

OPUS2

Manchester Arena Inquiry

Day 62

February 9, 2021

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Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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

Tuesday, 9 February 2021

1
2 (10.00 am)
3 SIR JOHN SAUNDERS: Mr Greaney, not such a good morning,
4 I gather.
5 MR GREANEY: No, not such a good morning. May I explain the
6 position. Originally, we had scheduled for today two
7 witnesses: former Inspector June Roby was due to give
8 evidence at 10 am and GMFRS Station Manager Lawlor was
9 due to give evidence starting at 12.30 pm.
10 However, because retired Temporary Inspector
11 David Whittle was not reached yesterday, the plan was
12 changed yesterday evening so that the plan became as
13 follows: that Mr Whittle was due to give evidence at
14 10 am, to be followed, as was originally scheduled, by
15 Mr Lawlor at 12.30 pm.
16 Unfortunately, that plan was thrown into chaos this
17 morning. Mr Whittle has had contact with a person who
18 has tested positive for COVID so it is not appropriate
19 for him to attend the courtroom today. In those
20 circumstances, we have considered a number of
21 possibilities — and when I say "we", I mean your legal
22 team — and we've considered those possibilities with
23 a view to avoiding the loss of time. We have considered
24 dealing with the evidence of Mr Whittle entirely
25 remotely, but that is very far from being ideal because

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1 there is a need to descend into the detail of
2 a considerable number of documents.
3 We have considered dealing with part of Mr Whittle's
4 evidence remotely, by that I mean that there is
5 a portion of his evidence that could be dealt with
6 without reference or extensive reference to documents.
7 That evidence will probably take no more than 30 or
8 45 minutes and our view is that it would be pointless to
9 receive that evidence just to achieve that period of
10 time in court, bearing in mind that some of it would
11 have to be repeated when he returned to give his
12 substantial evidence.
13 Thirdly, we have considered whether it is possible
14 for June Roby to be placed back into the list to be
15 called at 10 am today. She, of course, was cancelled at
16 the end of yesterday given the change in plan.
17 Unfortunately, since being cancelled yesterday evening,
18 she has undertaken a commitment which cannot be changed,
19 so it is not possible to call her at 10 am.
20 So the upshot is that there is no work that can be
21 done this morning. I should add that we have
22 investigated the possibility of bringing forward the
23 evidence of Mr Lawlor to enable him to start at 10.00 or
24 11.00, but the judgement that we have come to, of course
25 subject to your view, sir, is it would not be fair to do

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1 so because of the unavoidable professional commitment of
2 one of the advocates who must question Mr Lawlor, and in
3 any event to bring him forward would not mean getting
4 any additional evidence heard today, bearing in mind
5 that Mr Lawlor is the only witness from whom we can
6 hear.

7 So in the circumstances, sir, what it comes to is
8 this: that our invitation to you is that you say that we
9 do not sit today until 1.30, when we will start the
10 evidence of Mr Lawlor with a full contingent of
11 advocates.

12 SIR JOHN SAUNDERS: Mr Greaney, you gave me advance notice
13 of what you were going to say and one of the options
14 looked at was if the advocate who can't, for
15 professional reasons, be here first thing happened to
16 become free earlier that we could start Mr Lawlor's
17 evidence earlier. However, I took the view that
18 I thought people, particularly as they are not here,
19 would actually prefer to have a definite time that
20 we will start rather than tuning in and then being told,
21 "We can't start now", so it seemed to me a definite time
22 was better for everybody.

23 Because an advocate is having another hearing,
24 although he is due to be back and finished well before
25 1.30, I am well aware, as you are, that the length of

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1 hearings cannot always be precisely foreseen. So what
2 I would like to happen, if this can be arranged, is that
3 if we receive notice that that advocate is not going to
4 be here by 1.30 so we can't start Mr Lawlor, that
5 we have something to do and if that means doing the
6 uncontroversial parts of Mr Whittle, if that can be
7 done, to get him on a video link, then we should try and
8 do this. I have given neither you nor Mr Suter warning
9 of this because it has only just occurred to me, so it
10 may not be possible, but I would prefer not to come in
11 at 1.30 and say to everyone, "I'm really sorry, we're
12 going to have to come back a bit later".

13 MR GREANEY: Understood, sir, thank you.
14 SIR JOHN SAUNDERS: I'm very sorry to people. I don't know
15 whether any CP advocate wishes to say anything. It does
16 seem to me to be unavoidable and I thought and believed
17 that you'd prefer a set time rather than just being kept
18 on the end of a string as to when we were ready to
19 start. So silence is golden, no one has anything to
20 say, and we'll see you at 1.30. Thank you. Sorry.

(10.05 am)

(Adjournment)

(1.30 pm)

24 MR GREANEY: Sir, good afternoon. Could I give you an
25 update, please? The position is that unfortunately,

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1 Mr Cooper, the advocate that we mentioned this morning,
 2 his case in the Administrative Court has not concluded
 3 as quickly as was expected. What we propose in the
 4 circumstances is that we not lose the afternoon or any
 5 part of it, but instead Mr Lawlor should be called now,
 6 and he is in the witness box. Ms Cartwright will then
 7 examine him, which will take an hour or so. He should
 8 then be questioned by the other core participants who
 9 have questions, those core participants being, as
 10 I understand it, GMP and NWFC, and that we then postpone
 11 the questioning of Mr Cooper until tomorrow morning but
 12 that we claw back time by sitting at 9.30 tomorrow for
 13 that purpose.
 14 SIR JOHN SAUNDERS: Right. Thank you very much.
 15 MR GREANEY: Having given you that update, I'm going to ask
 16 that we go to the holding screen and give Ms Cartwright
 17 a minute or so to arrange her papers.
 18 SIR JOHN SAUNDERS: Mr Lawlor, I am sorry for the fact that
 19 you will have to come back tomorrow, I do apologise, but
 20 these things do happen to us.
 21 MR GREANEY: I should say that Ms Cartwright has spoken to
 22 Mr Lawlor and warned him that that was in prospect and
 23 he very kindly said he would make himself available in
 24 the morning.
 25 SIR JOHN SAUNDERS: Right. Thank you.

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1 MS CARTWRIGHT: Can I indicate at the outset that all of the
 2 core participants were aware of Mr Lawlor being called
 3 at this stage in chapter 10 that we're going to be
 4 dealing with his first witness statement up to
 5 paragraph 64. Therefore we will not be dealing with the
 6 events of 22 May of 2017, we will not be dealing with
 7 the learning that arose following on from the incident,
 8 nor will we be dealing with the second aspect of
 9 Mr Lawlor's statement today that deals with various
 10 contingency planning actions.
 11 With setting out that path of travel, could I ask,
 12 please, for Mr Lawlor to be sworn?
 13 MR MICHAEL LAWLOR (sworn)
 14 Questions from MS CARTWRIGHT
 15 MS CARTWRIGHT: Good afternoon. Could you please give the
 16 court your full name?
 17 A. Michael Lawlor.
 18 Q. Thank you. Mr Lawlor, you should have in front of you
 19 a bundle that contains the two witness statements that
 20 you have provided to the inquiry. Can I briefly first
 21 of all take you to both of those.
 22 The first statement in the bundle is dated -- this
 23 one is undated. Can I ask you, in terms of that
 24 statement, is it true to the best of your knowledge and
 25 belief?

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1 A. It is.
 2 Q. Secondly, you provided a witness statement on 20 January
 3 of this year, which is behind, I think, tab 2, and are
 4 the contents of that statement true to the best of your
 5 knowledge and belief?
 6 A. It is.
 7 Q. Thank you.
 8 Mr Lawlor, could I ask you then first of all to give
 9 details by way of the background of your employment.
 10 You tell us first of all in the witness statement that
 11 you've been employed by Greater Manchester Fire and
 12 Rescue Service since 27 November 1989. You then go on
 13 to give us a background in terms of your roles and
 14 I wonder if you could set that out for us now before we
 15 come to deal with the specific role that you've had as
 16 a NILO at Greater Manchester Fire and Rescue Service,
 17 please.
 18 A. Okay. I initially started off as a retained firefighter
 19 in 1989. As such, some years later, I transferred into
 20 the whole-time fire service, I undertook a number of
 21 roles within the organisation, through various ranks, up
 22 to my current position now as station commander.
 23 Q. Thank you. Then perhaps if we could go into a little
 24 more detail. You tell us that in 1998 you took a number
 25 of temporary leading firefighter roles between Rochdale

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1 and Oldham fire stations, the role now known as crew
 2 manager?
 3 A. That's correct.
 4 Q. You then progressed in rank to the sub-officer role on
 5 30 May 2001 and that's a role between crew manager and
 6 watch manager, but that no longer exists --
 7 A. Correct.
 8 Q. -- as a role? Thereafter you go on to tell us that you
 9 became the substantive sub-officer based at the training
 10 and development centre in Manchester as a recruit
 11 general instructor in January 2002.
 12 A. That's correct.
 13 Q. And then you received a temporary transfer over to the
 14 New Dimensions Project on 1 July 2004?
 15 A. That's correct.
 16 Q. Could I ask you then, please, just to give details about
 17 what the New Dimensions Project was, please?
 18 A. The New Dimensions Project was a Government-initiated
 19 project following the events of the Twin Towers back in
 20 2001, where a number of capabilities to respond to major
 21 catastrophic incidents what was expected at that time.
 22 Initially, the capability what was delivered was
 23 response to a CBRN incident --
 24 Q. Pause there. Could you explain what CBRN stands for?
 25 A. Chemical, biological, radiological, nuclear. I was

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1 seconded over to the New Dimensions department to manage
2 and coordinate the various training matters within the
3 organisation. Initially it was -- like I say, it was
4 the CBRN mass decontamination response followed by
5 high-volume pumping and that's pretty much where I've
6 remained and managed a number of the national resilience
7 assets. The national resilience is the outcome of the
8 New Dimensions project.

9 Q. Just pausing there, I was going to then clarify.

10 I think the New Dimensions ran, in terms of your
11 involvement, from 2004 to 2007.

12 A. Correct.

13 Q. And that you effectively describe the work that
14 New Dimensions was doing is what now would be known as
15 national resilience?

16 A. That's correct.

17 Q. Could you then just assist, so we can understand your
18 knowledge and experience with Greater Manchester Fire
19 and Rescue Service, us with the role that you had within
20 the New Dimensions Project relating to training, please?

21 A. Again, a number of capabilities were delivered into fire
22 and rescue services across the country. My role was to
23 manage, coordinate and deliver some of the training
24 aspects of certain capabilities. So for me as an
25 individual I was given the reference for CBRN mass

1 decontamination and high-volume pumping. So I would
2 then go out to pull a training package together and then
3 go out to stations and deliver that training to
4 response -- front line responders.

5 Q. I think you make clear in your witness statement that as
6 part of that role, it included multi-agency training
7 with Greater Manchester Police as well as with
8 Greater Manchester Ambulance Service, NAWAS.

9 A. Yes. Essentially, mass decontamination, that is still
10 the responsibility of the Department of Health, and as
11 a consequence the fire and rescue service was tasked
12 with, I suppose, being a supporter of that deliverable
13 to decontaminate the public should we have an attack
14 using a chemical, biological, nuclear or radiological
15 substance.

16 So in terms of the training, we undertook various
17 foundation training and then a number of exercises with
18 both Greater Manchester Police and, at the time,
19 Greater Manchester Ambulance Service, which is now North
20 West Ambulance Service.

21 Q. Thank you. Can we then move forward to the time after
22 the New Dimensions Project came to an end. You tell us
23 within your witness statement that there was continuing
24 resources required in managing those assets locally by
25 reference to the New Dimensions Project and that became

1 part of the operations department within
2 Greater Manchester Fire and Rescue Service although you
3 have now described that that is known now as the
4 emergency response department. You then tell us that
5 shortly after that time you were promoted to substantive
6 station manager within the contingency planning unit in
7 November of 2008. Could you just describe and give
8 a little bit more detail about that role, please, within
9 the contingency planning unit and as a station manager?

10 A. So the national resilience project at the time, our New
11 Dimensions Project, was a 20-year project. So although
12 the various capabilities were delivered into fire and
13 rescue services and then essentially undertaken as
14 business as usual. Even though the New Dimensions
15 Project as it was came to an end, those capabilities
16 needed to be still managed within fire and rescue
17 services. So at that time, because of the work, the
18 previous work I'd undertaken with the project, I was
19 seen as the most appropriate person at that time to
20 continue and manage the delivery and ongoing capability
21 of delivery of some of those assets.

22 So in terms of national resilience, there were
23 a number of capabilities, so mass decontamination,
24 high-volume pumping, (inaudible: distorted) search and
25 rescue, enhanced logistical support, but I only have two

1 of those references.

2 Q. And just to be clear, the two references you have?

3 A. CBRNE mass decontamination and high-volume pumping.

4 Q. Thank you. You tell us in the witness statement that
5 you have remained in the contingency planning unit ever
6 since that time and that your role has developed over
7 time to reflect national trends, requirements and
8 changes to address all manner of contingencies including
9 terror attacks.

10 A. That's correct.

11 Q. I just want to continue to go through the other detail
12 you give before we can focus on the role of the ILO and
13 then the NILO. You tell us that:

14 "Subsequent to this, in March 2010, you trained to
15 become an inter-agency liaison officer, this role is now
16 known as the NILO to reflect national consistency."

17 Could you just explain what, first of all, an ILO
18 was at that time? Then we're going to move to deal with
19 the detail about the role of the NILO, please.

20 A. An ILO at the time was an interim, as you say, liaison
21 officer. The ILO role at the time was developed
22 following an exercise in London. There were a number of
23 issues identified during that exercise, which
24 necessitated the need to give individuals specific
25 training [REDACTED] to undertake a closer working

1 relationship with the police, ambulance and
 2 counter-terrorism.
 3 As such, some years later, the course or the role
 4 was much more formalised in terms of consistency.
 5 A course was developed by London Fire Brigade, or led by
 6 London Fire Brigade, and that title then was changed
 7 from ILO to NILO.
 8 One of the reasons behind that was because other
 9 agencies would also have roles in terms of -- with the
 10 same initials, ILO, for example, local authority, they
 11 would have an incident liaison officer and that
 12 sometimes conflicted with the ILO terminology. That
 13 basically was -- you may well have two ILO references
 14 but one wouldn't have the training as a NILO in terms of
 15 [REDACTED] bespoke training around other agencies'
 16 capabilities and the local authority incident liaison
 17 officer was totally different. So it was to separate
 18 the confusion, I suppose.
 19 Q. You mentioned the incident that had led to the
 20 development of the role of the ILO. I think we can see
 21 that set out in the national guidance that exists for
 22 the role of the NILO. Perhaps then if we just look at
 23 that first of all, please, and then I'm going to ask you
 24 about the specific training you had. Could I ask,
 25 please, Mr Lopez, if we turn to {INQ004559/1}.

