

OPUS2

Manchester Arena Inquiry

Day 63

February 10, 2021

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1 Wednesday, 10 February 2021
 2 (9.30 am)
 3 MS CARTWRIGHT: Good morning, sir. As you know, we're
 4 in the middle of Mr Lawlor's evidence and the remaining
 5 advocates to question. We turn next to Mr Cooper on
 6 behalf of the families, please.
 7 (Pause)
 8 MS CARTWRIGHT: Sir, can I thank you for the extra time and
 9 apologise to you for the inconvenience.
 10 SIR JOHN SAUNDERS: Nothing to apologise about.
 11 MR MICHAEL LAWLOR (continued)
 12 Questions from MR COOPER
 13 MR COOPER: Sir, I should apologise, I'm afraid my
 14 technology failed me at the last minute, so thank you
 15 for your technology support team who are extremely
 16 helpful.
 17 Mr Lawlor, as you know, I ask questions on behalf of
 18 the families today of you. You can be reassured that
 19 I've had an opportunity of reading your evidence and
 20 seeing the matters that you've covered yesterday, so
 21 I obviously won't be repeating those, although I will be
 22 asking you just a few questions to develop that.
 23 Can I take you first, please, to the issue
 24 in relation to your statement and ask you to look at
 25 paragraph 27 of your statement, please.

1

1 In paragraph 27 of your statement, if you look at
 2 it, it's a short paragraph, you indicate that NILOs can
 3 go further forward in a terrorist attack. Do you see
 4 that?
 5 A. Yes, sir.
 6 Q. Can you just explain what you mean about that? Then I'm
 7 going to ask you just a few details about the advantages
 8 of that. What do you mean by "go further forward"?
 9 A. Sorry, sir?
 10 Q. What do you mean when you say, "Go further forward
 11 in the attack"? Can you just develop that for me?
 12 A. Yes. What that is referring to is the additional
 13 training we have received in terms of, at the time, the
 14 marauding terrorist firearms attack and Operation Plato.
 15 With our knowledge and understanding of the national
 16 doctrine, what that means is any personnel from the
 17 appropriate stations, the specialist responders, they,
 18 with the training, the PPE, the knowledge of the
 19 doctrine, what that does is it allows the NILO to commit
 20 specialist responders into the warm zone.
 21 We would agree a limit of exploitation and it may be
 22 within that warm zone there's actually a point where
 23 they wouldn't go forward. That's the understanding as
 24 of the MTFA JOPs 3 at the time, sir.
 25 Q. I've looked very carefully at the interchange of

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1 questions and answers that you gave the chair yesterday
 2 in relation to the warm and the hot zones and the
 3 guidance given about who can enter the warm and the hot
 4 zones. That's, as you told us yesterday, changed,
 5 hasn't it, since the arena tragedy?
 6 A. That's correct. The current JOPs 1, basically
 7 specialist and non-specialist responders, are permitted
 8 to enter those various zones, but again that would be
 9 based on a risk assessment or assessment of risk that
 10 may or may not be with partner agencies, and the focus
 11 now is to, where possible, commit specialist and
 12 non-specialist resources further forward as we see
 13 necessary to undertake operational activities to render
 14 rescues.
 15 Q. Thank you. I think the answer you gave yesterday was
 16 that that change is to acknowledge scenarios where the
 17 first responders arrive on scene unaware of the type of
 18 attack or prior to the establishment of a zone; that's
 19 right, isn't it?
 20 A. Sir, that would be correct and that's taking into
 21 account the first responders attending at the scene.
 22 However, as that scene develops and there is more of
 23 a manned structure and specialist resources and
 24 specialist officers attending that scene, it still
 25 doesn't take away from that entering into the warm or

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1 hot zone is now under MTA — JOPs 2, sorry, edition 2
 2 allows us to enter those risk areas.
 3 Q. Mr Lawlor, I'm very conscious of time and you must
 4 answer your questions as best you feel fit, but if you
 5 can try and shorten them, if possible. I'm not asking
 6 you to not give the best of yourself, you must
 7 of course, but if you can, because I'm conscious of the
 8 inquiry's time and I've just got a few questions to ask
 9 and I'd like to get through them. That's not being rude
 10 to you, please be assured of that, I'm just trying to
 11 make some progress.
 12 A. Okay.
 13 Q. As far as the warm and the hot zone is concerned, that
 14 includes generally, doesn't it, whether any of fire
 15 personnel can enter, for instance, the hot or warm
 16 zones? It governs their access, doesn't it?
 17 A. Correct.
 18 Q. GMFRS have specially trained, as you've told us, MTFA
 19 crews, that's right, isn't it, with equipment which can
 20 work in the warm zone?
 21 A. Yes.
 22 Q. And obviously, if personnel do not get into that warm
 23 zone, that equipment is not available to be deployed to
 24 assist casualties or indeed, very sadly, people who are
 25 dying; is that right?

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1 A. That would be correct.
 2 Q. In your paragraph 30 of your statement, you say that:
 3 "At the time of the attack, GMFRS had specially
 4 trained MTFA crews who had specialist training and
 5 equipment to work within the warm zone to assist
 6 ambulance personnel in casualty recovery."
 7 Do you see that?
 8 A. I do, sir.
 9 Q. What was the special training -- and I'm asking
 10 specifically of the special training in relation to
 11 assisting casualties -- that these individuals were
 12 given?
 13 A. As part of the overall MTFA training for crews, that was
 14 a four-day course. On day 2 of that course they would
 15 spend a full day with North West Ambulance Service HART
 16 teams and undertake specialist training in terms of
 17 assisting the crews with -- for example, with ballistic
 18 injuries.
 19 Q. Right. I am going to be utterly -- change my question
 20 of you and ask you to be a little more specific now, if
 21 you can, on that. What sort of specialist training
 22 would these individuals have that might have been of
 23 assistance to casualties in the circumstances of the
 24 arena attack?
 25 A. That would be applying assistance to the wounds. We

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1 carried a number of, I suppose, large glass wounds for
 2 packing any wounds out. And the additional specialist
 3 training would be to assist the HART teams in recovering
 4 those casualties from the affected area out to a holding
 5 point where the ambulance crews would then be waiting to
 6 onward transport the casualties to hospitals.
 7 Q. Would that specialist training have assisted casualties
 8 who were heavily bleeding or seriously bleeding to
 9 a dangerous level?
 10 A. That would, sir, yes.
 11 Q. And in what way on that specific question I ask you,
 12 that's casualties who are bleeding and potentially
 13 fatally bleeding, how would crews, fire crews, have
 14 potentially been able to assist them?
 15 A. Again, we would always be working under the guidance of
 16 the HART team, who we would be working alongside. But
 17 we had or have specific packs, Prometheus packs, to pack
 18 those wounds out and, where possible, stem the bleeding.
 19 Q. Thank you. And in terms of the specialist equipment
 20 that could have been brought into the warm zone, or even
 21 a hot zone if it was appropriate, but in that case
 22 a warm zone in the arena, what sort of specialist
 23 equipment could have been deployed?
 24 A. We had tourniquets as well with the specialist
 25 responders.

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1 Q. What about things like stretchers?
 2 A. That's correct. So that's where I made reference to
 3 recovering the casualties from the affected area on to
 4 stretchers and out to the waiting North West Ambulance
 5 Service.
 6 Q. In terms of the specific details of 22 May 2017,
 7 approximately how many stretchers could have been
 8 deployed by GMFRS specialist individuals in the
 9 City Room had they been able to get in there?
 10 A. Every fire appliance had a stretcher in any case, but
 11 that was more of a long board. But in terms of bespoke
 12 stretchers for this type of incident and this
 13 capability, I believe there was five stretchers on each
 14 vehicle.
 15 Q. And how many vehicles were available for deployment
 16 at the time of this atrocity?
 17 A. Two specialist responders.
 18 Q. Two specialist vehicles, so 10 stretchers potentially
 19 available to be deployed in the City Room?
 20 A. That would be correct, sir.
 21 Q. And how many specially trained staff potentially
 22 available to be deployed in the City Room?
 23 A. At the time the MTA specialist responder capability
 24 consisted of 12 specialist responders.
 25 Q. Thank you. Obviously had other responders or other

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1 stretchers been required, they could have been called
 2 for, one presumes, by people on the ground communicating
 3 with command and control, effectively?
 4 A. That would be correct, sir. We also had the ability to
 5 call on mutual aid, so from fire and rescue services,
 6 neighbouring fire and rescue services, for example
 7 Merseyside and West Yorkshire.
 8 Q. So for instance if colleagues of yours who are trained
 9 in the way that you explained had attended at the
 10 City Room and considered that more equipment was needed,
 11 ie stretchers and more trained personnel were needed to
 12 attend to people who were bleeding heavily or generally
 13 bleeding, a call could have been made for immediate
 14 reinforcement; is that right?
 15 A. Absolutely, sir.
 16 Q. Thank you. Again, I can take you to the source material
 17 as far as the papers are concerned, rest assured I'm
 18 asking you questions based on what I read in the papers,
 19 but let me put the general proposition to you to try and
 20 speed the process. It's right, isn't it, that the
 21 specialist equipment that we've been speaking of can be
 22 utilised by other agencies on the scene?
 23 A. That would be correct.
 24 Q. So in other words, should ambulance personnel or
 25 paramedic personnel or indeed members of the public who

