have spoken
 13 to the bomber.

14 (f) What may have happened thereafter is easy to
 15 imagine but impossible to say, we submit. It may have
 16 depended on the bomber's state of mind, on his
 17 resourcefulness, on his instructions, on the disposition
 18 of the people within the room at that moment and so much
 19 else besides.

20 If you think you can extend the hypotheticals
 21 further and in expansion of (f), I suggest you could
 22 consider how long it may have taken from an officer
 23 talking to the bomber to the officer, if he was, being
 24 dissatisfied with the bomber's responses to the
 25 officer's dissatisfaction turning into a concrete

1 suspicion which eh thought ought to be passed on to
 2 someone who could then pass it on to SMG staff, for
 3 instance, in the Sierra Control Room. What the bomber
 4 may have done in that period as the conversation
 5 continued as radio messages were passed to and fro is
 6 hard to say, I submit.
 7 One thing you may think is most unlikely to have
 8 changed in that period, and that is his determination to
 9 die and to kill as many innocent people as possible.
 10 And who may have been exactly where at that time is hard
 11 to say, in fact it 's impossible to say, but you have the
 12 stills which show the number of people waiting in the
 13 City Room in the minutes before the main body of the
 14 audience emerged and the disposition of the people
 15 changes over time but there are quite a few of them and
 16 none of them is many steps away from where the bomber
 17 had been sitting, I suggest.
 18 So what it comes to is this, we submit: if the
 19 preceding events before 22.31 had gone differently,
 20 there would have been a different outcome, but what
 21 exactly that outcome would have been and how many people
 22 would have died and how many would have been seriously
 23 injured and who they would have been is impossible with
 24 any confidence to say, we submit.
 25 Those are our submissions on chapter 7.

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1 SIR JOHN SAUNDERS: Thank you, Mr Gibbs, I'm very grateful.
 2 MR GREANEY: Sir, thank you, as you know, and as I indicated
 3 before lunch, that is as far as we can take the
 4 submissions today and we'll resume tomorrow morning at
 5 10 am, subject to your views, with the submissions of
 6 Greater Manchester Police from Mr Horwell.
 7 SIR JOHN SAUNDERS: Right. Thank you very much. It's an
 8 early finish, but there's plenty to do reviewing what's
 9 already been said in very detailed submissions, so
 10 thank you all very much.
 11 (2.43 pm)
 12 (The inquiry adjourned until 10.00 am
 13 on Wednesday, 27 January 2021)

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