1 Mr Lawlor, can you assist me first of all with this
 2 document? We can see this is titled "National
 3 inter-agency liaison officer guidance document" from the
 4 Chief Firearms Officers' Association.
 5 A. The Chief Fire Officers' Association.
 6 Q. Sorry. And I think we can see that you had played
 7 a role in reviewing earlier iterations of the policy?
 8 A. That was a very early iteration, yes, that's correct.
 9 Q. Perhaps if we turn to, please, {INQ004559/3}. We can
 10 see at paragraph 1.1 the background to the role of the
 11 inter-agency liaison officer is set out within that
 12 guidance. It was:
 13 "... developed in 2001 by London Fire Brigade.
 14 After the initial development by LFB, a number of other
 15 fire and rescue services introduced similar concepts
 16 with a range of skill sets, training and liaison
 17 lessons, which then led to a national standard of
 18 national inter-agency liaison officers."
 19 A. Correct.
 20 Q. Just leave that guidance, please, on the screen,
 21 Mr Lopez.
 22 Can you assist us, so we're clear, as to what
 23 training you had to become an ILO first of all?
 24 A. I attended the pilot course back in 2010 and essentially
 25 what that training entailed was a number of personnel

1 from various agencies, mainly fire and ambulance,
 2 attended the Fire Service College in Gloucestershire.
 3 We would undergo various training themes, we would
 4 receive information on specific agencies' roles and
 5 responsibilities and capabilities, so that may well be
 6 the military, various capabilities within the military,
 7 that may well be counter-terrorism units, ambulance,
 8 National Ambulance Service, information around national
 9 fire capabilities, Public Health England, atomic weapons
 10 establishments. We would receive detailed information
 11 on those various capabilities so that we was in
 12 a position, depending on what the incident type was, we
 13 could advise our incident commanders or indeed inform
 14 our partner agencies in terms of what capabilities a
 15 fire and rescue service would have or could have to
 16 support the incident to bring it to a safe resolution.
 17 Q. How long would that training take place at the Fire
 18 Service College?
 19 A. At the time, that would have been 10 days.
 20 Q. Thank you. Is it correct that also additionally you had
 21 to be a certain rank within the Fire Service to be able
 22 to be put forward to be an ILO?
 23 A. Generally, the recommendation is that you undertake the
 24 rank of a station manager; at the time it would have
 25 been an assistant divisional officer. So it was a rank

1 what had command, command competence.
 2 Q. You mentioned in giving an answer a little earlier about
 3 the [REDACTED] aspect. Could you just then at
 4 a high level explain the role, why an ILO and now a NILO
 5 needs to have that [REDACTED], please?
 6 A. [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 that a role that then meant that you were embedded
 18 within the counter-terrorism unit at that time?
 19 A. At that time, no.
 20 Q. So if we ask similar questions about when the role
 21 changed from an ILO to a NILO. Did you have to
 22 undertake any additional training when the role became
 23 a NILO?
 24 A. No.
 25 Q. Then when the role changed to the NILO, did that make

1 the role one that meant it was an embedded role within
 2 a counter-terrorism unit?
 3 A. Essentially, when it went -- when the role was changed
 4 from ILO to NILO, there was national consistency in
 5 terms of the course what was delivered at the Fire
 6 Service College. When the ILO came into
 7 Greater Manchester initially, that training was
 8 undertaken locally because there was no national course.
 9 So colleagues from Greater Manchester, following the
 10 introduction of the ILO role in London, colleagues from
 11 Manchester saw that as a step forward and colleagues
 12 from fire, ambulance and police went to London and
 13 liaised with their respective partners in London to get
 14 an understanding of the role and how that role fitted
 15 within the various organisations, and as such brought
 16 that role back locally within Manchester.
 17 Some years later, the role then was much more
 18 formalised, it was formalised by the national
 19 coordinator in London Fire Brigade, the national course
 20 then was developed, delivered and has been delivered
 21 since now at the national Fire Service College where
 22 partner agencies will attend and undertake that NILO
 23 role.
 24 Q. Thank you. So I'll just keep working through your
 25 witness statement before we look then back at the

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1 national guidance and then the local policy for
 2 Greater Manchester Fire and Rescue Service.
 3 You tell us that you are Greater Manchester Fire and
 4 Rescue Service's NILO lead and regional lead officer,
 5 which means that you represent NILOs in the north-west
 6 at a national level.
 7 A. That's correct.
 8 Q. And you'd worked in that role for about 6 years,
 9 including at the time of the arena attack?
 10 A. That's correct.
 11 Q. You indicate that you were the single point of contact
 12 around contingency planning, working with multi-agency
 13 liaison within GMP Headquarters?
 14 A. That's correct.
 15 Q. The Local Authority Civil Contingencies Unit and the
 16 Counter-terrorism Policing North-west, formerly known as
 17 North-west CTU, but also the single point of contact for
 18 NWAS?
 19 A. That's correct. Essentially what I would be, I would be
 20 a signpost for any queries what came in from any of
 21 those agencies, so I would signpost them within
 22 Greater Manchester Fire and Rescue Service. So it
 23 wouldn't necessarily mean that I would take that work on
 24 myself and deliver that query, it would be that I would
 25 have the knowledge within the fire and rescue service to

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1 be able to say, "You need to speak to that person", or,
 2 "You need to speak to that department".
 3 In terms of planning with those agencies, yes, I may
 4 well undertake the planning or review of plans, but
 5 essentially some of the other work or queries I would be
 6 that conduit from those agencies back into the fire and
 7 rescue service or from the fire and rescue service back
 8 out to those agencies.
 9 Q. Thank you. Then from the time -- the work you've been
 10 doing over the last 5 or 6 years, has that been mainly
 11 based as an embed at the Counter-terrorism Police?
 12 A. I'm the embedded officer into Greater Manchester Police
 13 Headquarters and that is working with the North-west
 14 Counter-terrorism Policing, formerly North-west
 15 Counter-terrorism Unit, the Civil Contingencies Unit, so
 16 that's the local authority arm of the planning, Greater
 17 Manchester Police Contingency Planning Unit and, to some
 18 degree, North West Ambulance Service.
 19 SIR JOHN SAUNDERS: So you're embedded in quite a lot of
 20 places?
 21 A. Sir.
 22 MS CARTWRIGHT: You tell us specifically in your
 23 statement -- you deal with -- you have identified those
 24 individuals in terms of to whom you were the single
 25 point of contact. You then tell us about the liaison

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1 with British Transport Police. Could you tell us about
 2 that, please, around contingency planning?
 3 A. In terms of British Transport Police itself that's not
 4 an agency I would have been directly engaged with.
 5 Through the various resilience forum meetings, other
 6 members of the department attended that meeting and
 7 sometimes chaired those meetings and indeed other
 8 members of the department would attend those meetings.
 9 In terms of British Transport Police, I would say
 10 myself would have had very little contact in terms of
 11 resilience planning with British Transport Police. That
 12 would have come into other areas of the department.
 13 Q. Can we then, please, go back into the national guidance
 14 before we look at the local operating policy. We can
 15 see on --
 16 SIR JOHN SAUNDERS: Is embedded the right word?
 17 A. Seconded, embedded.
 18 SIR JOHN SAUNDERS: Okay. Or you're just the single point
 19 of contact for all of these different groups?
 20 A. In my day-to-day work I will work, for the majority of
 21 times, from Greater Manchester Police Headquarters. So
 22 I'm in that building the majority of the time, working
 23 with our partner agents in -- those agencies would know
 24 where to come to me.
 25 SIR JOHN SAUNDERS: So you're actually at the GMP building,

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1 but while you're there, you're the single point of
 2 contact for a number of other people or organisations?
 3 A. That's correct.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MS CARTWRIGHT: Can we look, please, at the NILO national
 6 guidance at page 3, please, of {INQ004559/3}.
 7 We can see it sets out there the four main
 8 categories of incident types in which the NILO may be
 9 involved: conventional and CBRN terrorism, including
 10 MTFA; major incidents; complex or protracted police-led
 11 incidents; spontaneous and planned serious public order.
 12 Correct?
 13 A. That's correct.
 14 Q. And I think we can then see at paragraph 2.4 of the
 15 national document that the role of the NILO will
 16 include:
 17 "Bridge the intelligence and information sharing
 18 between the partner agencies involved."
 19 A. That's correct.
 20 Q. Is that the reason why there needs to be the clearance
 21 for the NILO?
 22 A. That's correct.
 23 Q. Turning over the page to {INQ004559/4}, the next bullet
 24 point:
 25 "To improve inter-agency planning, operational

21

1 preparedness, liaison and response at emergencies,
 2 terrorist-related and other critical incidents."
 3 A. That's correct.
 4 Q. "to improve cooperation and understanding amongst
 5 agencies on matters of organisational capacity,
 6 capability and command."
 7 A. That's correct.
 8 Q. "To reduce risk to the public, operational personnel and
 9 the environment."
 10 A. That's correct.
 11 Q. Could I ask you -- the next paragraph, paragraph 2.5,
 12 says this:
 13 "Where possible the NILO will not take over incident
 14 command or take on other command functions. The command
 15 responsibility will remain with the incident commander
 16 and the NILO will act as a tactical adviser."
 17 Just pausing there, please, in the ordinary course
 18 of events, when a NILO is involved in an incident or one
 19 of the four types of incident, what is the NILO's role,
 20 please?
 21 A. Primarily, the NILO, as it states in 2.5 there, is
 22 a tactical adviser to the incident commander. There's
 23 no exception to that.
 24 Q. Then can I ask you to clarify -- and we'll come on to
 25 perhaps deal with this -- where there's a major incident

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1 where Operation Plato is declared, how can the role of
 2 the NILO change in that scenario, please?
 3 A. In that scenario, the NILO may well become what they
 4 call an on-scene commander. Essentially, that is akin
 5 to, in the fire and rescue service, a sector commander.
 6 So that's a sector commander who would have specific
 7 responsibilities for a section of the incident or the
 8 overall incident. The NILO still would be responsible
 9 and feed back into the incident commander.
 10 In terms of the NILO and the on-scene commander,
 11 that was something within the fire and rescue service
 12 what -- where fire and rescue services would accept that
 13 the NILO would be the on-scene commander following
 14 various initial foundation training, various exercises,
 15 from when the MTFA capability, so the marauding
 16 terrorist firearms attack capability, came into effect
 17 within the fire and rescue service, so the NILO would
 18 assume that responsibility.
 19 As a result of that, the National Fire Chiefs'
 20 Council chair, Roy Wilsher, in March 2017, wrote
 21 a letter to all chief fire officers and basically
 22 explained this, that in terms of the progression of MTFA
 23 work within the country, certainly within the fire and
 24 rescue service, and the work NILOs had in terms of
 25 supporting an MTFA incident, that NILOs would be --

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1 should certainly be highly considered as an on-scene
 2 commander. That was basically born out of -- we
 3 undertook lots and lots of training with our partner
 4 agencies in terms of the response to an MTFA or Plato
 5 event. We understood our partner agencies'
 6 responsibilities and capabilities. We had very detailed
 7 knowledge of terminology and, in addition to that, we
 8 had our ballistic PPE, personal protective equipment.
 9 So essentially, we could work up to or at the
 10 forward control point, liaising with our partner
 11 agencies to undertake that joint understanding of risk,
 12 that we all had the situational awareness, and then we
 13 could share that information out. And whilst at that
 14 forward control point we would have the knowledge in
 15 terms of the real time situational reports, what was
 16 happening in front of us, we could put a safe system of
 17 work in either for our partner agencies, but certainly
 18 to support the Ambulance Service in terms of mass
 19 casualty recovery and then indeed provide a briefing to
 20 our mass casualty recovery teams to go in and undertake
 21 any rescues.
 22 Q. I think you've told us there that the position that
 23 where an Operation Plato is declared for the NILO to
 24 then become an incident commander at the forward control
 25 point is something that's been approved by Mr Wisher,

24

1 I think you said.
 2 A. If I can just make a slight correction there: it's not
 3 an incident commander, it would be an on-scene
 4 commander.
 5 Q. Sorry, I do apologise.
 6 A. That's a specific role, a specific location, for example
 7 the forward control point at that incident. We would
 8 still work under the main incident commander.
 9 SIR JOHN SAUNDERS: So in terms of what we've been hearing
 10 about other organisations, incident commander is the
 11 equivalent of Gold?
 12 A. No.
 13 SIR JOHN SAUNDERS: I'll stop. We'll come back to it.
 14 But just to get some practicality around the theory,
 15 we know that on this particular night there was
 16 a warning of a --- and we may have doubt about this ---
 17 a bomb or an explosion. And that meant that the NILO
 18 was the person who was called out. There was no Plato
 19 actually declared at that time. Is that the right
 20 thing?
 21 A. Sir, in terms of the action cards, I have my own views
 22 in terms of the action card.
 23 SIR JOHN SAUNDERS: Okay. We're not going to be dealing
 24 with this now.
 25 MS CARTWRIGHT: I think we'll be coming on to deal with that

1 briefly. Maybe now is a good time to deal with that.
 2 SIR JOHN SAUNDERS: I just... Whatever they may have
 3 thought, the NILO was called out?
 4 A. That's correct. So in terms of that evening ---
 5 MS CARTWRIGHT: Sorry, in terms of --- next time the witness
 6 comes, he'll be dealing with his involvement on the
 7 night and also his role in the debrief. So the detail
 8 of what occurred on the night will be dealt with. I was
 9 just trying to ascertain ---
 10 SIR JOHN SAUNDERS: Okay. Let's just do it in theory, all
 11 right? If the alert is a bomb, who should be called
 12 out? It's not talking about the night, just the theory.
 13 A. Sir, at that time, in terms of the "Bomb: general", the
 14 bomb alert action card, that is for a device, whether
 15 that be a suspect package or whether that be
 16 a World War II bomb what's been located in a garden.
 17 The initial action there is to make contact with the
 18 NILO, who would then make contact with the police. The
 19 NILO then would put a number of resources on standby to
 20 support that incident. That is pre-explosion.
 21 SIR JOHN SAUNDERS: So it's a bomb which hasn't gone off?
 22 A. Correct.
 23 SIR JOHN SAUNDERS: And if it's an explosion?
 24 A. We would then respond and mobilise the predetermined
 25 attendance to an explosion, which then would, in terms

1 of that response, have a command structure wrapped round
 2 it.
 3 SIR JOHN SAUNDERS: But not through the NILO?
 4 A. Definitely not through the NILO.
 5 SIR JOHN SAUNDERS: Thank you. I think that's as far as we
 6 need to go today. It just gives people some sort of
 7 practical idea rather than talking about the theory.
 8 A. For an incident, and it matters not what incident it is,
 9 when resources are mobilised, it will be mobilised with
 10 a command structure. Now, that command structure may
 11 well be limited to those officers on the fire engines.
 12 If the response of resources is such so the more fire
 13 engines that are responding to an incident, the higher
 14 the level of a rank or role what will be mobilised to
 15 that incident to take command of the overall incident
 16 and responsibility of it.
 17 SIR JOHN SAUNDERS: We'll hear more about that but the
 18 intellectual justification for this is if you have an
 19 unexploded bomb, a NILO needs to make tactical decisions
 20 about what to do, but if you have an explosion, there's
 21 no doubt, you get the fire service there?
 22 A. Correct. At an unexploded bomb, yes, the NILO for
 23 Greater Manchester Fire and Rescue Service's action card
 24 was to contact the --- was to make contact with the
 25 police. That is still to coordinate the resources.

1 There still would be a response of resources. Sometimes
 2 it wouldn't respond to the incident itself because what
 3 we don't probably want is numerous fire engines turning
 4 up before the military (overspeaking) ---
 5 SIR JOHN SAUNDERS: Thank you.
 6 MS CARTWRIGHT: We just need to be conscious, perhaps
 7 I should have said, in terms of --- I elicited and asked
 8 the position, but just we need to be careful about the
 9 level of clearance issue in terms of that being
 10 operationally sensitive.
 11 Can I just, please, then deal briefly --- we talked
 12 about the two action cards. Can I take you to both of
 13 those just so we can see how those action cards set out
 14 the role of the NILO.
 15 To deal with the action plan for the bomb that
 16 you've just told the chairman about, {INQ004360/1},
 17 please, Mr Lopez.
 18 SIR JOHN SAUNDERS: Have we said things which are
 19 operationally sensitive? Right.
 20 MS CARTWRIGHT: We can see there --- I think the action card
 21 that you just described to the chairman was the one for
 22 bomb.
 23 A. That's correct.
 24 Q. I think if we go to the second page, please, Mr Lopez,
 25 {INQ004360/2}.