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1 are calling for a stretcher, they can do so and,
 2 provided it was available, no doubt your colleagues
 3 would have immediately supplied it? Is that right?
 4 A. That would be a possibility.
 5 Q. I'll add to that, to be fair to you, from the material
 6 I've read, it does say "following a risk assessment and
 7 any necessary training". I understand that's probably
 8 why you're perfectly properly hesitating. I understand
 9 technical equipment requires technical training. But
 10 perhaps in terms of stretchers, if there were stretchers
 11 available, and a member of the public or a paramedic or
 12 an ambulance personnel who'd managed to get on to the
 13 scene called out, "We need another stretcher over here",
 14 of course it would be immediately provided, wouldn't it,
 15 if it was available?
 16 A. If it was available. Primarily we would aim to enter
 17 that area ourselves with our equipment, but if need be,
 18 yes.
 19 Q. Thank you. Can I take you, please, to paragraph 44 on
 20 the same sort of subject of your statement, please.
 21 I just want to ask you about Saton Force; is that
 22 the correct pronunciation?
 23 A. That's correct.
 24 Q. It's another example, you say, of specific training in
 25 pre and post-bomb scene management. I just want to --

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1 I couldn't see on the real time whether you'd been asked
 2 in any detail about this, so I hope the hearing will
 3 forgive me that I'm going over ground, but I don't think
 4 you have. I just want to ask you a little bit about
 5 that.
 6 Can you develop what Saton Force is and what that
 7 specific training is in pre and post-bomb scene
 8 management?
 9 A. Sorry, sir?
 10 Q. It's held twice a year, it seems, from your statement.
 11 A. That's generally. It's been postponed during COVID
 12 times. However, in normal times, so Exercise
 13 Saton Force is the re-accreditation of the EOD bomb
 14 scene operatives. As such we work closely with
 15 Counter-terrorism Policing North-west -- when I say
 16 "we", Greater Manchester Fire and Rescue Service -- and
 17 West Yorkshire Police, who are the coordinators for the
 18 partner agencies to Exercise Saton Force.
 19 As such, the military exercise coordinators again
 20 have invited partner agencies to participate where
 21 necessary into this exercise. It's basically broke up
 22 into a number of elements. The elements I've referred
 23 to are element 1, which is a pre-bomb scene attendance,
 24 so if we reflect on yesterday, we were talking about the
 25 pre-explosion. And generally that's, I would suggest,

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1 more of a command and control type of exercise from the
 2 partner agencies.
 3 Q. Can I guide you, again to save time? Let's just deal
 4 with post-bomb because that's probably more relevant to
 5 the issues that may concern the chair. What sort of
 6 post-bomb training did Saton Force provide?
 7 A. In terms of the attendance at the post-bomb scene that's
 8 mainly forensic management and we work again with the
 9 Counter-terrorism Policing North-west and that's just an
 10 opportunity to convey what resources fire and rescue
 11 services can offer at a post-bomb scene or indeed an
 12 initial bomb scene. It's basically an opportunity for
 13 us to attend with multi-agency partners -- in the
 14 police's case, as first responders, to explain how
 15 we can assist them at these types of incidents.
 16 Q. Was Saton Force in operation at the time of the arena
 17 bomb?
 18 A. Sir, it was the week before, on Friday the 19th, that
 19 was the last day of Saton Force, and as you know, the
 20 bomb occurred on the Monday.
 21 Q. So there was a Saton Force training programme a few days
 22 before this atrocity?
 23 A. The week before, sir. The full week.
 24 Q. Is Saton Force still continuing?
 25 A. It will be continuing but from a military EOD

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1 perspective. However, the partner agencies since COVID
 2 has hit us, there's not been any partner agency support
 3 in that event.
 4 Q. Has there been any development of what Saton Force can
 5 offer as a result of the learning that may have been
 6 received from the arena bomb?
 7 A. That's probably -- I'm probably not the appropriate
 8 person to ask that question.
 9 Q. All right then, I'll respect that answer. Who would be?
 10 Would it be Mr Fletcher?
 11 A. No, sir. In terms of the -- I would say the primary
 12 exercise planners, that would be the military EOD. That
 13 may well be the West Yorkshire Police exercise planner
 14 and Counter-terrorism Policing North-west.
 15 Q. All right. Let me move on. I want to ask you about
 16 paragraph 34 of your statement and the National Security
 17 Review Committee meetings. I just want to ask you about
 18 issues relating to cascading of information from these
 19 meetings. If you look at paragraph 34 of your
 20 statement, you say:
 21 "There are National Security Review Committee
 22 meetings which I dial into."
 23 And you go on to describe your involvement there.
 24 How regularly did these National Security Review
 25 Committee meetings take place?

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1 A. [REDACTED] sir.
 2 Q. So one would have taken place, would it —
 3 SIR JOHN SAUNDERS: Is that actually sensitive? Looking at
 4 paragraph 34, it may be an indication that that
 5 information is sensitive. I'm not quite sure why.
 6 MR COOPER: Forgive me if I transgressed, I didn't mean to.
 7 SIR JOHN SAUNDERS: I'm sure you did. I'm a bit lost to
 8 know why it's sensitive.
 9 MR COOPER: It is sensitive?
 10 SIR JOHN SAUNDERS: I think it may be, yes. Please don't
 11 worry about it.
 12 MR COOPER: I will step carefully. Mr Lawlor, the last
 13 thing I want to do is to prejudice these matters.
 14 Can I ask you this, and pause before you answer just
 15 in case it's a sensitive answer: how close to the arena
 16 bombing incident was the last National Security Review
 17 Committee meeting? Was it a week before or a few days
 18 before? If you're not — obviously I can't see what's
 19 going on in the hearing room, but if it's not being
 20 indicated that it's sensitive, then can you answer that
 21 question?
 22 A. The maximum of the period I've made reference to in
 23 my —
 24 SIR JOHN SAUNDERS: Would you like to go away and check —
 25 no doubt there's a diary that can tell you — and supply

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1 us with the information?
 2 Will that do, Mr Cooper?
 3 MR COOPER: It was a building block of a question for the
 4 next one anyway which was: at the time of that meeting
 5 it would have been known, very close to the arena bomb,
 6 the state of the national risk assessment? That would
 7 be right, wouldn't it?
 8 A. That would be.
 9 Q. If we look at your paragraph 38, you say:
 10 "Whilst we knew that a terror attack was likely, the
 11 Manchester Arena attack involved a different approach to
 12 other terrorist attacks."
 13 I'm going to come on to that in a moment. I suppose
 14 that this will be sensitive, so don't answer it, but
 15 I would have been interested to know as far as that
 16 National Security Review Committee meeting was
 17 concerned — and this is history now, we're not talking
 18 about what might be discussed now — the general tenor
 19 of what was covered in that National Security Review
 20 Committee meeting so far as it might relate to flagging
 21 concerns that might affect the Manchester Arena. I put
 22 the question like that. Go away and have a think about
 23 it if you can and make sure there's nothing sensitive
 24 in that question. But if there was such a meeting close
 25 to the arena atrocity, my question would be: what was

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1 discussed at this meeting that may have assisted the
 2 security of the Manchester Arena on the 22nd? So hold
 3 on to that.
 4 A. At this moment in time, I couldn't — I'm not in
 5 a position to discuss the actual detail —
 6 Q. I understand. I respect that.
 7 A. — of that meeting.
 8 SIR JOHN SAUNDERS: What we do know from your statement is
 9 the threat level was severe, you knew that, and it had
 10 been for some time, and there was no specific
 11 intelligence relating to the arena or to Manchester.
 12 I think that comes in different paragraphs of the
 13 statement.
 14 MR COOPER: Thank you, sir.
 15 SIR JOHN SAUNDERS: If you want further detail, Mr Cooper,
 16 I'm sure we can try and get it and then we'll have to
 17 decide whether it's sensitive or not.
 18 MR COOPER: Of course, I'd be grateful, thank you.
 19 Paragraph 41, please, Mr Lawlor, on the same
 20 subject, as to what you did know at the time — and when
 21 I say "you", I mean the corporate you. You say this:
 22 "Since the 2012 Olympics, the emergency services
 23 have trained together on the national JOPs as part of
 24 their multi-agency preparations for an attack. When you
 25 look at [blank], the targets for terrorists incidents

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1 are: terrorist (sic) hubs, crowded places, shopping
 2 centres, events. GMFRS has specifically attended
 3 training based upon scenarios at all these locations
 4 since 2012."
 5 So my question is this: certainly from the material
 6 within that paragraph, you, your colleagues and
 7 multi-agencies were very aware on 22 May 2017 that
 8 targets for terrorist incidents included transport hubs,
 9 crowded places and events as well as shopping. That's
 10 right, isn't it?
 11 A. Correct, sir.
 12 SIR JOHN SAUNDERS: Mr Cooper, just before you go on,
 13 inadvertently you actually misread it first time round
 14 and you described it as "terrorist hubs" rather than
 15 "transport hubs", just in case anyone is confused by
 16 that who is listening.
 17 MR COOPER: I'll read it again.
 18 SIR JOHN SAUNDERS: Don't worry. The second time you read
 19 it entirely right. It's a transport hub.
 20 MR COOPER: The transcript will bear out the correct
 21 reading.
 22 My question is simply this, Mr Lawlor, if I can:
 23 there is the description of what targets for terrorist
 24 incidents are or were at the time in 2017. In other
 25 words, the Manchester Arena; correct?