1 You gave a description to the chairman about
 2 action — this being the action plan for a bomb, but in
 3 the scenario you have described. We can see:
 4 "Bomb alerts (confirmed serious by police)."
 5 Can you clarify your understanding of what that
 6 action card is for, please?
 7 A. That's a device pre—detonation.
 8 Q. If we then go back to the first page, {INQ004360/1}.
 9 The role of the duty NILO in that scenario would be —
 10 for the action card for North West Fire Control would be
 11 for the duty NILO to be informed and to request guidance
 12 on actions to be carried out before proceeding further?
 13 A. That's correct.
 14 Q. Thank you. I'm not going to take you through the rest
 15 of that action plan, but that's the document you were
 16 referring to when you gave the answers to the chairman
 17 a moment ago?
 18 A. Pre—detonation, that's correct.
 19 Q. Thank you. Then, please, if we could go to the
 20 explosion action plan that you told the chairman about.
 21 That's {INQ004404/1}.
 22 This is the action plan for when a bomb has
 23 exploded; is that correct?
 24 A. That's correct.
 25 Q. Again, in terms of what you told the chairman a moment

1 ago, can we see there that the action in respect of that
 2 scenario would be:
 3 "Send the TRU, send the pumps, send station manager
 4 and also send the duty NILO"?
 5 A. That's correct.
 6 MS CARTWRIGHT: Sir, I don't think at this stage we need to
 7 go into any further detail about those action plans
 8 unless you want any further detail about —
 9 SIR JOHN SAUNDERS: No, that's fine, thank you very much.
 10 MS CARTWRIGHT: Thank you.
 11 Just taking you back into your witness statement,
 12 just where we deal with the role of the NILO, you've
 13 already told us that the role of the NILO has always
 14 been a tactical adviser to the incident commander. They
 15 support partner agencies in sensitive operations, the
 16 exception being when Operation Plato is declared where
 17 a NILO adopts the role of on—scene commander at the
 18 forward control point. In reality this is akin to the
 19 role of sector commander in normal firefighting
 20 operations?
 21 A. That's correct.
 22 Q. Then in terms of the national position as to what was
 23 understood, what was subject to training and exercising,
 24 was it well—known that in an Operation Plato scenario
 25 that's where the duty NILO should be, at the forward

1 control point, providing the role of on scene commander?
 2 A. That's my belief.
 3 Q. I think you go on to tell us at paragraph 23 of your
 4 witness statement, at {INQ026735/1}, that:
 5 "The reason a NILO becomes on—scene commander in the
 6 event of an MTFA is because they have specialist
 7 training which provides for an understanding of partner
 8 agencies' working protocols within an MTFA response."
 9 A. That's correct.
 10 Q. Could I ask you then in terms of the role of a NILO also
 11 in attendance of Security Review Committee meetings,
 12 please. Could you explain generally why the NILO would
 13 attend at Security Review Committee meetings, please?
 14 A. That's not necessarily a NILO. That was one of my roles
 15 as the seconded officer into Counter—terrorism Policing.
 16 So every 2 weeks, I would dial in with my colleagues
 17 from Counter—terrorism Policing Protect and Prepare and
 18 we would dial into the Security Review Committee, which
 19 was held in London.
 20 Essentially, there was various aspects, I suppose
 21 agenda items, to that Security Review meeting. One
 22 aspect was a JTAC update, a Joint Terrorism Analysis
 23 Centre update, in terms of the current risk threats to
 24 the UK and UK interests.
 25 Q. Thank you.

1 Can I then ask you — we've looked briefly at the
 2 national policy. Could I then, please, take you into
 3 the standard operating procedure at Greater Manchester
 4 Fire and Rescue Service for the role of the NILO.
 5 That's at {INQ004561/1}.
 6 Mr Lawlor, if we could turn over the page, please,
 7 to INQ004561/4, we can see the various versions of that
 8 SOP. Is this the SOP that was governing the role of the
 9 NILO and the SOP that was in place at the time in 2017?
 10 A. I believe so.
 11 Q. Could we use this SOP, please? I think it's a document
 12 that you, we can see, had a role in terms of various
 13 drafts of that document. Could we turn, Mr Lopez, to
 14 page 8 of that local SOP {INQ004561/8}?
 15 We can see there the national standards for the
 16 NILO. Again, that sets out that following the 7/7
 17 attacks in London, there was a drive to develop the NILO
 18 role across the country against a national set of
 19 standards and to forge closer links with the regional
 20 counter—terrorist hubs, which you have told us about.
 21 A. That's correct.
 22 Q. Then if we could turn over the page, please, to
 23 {INQ004561/9}, could you assist us in terms of the
 24 NILO's availability and the work that takes place
 25 between the NILO and then the FDO, please?

1 A. So as an agency, we have a number of NILOs on duty at
 2 any one time. In terms of those NILOs, there would
 3 always be a duty NILO. That NILO would potentially take
 4 all the calls day-to-day, issues, queries, from the
 5 various agencies. Mainly there would have been dialogue
 6 between the duty NILO and police. We would book on duty
 7 through our normal processes, but at the same time
 8 we would also contact the force duty officer and inform
 9 them that we was the duty NILO for that period,
 10 a 24-hour period, or if it was a weekend and you were
 11 duty NILO for that weekend, you would convey that
 12 information.
 13 Q. So in terms of that contact with the force duty officer
 14 when coming on, does that take place on every day
 15 between the NILO and the FDO?
 16 A. That's correct, yes. It's probably not for discussion
 17 now, but we have certainly -- we have enhanced that and
 18 moved it forward now, but at that moment in time there,
 19 every day the duty NILO would contact the force duty
 20 officer.
 21 Q. So that we have been the position in May 2017?
 22 A. That's correct.
 23 Q. In terms of that liaison, is that just over the
 24 telephone?
 25 A. Yes.

1 Q. Can we then turn over the page, please, in this local
 2 SOP to {INQ004561/10}.

3 We can see there the function and responsibilities
 4 of the NILO role as recorded in the policy at
 5 paragraph 10. I think that mirrors what was contained
 6 within the national policy. The guidance also sets out
 7 at paragraph 12 again the various criteria of incidents
 8 at which a NILO would be required.
 9 A. Correct.
 10 Q. Then again over the page, {INQ004561/11}, we can see
 11 that the local SOP mirrors the national policy. Then
 12 can I ask you -- we can see at paragraph 13, the
 13 penultimate bullet point, it says:
 14 "In certain circumstances the NILO will act as the
 15 incident commander."
 16 In what scenario will a NILO act as the incident
 17 commander, please?
 18 A. So in certain circumstances, the NILO, through
 19 a request, say, from Greater Manchester Police or
 20 another agency -- it may be that the NILO would respond
 21 in isolation to that incident type, it may be that the
 22 NILO has assessed that incident type, so for example it
 23 might be just to give advice, so therefore there are no
 24 resources being mobilised to that event or location, so
 25 therefore the NILO is the only person that is there. So

1 essentially, that individual would, I suppose, assume
 2 the role of the incident commander because there's no
 3 other resources to command. It would be then the
 4 messaging -- any messages or any dialogue with North
 5 West Fire Control would be purely between that
 6 individual, the NILO, and North West Fire Control to
 7 update them of any information.
 8 I'm struggling to think of an incident type at this
 9 moment in time, but it may just be that the NILO is the
 10 only person providing support to our partner agencies to
 11 resolve an incident, a scenario, or it might be that
 12 there may be some fire service advice that may be
 13 required.
 14 Q. But in terms of if it was a major incident or terrorist
 15 attack, that wouldn't be a NILO performing the incident
 16 commander?
 17 A. No.
 18 Q. And in respect of an Operation Plato declaration, it
 19 wouldn't be the role of a NILO?
 20 A. Definitely not. It would just be if that individual as
 21 a NILO is at a location on their own, providing some
 22 sort of assistance to other agencies.
 23 Q. Thank you.
 24 Looking at {INQ004561/14} of this document,
 25 paragraph 20, it sets out that:

1 "The NILO will be aware of strategic and tactical
 2 plans and priorities of other agencies involved" --
 3 SIR JOHN SAUNDERS: Can we just stop for a moment? If
 4 Mr Lopez will enlarge, I think they're quite difficult
 5 to see if they're in their original form. If you would
 6 do it automatically. Thank you.
 7 MS CARTWRIGHT: We can see at paragraph 20 that:
 8 "The NILO will be aware of strategic and tactical
 9 plans and priorities of the other agencies involved and
 10 will ensure that any deployments of GMFRS personnel or
 11 resources are:
 12 "Appropriate;
 13 "Timely;
 14 "Subject to a suitable and sufficient assessment of
 15 risk and benefit;
 16 "Subject to the implementation of a safe system of
 17 work."
 18 A. That's correct.
 19 Q. Can I ask you then, in terms of the resources that the
 20 NILO has the responsibility for, that's not just the
 21 Greater Manchester Fire and Rescue Service personnel, is
 22 it? It's also other resources like TRU and SRT?
 23 A. So resources -- so the NILO would have a good
 24 understanding of what resources locally, within the
 25 Greater Manchester Fire and Rescue Service, for example,

1 would have at their disposal for an incident. So that
 2 would involve the technical response unit.
 3 Q. I used the TRU and SRT. Can you give a high-level
 4 summary of what TRU is, first of all, please?
 5 A. TRU is the technical response unit. That's a specialist
 6 capability we have at [REDACTED]
 7 [REDACTED] OS Those personnel have enhanced training in
 8 a number of capabilities, so whether that's rope access
 9 rescue, whether that's collapsed structures such as
 10 sewer rescues, they have had the enhanced training.
 11 Q. Then in terms of the SRT, please, the specialist
 12 response --
 13 A. The specialist response team. Before the MTFA
 14 capability came to Manchester, a decision was made
 15 organisationally to nominate both the technical response
 16 units as the most -- the best appropriate stations to
 17 undertake the specialist response team training.
 18 Q. I'm going to take you back into your witness statement,
 19 if we could work through the information from
 20 paragraph 24 onwards. You have told us about the NILO
 21 becoming an on-scene commander in the event of an MTFA
 22 because they've got the specialist training. Then you
 23 go on to give us a little detail about a NILO1 at
 24 an MTFA. Could you give us that detail, please?
 25 A. Essentially, for an MTFA incident, the procedure then

1 was, where possible, to mobilise two NILOs to the
 2 incident. The NILO1 would be the individual who would
 3 attend the forward control point. They would liaise
 4 with the ambulance tactical commander and the police
 5 tactical firearms commander where the three agencies
 6 would undertake and carry out a joint understanding of
 7 risk.
 8 From that conversation, or that meeting, that's --
 9 essentially throughout the MTA world, that's called an
 10 over-the-bonnet conversation. So that's the various
 11 agencies coming together and having those discussions.
 12 So following the joint understanding of risk, the
 13 various zones would be identified. So whether that's
 14 hot zone, a warm zone, a cold zone. Once that
 15 information was known, we would be asking the police
 16 tactical firearms commander to inform us of the limit of
 17 exploitation, so the LOE.
 18 Q. Let's pause there for a moment. The terminology
 19 you have given is to hot zones and warm zones and limits
 20 of exploitation. They are dealt with in the joint
 21 operating procedures of the emergency services, aren't
 22 they?
 23 A. That's correct.
 24 Q. And I think the version that was in place in May 2017
 25 was edition 3. Perhaps then, before we get into the

1 summary of those, if we could go to that Joint Operating
 2 Principles edition 3, please, which is {INQ008372/1}.
 3 Is this the guidance that contains the description
 4 you have just told us about, hot zones and limits of
 5 exploitation?
 6 A. That's correct. That will be in the glossary of terms.
 7 Q. Let's turn to those so we understand and get
 8 a foundation for those descriptions, please. If we
 9 could turn to {INQ008372/4}.
 10 If we could expand halfway through the page where we
 11 deal with hot zone, first of all. You have described
 12 a moment ago the hot zone. We can see in the joint
 13 operating principles:
 14 "The hot zone is where the attackers are present or
 15 there's an immediate threat to life."
 16 A. That's correct.
 17 Q. In terms of in a hot zone, who would, in accordance with
 18 the JOP 3, be in the hot zone?
 19 A. At that time, in terms of JOPs 3, the people who were
 20 permissible, I suppose, to work in that zone would be
 21 police and military.
 22 SIR JOHN SAUNDERS: Armed?
 23 A. I would say so, yes.
 24 MS CARTWRIGHT: You were going on to tell us in the answer
 25 you gave a moment ago about limits of exploitation.

1 SIR JOHN SAUNDERS: Before you go on to that, I'm really
 2 sorry. Hot zone, where the attackers are present or
 3 where there's an immediate threat to life. There may be
 4 a stage where something has happened, a suicide bomber,
 5 but nobody knows at that early stage whether there is
 6 anyone else within that area where they set off the
 7 bomb.
 8 A. That's correct, sir.
 9 SIR JOHN SAUNDERS: Is that a hot zone or a warm zone?
 10 A. That would be determined -- that would be deemed a hot
 11 zone at that time.
 12 SIR JOHN SAUNDERS: When you don't know whether there are
 13 other people there or not?
 14 A. That's my understanding.
 15 SIR JOHN SAUNDERS: It does seem to me to be quite
 16 important. Obviously you're an expert at this. That
 17 doesn't actually make it clear because what it's saying
 18 is that they are present.
 19 A. In terms of when you consider the methodologies, where
 20 that may well be a single-seated attack or multi-seated
 21 attack, whether that's using a number of devices to
 22 carry out the attack, so I suppose in the early stages
 23 it would be, I suppose, unreasonable or unlikely that
 24 you would declare that initial area of attack anything
 25 other than a hot zone until armed police or military

1 assets are moved forward to undertake an assessment of
 2 that area. So it's quite reasonable that until some
 3 assessment has been carried out initially that still
 4 would remain a hot zone.
 5 SIR JOHN SAUNDERS: Okay. If I'm delving into areas where
 6 I shouldn't be delving or we're coming to it later,
 7 please do stop me.
 8 Does that mean in practice armed police go in to
 9 look at the place and within that area there are
 10 a number of members of the public helping people who are
 11 injured and maybe the odd paramedic who's got there.
 12 Would the armed police then clear them out until they
 13 had completed a search of the area?
 14 A. It's unlikely, sir.
 15 SIR JOHN SAUNDERS: I'm sorry, are there rules and
 16 regulations about it or do they just have their own
 17 discretion?
 18 A. What should happen at the forward control point, where
 19 the three services are undertaking a joint understanding
 20 of risk, we as a collective tri-agency, what we would be
 21 trying to do as soon as possible is reduce those zones,
 22 so the scenario you've just identified there, where
 23 a device has operated, there may well be members of the
 24 public in that area. In terms of that conversation over
 25 the bonnet, we would be trying to push for that area to

1 be reduced from, say — for example, reduce the extent
 2 of the hot zone but extending the area of the warm zone,
 3 so specialist responder capabilities can move into that
 4 area to undertake rescues of casualties.
 5 But I must say, we've now moved on from JOP 3 to
 6 a new edition and where we have moved on a lot further
 7 now from what you are describing there, sir.
 8 MS CARTWRIGHT: Perhaps for the purposes at this stage,
 9 because there will be witnesses coming to deal with what
 10 happened on 22 May, if we could just use the glossary to
 11 deal with the various terminologies to get a general
 12 understanding about those and how it applies to the
 13 NILO.
 14 SIR JOHN SAUNDERS: Okay. I'm quite keen to know how the
 15 hot zone is actually defined and this witness seemed
 16 a reasonable one to get the definition from and how it
 17 applied in practice.
 18 MS CARTWRIGHT: Perhaps Mr Lawlor if I could then take you
 19 to paragraph 29 of your witness statement. You tell us
 20 there that:
 21 "A hot zone is where the terrorists are believed to
 22 be present undertaking their attack. Fire and rescue
 23 services would not work in a hot zone. At the time of
 24 the arena incident and the JOP 3, there were no
 25 exceptions to this rule. Those rules have subsequently

1 been amended under MTF A JOPs to acknowledge scenarios
 2 where first responders arrive at a scene, unaware of the
 3 type of attack or prior to the establishment of zones."
 4 A. That's correct.
 5 Q. But as of the time of the arena attack and what was
 6 contained in JOP 3, the scenario was the hot zone was
 7 not for fire and rescue service to be within?
 8 A. That's correct. What you've got to accept, though, is
 9 if there is a dynamic incident that is unfolding, so for
 10 example using a vehicle as a weapon, and fire and rescue
 11 services are mobilised to a road traffic collision, it
 12 may be that you do get non-specialist responders within
 13 that zone and carrying out life-saving operations or
 14 actions.
 15 Again, if the hot zone or warm zones couldn't be
 16 reduced at the forward control point, there would be
 17 a desire to swap, if you will, those non-specialist
 18 responders with specialist responders to continue and
 19 carry out those life-saving rescues or operations.
 20 Q. Pause there, please, Mr Lawlor.
 21 Mr Lopez, could we put back up, please,
 22 {INQ008372/4}.
 23 SIR JOHN SAUNDERS: While this is being put up, this is all
 24 on the assumption that we have a forward control point
 25 at which the three main services are all represented?