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1 A. Sir, that would fall under that category, yes.
 2 Q. So it cannot have been a surprise then, would you agree,
 3 a tragic surprise, it couldn't have been a surprise when
 4 this atrocity happened? Would you agree?
 5 A. Quite right. When you look at the posture during that,
 6 certainly in the 12-month lead-up to that event and the
 7 various discussions, what was going on, then when we --
 8 you kind of looked at the unfolding attacks across
 9 Europe and then into the UK mainland, the posture -- we
 10 felt sure, you know, we... an incident could unfold at
 11 any time. So I guess, no, it wasn't a surprise.
 12 Q. We'll come on to whether a suicide bomber was
 13 a particularly surprising affair in a moment. But
 14 certainly the venue, that is the Manchester Arena,
 15 certainly was not a surprising venue for a terrorist
 16 attack around and about the time of May 2017.
 17 I want to ask you about your paragraph 36 -- it
 18 links into this -- for clarification on state of
 19 knowledge, as it were.
 20 You refer to producing safety alerts on a regular
 21 basis since 2014. Were safety alerts -- and there are
 22 five safety alerts, I think you say there, in the
 23 12 months preceding the attack sent out to GMFRS
 24 personnel; is that right?
 25 A. That's correct, sir.

17

1 Q. Again, in short, what sort of details were in these
 2 safety alerts?
 3 A. Generally, the safety alerts just highlighted the event,
 4 what had happened, either within Europe or the UK, and
 5 it was just an awareness to all personnel within
 6 Greater Manchester Fire and Rescue Service to be extra
 7 vigilant, to take care when either travelling to or from
 8 work or to ensure equipment is safe and secure.
 9 Generally the safety alerts would have pointed or
 10 signposted any concerns to the Anti-terrorism Hotline.
 11 Q. Of the safety alerts that were sent out in advance of
 12 the arena attack, was the Bataclan attack included
 13 in the safety alerts?
 14 A. I don't recall that.
 15 Q. You're aware of that attack, I presume now?
 16 A. Yes.
 17 Q. Is there any reason why it wasn't?
 18 SIR JOHN SAUNDERS: I don't think he's saying that,
 19 Mr Cooper. He can't recollect it, but we can check
 20 whether it did go out. I'm sorry, I just think ...
 21 MR COOPER: Absolutely, I will move on.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR COOPER: I want to ask you a little more about
 24 Winchester Accord just to supplement what you've already
 25 been asked. I'm going to put an observation made about

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1 Winchester Accord and I can reference it for those who
 2 want to see it. It's at {INQ004521/3}. It's an
 3 observation simply from someone who was attending that
 4 and I just want to ask you whether you generally agree
 5 with the observation of that participant when he or she
 6 says:
 7 "There were lots of repercussions and
 8 misunderstandings of the role of the chief of staff,
 9 Gold commander and Gold coordinator. The coordinator
 10 made decisions and then the commander made different
 11 ones. It was as though there were three Golds.
 12 Thankfully, we don't do this on a regular basis in real
 13 life."
 14 Have a look at that if you want to. This is
 15 feedback from participants in Winchester Accord.
 16 {INQ004521/3}.
 17 SIR JOHN SAUNDERS: We've got it. I don't think the witness
 18 needs to see it.
 19 MR COOPER: Sorry, it wasn't being put on my screen. It is
 20 now, thank you.
 21 You'll see the reference. Do you agree with that
 22 sentiment, Mr Lawlor?
 23 A. My understanding on that feedback is relating
 24 specifically to the strategic coordination group, which
 25 was held up at Greater Manchester Police Headquarters.

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1 I wasn't involved in that part of the exercise, so I'm
 2 probably not the right person to make comment on the
 3 detail of that individual and the concerns he or she may
 4 have had.
 5 Q. Did you have similar concerns, is my question? I'm not
 6 asking you to quality control their concern. From your
 7 involvement with Winchester Accord, do you agree with
 8 the sentiments being expressed there?
 9 A. My concern I had personally, and from a professional
 10 point of view, at Winchester Accord was related to the
 11 cascade of information to activate the multi-agency
 12 response to the forward control point. They were the
 13 only concerns I had at that time with Winchester Accord.
 14 Q. Thank you. Look at your paragraphs 55, please, and 56
 15 of your statement. You say:
 16 "I was exercise coordinator and based at Stretford
 17 Fire Station."
 18 You go on to describe that:
 19 "Whilst I knew as coordinator the FCP would be
 20 declared at the Trafford Centre, in fact no FCP was
 21 issued by either the FDO or tactical firearms commander.
 22 There was no call to move forward. As a consequence
 23 there were very lengthy delays. In the end, because we
 24 knew the preordained location of the FCP, we moved the
 25 resources forward to that location without communication

20

1 with Greater Manchester Police and with a view to
 2 preventing disruption of the exercise. However, we
 3 encountered further delay at the FCP as we could..."

4 And you go on to develop that. You had therefore
 5 direct personal experience, didn't you, of the failures,
 6 or one of them at least, a significant one, of
 7 Winchester Accord?

8 A. That's correct, sir.

9 Q. And the only way that failure was remedied was by
 10 effectively you taking your own initiative; is that
 11 right?

12 A. Sir, it was a joint decision by fire, ambulance and
 13 police exercise coordinators to move forward.

14 Q. Would it perhaps have been better to let it fail, as it
 15 were, and therefore to expose the deficiency rather
 16 than, shall we say, taking your own initiative?

17 SIR JOHN SAUNDERS: Mr Cooper, forgive me for interrupting.
 18 I think the explanation given yesterday about that was
 19 there are other stages of the exercise which, had they
 20 not done what they did, would never have taken place.
 21 That is what I understood. I think an hour and a half
 22 delay getting in there was actually enough, perhaps, to
 23 demonstrate the shortcomings in the system if that
 24 answers the question.

25 MR COOPER: Sir, I'll move on if that's been adequately

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1 covered to your satisfaction.

2 SIR JOHN SAUNDERS: I'm sorry to have interrupted you.

3 MR COOPER: I take it as helpful, which means I can move on.

4 Really, the crux of a question as far as both the
 5 arena is concerned and Winchester Accord are
 6 concerned — you accept, don't you, that there were not
 7 only lengthy delays as far as the deployment of fire
 8 personnel is concerned but in relation to specialist
 9 equipment, and I will just use the word shortly, it
 10 never even arrived at the arena, did it?

11 A. That's correct, sir.

12 Q. And that is very serious, isn't it?

13 A. Absolutely, sir.

14 Q. Because without going back to — and I'm not going to —
 15 my earlier questions about the importance of the
 16 training that your colleagues had, the equipment that
 17 your colleagues had, and the availability of resources
 18 that others such as the Ambulance Service might have
 19 even been able to use, that just simply was taken out of
 20 the equation, wasn't it?

21 A. It was, sir.

22 Q. And I'm in no way impugning the brave individual men and
 23 women of your colleagues who no doubt would have wanted
 24 to be there, wouldn't they, providing their skill and
 25 providing their care to stricken members of the public?

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1 You understand my criticisms don't lie there, of course.
 2 But the fact of the matter is, for some reason, and the
 3 chair will decide what, vital assistance to casualties,
 4 vital assistance to the dying, was denied of them,
 5 wasn't it?

6 A. That's correct, sir.

7 Q. Thank you. I know these are difficult questions and I'm
 8 sorry to have to put them to you, but you'll understand,
 9 acting on behalf of the families, particularly, you may
 10 think, those that might have been saved, these are
 11 important questions. Bear with me a moment.

12 (Pause)

13 Can I take you, please, to your paragraph 58. You
 14 detail there that following Winchester Accord,
 15 John Fletcher and yourself identified further training
 16 for police tactical firearms officers in multi-agency
 17 incidents:

18 "It was our opinion that fire and ambulance NIOs
 19 were more familiar with the JOPs and that the exercise
 20 identified that the police were not as mindful of the
 21 contents of that document. The police focus is on going
 22 into an incident and neutralising the situation rather
 23 than what the other agencies need to do. We provided
 24 feedback."

25 Do you want to develop a little more, succinctly if

23

1 you can, what you mean by, "The police were not as
 2 mindful of the contents of the JOPs document", perhaps,
 3 "as they should have been"?

4 A. We believe that in terms of some GMP commanders there
 5 was perhaps a shortfall in the knowledge of the detail
 6 in terms of the supporting partners at this type of
 7 incident. So for example, the roles and
 8 responsibilities of the Fire and Rescue Service and
 9 Ambulance Service, taking into account the need to enter
 10 the various zones and undertake rescue activities. So
 11 with that, we agreed and liaised with Greater Manchester
 12 Police and tried to plug that gap.

13 Q. Was it effectively a communications issue as far as the
 14 police were concerned in terms of their understanding of
 15 requirements?

16 A. I would say it's based around an understanding of the
 17 JOPs and the JOPs right across the board in terms of
 18 roles and responsibilities, but effectively it was
 19 a communications failure.

20 Q. Thank you. Would you agree that both the general JESIP
 21 guidance and, in particular, the specific MTFA JOPs
 22 stress the importance of direct communication between
 23 agency services' control rooms at the outset of an
 24 incident?