1 A. Sir, so the JOP 3 at the time and the documentation
 2 assume that on the declaration of Operation Plato, that
 3 would be communicated to our agencies with the
 4 identification of a forward control point. In all
 5 circumstances there may not be a forward control point
 6 set up, so that would require then the responding
 7 commanders, the NILOs or resources to do something. So
 8 what we shouldn't do is allow the non-existence or
 9 a forward control point which has not been set up to
 10 stop us from undertaking rescue activities.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MS CARTWRIGHT: I'm just going to deal with the terminology
 13 of the warm zone and what you tell us in your witness
 14 statement, please.
 15 Mr Lopez, if we turn over the page to {INQ008372/5},
 16 the last row of that page, we can see the warm zone
 17 there is:
 18 "... where the attackers are believed to have passed
 19 through but could enter/re-enter imminently. These
 20 areas cannot be guaranteed as safe."
 21 You tell us in your witness statement — this is at
 22 paragraph 30:
 23 "A warm zone is the area where responders with
 24 specialist PPE would work. The idea behind this is that
 25 the area is not under immediate threat but there may be

1 a ballistic risk to the area, in particular if
 2 perpetrators of an attack return or pass through it.
 3 Therefore at the time of the Arena attack, GMFRS had
 4 specially trained MTFA crews who have specialist
 5 training and equipment to work within a warm zone to
 6 assist ambulance colleagues in casualty recovery.”
 7 A. That’s correct.
 8 Q. Then you tell us that:
 9 “The cold zone is the area where there is no
 10 perceived risk, therefore unprotected responders can
 11 carry out their duties.”
 12 A. That’s correct.
 13 Q. I think we see, Mr Lopez, please, on {INQ008372/4} of
 14 that document, the definition in JOP 3 of the cold zone:
 15 “An area where it’s been assessed that there is no
 16 immediate threat to life.”
 17 A. That’s correct.
 18 Q. Just so we can deal with the limits of exploitation,
 19 which is a terminology you have used already in giving
 20 answers to the chairman:
 21 “The limits of exploitation is the border between
 22 the hot and warm zone. It’s the furthest point to which
 23 some specialist emergency responders will operate. The
 24 limits of exploitation will be jointly agreed between
 25 on-scene commanders as part of an ongoing joint

1 assessment of risk.”
 2 A. That’s correct.
 3 Q. Then I think you told us about the forward control
 4 point, and again we can see the definition of the
 5 forward control point in the glossary at {INQ008372/4}:
 6 “A location near to the scene where the response by
 7 the emergency services is managed.”
 8 A. That’s correct.
 9 Q. You tell us in your witness statement at paragraph 32:
 10 “The forward control point should be on the cusp of
 11 the warm and cold zone. Anyone working in the warm zone
 12 should be in ballistic PPE. Under JOP 3 it would not be
 13 permissible to have unprotected workers working within
 14 the warm zone. Anyone in the cold zone is in normal
 15 PPE.”
 16 A. That’s correct. So in terms of where it identifies
 17 it would not be permissible, in terms of — if I put
 18 a bit of context to that. So if I’m the NILO at the
 19 forward control point, I wouldn’t knowingly commit
 20 non-specialist responders, so unprotected responders,
 21 into that warm zone, notwithstanding, though, in terms
 22 of the initial response there may well already be first
 23 responders in that area. What I would be doing is
 24 committing specialist responders into that area as
 25 quickly as possible or through the dialogue with the two

1 other commanders to try and reduce those areas as
 2 quickly as possible.
 3 In any case, where I’m committing people into a warm
 4 zone, at the time of JOP 3, that would be specialist
 5 response teams who’ve had the training and who have the
 6 appropriate ballistic PPE.
 7 Q. Would that be fire personnel who had had the MTFA
 8 training?
 9 A. That’s correct. That’s the specialist responders team
 10 we discussed earlier.
 11 Q. And the PPE that you have told us about that the NILO
 12 would have, the same PPE would be possessed by those
 13 MTFA specially trained fire service personnel?
 14 A. In the main, yes.
 15 Q. Thank you.
 16 SIR JOHN SAUNDERS: I’ll stop intervening in a moment. But
 17 this all depends on the agreement of the three
 18 commanders at the scene?
 19 A. Correct.
 20 SIR JOHN SAUNDERS: So it’s up to — obviously you talk
 21 together and you hope and you normally would entirely
 22 agree, but if you don’t agree and if the fire commander
 23 does not think a particular zone is safe, that it’s not
 24 a cold zone but it’s a warm zone or a hot zone, whereas
 25 others think it is, am I right in thinking that you

1 would not commit your fire officers unless you were
 2 personally satisfied what was a cold zone and what was
 3 a warm and hot zone?
 4 A. What I’d say in response to that was we at the time and
 5 prior to the arena we undertook a lot of live play
 6 exercises with Greater Manchester Police firearms and
 7 North West Ambulance Service. We undertook quite
 8 a number of tabletop exercises. We undertook a number
 9 of awareness sessions. So in terms of not agreeing,
 10 that would be extremely unlikely.
 11 We would certainly — when I say “we”, I mean
 12 Greater Manchester fire NILO and NWS Tactical advisers,
 13 we would take on board the risk information or the
 14 information what is coming from the tactical firearms
 15 commander because they would have the up-to-date
 16 information about risks that are posed within that zone,
 17 which would be fed back from the firearms responders to
 18 the tactical firearms commander, who would be giving us
 19 up-to-date intelligence and information. So I can’t see
 20 that being an issue in terms of us not agreeing the
 21 zones or the limits of exploitation.
 22 SIR JOHN SAUNDERS: Right. Bearing in mind the job of the
 23 police commander, armed police commander, on the scene,
 24 who, as you say, has the information, his men going out
 25 and checking, in a way it would seem logical for him or

1 her to check the zones.
 2 A. The police tactical firearms commander, they would
 3 inform us of the zones and essentially we would agree to
 4 those — we would agree by virtue that the tactical
 5 firearms commander is informing us of where the zones
 6 are and past a certain point they can't guarantee the
 7 safety, if you will, so that's your limits of
 8 exploitation. So even in a warm zone, there may well be
 9 a point in that warm zone where we would, when tasking
 10 our specialist response teams, would say, "Don't go past
 11 Debenhams, for example", so that would be the limit of
 12 exploitation.
 13 MS CARTWRIGHT: Can I take you back into your witness
 14 statement then. You tell us at paragraph 33 that:
 15 "NILOs are well-versed on national threats of
 16 terrorism and will think differently therefore to other
 17 firefighters when attending these types of incidents."
 18 You go on to give us details about the national
 19 Security Review Committee meetings that you've told us
 20 about that you would dial into with your regional
 21 counter-terrorism colleagues as part of your role within
 22 GMP Headquarters. You would dial in, in conference with
 23 your counter-terrorism and ambulance colleagues, and
 24 that within those meetings the JTAC update would be
 25 given as to the current threat?

1 A. That's correct.
 2 Q. You go on to tell us that you, as a NILO, would be very
 3 mindful of recent attacks but also the national threat
 4 level which at the relevant time would have been severe.
 5 A. That's correct.
 6 Q. I think you go on to tell us that one of the roles that
 7 you would have is, I think, the production of safety
 8 alerts that Greater Manchester Fire and Rescue Service
 9 issued and provided to all personnel?
 10 A. That's correct.
 11 Q. I think you have provided to your witness statement
 12 a number of those. Perhaps if I could take you to one
 13 of those as an example of those alerts, please. If
 14 I could take you to {INQ004225/1}.
 15 Is this an example of one of those safety alerts
 16 that would be then issued to all Greater Manchester
 17 personnel, fire and rescue service personnel?
 18 A. Yes, it would be, but that — in terms of the INQ number
 19 and the safety alert, they do differ. You said 225
 20 refers to the Westminster attack and the one on screen
 21 is referring to the Berlin incident, 224.
 22 Q. I think that's the INQ reference that's given within
 23 your statement, but perhaps then —
 24 A. It matters not.
 25 Q. It's an example of one, and we can see the directions

1 that are given to the personnel in respect of incidents
 2 that have occurred and:
 3 " ... to have an awareness that the current threat
 4 level remains at severe for international terrorism and
 5 personnel should ensure compliance with the relevant
 6 requirements detailed in the national threat level
 7 policy and procedure."
 8 A. That's correct.
 9 Q. And I think all of the various safety alerts that you've
 10 referenced operate on a similar position to ensure that
 11 all GM Fire and Rescue Service staff were well aware of
 12 the changing and evolving threat level?
 13 A. That's correct. So again, in terms of a context behind
 14 that, behind those various safety alerts, it was still
 15 with the ethos of responding to the incident,
 16 undertaking rescues, but also being mindful that there
 17 is a number of low-level methodologies which could
 18 include what we would normally respond to, business as
 19 usual.
 20 Q. Thank you.
 21 Perhaps then if we do look to the one that is in
 22 fact for Westminster, which is {INQ004224/1}.
 23 SIR JOHN SAUNDERS: And you'd always be alert to copycats?
 24 A. That's correct, yes.
 25 MS CARTWRIGHT: {INQ004224/1}. Perhaps if that could be

1 expanded, thank you.
 2 This is an example of a safety alert that was issued
 3 to all personnel the day after the London incident on
 4 23 March 2017.
 5 A. That's correct.
 6 Q. I think you tell us in your witness statement that the
 7 alerts warn GMFRS personnel of current types of threats
 8 and, at the point of the arena attack, you were not
 9 aware of any specific intelligence suggesting that an
 10 attack in Manchester was imminent nor did you know of
 11 any specific threat against the arena?
 12 A. That's correct.
 13 Q. Then I think you go on to set out that:
 14 "The Manchester Arena attack involved a different
 15 approach to other terror attacks taking place around
 16 that time. Those other attacks centred on use of
 17 vehicles and bladed weapons utilised on a marauding
 18 basis. They were of low sophistication and that as
 19 suicide bombers in reality are a more sophisticated type
 20 of attack, it was at odds with the general approach
 21 being used at that time."
 22 I think you specifically say:
 23 "It is important that this is borne in mind when
 24 considering the approach taken by GMFRS NILOs on the
 25 night of the arena attack. The arena is an iconic

1 crowded place. The national risk assessment in place at
 2 that time identified a specific threat around crowded
 3 places and iconic locations.”
 4 A. Correct.
 5 Q. Then could I just ask you to expand on particularly what
 6 you mean by that it should be borne in mind when
 7 considering the approach of the GMFRS NILO, the
 8 importance of that?
 9 A. So again, at that period of time, if you looked
 10 12 months prior to the incident, the environment, it
 11 just felt different. So the NILOs and the corporate
 12 leadership team were aware of the various attack
 13 methodologies, the places of interest, along with the
 14 national risk assessment. So in terms of the thought
 15 process, the NILOs would have this in mind in terms of
 16 if there is an incident at such a location, so for
 17 example a bomb or explosion, then the NILO would be
 18 thinking differently. That’s not necessarily to say
 19 take any other action, but certainly would be thinking
 20 differently in terms of the incident. So it could well
 21 be that the thoughts running through the NILO’s mind
 22 would be that this could be a malicious, deliberate
 23 attack or an incident.
 24 SIR JOHN SAUNDERS: Okay. I am not sure I quite understand
 25 that. Clearly, with any unexploded bomb threat, if

1 that’s what it is that you’re hearing about, then it
 2 always could be a malicious call, couldn’t it, but
 3 you have to treat it the same way as if it’s a genuine
 4 one, don’t you?
 5 A. Sir, an unexploded bomb or an exploded —
 6 SIR JOHN SAUNDERS: If it’s an exploded bomb, it can’t make
 7 any difference to your thinking, can it? So if it’s an
 8 unexploded bomb, which is, as I understand it, what
 9 you’d understand by a bomb alert.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: An unexploded bomb could be malicious.
 12 Does that make any difference to your response?
 13 A. It wouldn’t necessarily make any difference to the
 14 response, it just would make a difference to the thought
 15 process of the NILO. But in terms of — we wouldn’t
 16 necessarily treat it as business as usual.
 17 What you’ve got to understand, sir, is the
 18 environment we were working in and the information
 19 what was being shared through the national network into
 20 the local network and then from there into the
 21 Greater Manchester Fire and Rescue Service. It just
 22 meant that we were thinking differently in terms of
 23 certain incident types at certain locations.
 24 So for example, if we were responding to a road
 25 traffic collision in Deansgate where a number of people

1 have been injured, yes, we will still respond the same,
 2 and we will still mobilise resources in the same manner,
 3 it would be down then to the NILO to start to quickly
 4 gather intelligence from partner agencies, so the force
 5 duty officer and our police colleagues to ascertain: is
 6 there a threat there, is that a deliberate attack or
 7 is that just an accident? And if it’s perceived as
 8 a deliberate attack, what the NILO would do then,
 9 through various comms methods and North West Fire
 10 Control, we would try and get the information back out
 11 to those responding crews just to say, “You need to be
 12 aware, be careful of potential other or multi-seated
 13 attacks”.
 14 We would still respond the same, we just think
 15 differently, I would say, if I can kind of capture that
 16 in a nutshell.
 17 SIR JOHN SAUNDERS: I readily understand that example. I’m
 18 not quite sure how it relates to what you were saying
 19 before about the thought processes of the NILO.
 20 Clearly, it may be going through a NILO’s mind, “Well,
 21 this may not be genuine”, but how does that affect what
 22 he does or she does?
 23 A. Are we talking about the night itself?
 24 SIR JOHN SAUNDERS: No, I’m talking about — you were the
 25 one who said we have to bear that in mind because of the

1 nature of the attacks that were going on at the time,
 2 which by and large, you’re saying, were not suicide
 3 bombs. So the thought processes of a NILO then would be
 4 in some way more likely that it’s not genuine or...
 5 I don’t see how it affects the actions of a NILO. You
 6 asked us to bear it in mind; now tell us how it affects
 7 the actions of a NILO. I’m sorry to put you on the
 8 spot.
 9 A. To be honest, I’m struggling in terms of the question
 10 you’re asking. You made reference to an unexploded bomb
 11 previously. So in terms of an unexploded device...
 12 SIR JOHN SAUNDERS: This all comes out of paragraph 38.
 13 Fourth line:
 14 “A suicide bomb is in reality a more sophisticated
 15 type of attack and was at odds with the general approach
 16 being used at the time.”
 17 So by and large, suicide bombs were pretty rare
 18 amongst terrorists at the time; is that what that means?
 19 A. Yes, sir.
 20 SIR JOHN SAUNDERS: Okay:
 21 “It is important that this is borne in mind when
 22 considering the approach taken by NILOs on the night of
 23 the arena attack.”
 24 So how did that, the fact that they were pretty rare
 25 at the time, affect the approach taken by the NILO on

1 that night?
 2 A. The NILO on that night was seeking to gain further
 3 information from the police force duty officer to
 4 ascertain the nature of the incident, so was it an
 5 accident or was the information being passed to them --
 6 was it a deliberate attack? And where the appropriate
 7 forward control point would be to meet our partner
 8 agencies to, I suppose, get round the bonnet of the car,
 9 vehicle, and undertake that joint assessment of risk.
 10 SIR JOHN SAUNDERS: Sorry to push you, Mr Lawlor, but
 11 contacting the force duty officer is standard procedure.
 12 It was there always. So he was going to do that
 13 whatever, wasn't he, because he needed more information?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: So I'm still not sure how the rarity of
 16 suicide bombing attacks at the time affected the conduct
 17 of the NILO.
 18 A. I suppose primarily, the NILO on the night for that
 19 incident shouldn't have been contacted immediately in
 20 terms of the action cards. The very fact that the NILO
 21 was contacted, I suppose he assessed the information
 22 he was provided on that night, and it would be then the
 23 NILO then -- would be required to try, where possible,
 24 to obtain further information, advice, in terms of,
 25 I suppose, advising or putting a safe system of work in

1 place so that responders are not unnecessarily injured,
 2 that they could direct or mobilise the appropriate
 3 resources in the absence of those resources being
 4 mobilised in the first place, and again just gathering
 5 that information to ensure there's a safe system of work
 6 in place responding to the incident.
 7 SIR JOHN SAUNDERS: You'll understand there are certain
 8 factual matters which will have to be decided about
 9 which card was being used and why.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: But thank you for that. I hope I'm
 12 beginning to understand, but that particular comment
 13 there still does worry me as to its precise meaning or
 14 relevance at the moment. But we'll see as we go along.
 15 MS CARTWRIGHT: Sir, we're going to be moving now just to
 16 deal with the training and then live play and
 17 Winchester Accord, so we've a little to go. I'm
 18 conscious we've been going a little while and I had
 19 hoped to be making more progress than I have.
 20 SIR JOHN SAUNDERS: That's my fault entirely. I have taken
 21 a very long time over that.
 22 MS CARTWRIGHT: I think, sir, we can deal with this at a
 23 high level, but it's whether at this stage, bearing in
 24 mind the stenographer, whether you want to take a short
 25 break or whether we continue to see --

1 SIR JOHN SAUNDERS: It's not for me to be saying, it's
 2 really for the stenographers, and we have been going now
 3 for 1 hour and 20 minutes.
 4 Right, we'll have a 10-minute break, so just after
 5 3.00.
 6 (2.53 pm)
 7 (A short break)
 8 (3.07 pm)
 9 MS CARTWRIGHT: Mr Lawlor, I'm going to move now to deal
 10 with aspects of your statement to do with training, and
 11 I make clear that I'm not going to deal with every
 12 aspect of your witness statement where you deal with
 13 a number of matters. I want to focus today on perhaps
 14 matters of most assistance to the chairman.
 15 You tell us in your witness statement that:
 16 "Since the 2012 Olympics, the emergency services
 17 have trained together on the national JOPs as part of
 18 their multi-agency preparations for an attack and when
 19 [you] look at the targets for terrorist incidents, they
 20 are transport hubs, crowded places, shopping centres,
 21 events." And that:
 22 "Greater Manchester Fire and Rescue Service has
 23 specifically attended training based upon the scenarios
 24 at all of those locations since 2012."
 25 A. Correct.