25 A. I would, sir.

24

1 SIR JOHN SAUNDERS: Is it really communications? As
 2 I understand it, the main problem of Winchester Accord
 3 that you were telling us about was you were never called
 4 forward. So that's not only communication but it seems
 5 that someone didn't realise that they needed to give you
 6 the instruction to move forward.
 7 A. You could look at it that way, sir.
 8 SIR JOHN SAUNDERS: Can you look at it any other way?
 9 A. I would generally put that under knowledge and
 10 communication with the — they work to plans, action
 11 cards, and although it may be on that the other
 12 agencies' action cards — we just wasn't communicating,
 13 whether that be a real-life incident or whether that be
 14 for the exercise itself. So I understand what you're
 15 saying, sir, but for me it is communication cascade.
 16 SIR JOHN SAUNDERS: Okay.
 17 MR COOPER: JOPs specifically directs, doesn't it, and I can
 18 give the reference if needs be, and I quote it:
 19 "Three-way communications link between the control
 20 rooms should be maintained until ambulance and FRS
 21 representatives are operational within the tactical
 22 coordinating group."
 23 That's right, isn't it?
 24 A. Sorry, could you just repeat?
 25 Q. Yes. I can even reference it. I'm not asking for it to

25

1 be called up, but it's {INQ008372/10}, 4.4. The
 2 reference I make is:
 3 "Three-way communications link between the control
 4 rooms should be maintained until ambulance and FRS
 5 representatives are operational within the tactical
 6 coordinating group."
 7 Is that something you're familiar with? This is not
 8 a test of memory, honestly, and if you don't remember
 9 something it's perfectly permissible to say you don't.
 10 I'm not going to criticise you. It's a pretty basic
 11 principle, isn't it, do you agree?
 12 A. I'm familiar with that.
 13 Q. The issue that I have with that is really coalescing
 14 around this next question. Is it right that neither the
 15 NWFC bomb or explosion cards mention the set-up of such
 16 a link nor did they promote —
 17 SIR JOHN SAUNDERS: Stop, sorry, we lost that. Could you
 18 start again? We didn't hear part of the question.
 19 MR COOPER: Of course I will, sir.
 20 SIR JOHN SAUNDERS: You were telling us neither the bomb or
 21 explosion card...
 22 MR COOPER: The conflict I'm asking you about is this: that
 23 neither the NWFC bomb or explosion cards mention the
 24 set-up of such a link, as we have established, nor
 25 prompted contact with the police control room.

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1 Shouldn't that have been planned for within those
 2 documents?
 3 A. If I make reference to an Operation Plato action card,
 4 so that makes reference to the communication between the
 5 three agencies. We have the bomb action card, we have
 6 the explosion action card, and then if we are informed
 7 of an MTFA Operation Plato event, North West Fire
 8 Control then are guided by the Operation Plato action
 9 card, which basically details the resources to mobilise
 10 and the people to either send or inform.
 11 SIR JOHN SAUNDERS: Okay, just stop for a moment. As
 12 I understand it, and we'll see them and this is going
 13 from memory again, but the bomb action card actually
 14 directs the NILO, who's been contacted, to contact the
 15 FDO.
 16 A. Sir, that's pre-bomb. That's a device what's not
 17 exploded.
 18 SIR JOHN SAUNDERS: Okay. I understand that. But that's
 19 what it says on that one because they need to know
 20 what's going on to know how close you can get fire
 21 engines to it.
 22 A. They're very different incident types though.
 23 SIR JOHN SAUNDERS: Yes, I understand that.
 24 MR COOPER: Is there some sort of disjunct or some conflict
 25 between these directions in your view or are they

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1 consistent with each other?
 2 A. In terms of the development of the action cards, so the
 3 bomb, explosion, Operation Plato, once again I've had no
 4 involvement in the development or indeed the execution
 5 of those action cards.
 6 Q. Well, maybe someone else. I'm coming to the end of my
 7 questioning, but I do want to take you to paragraph 38
 8 of your statement, please. This concerns the important
 9 issue for those we represent about how surprising this
 10 particular attack was. We've heard some evidence
 11 concerning how its methodology was a surprise.
 12 What happened at the arena in short was that
 13 a suicide bomber detonated an improvised explosive
 14 device in a crowded place during an event. That's
 15 tragically what happened, isn't it, at the arena?
 16 A suicide bomber detonates an improvised explosive
 17 device in a crowded place during an event. I've already
 18 asked you questions about the predictability at the time
 19 of an atrocity being committed in a crowded place and at
 20 an event.
 21 In your paragraph 38 of your statement, you say:
 22 "The Manchester attack involved a different approach
 23 to other terrorist attacks taking place at that time."
 24 You go on to say:
 25 "A suicide bomb is a more sophisticated type of

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1 attack and at odds with the general approach being taken
 2 at the time. It is important this is borne in mind when
 3 considering the approach taken by GMFRS NILOs on the
 4 night of the arena attack.”
 5 I have to put this to you, Mr Lawlor. I continue
 6 struggle to understand that on behalf of those we
 7 represent. A suicide bomber is an evil individual, but
 8 it's not a particularly sophisticated method of causing
 9 this carnage, is it?
 10 A. In that context, no. In terms of the reference there —
 11 in terms of reference to sophisticated, I was referring
 12 there to the developing and making up of the device, so
 13 the actions before and in terms of mixing chemicals into
 14 a device. I would say that's the sophisticated
 15 reference I was making.
 16 SIR JOHN SAUNDERS: Mr Cooper, I have thought about the
 17 paragraph quite a lot and I wonder if you'd mind if
 18 I ask a couple of questions.
 19 MR COOPER: By all means, sir, this is your inquiry.
 20 SIR JOHN SAUNDERS: I just want to know what this is aimed
 21 at. You did become involved in these events later on,
 22 didn't you, as a NILO on the night?
 23 A. Much later on, yes.
 24 SIR JOHN SAUNDERS: Much later on, okay. Did that affect
 25 your general approach?

1 A. It didn't — in terms of my involvement on the night, we
 2 had effectively —
 3 SIR JOHN SAUNDERS: I'm really sorry, Mr Lawlor, I think it
 4 may be capable of a yes or no answer. That's not being
 5 rude. Did it affect your approach on the night, your
 6 idea that, as it were, the type of things terrorists
 7 were doing had moved on and away from suicide bombing?
 8 Did it affect your approach?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: How?
 11 A. Like I say, rather than responding to the scene or
 12 responding to an RVP, which I wasn't aware of at the
 13 time, we decided to place our resources at what we would
 14 suggest is the most appropriate place when I got
 15 involved. So for instance, for me, I went directly to
 16 the force command module.
 17 SIR JOHN SAUNDERS: Okay. Because you didn't believe it was
 18 a suicide bomb?
 19 A. I wasn't aware it was a suicide bomb at the time.
 20 SIR JOHN SAUNDERS: Were you aware there had been an
 21 explosion?
 22 A. Yes. Can I just clarify the "borne in mind" element?
 23 SIR JOHN SAUNDERS: Yes, you may. What I want to know is
 24 whether you were talking about yourself or you were
 25 talking for others.

1 A. I was talking for others.
 2 SIR JOHN SAUNDERS: Is that as a result of conversations
 3 with them or just you think that may be what happened?
 4 A. Both. That was understanding the posture at the time,
 5 the national doctrine in terms of the various threat
 6 levels, the information and communication cascade
 7 what was being pushed out at the SRC meetings. Then
 8 again in that — in the lead-up to the incident, the
 9 various attacks what was ongoing in and around Europe
 10 and the UK, the Bataclan incident in terms of the
 11 methodology, the multi-seated site, the multi-seated
 12 attack. We had the Paris Charlie Hebdo —
 13 SIR JOHN SAUNDERS: Okay. Do you mind if I just stop you?
 14 I understand the list of things. So in your mind at
 15 this particular time, a suicide attack was unlikely,
 16 a remote possibility? How would you describe it?
 17 A. It was likely as much as the other methodologies of
 18 attacks.
 19 SIR JOHN SAUNDERS: So it was — okay, right.
 20 Sorry, Mr Cooper.
 21 MR COOPER: Not at all, sir.
 22 Let me draw this together. So at the time of the
 23 attack at the arena, we have the severe threat level,
 24 which is obviously imminent attack. We have, as we've
 25 already established in the course of my questioning this

1 morning, high on the risk list was crowded places and
 2 events and transport hubs. Of course we know
 3 Victoria Station is close by. And, as you've just
 4 accepted from the chair's questions, that a suicide
 5 attack at the time was just as likely as any other form
 6 of terrorist attack.
 7 So would you agree then that what happened at the
 8 arena at the time, tragically, was entirely predictable?
 9 A. Yes.
 10 Q. And therefore —
 11 SIR JOHN SAUNDERS: I've asked a lot of questions about that
 12 particular paragraph. It's probably me being obtuse,
 13 but it's actually for me to understand what is meant by
 14 that and what is the significance as far as the inquiry
 15 is concerned of those comments.
 16 MR COOPER: Can you help us?
 17 SIR JOHN SAUNDERS: No, no, I think that was just me making
 18 a comment, Mr Cooper. It's often difficult to tell the
 19 difference between a comment and the question.
 20 MR COOPER: It's difficult when we're remote as well.
 21 SIR JOHN SAUNDERS: I do understand.
 22 MR COOPER: It's far more difficult to read people, as it
 23 were, over this system I'm finding than face to face.
 24 Well, Mr Lawlor, I've pressed you on this and the
 25 reason I've pressed you on it is — can you understand