1 Q. You indicate that the training is a number of different
 2 forms of exercise: tabletop and live play to lectures
 3 with practical elements.
 4 A. That's correct.
 5 Q. What I want to take you to now is just to a number of
 6 those that you tell us about. I'm not going to deal
 7 with Satan Force.
 8 Can I move then please to paragraph 48 of your
 9 witness statement, please. You tell us about
 10 Exercise Valley Oak as an example of a multi-agency
 11 awareness exercise for commanders, and that specifically
 12 it assembled each agency's specialist response vehicles
 13 to a rendezvous point.
 14 A. That's correct.
 15 Q. In terms of those specialist response vehicles, are
 16 those the TRU and the SRT that we've heard about?
 17 A. No, I don't believe so. In terms of those specialist
 18 vehicles, the Exercise Valley Oak was around the command
 19 and control. There's been a number of different
 20 iterations of Exercise Valley Oak. So in terms of
 21 recollection of which resources attended the one I've
 22 referred to there, I can't recall if the technical
 23 response unit and the specialist response teams attended
 24 that exercise, but essentially it was all around the
 25 command and control, so which command and control

1 vehicles does each agency have to bring to an incident
 2 in terms of, I suppose, sharing and cascading and
 3 commanding a command facility for that incident.
 4 Q. I think then, just as a general proposition, you tell us
 5 in your witness statement at paragraph 49 that you've
 6 been involved in the exercises, the events and the
 7 audits by way of planning and delivery in your capacity
 8 as the lead NILO and that all of those exercises require
 9 extensive multi-agency liaison in their planning and
 10 execution.
 11 A. That's correct.
 12 Q. You go on then to tell us about an Exercise Hawk River.
 13 I wonder if you could tell us at high level what
 14 Hawk River was, please.
 15 A. Hawk River was a tabletop exercise for commanders, which
 16 was -- it was, I suppose, coordinated by the Office for
 17 Security and Counter-terrorism training hub and it was
 18 to bring commanders into a room and work through the
 19 joint operational principles and the different various
 20 subsections or chapters of the JOPs and then, in terms
 21 of working the way through a given scenario, working
 22 through the chapters.
 23 Q. I'm going to take you, please, to the debrief report
 24 that's been provided for Exercise Hawk River and then
 25 see if you can assist us with that document.

1 Mr Lopez, it's {INQ004529/1}.
 2 You've already identified that the Hawk River was
 3 Counter-terrorist Policing and we can see that the
 4 exercise was on 1 March 2017. Can you assist us: when
 5 would you have received this debrief report please,
 6 Mr Lawlor?
 7 A. If you see the report date is 7 April. In terms of me
 8 receiving that report, it was 19 May 2017. So perhaps
 9 some 6 weeks after the report date.
 10 Q. Why would it take 6 weeks for you to receive, as the
 11 lead NILO, the report, the debrief report, for
 12 Exercise Hawk River?
 13 A. I can't explain that. In terms of the report, that
 14 report or the owners of that report were the North-west
 15 Counter-terrorism Unit, and you'll see the sponsor
 16 there, Sarah Shelley. So honestly, I can't answer why
 17 there was a delay in the report date to me receiving
 18 that report. What I can say is that when I received
 19 that report on 21 May 2017, that was a Friday.
 20 SIR JOHN SAUNDERS: You received it on 19 May, I think.
 21 A. Sorry, sorry, 19 May. I circulated that report
 22 internally within the Contingency Planning Unit, so to
 23 my line manager and the MTFA lead of the department to
 24 offer up a suggestion of further discussion around the
 25 contents of the report. Then, as we know, the very day

1 after, the arena incident occurred.
 2 MS CARTWRIGHT: Could I ask you then, in terms of the
 3 planning and preparation for Hawk River as the lead
 4 NILO, did you have a role in the planning for that
 5 training exercise?
 6 A. As the seconded officer, anything from CTU generally
 7 came through me as the single point of contact. So
 8 although the opportunity for the north-west region to
 9 participate in the exercise, that came through me, the
 10 theme of the exercise was MTFA and to exercise the joint
 11 operational principles, so if you remember, like I said
 12 earlier, I don't necessarily take on that work, what
 13 I would do then is signpost or liaise with internal
 14 personnel to develop this exercise.
 15 So with that in mind, through my line manager, we
 16 passed the organisation of the exercise, the management
 17 of the exercise, over to the MTFA lead within the
 18 department, who worked with his opposite colleagues in
 19 North West Ambulance Service and Greater Manchester
 20 Police to support the national team delivering the
 21 Hawk River exercise, tabletop exercise.
 22 Q. You have indicated the MTFA lead. Could you just
 23 identify who that was, please?
 24 A. That would be Neil Gaskell.
 25 Q. So in terms of the detail of the Hawk River debrief, is

1 this something you're able to assist us with or is it
 2 better targeting those questions about this document to
 3 Mr Gaskell?
 4 A. In terms of -- if you were to direct any specific
 5 questions around the exercise development or delivery,
 6 it would be more appropriate to discuss it with
 7 Neil Gaskell. In terms of the document and the
 8 recommendations within the document, I think I'm in an
 9 appropriate position to answer those questions.
 10 Q. Then let's just look at some of the detail in this
 11 document, please. We can see that one of the matters
 12 that was identified in this debrief from Hawk River was
 13 that:
 14 "[It was] important that an MTFA is identified
 15 at the earliest opportunity and it's key all emergency
 16 responders react collaboratively with due consideration
 17 to the unique nature of the threat. It's also important
 18 to note that a Plato incident is distinct from any other
 19 form of firearms incident."
 20 Was that a key message that came out of Operation
 21 Hawk River?
 22 A. That's correct.
 23 Q. Then we can see at the bottom of page 1, by way of the
 24 executive summary, that:
 25 "It is imperative therefore that we rigorously

1 jointly exercise out plans and state of readiness, hence
 2 the reason for Exercise Hawk River."
 3 A. The image was late coming up there, so could you go
 4 through that again, please?
 5 Q. I'm at the bottom of page 1, Mr Lawlor. It says this:
 6 "At the commencement of an attack it is likely that
 7 all three emergency services control rooms will receive
 8 an increased volume of calls from members of the public.
 9 It is imperative therefore that we rigorously jointly
 10 exercise our plans to improve our interoperability and
 11 state of readiness, hence the reason for
 12 Exercise Hawk River."
 13 A. That was the perceived perception at the time in terms
 14 of increased calls .
 15 Q. And in terms of having, I think you have told us,
 16 received the debrief on 19 May, it's right, isn't it ,
 17 that that issue of interoperability was one of the
 18 issues identified in Hawk River and was identified as
 19 a further area where work was needed?
 20 A. That's correct .
 21 Q. Could we turn over the page, please, to {INQ004529/2}.
 22 And if you could assist us with the role that you had,
 23 if you can help us. We can see that a number of
 24 individuals attended the training exercise, including
 25 from NWS, the fire and rescue service,

1 Counter—terrorist Policing, the local authority,
 2 Cabinet Office, Ministry of Defence. Could I ask
 3 then — we can see that British Transport Police or
 4 North West Fire Control were not down as attendees at
 5 that exercise . Was there a reason why they were not
 6 part of Operation Hawk River?
 7 A. That's not something I can answer. Again, in terms of
 8 the development of the exercise and the invites for
 9 attendees, that would sit with internally within GMFRS
 10 and the MTFA lead, Neil Gaskell.
 11 Q. If we turn over the page to {INQ004529/3}, the top of
 12 the page. I think we can see that one of the issues
 13 that was identified in Operation Hawk River was that
 14 there was a difference of opinion if the incident should
 15 have been declared an Operation Plato. In terms of that
 16 discussion, were you aware of that from the involvement
 17 in the training exercise itself although you didn't
 18 receive the debrief until 19 May?
 19 A. If I recall — briefly, I do recall the scenario
 20 what was set. I do think, I recall, that there was
 21 a number of differences with police colleagues in terms
 22 of how they saw this incident unfold and whether they
 23 would or would not declare that as an Operation Plato
 24 event.
 25 Q. We can see a little bit further down the page, in the

1 centre, one of the matters that was highlighted is:
 2 "Across ambulance, fire and rescue service and
 3 police it was raised there would be a lack of knowledge
 4 for front line responders at an MTFA—type incident,
 5 including location of RVPs, command and control (who
 6 responders would link in with) and Stay Safe protocols.
 7 The uplift training to fire and rescue service staff in
 8 medical interventions skills is a huge positive as the
 9 fire and rescue service can provide the support to NWS
 10 if there was a major incident."
 11 A. Correct.
 12 Q. Can you just then at a high level assist the chairman as
 13 to the support that the MTFA fire officers can provide
 14 to NWS, and particularly NWS HART teams, please?
 15 A. I think it's important to highlight that this event or
 16 this exercise wasn't specific to Greater Manchester. It
 17 was a regional exercise, involving a number of agencies
 18 within the region. So in terms of, I suppose,
 19 a recommendation or uplift in the knowledge of front
 20 line responders at an MTFA event, that was something
 21 what was already ongoing within Greater Manchester Fire
 22 and Rescue Service, and indeed it was highlighted in one
 23 of the action plans for the department. So that piece
 24 of work was already ongoing in Greater Manchester.
 25 In terms of the uplift training of fire and rescue

1 service staff in medical intervention skills, again
 2 within Greater Manchester and certainly within the
 3 specialist response teams, so the two technical response
 4 units and OS [REDACTED], they were already
 5 undertaking that training with the North West Ambulance
 6 Service.
 7 So some of these actions, albeit they are
 8 highlighted within the Hawk River debrief report,
 9 wouldn't necessarily fall for Greater Manchester Fire
 10 and Rescue Service because we was already undertaking
 11 those tasks anyway.
 12 Q. Can you perhaps then, with that clarification, if you
 13 could move through the document at the moment. Does it
 14 identify in the recommendations which of those
 15 specifically were for Greater Manchester Fire and Rescue
 16 Service to take forward?
 17 SIR JOHN SAUNDERS: Do you actually have the document or are
 18 you following it on the screen?
 19 A. I'm following it on the screen, but what I am aware of
 20 is that, I think from the document I saw earlier, there
 21 was, I suppose, a recommendation summary.
 22 MS CARTWRIGHT: I do apologise, I'm asking you a question
 23 where you don't have the document.
 24 A. It's okay. I think I can recall a number of them.
 25 Q. If we perhaps turn to another issue that was identified

1 in Hawk River. {INQ004529/6}.

2 We can see that one of the matters that was

3 highlighted in this debrief report was around

4 communication.

5 A. That's correct.

6 Q. It reads:

7 "A consistent theme throughout the exercise was

8 Airwaves, particularly around the tri-services

9 communication protocols for conference calls and use

10 of ..."

11 Obviously there's an identification for one Airwave

12 for Bronze and operational and another Airwave for

13 Silver and tactical level.

14 Could you then just give us a summary as to what the

15 learning was about which was needed moving forward

16 following on from Hawk River around the Airwaves and

17 communication between the tri-services, please?

18 A. (Inaudible: distorted) that was identified within the

19 exercise within, I think it was, chapter 4,

20 communications, that one of the Greater Manchester

21 Police colleagues, I believe it was, a force duty

22 officer, acknowledged that because of workloads, tasks

23 to undertake, that they wouldn't have the time to open

24 up a tri-service call and continue with that call,

25 giving a running commentary. So as such, that promoted

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1 some discussion within the room.

2 In terms of a learning outcome from that, it was

3 given to two police colleagues to work up a protocol or

4 a process to use or to utilise Airwave radio on [redacted] so

5 that fast-time communication could be passed over

6 from -- primarily from the police force duty officer

7 into fire and rescue service control, ie North West Fire

8 Control, and ambulance control, North West Ambulance

9 Control.

10 Q. Could we turn to page 7 just to complete the tri-service

11 communication information? {INQ004529/7}. There is

12 then reference to:

13 "It is good practice for [a particular Airwave] to

14 be utilised as the tactical tri-services communication

15 channel and [other Airwaves] are utilised for any Bronze

16 operational activity."

17 So in terms of that good practice, can you assist us

18 as to that, at a high level, in terms of how it operated

19 in March 2017, please?

20 A. In terms of the tactical tri-service communication, so

21 that would have been via Airwave [redacted].

22 Q. Yes. Perhaps if I stop you there, I don't want that

23 degree of detail, please.

24 A. Okay.

25 Q. Perhaps if I deal with it in this way. If we could go

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1 to your witness statement, please, at paragraph 64. You

2 say:

3 "Arising from Operation Hawk River, recognising the

4 challenges with the FDO's ability to communicate, GMP

5 assigned responsibility to two officers of establishing

6 a joint communication Airwave protocol instead."

7 A. Correct.

8 Q. And:

9 "As a result, two individuals at GMP, Joe Hoyte and

10 Laura Lewis from GMP, were tasked with pulling

11 a procedure and protocol together for the use of a GMP

12 specific Airwave as a multi-agency communication

13 channel. This was agreed in or around March 2017,

14 however it had not been implemented by the time of the

15 incident and that the use of the particular Airwave was

16 outlined within the Hawk River debrief report."

17 A. Yes.

18 Q. Is that correct?

19 A. Yes.

20 Q. So as of the debrief that came out, was it clear as to

21 which Airwave should be used by way of that tri-service

22 communication?

23 A. Yes.

24 SIR JOHN SAUNDERS: What had to be done to implement that

25 protocol, which you said had been agreed in March but

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1 had not been implemented by 22 May? Did things need to

2 be done or was it just a matter...

3 A. The channels already existed. What it meant was just

4 pulling together a process or an agreement, a process

5 agreement, in terms of how those channels would be used

6 by each service's control room, and if information such

7 as Operation Plato was communicated, then for those

8 respective control rooms to carry out their various

9 tasks to ensure people and resources are mobilised to

10 a given location.

11 MS CARTWRIGHT: Thank you. I'm not going to take you

12 through the detail, further detail, of the debrief. But

13 can I ask you this about something you say in your

14 witness statement about the delivery of Hawk River. You

15 say this at paragraph 62 into 63:

16 "As we were planning the JOPs commander training

17 sessions, the Office for Security and Counter-terrorism

18 advised that they had funding available for training

19 exercises which the national MTFA training team would

20 deliver. As a result, we agreed to them running three

21 training sessions and a tabletop exercise. This was

22 Hawk River, which took place around March 2017."

23 You then go on to say this:

24 "The national team came and delivered that product

25 for JOP 3. I recall the FDO did advise during

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1 Hawk River that they would not have time to communicate
2 with GMFRS during a live MTFA. This was said during
3 discussion around JOPs from a police perspective and, in
4 particular, the requirement for there to be
5 a tri-service conference call", which is something you
6 highlight is in section 4.4 of JOP 3.

7 "The FDO said the only thing they would be able to
8 do if Operation Plato was declared was to make contact
9 to provide an FCP. He said that the FDO will not have
10 the time to provide the running commentary envisaged in
11 section 4.4 in a live incident. I saw this as the FDO
12 managing our expectations. Critically, he did not say
13 that the FDO would not be able to contact us at all.
14 This meant that we had minimum expectations to be told
15 about the declaration of Operation Plato and to be given
16 an FCP."

17 Pausing there for a minute, so you're referencing
18 then the conversation with the FDO who's performing that
19 role in Operation Hawk River?

20 A. That's correct, which I referenced a couple of minutes
21 ago.

22 Q. Are you able to help us as to who was performing the
23 role of the FDO in that training exercise?

24 A. I don't recall the name.

25 Q. Then in terms of what was being flagged by the FDO or

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1 what the issue was, can you expand on what you have told
2 us in your witness statement about what was highlighted
3 about the role of the FDO in Hawk River in March of
4 2017, please?