1 there's a great deal of concern by those we represent
 2 that in some ways what happened at Manchester Arena was
 3 considered to be such a surprise and therefore may
 4 explain the lack of communication and the things that
 5 went potentially wrong? This wasn't a surprise and the
 6 emergency services should have been well prepared for
 7 it, shouldn't they?
 8 A. Yes.
 9 Q. All right, thank you. I'm coming to an end now, but
 10 I just want to deal with the future, as it were. I want
 11 to take you back to your paragraph 15 of your
 12 statement --
 13 MS CARTWRIGHT: I don't want to interrupt Mr Cooper, but he
 14 has just referenced the future. This witness is
 15 returning when he is going to deal with the incident and
 16 post-incident matters. I don't want to stop Mr Cooper,
 17 but --
 18 MR COOPER: Then I'll do it on another occasion. In fact,
 19 my learned friend's helped me out because my computer
 20 screen has just frozen and I can't even scroll down on
 21 the statement --
 22 SIR JOHN SAUNDERS: You will have an opportunity, Mr Cooper,
 23 if there are any matters you haven't been able to deal
 24 with.
 25 MR COOPER: There are a number of matters outstanding, but

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1 I think for this session I've probably exhausted the
 2 patience of the tribunal, so I'll stop.
 3 SIR JOHN SAUNDERS: No, no, not at all.
 4 Just two things from me and I'll try and keep them
 5 brief. One is about JOPs guidance at the time as
 6 compared with now. So JOPs guidance at the time, which
 7 obviously provided for zoning, did not provide guidance,
 8 as I understand it, as to what should happen when the
 9 first armed police arrived on the scene or whatever, the
 10 first rescuers arrived, and they found that there were
 11 already rescuers at the scene, some of them who may be
 12 part of the rescue services but not armed, and members
 13 of the public, who were treating people who were injured
 14 in the hot zone. Did the JOPs at the time provide
 15 guidance as to what you should do?
 16 A. Sir, JOPs at the time were restrictive in terms of
 17 committing personnel into various zones.
 18 SIR JOHN SAUNDERS: Okay. It'd be helpful for me just to
 19 have the question answered. Was there any guidance in
 20 it as to what you did in relation to people who already
 21 were in the hot zone treating and helping the injured,
 22 be they members of the public or first responders who
 23 could be unarmed police and paramedics?
 24 A. I don't recall that.
 25 SIR JOHN SAUNDERS: Does it now provide guidance?

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1 A. It does, I believe.
 2 SIR JOHN SAUNDERS: I, of course, have the benefit of
 3 hindsight and I have to try and eliminate it to some
 4 extent. But had it not become apparent in any of the
 5 exercises that you'd done that this is a situation that
 6 people could have been faced with? It doesn't seem to
 7 me to be that unpredictable, but I've got the benefit of
 8 hindsight.
 9 A. Sir, I agree, I agree with you. Those questions are
 10 probably best directed at the JOPs --
 11 SIR JOHN SAUNDERS: Okay.
 12 A. -- development team.
 13 SIR JOHN SAUNDERS: But in the exercises people might have
 14 raised it.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: It matters, perhaps particularly here,
 17 because, as we know, Operation Plato was not
 18 communicated by the police to the others, and the reason
 19 given by the FDO, which we will have to look at and
 20 examine, was: I didn't want people to have to move out
 21 of the hot zone when they're actually there helping
 22 people. And Lord Kerslake commended the FDO or said it
 23 was a good thing he did that.
 24 Had JOPs guidance actually provided for it in the
 25 way it does now, that whole scenario might have been

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1 avoided. So it is important, isn't it?
 2 A. It is important, sir, yes.
 3 SIR JOHN SAUNDERS: And it never occurred to anyone during
 4 any of these exercises, it didn't come up?
 5 A. I don't recollect that.
 6 SIR JOHN SAUNDERS: Okay. Point 2 -- and this is entirely
 7 different and if you can't answer, then please do tell
 8 me.
 9 We're going to hear that the duty NILO on the night
 10 lived some way away. His journey into the centre of
 11 Manchester was delayed because of traffic, but actually
 12 would have taken him a significant amount of time to get
 13 in anyway because of the distance he was away.
 14 That might be regarded by some people as being
 15 a disadvantage. Was there any guidance at the time as
 16 to what you should do in that situation?
 17 A. Sir, there's guidance in, I believe, the major incident
 18 plan and I think it is in the NILO SOP, standard
 19 operating procedures, at the time. But the NILO on the
 20 night recognising that he was facing some difficulties
 21 and did request two further NILOs who were closer to
 22 attend the fire RVP.
 23 SIR JOHN SAUNDERS: But he remained, as I understand it, in
 24 charge of the operation for some time, travelling in in
 25 his car. Is there an automatic way of just handing it

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1 over, just saying, "Look, I'm too far away, someone else
 2 must take this over who's closer?"
 3 A. I think there would be an opportunity to scrutinise in
 4 terms of the perception of NILO number 1 being in
 5 charge. But I don't believe he was in charge. He was
 6 a NILO, he was a tactical adviser, and he was unaware
 7 that he was, if you want to call it, in charge.
 8 SIR JOHN SAUNDERS: Okay. We'll obviously hear from him and
 9 I'm asking you to comment on other people.
 10 The actual guidance as to what you do in that
 11 situation, "I'm a NILO, I'm a long way away, I'm stuck
 12 in traffic, what do I do?" --
 13 A. We would liaise with each other, we speak to each other,
 14 we text each other. It wouldn't be uncommon for any of
 15 us, at whatever incident type, if we realised we was
 16 further away, then we could contact North West Fire
 17 Control and either I would contact them myself or would
 18 contact North West Fire Control to ask them to make
 19 contact with a closer NILO, whatever type of incident
 20 that was, and I believe that occurred on the night.
 21 SIR JOHN SAUNDERS: Okay. Mr Lawlor, that's all I want to
 22 ask. Do you have any further questions?
 23 MR COOPER: Not from me.
 24 MS CARTWRIGHT: We still have Mr Warnock who has questions.
 25 SIR JOHN SAUNDERS: I'm so sorry. Mr Warnock.

1 MR WARNOCK: Can you see me and hear me?
 2 SIR JOHN SAUNDERS: We can, thank you.
 3 Questions from MR WARNOCK
 4 MR WARNOCK: Mr Lawlor, I won't keep you for long. First of
 5 all, could I ask, please, for Mr Lopez to bring up the
 6 JOPs guidance. It's at {INQ008372/1}.
 7 Just while Mr Lopez is doing that, Mr Lawlor, first
 8 of all could you just remind us: who drafts the JOPs
 9 guidance?
 10 A. That's the national JOPs team. That would be
 11 a department within the Home Office.
 12 Q. Thank you. Could we go to {INQ008372/10} of the
 13 document, please.
 14 You were asked about the action plans in
 15 North West Fire Control and whether they should have
 16 included something about three-way communication. Can
 17 I take you to paragraph 4.4 of the JOPs where it says:
 18 "The police will instigate a three-way communication
 19 link between the emergency services' control rooms."
 20 Does that accord with your recollection of what
 21 would happen or should happen?
 22 A. At a Plato event, yes.
 23 Q. Can we look at {INQ008372/11}. This relates to some
 24 questions the chairman asked you about whether the
 25 police firearms commander would be best placed to

1 determine the zoning at the scene and you said your
 2 understanding was that the tactical firearms commander
 3 would determine the zone and other agencies would then
 4 take them as a given.
 5 If we could look at page 11, please, at just below
 6 the second bullet point you will see the paragraph:
 7 "During the marauding phase of an attack, the
 8 information and intelligence picture is likely to be
 9 very confused. During this phase the TFC based in the
 10 force control/operations room is the person most likely
 11 to be best placed to make an effective assessment of the
 12 location of the attacks and the location of the
 13 terrorists. Therefore a clear command protocol and
 14 effective communications should be established between
 15 the control/operations-based TFC and the police on-scene
 16 commander."
 17 Then this:
 18 "The limits of exploitation determining the zones
 19 should be set by the police commander with the most
 20 up-to-date information in respect of the location of the
 21 threat. This will assist in ensuring that the zones are
 22 designated and assets deployed accordingly. It must be
 23 recognised that the decision to designate an area as
 24 a warm zone requires continual assessment based on the
 25 threat."