5 A. Like I discussed earlier, the FDO recognised that during
6 an unfolding MTFA Plato event, I suppose with an
7 understanding of their processes they needed to
8 undertake as the FDO, there was a recognition that they
9 wouldn't have the, I suppose, capacity to pick up
10 a phone and dial the two emergency services and carry
11 out an open-line conference call.

12 We was assured, following those discussions, that at
13 some point the information would be passed over to the
14 respective control rooms following the declaration of
15 Operation Plato, providing the service control rooms
16 with the nature of the attack, so the descriptor, and
17 followed by the location of, at best, the forward
18 control point for specialist responders, namely the
19 NILO, to attend with their specialist responders to
20 undertake the joint understanding(?) of risk and
21 conversations.

22 SIR JOHN SAUNDERS: Can I just understand? You did expect,
23 however, and there was no reason given why you
24 shouldn't, they would tell you about a declaration of
25 Operation Plato?

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1 A. That's correct, sir. So --

2 SIR JOHN SAUNDERS: It's the way your statement reads, "We
3 had minimum expectations".

4 A. During chapter 4.4, at the time, it essentially
5 suggested that there would be an open conference call
6 between --

7 SIR JOHN SAUNDERS: I understand, there's a running
8 commentary.

9 A. Yes. The FDO highlighted that because of their
10 workloads at that time they wouldn't have time to
11 provide a running commentary, but therefore managing our
12 expectations as a service or service control rooms that
13 we wouldn't receive an ongoing conference call with
14 risks changing and events happening at the scene. But
15 the minimum expectation that we had was that the force
16 duty officer would make contact with the fire and rescue
17 service and ambulance service to say, "We have got an
18 Operation Plato declared, the method of attack is..."

19 SIR JOHN SAUNDERS: I was just understanding, the way that's
20 been phrased is -- it might not mean that you're saying,
21 "I had very little expectation that we'd be told be
22 a declaration of Operation Plato", but that's what you
23 understood you would get?

24 A. Correct, sir.

25 SIR JOHN SAUNDERS: Thank you.

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1 MS CARTWRIGHT: I want to deal with just two aspects now of
2 other training, so Winchester Accord and then, secondly,
3 the JOPs commander training in January of 2017.

4 Dealing then with Winchester Accord, please, looking
5 at paragraph 52, you describe Winchester Accord as:

6 "Perhaps the most relevant example of the
7 multi-agency live play exercise prior to the arena
8 attack. The theme was designed to respond to the
9 current threat levels within the UK. There were three
10 elements to that: marauding terrorist attack element
11 based within the Trafford Centre for
12 Winchester Accord..."

13 And you describe that you were one of the fire leads
14 of Winchester Accord and so you were involved in the
15 event planning, along with you colleague Mr Gaskell, who
16 you told us about this afternoon, and that you ensured
17 NILO support in the police operations room whilst
18 Mr Gaskell did the planning for the exercise itself.

19 A. That's correct.

20 Q. You then say this at paragraph 54:

21 "In the pre-planning stages of Winchester Accord,
22 GMFRS and NWAS were told of the location of the forward
23 control point."

24 Pausing there for a moment. In the ordinary course
25 of events when there's a live incident you wouldn't at

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1 that point know where the forward control point was,
 2 would you?
 3 A. Not unless there were agreed, I suppose rendezvous
 4 points, forward control points for specific locations.
 5 But I would suggest during a dynamic unfolding incident,
 6 we wouldn't have that detail until we're contacted.
 7 Q. You say this:
 8 "Notwithstanding this, the exercise did not run
 9 smoothly from a GMFRS or NWAS perspective.
 10 Communications were a major issue, which encumbered the
 11 initial response. There are two key responders within
 12 GMP in the initial stages of an incident and other
 13 emergency responders including fire and ambulance are
 14 dependent on those individuals to communicate
 15 information throughout. In the initial stages there is
 16 the force duty officer who is remote from an incident.
 17 There is also an on-scene tactical firearms commander.
 18 In the case of Winchester Accord, neither the FDO, the
 19 person playing the role in the exercise, nor the
 20 tactical firearms commander were in contact with the
 21 other agencies."
 22 A. That's correct.
 23 Q. Then can you just explain how that had an impact in
 24 Winchester Accord, please?
 25 A. Notwithstanding that in terms of the responders or

1 response there are a number of key roles, in terms of
 2 MTFAs training and Plato planning, I would suggest the
 3 key points of contact during that training was either
 4 the FDO and/or the tactical firearms commander.
 5 In terms of — or since writing this statement, on
 6 reflection, come an event, it would be unlikely that
 7 we would receive any dialogue initially from the
 8 responding tactical firearms commander, so I just kind
 9 of want to make that clear.
 10 In terms of the evening itself, and during the
 11 planning stages, we were expecting to, as the exercise
 12 timeline unfolded — we were expecting to receive a call
 13 from the force duty officer or the individual playing
 14 the force duty officer on the night to inform us that an
 15 event is unfolding at the Trafford Centre and
 16 Operation Plato was declared and then to give us the
 17 location of the forward control point for exercise
 18 purposes. That forward control point was predefined
 19 between the exercise planning team.
 20 So as a result of not being informed, there was
 21 a delay — although we knew where to go, but in terms of
 22 that proper process or cascade there was an agreement
 23 between fire and ambulance exercise players to kind of
 24 run with it for now because if we'd just attended, that
 25 would have been false and it would have been a false

1 response.
 2 So we left it some time to give time for the force
 3 duty officer to catch up and inform us of the forward
 4 control point, but recognising that wasn't going to
 5 happen — and I can't recall if it was myself or if it
 6 was the NWAS exercise planner, we made contact with the
 7 Greater Manchester Police exercise planner and informed
 8 them that we would move forward to the forward control
 9 point, where we believed we were going to be met by at,
 10 best, the tactical firearms commander to undertake
 11 a joint assessment of risk and define the zonings and
 12 the limit of exploitation.
 13 Q. Perhaps then just to summarise, I think, what you
 14 said — and if I don't summarise this accurately please
 15 tell me. As part of the training exercise, was it
 16 envisaged that there would be a call for the Fire
 17 Service and NWAS to attend to move forward?
 18 A. That's correct.
 19 Q. And that didn't take place and there was some delay to
 20 that happening?
 21 A. That's correct.
 22 Q. And that because Greater Manchester Fire and Rescue
 23 Service and NWAS knew the location of the forward
 24 command point, they moved forward to that position
 25 without having been requested to do so by the FDO or the

1 TFC?
 2 A. That's correct. Again, just to put some context behind
 3 that, recognising that this exercise wasn't — it was
 4 part of a national exercise of significant importance,
 5 what we needed to try as best as possible is ensure that
 6 by delay or non-attendance of GMFRS resources and North
 7 West Ambulance Service resources, we basically didn't
 8 want to delay the exercise in unfolding. So that's why
 9 it was agreed there would be a pre-designated forward
 10 control point and at a given point, recognising that we
 11 didn't want to upset or delay the main exercise from
 12 continuing, we elected, as an exercise planning team,
 13 to, I suppose, artificially move forward to the forward
 14 control point and pick up the exercise from there.
 15 However, again, it's highlighted in my statement
 16 that at the forward control point, again we was not met
 17 by anybody from Greater Manchester Police to carry out
 18 that over-the-bonnet co-location and coordination and
 19 joint understanding of risk to mobilise and commit
 20 resources into the various zones.
 21 Q. I think you say this at paragraph 57 of your witness
 22 statement:
 23 "In the end the tactical firearms commander had to
 24 be directed to make contact with other agencies by the
 25 police exercise coordinator. This meant that there was

1 an overall delay of an hour and a half in fire and
 2 ambulance deploying into the Trafford Centre. The only
 3 reason we made a breakthrough is because we contacted
 4 the police exercise director.”

5 A. That’s correct.

6 Q. You go on to say this — I think you provide the debrief
 7 of Winchester Accord, I’m not going to take you through
 8 that for the purposes of this afternoon, but you
 9 indicated that following on from Winchester Accord, you
 10 and your colleague at Greater Manchester Fire and Rescue
 11 Service, John Fletcher, identified that further training
 12 for the police tactical firearms officers in
 13 multi-agency incidents was required.

14 A. That’s correct.

15 Q. You say:

16 “It was [your] opinion and Mr Fletcher’s that fire
 17 and ambulance NIOs were more familiar with the JOPs,
 18 but the exercise identified that the police were not as
 19 mindful of the contents of the document.”

20 A. That’s correct.

21 Q. You go on to say:

22 “The police focus is on going into an incident and
 23 neutralising the situation rather than what the other
 24 agencies need to do.”

25 A. That’s correct.

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1 Q. And that you and Mr Fletcher provided feedback in the
 2 debrief on the failure of tri-service communications.

3 A. That’s correct.

4 Q. And I think you then identify Mr Aspinall and
 5 Billy Myers who attended the debrief and I’m not going
 6 to take you into that document now.

7 You say that:

8 “Mr Fletcher met with Leor Giladi of GMP to
 9 specifically discuss issues with communications arising
 10 from Winchester Accord prior to the debrief given the
 11 urgency of the issue.”

12 A. That’s correct.

13 Q. And that:

14 “[You] and Mr Fletcher also decided that [you]
 15 needed three multi-agency briefing awareness sessions
 16 around JOPs so that all emergency responders are on the
 17 same page and both GMP and NWAS agreed to that.”

18 A. That’s correct.

19 Q. Those sessions were targeted at fire and ambulance
 20 NIOs, police tactical firearms commanders and other
 21 commanders and tactical advisers from all three
 22 agencies, and that training was called JOPs commander
 23 training?

24 A. That’s correct. If I just clarify, in terms of the JOPs
 25 commander training and the development of that, again

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1 that’s something we, although it’s not in paragraph 60,
 2 that’s something where myself and my line manager
 3 John Fletcher engaged with the MTFA lead, Neil Gaskell,
 4 to progress those exercises.

5 Q. Then in terms of that JOPs commander training, is it
 6 right that that took place in January of 2017?

7 A. Yes, I believe there were three sessions, two in January
 8 and one in February.

9 Q. In terms of your experience, I think we’ll hear from
 10 others about that JOPs commander training, what was your
 11 experience about the attendance of GMP at that JOPs
 12 commander training?

13 A. In terms of the overall attendance for the three
 14 sessions, I probably couldn’t comment on that.
 15 I attended one of them and again, to be honest,
 16 I couldn’t give you the ratio of police, fire or
 17 ambulance who attended.

18 Q. Again in terms of — can you help us as to your role as
 19 the lead NIO in the actual organisation of that JOPs
 20 commander training in the January? You provide the two
 21 PowerPoints, I’m not going to take you to those, but you
 22 give us the INQs. What was the extent of your role in
 23 the preparation for that exercise, please?

24 A. Probably non-existent in terms of... Myself, my line
 25 manager and Neil, we would have had a conversation and

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1 because it was an MTFA theme, and with Neil’s links into
 2 Greater Manchester Police and North West Ambulance
 3 Service, Neil would have picked up that baton and run
 4 with it.

5 Q. Mr Lawlor, I’m not going to deal with this afternoon the
 6 explanation and the detail of Contingency Planning Unit
 7 action plans because it’s something you deal with in
 8 your second witness statement. So when we revisit the
 9 next phase of your evidence in chapter 10, we’ll deal
 10 with those matters at that point rather than dealing
 11 with it piecemeal now.

12 Sir, that’s where I’m going to take Mr Lawlor
 13 through in terms of the training. We’ve had a number of
 14 requests under the Rule 10 —

15 SIR JOHN SAUNDERS: Can I just clarify one thing? When you
 16 were doing Winchester Accord, as I understand it, from
 17 something I’ve read, the rendezvous point was arranged
 18 beforehand. That’s where you started from, as it were?

19 A. That’s correct. Like I said, the overall exercise was
 20 a national exercise and I guess our agency, we were
 21 invited.

22 SIR JOHN SAUNDERS: That’s fine. If that was part of the
 23 exercise and the way it was set up. But part of the
 24 exercise was before you move to the forward control
 25 point, you would wait until you had something from the

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1 FDO; is that right?
 2 A. Yes. We identified Stretford Fire Station as the
 3 rendezvous point and muster point for the resources, and
 4 the rationale for us doing that is because, again, if
 5 those resources had started off from the respective
 6 stations or region, Merseyside, it may be that those
 7 resources could have been called upon for another
 8 incident, so what we didn't want to do was delay those
 9 resources. So what we — in terms of the planning of
 10 the exercise, we ring-fenced those resources, we brought
 11 them forward to Stretford Fire Station, so for the
 12 purpose of the exercise that was the rendezvous point,
 13 and then from there we would have mobilised or did
 14 mobilise them to the forward control point. It was
 15 purely so we was confident that we had the resources
 16 secured and attached to the exercise.
 17 SIR JOHN SAUNDERS: But the waiting while you're at the
 18 rendezvous point is you're waiting for the FDO to tell
 19 you where the forward control point is —
 20 A. That's correct.
 21 SIR JOHN SAUNDERS: — although in fact you already knew
 22 where it was?
 23 A. That's correct.
 24 SIR JOHN SAUNDERS: And that just never happened?
 25 A. That never happened on the night, no.

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1 SIR JOHN SAUNDERS: Okay. Was that because the FDO —
 2 do you happen to know? Was that because the FDO just
 3 had too much to do?
 4 A. I'm probably the wrong person to answer that question.
 5 SIR JOHN SAUNDERS: All right. Then when you got there,
 6 there was no one else at the forward control point for
 7 you to talk to?
 8 A. So again, in all the planning, the preparations, the
 9 guidance documents, there is an expectation that the
 10 three commanders come together at the forward control
 11 point. So when we were mobilising from the Stretford
 12 Fire Station to the forward control point, there was an
 13 expectation that somebody from police, ideally the
 14 tactical firearms commander, but notwithstanding they're
 15 pushed forward to assist the incident — but there was
 16 an expectation that somebody from the police would be
 17 able to meet us and undergo that joint assessment of
 18 risk to move to push our resources forward to carry out
 19 rescues.
 20 SIR JOHN SAUNDERS: It was a bit of a disaster. You arrived
 21 an hour and a half late, so that's quite a disaster.
 22 A. It didn't unfold as we expected.
 23 SIR JOHN SAUNDERS: And the way to deal with it, or the way
 24 it was decided, was to have the JOPs commander course —
 25 A. That's correct.