1 Does that accord with your understanding of how in
 2 practice zones were set?
 3 A. Yes, sir.
 4 Q. If we then look at {INQ008372/13} of the same document,
 5 just under the box that says "Operationally sensitive",
 6 this is dealing with the situation at the forward
 7 control point. It says:
 8 "As a measure for mitigating the risk to personnel
 9 operating in warm zones it is necessary that on-scene
 10 commanders jointly agree and clearly stipulate limits of
 11 exploitation, the furthest points to which emergency
 12 responders will operate in warm zones."
 13 Can you explain how that fits with what we just
 14 looked at in relation to the police commander
 15 determining the zones themselves?
 16 A. Like it says there, once we was together and determining
 17 the limit of exploitation we would agree the furthest
 18 point the specialist responder teams would operate
 19 in the warm zone with the ambulance HART teams. So
 20 albeit the limit of exploitation may not be the extent
 21 of the warm zone on the cusp of the hot zone, there
 22 would be a specific landmark, a shop, a location where
 23 we would say to the crews when we were briefing them,
 24 "That is your limit of exploitation, that's as far as
 25 you will go to undertake any casualty care". But

1 we would then continually review those zones and the
 2 limit of exploitation to keep pushing it forward as far
 3 as practical .
 4 Q. Thank you. Can I just ask you briefly about
 5 Winchester Accord. You told the inquiry that after
 6 Winchester Accord, yourself and Group Manager Fletcher
 7 decided that three-way agency briefing or awareness
 8 sessions were required so that all commanders and
 9 tactical agencies understood and properly applied the
 10 JOPs. Do you remember that?
 11 A. Yes, sir .
 12 Q. Set aside whether the right label for it is
 13 communication or not, what you see to be the root cause
 14 of the problem which caused the delayed attendance of
 15 both NWS and GMFRS at Winchester Accord? What was the
 16 perception of what the root cause of that failing was?
 17 A. Sir, that was the failure of communication of
 18 Operation Plato being declared. So in terms of the ---
 19 Q. Right. Why did you think that JOPs commander training
 20 would help address that?
 21 A. Because that would give the commanders, the tactical
 22 firearms commander, the force duty officer, a wider
 23 awareness and understanding of the importance to share
 24 information with partner agencies to ensure we mobilise
 25 resources and we mobilise specialist resources to the

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1 scene to undertake our core responsibilities .
 2 Q. You thought the problem was one of the force duty
 3 officer , the tactical firearms commander, not actually
 4 following JOPs; is that what you saw the problem as?
 5 A. Correct.
 6 Q. You said that you and GM Fletcher identified that need
 7 for training and GM Fletcher then met with
 8 Superintendent Giladi of GMP to discussion the matter.
 9 Were you then involved in designing or implementing the
 10 JOPs commander training?
 11 A. No, sir , that was our MTFA lead, Neil Gaskell.
 12 Q. Right. Do you know who was involved from other agencies
 13 or whether other agencies were involved?
 14 A. Sir, that would have been or that was police and North
 15 West Ambulance Service.
 16 Q. You were asked this morning by Mr Cooper about the
 17 bespoke stretchers which were available on the special
 18 response units, had they been deployed. Could you just
 19 describe in what way they are bespoke? In other words,
 20 what's the nature of the stretchers, what type are they?
 21 A. They're just a fast action stretcher, they're nothing
 22 technical, they are a rolled-up piece of plastic, if
 23 you will. We just basically unroll them, we would put
 24 a casualty on the stretcher, and strap them in and drag
 25 them out along the floor to the ambulance casualty

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1 point. They are just a very basic stretcher, but fast
 2 action.
 3 Q. Right. Finally, I'm sorry to come back to paragraph 38
 4 of your statement, but you've been asked about it a few
 5 times. You may recall that in that paragraph you said
 6 that account needed to be taken of the nature of the
 7 arena attack, which was at odds with the nature of
 8 terror attacks which occurred in the lead-up to it.
 9 Were there any specific features about those other
 10 attacks which were in your mind on the night, given that
 11 you were deployed, and if so what were they?
 12 A. Generally, the method of attack, the methodology and
 13 what was witnessed in some of the other attacks was that
 14 they were multi-seated, multi-targeted, they were
 15 marauding --- for example, people indiscriminately
 16 seeking out new victims to maim or kill --- and
 17 therefore, in terms of that paragraph, we were trying
 18 our best to obtain the current information picture of
 19 what was happening at the scene so we could direct and
 20 mobilise resources accordingly.
 21 MR WARNOCK: Thank you. That completes the questions
 22 I have.
 23 SIR JOHN SAUNDERS: Let me make sure I understand that
 24 properly. So this is that you were thinking that there
 25 may be other attackers elsewhere or further bombers?

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1 A. That's that sentence and what it refers to in terms of
 2 borne in mind.
 3 SIR JOHN SAUNDERS: So it's not the actual fact of a suicide
 4 bomber which was so different, it was the fact that
 5 you were considering whether there were other people who
 6 were going to take part in the attack?
 7 A. That's correct, sir .
 8 SIR JOHN SAUNDERS: Okay. I do actually understand the
 9 paragraph rather better now. I'm not actually sure it's
 10 terribly well phrased, but there we go. Thank you.
 11 Thank you, Mr Warnock, for explaining that to me.
 12 Have you finished?
 13 MR WARNOCK: I have, thank you, sir.
 14 SIR JOHN SAUNDERS: Okay, thank you.
 15 MS CARTWRIGHT: I have no further questions for the witness
 16 at this phase, sir, so unless you have, that concludes
 17 Mr Lawlor's evidence.
 18 SIR JOHN SAUNDERS: Thank you very much. It has taken much
 19 longer, but I'm very grateful for your help and you've
 20 had to deal with a lot of fairly convoluted questions,
 21 mainly from me, so thank you for that.
 22 We will take a break now. Will 10 minutes be
 23 enough?
 24 MS CARTWRIGHT: That should be adequate. I have not yet met
 25 Mr Fletcher.

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1 SIR JOHN SAUNDERS: Thank you.
 2 (10.54 am)
 3 (A short break)
 4 (11.10 am)
 5 SIR JOHN SAUNDERS: Before we start, we are running slightly
 6 late, which is understandable, although it's a shame.
 7 I make it clear to everybody who is listening that
 8 we will not go beyond 1.30. This witness, Mr Fletcher,
 9 is coming back in any event at a later stage and if
 10 there are questions left over then they can be dealt
 11 with on the next occasion. But it's going to disturb so
 12 many people's arrangements here if we go beyond 1.30
 13 that I'm afraid that's the way we must deal with it.
 14 MS CARTWRIGHT: Sir, perhaps having said that, I should also
 15 indicate that before Mr Fletcher attended today, it was
 16 indicated to core participants that his evidence will
 17 only go up to paragraph 65 of his statement. Certainly
 18 for my purposes today, I will be ending matters at
 19 paragraph 63 and will not be attempting to touch upon
 20 the information relating to the changes that were put in
 21 place as an interim measure on 26 May and thereafter.
 22 They seem better placed for the next time when the
 23 witness comes to give evidence.
 24 SIR JOHN SAUNDERS: Thank you very much.
 25

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1 MR JOHN FLETCHER (sworn)
 2 Questions from MS CARTWRIGHT
 3 MS CARTWRIGHT: Could you please give your full name?
 4 A. John Mark Fletcher.
 5 Q. Mr Fletcher, you should have a bundle of documents in
 6 front of you. Can I take you, please, behind tab 1
 7 where we find a copy of the witness statement you
 8 provided to the inquiry, dated 22 November 2019.
 9 A. Yes.
 10 Q. Have you had an opportunity to refresh your memory from
 11 that witness statement before today?
 12 A. Yes, I have.
 13 Q. Are the contents of that statement true to the best of
 14 your knowledge and belief?
 15 A. Yes, they are.
 16 Q. I'm going to start off by giving a summary of your
 17 various roles and responsibilities within
 18 Greater Manchester Fire and Rescue Service and also
 19 within New Dimensions and Resilience, but I'm going to
 20 do that at a very high level, bearing in mind the detail
 21 of the statement the chairman has. So perhaps
 22 if we work through that together now and if any aspect
 23 of the summary is not correct, please feel free to say
 24 so.
 25 You tell us in your witness statement that you

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1 joined Greater Manchester Fire and Rescue Service as a
 2 probationary firefighter in 1991.
 3 A. Yes.
 4 Q. And you thereafter were promoted, ultimately in
 5 1997/1998 becoming a leading firefighter at White Watch
 6 at Stretford Fire Station?
 7 A. Correct, yes.
 8 Q. In 1999 you were promoted to sub-officer and then the
 9 substantive post and posted to Eccles Fire Station?
 10 A. That's correct.
 11 Q. In June 2000 you took an extended period of temporary
 12 promotion as a station officer in the operations
 13 department at Greater Manchester Fire and Rescue
 14 Service's headquarters?
 15 A. Yes.
 16 Q. And you were then substantively promoted as part of
 17 a team called New Dimensions?
 18 A. That's correct.
 19 Q. And we heard yesterday a little about New Dimensions but
 20 it's right, isn't it, that was an initiative put in
 21 place after the September 11th attacks of 2001?
 22 A. It is, yes.
 23 Q. You then give us details that in 2007 you were appointed
 24 as a station manager based in the contingency planning
 25 unit?