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1 SIR JOHN SAUNDERS: — to resolve the problem?
 2 A. That's correct. So we believed that there were a number
 3 of learning outcomes. The next day, we quickly put
 4 a mechanism in place to address those learning outcomes.
 5 We established three JOPs commander training days and,
 6 as it happened, and coincidentally, the opportunity then
 7 to run Exercise Hawk River appeared, so I suppose the
 8 Exercise Hawk River was a confirmation of the awareness
 9 and training we did on the JOPs awareness days. It was
 10 the confirmation of understanding during a national
 11 tabletop exercise.
 12 SIR JOHN SAUNDERS: So did Hawk River suggest to you that
 13 the JOPs training course had done its job and now
 14 everything was resolved?
 15 A. Except for the issue around chapter 4 communications and
 16 cascade. That was still an issue in Hawk River. So we
 17 still had the issue —
 18 SIR JOHN SAUNDERS: You still couldn't talk to each other
 19 all the time as would be convenient to do so?
 20 A. We had the issue identified in Winchester Accord in
 21 terms of the initial activation of the Plato. When it
 22 come to Hawk River, there was still a discussion around
 23 the practicalities of the force duty officer actually
 24 being in a position and having the capacity to make that
 25 call and undertake an open conference call. It still

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1 highlighted an issue.
 2 The learning outcome from then Hawk River was then
 3 to set up a process to close that gap in terms of
 4 fast-time communication. So it wouldn't require the
 5 force duty officer to pick up a phone, it was literally
 6 a live radio set what would be on their desk and each
 7 control centre would have the same set on the same
 8 channel. It literally would be a quick pick a radio up
 9 and communicate that way and that was tested a number of
 10 times.
 11 SIR JOHN SAUNDERS: Thank you. So Winchester Accord was
 12 when?
 13 A. 2016. July 2016, was it? April? March?
 14 MS CARTWRIGHT: I think it is March 2016.
 15 A. March 2016. The JOPs commander training
 16 was January/February.
 17 SIR JOHN SAUNDERS: That seems to be a long time to be
 18 trying to sort out what were fundamental problems with
 19 Winchester Accord.
 20 A. I suppose what we need to understand and realise is that
 21 in terms of the target audience, so senior officers from
 22 the various agencies and getting them into a venue takes
 23 some time in terms of coordinating diaries. Also you've
 24 got the development of the training in terms of various
 25 aims, objectives, pulling that training together, each

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1 agency — the exercise or the awareness commander
 2 training, the planning team pulling that product
 3 together and then delivering it. So in reality it
 4 doesn't happen quickly.
 5 SIR JOHN SAUNDERS: At a time when the terrorist threat was
 6 severe?
 7 A. Sir, that was the reality at that time.
 8 SIR JOHN SAUNDERS: Okay, thank you.
 9 MS CARTWRIGHT: Sir, the debrief report, which I'm not
 10 asking Mr Lopez to take up, is {INQ004521/1}, confirms
 11 that the date of the Winchester Accord multi-agency
 12 training was 9 to 11 May 2016, with the debrief taking
 13 place on 23 May 2016. Thank you to Mr Greaney.
 14 SIR JOHN SAUNDERS: And remind me the date of the JOPs
 15 course?
 16 A. January and February.
 17 MS CARTWRIGHT: Then perhaps if we just identify that the
 18 Hawk River exercise was 1 March 2017. I think you've
 19 identified the report of the debrief was 7 April 2017.
 20 And you have told us that you received that debrief
 21 report on 19 May 2017.
 22 A. That's correct.
 23 MS CARTWRIGHT: Mr Lawlor, there are other questions.
 24 Sir, in accordance with the Rule 10 procedure,
 25 we have had a number of requests for questioning of the

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1 witness. Could I ask, first of all, if we could go to
 2 Mr Smith on behalf of North West Fire Control and ask
 3 for him, please, to ask his questions now.
 4 Questions from MR SMITH
 5 MR SMITH: Mr Lawlor, I would like to begin, if I may, by
 6 just identifying three exercises.
 7 Exercise Winchester Accord: did that take place
 8 overnight from midnight on 9 May 2016?
 9 A. Yes, sir.
 10 Q. Exercise Hawk River was a tabletop exercise, wasn't it?
 11 A. That's correct, sir.
 12 Q. A third exercise, going back to 7 May 2015, was that
 13 Exercise Lionheart?
 14 A. I believe it was.
 15 Q. Was that held at the Arndale Centre in Manchester?
 16 A. That's correct.
 17 Q. In each instance, that is in the case of all three of
 18 those exercises, is it correct that North West Fire
 19 Control was not invited to participate?
 20 A. I can't give you a definitive answer in terms of all
 21 three. In terms of myself, I can perhaps comment on
 22 Winchester Accord. Equally, I would imagine there would
 23 be similar reasons or similar conversations.
 24 Q. But in the case of Winchester Accord, it is the case,
 25 isn't it, that North West Fire Control was not needed?

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1 A. If I give you some context behind Winchester Accord, so
 2 in terms of me, as being the single point of contact
 3 when the offer of the exercise was passed over to
 4 Greater Manchester Fire and Rescue Service to consider
 5 participating in the exercise, what I would do then, or
 6 what I undertook then, sir, was to develop two corporate
 7 leadership team briefing notes. Basically, that would
 8 give an overview of the exercise with the various aims
 9 and objectives at that time.
 10 As part of my role, I would link in with key subject
 11 advisers to ensure that Exercise Winchester Accord was
 12 delivered successfully, and what I mean by subject
 13 matter advisers — so for example, as it was
 14 an MTFA-style exercise, I would link into the MTFA lead,
 15 Neil Gaskell, to ensure that that part of the exercise
 16 ran smoothly.
 17 In terms of volunteers, there was a request for
 18 approximately 300 volunteers that would link in or did
 19 link in with my volunteers coordinator within the
 20 organisation.
 21 I suppose finally, and probably most important to
 22 you, is the link in with the Greater Manchester Fire and
 23 Rescue Service single point of contact, who would liaise
 24 directly with North West Fire Control. At that point
 25 there would have been a conversation between the

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1 Greater Manchester Fire and Rescue Service single point
 2 of contact and one of the control room managers at
 3 North West Fire Control.
 4 So what I'm kind of saying — it's not... It wasn't
 5 for me not to involve North West Fire Control; that
 6 would have been a conversation between the GMFRS SPOC,
 7 the North West Fire Control manager, for those two
 8 people to have a conversation, assess the nature of the
 9 exercise, the aims and objectives, and either agree or
 10 disagree whether there would be or whether there was any
 11 interest in North West Fire Control to participate
 12 in the exercise.
 13 Notwithstanding that, sir, as I've just spoke
 14 before, there was — in terms of protecting or
 15 ring-fencing the resources, there was no requirement to
 16 mobilise the resources because we'd already identified
 17 that they was going to be at a forward control point.
 18 So essentially, that will have been a conversation
 19 between the GMFRS SPOC and North West Fire Control
 20 manager for them to assess whether there was an appetite
 21 for North West Fire Control to participate in the
 22 exercise.
 23 Q. So we all agree that in the usual course of events there
 24 are good reasons, often, for not involving part of an
 25 agency in a multi-agency response, because it's

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1 dependent on the objective of the exercise?
 2 A. Correct, sir.
 3 Q. Do you know who made the decision in respect of Exercise
 4 Winchester Accord that North West Fire Control would not
 5 be involved because the various GMFRS officers, GMP
 6 officers and others, had already been placed in their
 7 respective positions post—mobilisation? Do you know who
 8 made that decision?
 9 A. Who made the decision not for North West Fire Control to
 10 be involved in the exercise?
 11 Q. Yes.
 12 A. I wouldn't know who made the decision. I am confident
 13 that there will have been that conversation and I can't
 14 give you the answer in terms of who made the decision
 15 for them not to participate. What I will say is in
 16 terms of the documentation and what they call an OP16 in
 17 terms of exercise planning, that documentation was
 18 developed by the Greater Manchester Fire and Rescue
 19 Service SPOC, and that was delivered into
 20 North West Fire Control.
 21 Q. Well, in the case of all three of the exercises to which
 22 I've referred, it will be important to advise
 23 North West Fire Control, is this correct, that the
 24 exercise was to take place in order that they could be
 25 prepared for incoming calls that might arise from

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1 members of the public, for example?
 2 A. That's correct, sir, and that would have been or was
 3 part, I believe, of the OP16.
 4 Q. So that's part of that process, isn't it?
 5 A. Yes.
 6 Q. I'm right, am I, that Winchester Accord involved putting
 7 in place key individuals at the start of the process?
 8 That's the start of the exercise.
 9 A. In terms of forward deployment?
 10 Q. Yes. So was the result — forgive me, I'm so sorry,
 11 this is the trouble with the delay over the video link.
 12 I didn't mean to interrupt you.
 13 SIR JOHN SAUNDERS: It's not always that easy, Mr Smith.
 14 MR SMITH: The result was that in the case of GMFRS, the
 15 duty NILO was already in place, is this correct, at the
 16 rendezvous point and would not need to be mobilised to
 17 the rendezvous point by Fire Control?
 18 A. Like I said earlier, we ring—fenced key resources and
 19 mustered them at the rendezvous point, which was
 20 Stretford Fire Station.
 21 SIR JOHN SAUNDERS: So the answer is yes, in fact.
 22 MR SMITH: I'm just going to ask you if this sequence of
 23 events appears to you to be the correct sequence for
 24 Winchester Accord. Just after midnight, a number of
 25 calls started to come into GMP's control centre,

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1 alerting GMP to the commencement of the exercise; do you
 2 agree with that?
 3 A. Yes.
 4 Q. The FDO was expected to declare Operation Plato a short
 5 time later?
 6 A. That was the expected action.
 7 Q. Within a few minutes of that, the FDO was expected, is
 8 this correct, to make contact with the duty NILO by
 9 telephone?
 10 A. Yes, sir, for the purpose of the exercise.
 11 Q. And again for the purposes of the exercise, after that
 12 to nominate an RVP and to then nominate in due course,
 13 after that, a forward command or control point? That's
 14 the sequence I'm going to suggest was to be followed.
 15 A. Sir, not to nominate the RVP. The RVP was predefined
 16 within the exercise planning to muster the resources.
 17 The expected action from the force duty officer at the
 18 time was to nominate or identify the forward control
 19 point.
 20 Q. But didn't the force duty officer have to formally
 21 nominate the RVP as part of the exercise?
 22 A. Not that I believe.
 23 Q. Very well.
 24 A. I understand that an exercise planning of that event was
 25 the predefined mustering point, so the RVP, so the

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1 fire stations or ambulance stations were already defined
 2 and that was a given. The expectation was just to
 3 nominate the forward control point.
 4 Q. When the FDO nominated the forward command point, do you
 5 recall that the planning was that the divisional radio
 6 officer would then circulate the location of the forward
 7 command point almost immediately?
 8 A. Sir, I don't recall that detail. That would have
 9 been the police exercise planner in terms of their side
 10 of their agency. I wouldn't know in detail what that
 11 exercise plan looked like in terms of agency—specific
 12 actions, notwithstanding (inaudible: distorted).
 13 Q. If I may say so, Mr Lawlor, we were intending to have
 14 a witness named former Inspector June Roby give evidence
 15 about this particular issue, but she hasn't been able to
 16 give evidence at this stage, so I'm asking you these
 17 questions. But that's all I need to ask you on that
 18 point.
 19 But would you just clarify this, therefore? The
 20 last step in that sequence of nominating the forward
 21 command or control point was obviously, wasn't it, for
 22 the purposes of co—locating the multi—agency response?
 23 A. That's correct, sir.
 24 Q. And that is a critical and vital aspect of the
 25 multi—agency response, isn't it?

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1 A. I would agree.
 2 Q. The result of this was, that is the absence of
 3 North West Fire Control, the result was that the
 4 preparedness of the control room at North West Fire
 5 Control to respond to incoming calls and to mobilise
 6 GMFRS assets was not tested in this exercise? Do you
 7 agree?
 8 A. I agree it wasn't tested in this particular exercise.
 9 However, I go back to — that decision would have been
 10 a decision between the Greater Manchester Fire and
 11 Rescue Service, the North West Fire Control SPOC and the
 12 North West Fire Control manager. So that would have
 13 been a conversation and an agreement between those two
 14 people.
 15 Q. I'd very briefly like to identify three failures arising
 16 from Winchester Accord. I'll deal with it in summary
 17 form and ask you if you agree that this is within your
 18 knowledge.
 19 The FDO was never in contact with the duty NILO;
 20 is that correct?
 21 A. Correct.
 22 Q. No forward control point was ever issued or, if issued,
 23 never communicated by the FDO to the duty NILO?
 24 A. That's correct, sir, as part of the exercise, that's
 25 correct.

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1 Q. The result was that it was then not possible for GMFRS
 2 to co-locate at a forward control point?
 3 A. Along with North West Ambulance Service, that's correct.
 4 Q. And fourthly, there was a delay in moving GMFRS
 5 resources forward to the incident at the Trafford Centre
 6 of an hour and a half?
 7 A. I would say a delay of approximately an hour and a half
 8 of committing resources, but essentially there or
 9 thereabouts.
 10 Q. Were those resources intended to be standard pumps and
 11 crews, non-specialist, or were they intended to be
 12 specialist resources to deal with an MTFA?
 13 A. Because of the nature of the exercise, they were the
 14 specialist resources.
 15 Q. Did you therefore recognise, after Exercise
 16 Winchester Accord, that if this had been a real-life
 17 incident, GMFRS would be left without information about
 18 a critical feature of the response, perhaps the location
 19 of the forward control point?
 20 A. Sorry, sir, could you repeat that question again,
 21 please?
 22 Q. Did you realise after Exercise Winchester Accord that if
 23 this had been a real-life incident, GMFRS would be left
 24 without any information about this critical feature of
 25 the response, the location of the forward control point?

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1 A. Sir, we identified that on the evening itself and the
 2 very next day, sir, within the department, with the line
 3 manager, we started to put actions in place immediately.
 4 Q. And because of what had occurred, during the exercise
 5 GMFRS had to take the initiative, didn't it, during the
 6 exercise, because it knew the location of the forward
 7 control point and was able eventually, without
 8 communication with GMFRS (sic), to go forward to the
 9 forward control point?
 10 A. That's correct, sir. We took that decision primarily to
 11 prevent any further delay in the exercise because of the
 12 nature of the exercise and the high national importance
 13 of testing and exercising national, regional and local
 14 resources.
 15 Q. These failures occurred, do you agree, without any fault
 16 on the part of GMFRS?
 17 A. There was an expectation that the cascade of the
 18 exercise would come from GMP into the FRS NILO for the
 19 purpose of that particular exercise only.
 20 Q. And did you consider on the night that these were very
 21 serious failures?
 22 A. We did, hence the prompt action taken the next day.
 23 Q. So you did? You did consider these were very serious
 24 failures; is that right?
 25 A. Correct, sir, yes.

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1 Q. In this context, crews from the MTFA capability, once
 2 deployed to the scene of an incident, are trained to
 3 provide first aid, are they not, for very serious
 4 injuries?
 5 A. That's correct, sir.
 6 Q. That includes injuries caused by shrapnel, is that
 7 correct, or firearms?
 8 A. That's correct, in addition to supporting the North West
 9 Ambulance Service HART team.
 10 Q. Did the teams carry with them, the MTFA capability,
 11 additional equipment, specialist equipment, which would
 12 have allowed them to provide that sort of first aid
 13 support?
 14 A. They would.
 15 Q. May I turn to Exercise Hawk River, please, on
 16 1 March 2017. I would like to take you to page 1 of the
 17 debrief report, which is {INQ004529/1}.
 18 Do you have a hard copy of that in front of you,
 19 Mr Lawlor?
 20 A. I don't, sir.
 21 SIR JOHN SAUNDERS: It has come up now.
 22 MR SMITH: Mr Lopez has very helpfully put it on the screen.
 23 If I could ask Mr Lopez to go to the bottom of the page,
 24 please, and just enlarge that for the inquiry, I'd be
 25 grateful.

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1 I would like to take you, please, to these words.
 2 The third line down in the bottom section below the
 3 block that reads "irrelevant and sensitive":
 4 "It is also important to note that a Plato incident
 5 is distinct from any other form of firearms incident.
 6 The identification criteria that may indicate an attack
 7 of this nature is unfolding might include the
 8 following ..."
 9 And then you can see the list, I'll just read it out
 10 so we're clear about it:
 11 "Assailants attacking multiple sites .
 12 Indiscriminate targeting of people, intended to cause
 13 mass casualties. Explosive devices used."
 14 Then there are three other lines at the bottom which
 15 I needn't trouble you about.
 16 When you read that debrief report, Mr Lawlor, how
 17 did you interpret those bullet points set out in the
 18 report? What I'm driving at, so that you're absolutely
 19 clear about my question, is: did you think that all of
 20 these components in the bullet points needed to be
 21 present in combination or did you read the debrief
 22 report on the basis that any one of these elements might
 23 indicate that an attack of this nature is unfolding?
 24 A. Just for clarity, are you referencing now the exercise
 25 scenario or are you referencing a real-life incident?

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1 Q. Well, I must confine myself to the exercise scenario
 2 because it's the debrief report that I'm asking about at
 3 the moment.
 4 A. Yes, sir. So in terms of that information, there would
 5 be an expectation that there would be either one or
 6 multiple aspects of those bullet points at an unfolding
 7 incident or indeed the nature of the Exercise Hawk River
 8 tabletop exercise.
 9 Q. So did you understand the debrief report to indicate
 10 that if an explosive device was used in an incident, it
 11 may indicate an attack of this nature, that's a Plato
 12 incident, was unfolding?
 13 A. That would be dependent on the information that came in
 14 to either the service control room or from the service
 15 control room to individuals. But there would be an
 16 expectation — there would be an assumption that this
 17 style of attack, this methodology, could quite easily
 18 foresee a number of those bullet points or injuries
 19 being present.
 20 Q. Well, really, what I would like your clarification about
 21 is that, was it your belief at the time of this debrief
 22 report, when you read it, that the information it was
 23 conveying was that if an explosive device had detonated,
 24 this might indicate an MTFA attack had taken place and
 25 might lead to the declaration of Operation Plato?