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1 A. That's correct, yes.
 2 Q. And from 2000 to 2010, you had responsibility for COMAH.
 3 If I could deal with another cipher that we have heard,
 4 can you explain what COMAH is?
 5 A. It stands for the control of major accident hazards.
 6 Basically they are what we call upper tier sites,
 7 industrial sites that under the regulations require what
 8 we call an off-site plan. The Fire Service, because of
 9 the history of being a civil fire and defence authority,
 10 were designated local authority, this is in the
 11 metropolitan areas, and we have a responsibility for
 12 ensuring that those plans were appropriate and tested on
 13 a three-year cycle and that was overseen by the Health
 14 and Safety Executive.
 15 Q. And I think you had that COMAH responsibility from 2007
 16 to 2010?
 17 A. I had the COMAH responsibility, I think, for about
 18 18 months and then I carried on a workstream for CBRN
 19 within the department: chemical, biological,
 20 radiological and nuclear.
 21 Q. You also helpfully highlight that at the time of the
 22 arena attack it was Mr Berry who had the COMAH
 23 reference?
 24 A. That's correct.
 25 Q. Then moving forward, please, through an overview summary

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1 of your background. In August 2010 you were seconded to
 2 the National Resilience, formerly New Dimensions, in the
 3 capacity of a temporary group manager and then you were
 4 the national lead for the DIM capability?
 5 A. Yes. That's detection, identification and monitoring.
 6 Q. And in terms of the detection, identification and
 7 monitoring, is that in a specific area of work and
 8 responsibility?
 9 A. Yes. It was part of what they called the CBRN
 10 capability and it's providing a function that if there
 11 was that type of incident that the Fire Service had
 12 a capability to detect, identify and monitor unknown
 13 substances.
 14 Q. Thank you. In terms of then following on from your
 15 secondment with the National Resilience, you tell us
 16 that in 2013 you returned to Greater Manchester Fire and
 17 Rescue Service as a station manager?
 18 A. Correct, yes.
 19 Q. And in August 2013 then you were appointed as the group
 20 manager and the contingency planning manager?
 21 A. That's correct, yes.
 22 Q. And I think you continued in those roles until your
 23 retirement in 2019?
 24 A. I did, yes.
 25 Q. So that's a high-level summary, but I don't mean to do

1 any disservice to you, Mr Fletcher, in doing that. The
 2 chairman has your statement that deals with each of
 3 those matters. Could I summarise what you say in your
 4 witness statement about the experience that you had.
 5 You describe that when one looks at your role from
 6 the time of New Dimensions through to your retirement,
 7 you had worked for 18 years at Greater Manchester Fire
 8 and Rescue Service in respect of the development and
 9 support in respect of planning for terrorist incidents.
 10 A. Yes, that's correct.
 11 Q. We have heard evidence already in respect of the ILO
 12 role, which then became the NILO when it became the
 13 national role. If I could summarise the matters in
 14 respect of ILO, please. In 2003, is it correct that
 15 you were asked by Divisional Officer Mark Arrowsmith to
 16 scope the role of the ILO with the potential to
 17 introduce it within Greater Manchester Fire and Rescue
 18 Service?
 19 A. Yes, that's correct.
 20 Q. And that following a visit to London you wrote
 21 a feasibility report recommending its introduction and
 22 at the time the role was intended to be an
 23 intelligence-led liaison to fast track information
 24 through secure channels to enable a swift and
 25 coordinated response?

1 A. Yes.
 2 Q. And that Greater Manchester Fire and Rescue Service
 3 introduced the role, the ILO, in 2005?
 4 A. Yes.
 5 Q. And I think you summarise in your witness statement that
 6 in your experience that had been a great success?
 7 A. It really moved us forward for how we were dealing with
 8 incidents. It was a step change really in how we
 9 interlinked with other services, particularly the
 10 police.
 11 Q. I think you tell us in your witness statement also that
 12 you set up a multi-agency regional ILO group, which
 13 enabled you or Greater Manchester Fire and Rescue
 14 Service to share useful intelligence.
 15 A. Yes, that's correct, that was also part of a drive to
 16 implement the ILO role nationally. At the time it
 17 was -- London were the instigator of the role,
 18 Manchester was the second fire service to adopt it, and
 19 there was a drive then to make it national, so we worked
 20 with the regional partners.
 21 Q. Thank you. I think you also -- the standard operating
 22 procedure for the NILOs that was the local policy for
 23 Greater Manchester Fire and Rescue Service I think deals
 24 with that the group was established to ensure that
 25 information and good practice was cascaded across the

1 north-west region and to ensure resilience arrangements
 2 were maintained through pan-regional liaison with the
 3 Fire and Rescue Service's NILOs, including dynamic
 4 response, pre-planned events, training and exercising?
 5 A. Yes.
 6 Q. I then, please, just to deal with the fact that in 2010,
 7 we've already heard some evidence about this, ILOs
 8 became NILOs with the introduction of a national course?
 9 A. That's correct, yes.
 10 Q. And I think that was to reflect that the role had become
 11 a national role within fire and rescue services but also
 12 ambulance services?
 13 A. It had, and when we introduced the role in 2005 we
 14 brought in the Ambulance Service. The chronology
 15 I can't remember, but when HART was being introduced,
 16 but we brought the Ambulance Service in and again that
 17 was seen as best practice around the country.
 18 Q. I'm not going to deal with the work in respect of the
 19 chemical biological radiological nuclear subgroup, I'm
 20 going to move next to the MTFA capability, please,
 21 aspect of your statement. If you want to perhaps just
 22 locate yourself, please, in your witness statement, it's
 23 paragraph 37.
 24 We have summarised that you had been on secondment
 25 as part of National Resilience but returned as a station

1 manager in 2013 and when you arrived back at the
 2 Greater Manchester Fire and Rescue Service that
 3 Steve Thomas, one of your predecessors, had been
 4 established as the MTFA capability in
 5 Greater Manchester.
 6 A. Yes. That would have been put in place in the run-up to
 7 the Olympic Games in 2012.
 8 Q. I think you tell us that initially this was an interim
 9 capability but it has since become embedded with the
 10 introduction of the technical response unit, and I don't
 11 want us to deal with the locations of those, but it's
 12 right, isn't it, there are a number of locations where
 13 there is a technical response unit?
 14 A. Yes, there are.
 15 Q. It's right, isn't it, also that Neil Gaskell from
 16 Greater Manchester Fire and Rescue Service was the MTFA
 17 lead from its implementation and he continued in that
 18 role until August of 2017?
 19 A. That's correct, yes.
 20 Q. And then he was seconded to the Home Office, working on
 21 MTFA at a national level?
 22 A. Correct.
 23 Q. I wonder if I could please take you to a document that
 24 perhaps identifies, particularly at the relevant period
 25 in respect of the arena attack, just to understand how

1 the contingency planning unit fitted together and the
 2 different roles and responsibilities. I'm going to ask,
 3 please, Mr Lopez, if we could please display
 4 {INQ039354/1}.
 5 Please could you display {INQ039354/8} of that
 6 document.
 7 Mr Fletcher, we see this is a page from within the
 8 contingency planning unit document from the year 2016 to
 9 2017. But we see at page 8 a helpful table that
 10 displays a bit of a who's who --
 11 A. Yes.
 12 Q. -- and who was in position at that time. Perhaps if we
 13 could just -- we can see that you sit below Billy Myers
 14 in that table.
 15 A. Yes, correct. Area Manager Myers was my direct line
 16 manager.
 17 Q. Thank you. Then we can see sitting below you Mr Lawlor,
 18 who we heard from yesterday and today. His role is
 19 identified as CCRU and NWCTU embedded officer.
 20 A. Yes.
 21 Q. Then Mr Gaskell who you've already identified, who had
 22 the MTFA lead.
 23 A. Yes.
 24 Q. And then also Andy Berry, who during the relevant time
 25 was responsible for contingency planning.

1 A. And COMAH, yes.
 2 Q. Thank you. So is it right that you effectively then
 3 were the manager for each of those individuals?
 4 A. Yes, direct line manager.
 5 Q. And you yourself were managed by Mr Myers?
 6 A. Correct, yes.
 7 Q. All of those individuals, they would have been in the
 8 same roles at the time of the arena attack?
 9 A. Yes.
 10 Q. Thank you. Just a little bit more then, please, if you
 11 can assist us with the MTFA capability. You tell us in
 12 your witness statement that Neil's role as GMFRS's MTFA
 13 lead links in with the deputy chief officer from West
 14 Yorkshire Fire and Rescue Service?
 15 A. Yes, that's correct. Mr Walton was the National Fire
 16 Chiefs' Council lead for MTFA.
 17 Q. And I think you also go on to clarify that after the
 18 bombing, in August 2017, Andy Berry in fact picked up
 19 Neil's role within GMFRS?
 20 A. Yes, that's after his secondment.
 21 Q. You then go on to tell us that there are two tiers to
 22 the national user group, and is that the national user
 23 group for MTFA?
 24 A. It is, yes.
 25 Q. And the national working group which, at the strategic

1 level, ACFO Dave Keelan would attend?
 2 A. That's correct.
 3 Q. And then the national user group operational level which
 4 Andy Berry attends?
 5 A. Yes, after Mr Gaskell had moved on.
 6 Q. You say they put together a national concept of
 7 operations?
 8 A. Yes. Through the national lead, a national concept of
 9 operations was developed and communicated to the fire
 10 and rescue services.
 11 Q. Can I ask, for the purposes of these questions I ask
 12 you, that we don't deal with the Mr Berry time after the
 13 incident but we're working on the basis of when
 14 Mr Gaskell was lead, so pre--the attack? So can you just
 15 assist us to have a better understanding. You say that:
 16 "My team would then interpret the concept of
 17 operations, put them into GMFRS's own procedures, and
 18 oversee everything including training, procurement and
 19 maintenance of personal protective equipment, and
 20 standard operating procedures."
 21 A. Yes, that's correct.
 22 Q. Can you give us explain how that operated in practice on
 23 the ground at GMFRS, please?
 24 A. Yes. Basically, the lead officer, which was Mr Gaskell,
 25 for the concept of operations, we would look at that, we

1 develop, as I say, the operational procedures to tie in
 2 with the concept of operations, the team type—in(?), so
 3 the numbers of personnel that were required, the levels
 4 of personal protective equipment that was required, so
 5 again we kept a list of items that were required. We
 6 procured them, we received ongoing external funding.
 7 When the capability was initially set up, the Government
 8 provided an initial set of funding and then year on year
 9 we received additional funding to maintain that
 10 capability .
 11 Q. I am going to ask you some more questions about
 12 Greater Manchester Fire and Rescue Service's MTFA
 13 capability . I appreciate that at the relevant time it
 14 was Mr Gaskell who was the manager for that --
 15 A. Yes.
 16 Q. -- but you obviously had an oversight as his manager.
 17 A. Yes, correct.
 18 Q. So if any of the questions I ask you are better placed
 19 with Mr Gaskell, the please feel free to say so.
 20 A. I will do.
 21 Q. You go on to tell us in the witness statement that MTFA
 22 is now a National Resilience asset and is hosted by
 23 a number of fire and rescue services throughout the
 24 country.
 25 A. That's correct, yes.