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1 A. That's a fair assumption, sir. Again, if I just
 2 clarify, the debrief report is 7 April, I received this
 3 on 19 May. I pushed out for further discussion and
 4 dialogue within the team on 21 May 2017, and as we know,
 5 unfortunately the incident unfolded on 22 May. So in
 6 terms of, I suppose, digesting and actioning any
 7 actions, it was a tight timescale, sir.
 8 Q. As far as Exercise Hawk River is concerned, the result
 9 is that the preparedness of the control room at
 10 North West Fire Control to respond to incoming calls and
 11 to mobilise GMFRS assets after being notified of an
 12 incident wasn't tested, was it, in this exercise?
 13 A. In terms of confidence, again Exercise Hawk River was
 14 developed outside of my control. My understanding —
 15 and again this is where I can't say with confidence, but
 16 my understanding is that representation from
 17 North West Fire Control was at Exercise Hawk River. But
 18 again, you know, we would have to clarify that further
 19 with other members of the team at that time.
 20 Q. I think you've been put on notice that you may be asked
 21 questions about Operation Powerhouse; is that correct?
 22 A. Sir, I believe that was part of my witness
 23 documentation, and again, in terms of the development of
 24 Exercise Powerhouse, that wasn't — that exercise or the
 25 documentation wasn't something I undertook or was

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1 responsible for.
 2 Q. Would it be better if I asked questions of general
 3 manager Mr John Fletcher concerning that or Mr Gaskell?
 4 A. In terms of Exercise Powerhouse, the most appropriate
 5 person would be Group Manager John Fletcher, who's since
 6 retired. He's due to give evidence.
 7 Q. Thank you very much, Mr Lawlor. I'll confine my
 8 questions in relation to Operation Powerhouse to Group
 9 Manager John Fletcher.
 10 A. Thank you.
 11 Q. Could I thank you for your help.
 12 A. Thank you, sir.
 13 MR SMITH: Before I leave the screen, I'd just like to raise
 14 one matter with the chairman if I may.
 15 Sir, can I just make mention of the fact that
 16 evidence has been given today, as you're well aware,
 17 concerning the interpretation of the action plans.
 18 I would just like to make the point, as I'm probably
 19 confident you well understand, that the evidence that's
 20 been given today is very much in issue and it's
 21 a subject in its own right, quite a detailed one. So
 22 could I just make it clear that this is something
 23 I would like to ask Mr Lawlor about at a later stage
 24 when he comes back to give evidence.
 25 SIR JOHN SAUNDERS: Of course, and it may be that I was

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1 asking at an inappropriate time, so if I was,
 2 I apologise. Certainly you may ask the questions when
 3 you wish.
 4 MR SMITH: Thank you very much indeed.
 5 MS CARTWRIGHT: Sir, I'm conscious of the time. We won't be
 6 achieving the conclusion of the evidence until tomorrow,
 7 but Mr Horwell had indicated on the Rule 10 process that
 8 he would have a short area of questioning. I wonder
 9 whether we could move to Mr Horwell next to deal with
 10 his questioning, which would mean that we'd finish the
 11 balance of this witness's evidence with Mr Cooper and
 12 then with Mr Warnock tomorrow.
 13 SIR JOHN SAUNDERS: I would be grateful to do that, yes.
 14 We haven't sat for long today, so let's do what we can.
 15 Mr Horwell.
 16 Questions from MR HORWELL
 17 MR HORWELL: Mr Lawlor, just one question on
 18 Winchester Accord. The exercise was based on the
 19 premise, as I understand it, that the emergency services
 20 would go to the designated RVP?
 21 A. The RVP was pre-identified as part of the exercise
 22 planning.
 23 Q. Yes, and so the exercise was based on the premise that
 24 after an RVP had been established, the emergency
 25 services would go there; is that correct?

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1 A. That would be my understanding.
 2 Q. Thank you.
 3 You were asked a number of questions about hot, warm
 4 and cold zones, Mr Lawlor, and I just want to ask you
 5 a few questions about those myself. You referred to
 6 this in the course of your evidence, that this inquiry
 7 of course will be concentrating on JOP 3, which, as
 8 we are all aware, is an MTFA, JOP 3. I've forgotten,
 9 there have either been two or three subsequent JOPs,
 10 have there not?
 11 A. There's been MTFA JOP 4, which was circulated in late
 12 2017, I believe, and then there was a change in
 13 terminology in terms of MTA, edition 1, in January 2019.
 14 And just recently there has been the publication and
 15 circulation of MTA JOP 2, which is quite different to
 16 the previous JOPs.
 17 Q. Yes. So there have been three editions since the one
 18 that we are going to have to look at in detail. The
 19 title, as we know, has changed, it's gone from MTFA to
 20 MTA, and there are significant differences to zones and
 21 procedures.
 22 A. That's correct.
 23 Q. I'm asking you, Mr Lawlor, about JOP 3, the one that was
 24 in force at the time of this attack. Let me make it
 25 clear, please -- I know these ground rules have already

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1 been established -- I'm asking you about the principles,
 2 I'm not asking you about the attack on the night. I'm
 3 sure you understand that, Mr Lawlor.
 4 A. Yes, sir.
 5 Q. In terms of the hot zone, if we could look at JOP 3,
 6 it's {INQ008372/13}. It's the top of that page, please.
 7 It's the second paragraph, so if we go to the top.
 8 The second sentence of the second paragraph reads:
 9 "Specialist emergency personnel will deploy into the
 10 hot and warm zones from the FCP."
 11 And against the word "hot" is a footnote,
 12 footnote 9, and if we could go to the bottom of the
 13 page, please, for that footnote. The footnote reads:
 14 "Only police firearms officers or other identified
 15 police specialist assets will be deliberately deployed
 16 into hot zones."
 17 We can take that off, please.
 18 So Mr Lawlor, JOP 3 was very clear, was it not? The
 19 only persons who should be deliberately deployed into
 20 a hot zone were police firearms officers or other
 21 identified police specialists. That's very clear, is it
 22 not?
 23 A. Yes, sir, that's consistent with the information
 24 I provided earlier.
 25 Q. Yes. There was certainly a belief, was there not, and

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1 I'm not suggesting right or wrong, Mr Lawlor, but
 2 certainly a belief that if there were civilians treating
 3 survivors in a hot zone, some people thought they should
 4 leave on a direct application of these principles?
 5 A. Sorry, who should leave?
 6 SIR JOHN SAUNDERS: The civilians treating casualties.
 7 A. That's not my understanding.
 8 MR HORWELL: Where do you take that understanding from?
 9 A. That's just -- in terms of if I was a civilian
 10 responder, in terms of moral duty to my fellow members
 11 of the community, that is not something I would do. In
 12 terms of the JOPs, as you have referred to there, in
 13 terms of deliberately deploying assets into the hot
 14 zone, they would be essentially police colleagues or
 15 firearms colleagues.
 16 I have not read or do not understand the reference
 17 you are making there in terms of members of the public
 18 moving from a risk area to help a fellow person.
 19 Q. Well, Mr Lawlor, that's very helpful, thank you. So as
 20 a civilian you would regard it as a moral duty to stay,
 21 as you've said. That's correct?
 22 A. (Overspeaking). Sorry, sir?
 23 Q. And as a fire officer you would regard it as your duty
 24 to stay in a hot zone; is that correct?
 25 A. In terms of a fire officer, my role as an on-scene

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1 commander deploying assets into the various risk
 2 areas — I'm sure you'll appreciate I have policies and
 3 procedures to work against and that's embedded within my
 4 training. That's perhaps all I can say on that matter.
 5 I'm guided by policies, procedures and health and
 6 safety.
 7 Q. You went through various protocols much earlier in your
 8 evidence. The words "safe system of work" appear on
 9 a number of occasions, do they not?
 10 A. I've referred to a safe system of work, sir, yes.
 11 Q. So do we understand those protocols, that unless you are
 12 satisfied that there is a safe system of work and that
 13 can be achieved, the Fire Service will not enter
 14 a scene?
 15 A. I would assess the risk, I would — in terms of the
 16 training, my policies, procedures, I have an element of
 17 operational discretion, which allows me to move beyond
 18 operational policies for a given time. But yes, you're
 19 correct, in terms of me as a commander undertaking my
 20 command role, I would be guided by policies and
 21 procedures to ensure that I put a reasonable and
 22 practical safe system of work in place for any operators
 23 under my command.
 24 Q. And Mr Lawlor, only this: I think it was in answer to
 25 a question from the chairman that you said that on

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1 exercises, you would expect the three emergency services
 2 to agree risk and agree zones.
 3 A. That's the evidence I gave, sir, yes.
 4 Q. The question I'm about to ask you, I'm afraid, is to
 5 some extent hypothetical, but that may be very different
 6 during the course of an emergency. There are going to
 7 be different opinions as to the assessment of risk and
 8 the assessment of zones. That is always going to be
 9 a possibility, is it not, Mr Lawlor? No criticism of
 10 anyone, but opinions are going to differ, are they not?
 11 A. Sir, again, as I made reference to earlier, one of the
 12 ways to overcome that potential risk is to undertake
 13 regular training and exercising with partner agencies,
 14 being confident in the information you are receiving.
 15 For example, under the joint understanding of risk, so
 16 that's being confident with your colleagues that the
 17 information is credible, is timely, and it's building up
 18 those relationships in the lead-up to the event itself.
 19 As I've made reference to earlier and we've made
 20 references within this afternoon, we did a lot of
 21 training and exercising with our colleagues in specific
 22 roles.
 23 So for example, the tactical firearms commander, the
 24 force duty officer, the ambulance commanders, the NIOs.
 25 That was either nationally, regional or locally. We

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1 undertook that on a regular basis. We understood each
 2 other's roles and responsibilities at this type of
 3 event.
 4 And whilst I appreciate, sir, you make reference to
 5 a hypothetical situation, in terms of those
 6 relationships we built up with our colleagues and the
 7 confidence we had in each other during training and
 8 exercising, I would have no reason to doubt my fellow
 9 colleague in another emergency service to disbelieve or
 10 come up with a different risk within that given area.
 11 I would trust that person.
 12 Q. So if one of your emergency service colleagues thought
 13 it safe to enter a scene, you think it's more than
 14 likely that you would agree with that assessment?
 15 A. If it was safe to enter a scene... The primary aim is
 16 to undertake rescue, life-saving operations, and if my
 17 fellow — and if we keep it on the theme of an MTFA
 18 incident and my fellow colleague informed me of the
 19 various zones, and informed me of a limit of
 20 exploitation within that warm zone or within the zone,
 21 based on the information I would most certainly agree
 22 that joint understanding of risk.
 23 With that information, I would undertake the
 24 situational awareness and share that information and
 25 give an adequate, a good briefing to my colleagues, the

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1 personnel who were being committed into that area. It's
 2 all about providing a thorough brief to my colleagues or
 3 the multi-agency colleagues entering into a risk area,
 4 which hopefully then, with their training, their PPE,
 5 will give them confidence into entering that area and
 6 undertaking the tasks they've been given to undertake.
 7 Q. I understand all of that, Mr Lawlor, but you would
 8 expect to trust the assessment of one of your emergency
 9 service colleagues?
 10 A. I would.
 11 MR HORWELL: Thank you very much indeed. Sir, that's all
 12 I ask.
 13 SIR JOHN SAUNDERS: Thank you.
 14 This is dealing with the practicalities. You
 15 said — and it's a credit to you — that if you'd been
 16 a civilian, even if someone said, "This is a hot zone,
 17 get out, it's not safe", you would remain helping
 18 casualties. I don't want to go back over that. If you
 19 arrive on the scene as the NIO and you find one of your
 20 officers in an area declared to be a hot zone treating
 21 civilian casualties, what would you then do? I hope
 22 this is a hypothetical situation for you, but tell me
 23 what you would do.
 24 A. Sir, like I referenced earlier on this afternoon, part
 25 of that joint understanding of risk, yes, if by the very

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1 nature of the response, colleagues were in a hot zone or
 2 warm zone at the time, if possible we will try to
 3 replace them with specialist responders. However,
 4 I accept that we don't have infinite specialist
 5 responders, so again that would be a conversation with
 6 the tactical firearms commander and it may be that the
 7 tactical firearms commander could deploy some of their
 8 resources, so for example armed resources, to protect
 9 the life-saving work what was ongoing at the incident.
 10 So for example, if it's a vehicle with a weapon, so
 11 put, if I call it, a ring of steel or ring of armed
 12 assets around that scenario where non-specialist
 13 responders are undertaking life-saving activities and
 14 for me that would be -- I would be happy with that,
 15 I would be happy that I could actually or we could
 16 actually downgrade to some degree that zoning, and
 17 again, through my rationale, decision logging, I would
 18 be happy for my non-specialist responders to continue to
 19 carry out life-saving activities.
 20 SIR JOHN SAUNDERS: Providing they were prepared to do so in
 21 full knowledge of the facts?
 22 A. Absolutely.
 23 SIR JOHN SAUNDERS: Actually, just looking at the document
 24 and the zones, what the direction is is that:
 25 "No one shall be deployed in something which is

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1 a hot zone."
 2 It actually doesn't deal with a situation where
 3 people are already there and perhaps it's a lacking
 4 in the guidance that it doesn't.
 5 A. Sir, if I just, I suppose, bring your attention then to
 6 JOP 4 and the JOPs which preceded that, the JOP 3. That
 7 did make reference to -- there is the possibility of
 8 non-specialist responders being either in a warm zone or
 9 a hot zone. So the subsequent JOPs has taken that into
 10 account and that's referenced.
 11 SIR JOHN SAUNDERS: I don't want to delve into things which
 12 I shouldn't be doing. I'm always nervous when Mr Suter
 13 starts talking to Mr Greaney that I'm asking questions
 14 that I shouldn't, but it appears to be all right. So
 15 JOP 4 and JOP 5 and the latest guidance have taken
 16 account of all these things, have they? We'll obviously
 17 look at them later on.
 18 A. Sir, I think I can say with confidence JOP 4 did take
 19 that into account. The MTFA JOP 4 initiative, if
 20 you will, and then the MTA JOP was issued in
 21 January 2019. And throughout those, throughout any of
 22 the JOPs now, it makes reference to non-specialist
 23 responders or first responders potentially being in
 24 a risk area undertaking activities by nature of their
 25 work.

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1 SIR JOHN SAUNDERS: One final point: I understand what you
 2 say about how you would trust what your fellow commander
 3 would say. But in an emergency situation, some people
 4 might regard it not very satisfactory that what's
 5 expected is for people to somehow talk and agree
 6 something when in fact the firearms commander is the man
 7 with all the information to declare the zones. Would it
 8 be better if he just did it?
 9 A. Declare the zones?
 10 SIR JOHN SAUNDERS: Yes, and then you know exactly where
 11 you are and who can go in where.
 12 A. I suppose then in terms of the terminology, you could
 13 argue that it's a bit unclear. Without doubt, when the
 14 tactical firearms commander -- they will determine the
 15 zones. That would be my understanding. And the
 16 tactical firearms commander at the forward control point
 17 would then just be confirming the zones and not
 18 necessarily a huddle to agree those zones; it would be
 19 a given that the zones have been set, we understand
 20 where the zones are, we understand where the limit of
 21 exploitation is, and then we would respond accordingly.
 22 SIR JOHN SAUNDERS: Thank you very much.
 23 MS CARTWRIGHT: Sir, I think that's all the evidence we can
 24 achieve this afternoon. We still have, on the estimates
 25 provided in the Rule 10 process, about another hour to

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1 go with this witness, and I think the indication was
 2 that if you're content, sir, that we reconvene at 9.30
 3 tomorrow to conclude the evidence of Mr Lawlor, then to
 4 start the evidence of Mr Fletcher.
 5 SIR JOHN SAUNDERS: It may be that some of the questions
 6 which Mr Cooper wants to ask have already been covered
 7 so we can limit that time a bit. Everyone is working on
 8 the basis we finish by lunchtime and obviously --
 9 Mr Cooper?
 10 MR COOPER: Sir, I'm firstly grateful to you and the rest of
 11 colleagues in the hearing for assisting me today. I've
 12 been listening to the latter part of the evidence and
 13 I undertake to look at the real time evidence tonight.
 14 I am very much in mind of what you have said, sir, and
 15 I'll achieve what you require.
 16 SIR JOHN SAUNDERS: Okay. Mr Cooper, it's not just I only
 17 want a half day, you'll understand people make
 18 arrangements on the basis that we are finishing then and
 19 I don't want to upset them if we can avoid it.
 20 MR COOPER: I do understand and again I'm grateful.
 21 SIR JOHN SAUNDERS: And 9.30, I hope, is all right for
 22 everybody. Is that all right for you, Mr Lawlor? You
 23 won't be long, I'm told.
 24 (4.47 pm)
 25 (The inquiry adjourned until 9.30 am

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