1 Q. And, if necessary, additional national assets can be
 2 requested by a fire and rescue service?
 3 A. Yes, under mutual aid.
 4 Q. So if GMFRS needs support, North West Fire Control would
 5 liaise with National Resilience Fire Control?
 6 A. Yes, correct.
 7 Q. Now run by Merseyside Fire and Rescue Service?
 8 A. Yes.
 9 Q. To implement any subsequent requests?
 10 A. Yes, correct.
 11 Q. You tell us that was in fact done on the night of the
 12 incident?
 13 A. It was, we asked Merseyside or we put Merseyside on
 14 standby.
 15 Q. We're going to come and look in a little detail at two
 16 of the assets that were held by GMFRS at the time of the
 17 arena attack, so the TRU and the SRT.
 18 A. Yes.
 19 Q. But in terms of the SRT, were there neighbouring fire
 20 services that had an SRT capability?
 21 A. Yes, there was neighbouring fire services. As I say,
 22 the national capability was held through -- or we could
 23 request it via the National Resilience Fire Control.
 24 They would have similar levels of kit. The vehicles
 25 might slightly differ, but the kit and the concept of

1 operations and the method of operations when they arrive
 2 at the incident will be the same.
 3 Q. Thank you. Just at a high level at this stage, in terms
 4 of an SRT vehicle, they are equipped to be able to deal
 5 with blast and ballistic injuries, is that correct?
 6 A. Yes.
 7 Q. So other fire services would also have an SRT capability
 8 to deal with a similar scenario?
 9 A. That's correct. That's my understanding, yes.
 10 Q. [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 19 Q. Thank you. In terms of MTFA, you indicate in the
 20 witness statement it's funded by the Home Office and you
 21 then give information as to the costing. You then go on
 22 to say that a full capability means that you can
 23 deploy -- I'm going to be careful about the numbers and
 24 the like now because of operationally sensitive matters.
 25 It enables a number of individuals to be deployed,

1 a number of NILOs, and you clarify that at the time of
 2 the arena attack, Greater Manchester Fire and Rescue
 3 Service had a full capability .
 4 A. That's correct, yes.
 5 Q. You also go on to tell us that on 8 May 2017,
 6 a presentation was also delivered to principal and
 7 assistant principal officers on National Resilience and
 8 the national coordination advisory framework after
 9 Merseyside had taken over the facilitation of the NRFC
 10 from London Fire Brigade?
 11 A. That's correct.
 12 Q. So in terms of what was then to develop on 22 May, would
 13 there have been anything of significance that was
 14 discussed at that meeting on 8 May 2017?
 15 A. Well, basically some changes in how the national
 16 coordination advisory framework was implemented. High
 17 level stuff on the finances and Mr Lawlor gave
 18 a presentation on the current threat level following the
 19 Westminster Bridge attack and Mr Gaskell gave again an
 20 update on the current status of the MTFA capability.
 21 Q. So just then to clarify what you've just told us. At
 22 that presentation Neil Gaskell delivered about the MTFA?
 23 A. Yes.
 24 Q. And Mr Lawlor gave an update about the current threat
 25 following the Westminster Bridge attack?

1 A. That's correct, yes.
 2 Q. Mr Fletcher, we saw yesterday an example of the updates
 3 that were provided, particularly the update that was
 4 provided following on from the Westminster Bridge
 5 attack.
 6 A. Yes, the safety alert.
 7 Q. Would it be fair to say that not only was it well-known
 8 within Greater Manchester Fire and Rescue Service the
 9 current threat level by all personnel at that time?
 10 A. It was, and the process -- we had a board outside of the
 11 main buildings as to what the current threat level was
 12 at that time.
 13 Q. So it was in Greater Manchester Fire and Rescue
 14 Service's mind that an attack was highly likely?
 15 A. Yes, we were at severe.
 16 Q. You go on to tell us that you recall that
 17 Peter O'Reilly, the former chief fire officer, attended
 18 that presentation on 8 May, as did the assistant chief
 19 fire officer, Geoff Harris, who were both in the command
 20 support rooms on the night of the incident?
 21 A. That's correct.
 22 Q. You go on to say that you also remember that ACFO Harris
 23 was in and out of room so missed key parts of the
 24 presentations.
 25 A. Yes, he did.

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1 Q. And is there anything significant about that as to why
 2 you included it in your witness statement?
 3 A. No, it was just background information as I was putting
 4 the statement together, that was all.
 5 Q. So I want to now ask about your assistance with the MTFA
 6 capability as it existed at the time of the attack,
 7 please, within Greater Manchester Fire and Rescue
 8 Service.
 9 A. Yes.
 10 Q. I wonder if you could help us clarify the difference,
 11 first of all, between a TRU and then the SRT.
 12 A. Yes.
 13 Q. They're not the same, are they?
 14 A. No, they are not the same. It's sort of a double-crewed
 15 facility. So the technical response unit is the
 16 day-to-day vehicle that the fire crews will turn out on,
 17 so they'll turn out to road traffic collisions, line
 18 rescue and incidents of that nature. The SRT was
 19 a bespoke vehicle with the levels of equipment on that
 20 we've previously discussed and if the incident was
 21 deemed to be an MTFA, the TRU crew would take that
 22 vehicle to the incident.
 23 Q. So just to clarify, the TRU, so the technical response
 24 units, when we say "units", we're referring to them as
 25 a physical place or the actual vehicle or both?

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1 A. Well, they were types of vehicle, but they were located
 2 at certain fire stations. There was another
 3 fire station as well as part of the capability that
 4 didn't have a TRU located at that station.
 5 Q. Then just pausing there then, you've included reference
 6 to the TRU as part of the MTFA capability.
 7 A. Yes.
 8 Q. So can I be clear, did the TRU vehicles -- were they
 9 equipped with resources that would enable the fire
 10 personnel to treat blast or ballistic injuries?
 11 A. Not the TRU vehicles themselves, or not to my knowledge.
 12 I wasn't completely aware of what the full inventories
 13 were on the standard vehicles.
 14 SIR JOHN SAUNDERS: How I have understood what you said was
 15 the people who -- the TRU personnel, if there was
 16 an MTFA incident, would take the TRU vehicle.
 17 A. That's correct, sir, yes. So the equipment for the MTFA
 18 was on the SRT vehicle. It was a vehicle that was
 19 separate -- just for clarity, sir, sorry --
 20 SIR JOHN SAUNDERS: The personnel used both?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: But they would use different vehicles
 23 for different incidents?
 24 A. Yes. The transportation of the crew might well be on
 25 the standard vehicles and they would take the specialist

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1 response vehicle in addition to that.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MS CARTWRIGHT: So as the chairman's helpfully clarified, if
 4 the TRU vehicles went out, it would be the personnel
 5 that would be then operating that equipment, but that
 6 would have an impact upon using the SRT vehicles.
 7 Is that a fair way of putting it?
 8 A. If you are saying if they were already on an incident,
 9 that's correct. It was sort of a double crew, a double
 10 vehicle capability. The SRT vehicle never went out on
 11 anything else. TRU would be used on a daily basis for
 12 rudimentary types of incidents, including road traffic
 13 collisions and things of that like.
 14 Q. Thank you. We looked at yesterday -- and if you need me
 15 to put them up I can -- two of the action cards, one for
 16 bomb and the one that was in place for explosion at the
 17 time of the incident.
 18 A. Yes.
 19 Q. Have you had a chance to look at those recently?
 20 A. I have seen them recently, yes.
 21 Q. So can I ask you, for both of those action cards, we
 22 don't see any reference to SRT, just to TRU.
 23 A. Yes. That's correct. The SRT, as I say, is for the
 24 MTFA response, so if a Plato had been declared, and if
 25 we were aware of that, then that would generate the

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1 mobilisation of the specialist response vehicle.
 2 Q. So the action cards that existed for an Operation Plato
 3 do make reference to the SRT?
 4 A. That's correct, yes.
 5 Q. And so that affects the resource that's then deployed
 6 in the given circumstance?
 7 A. It does, yes.
 8 Q. Can I then ask you about the equipment that was on the
 9 SRT vehicles. There is an inventory, it's a very
 10 difficult document to navigate, but is it right that
 11 you have refreshed your memory from that inventory?
 12 A. I've had a very brief look, but the inventory, I must
 13 say, wasn't something that I was totally familiar with.
 14 That would be something that Mr Gaskell would deal with
 15 certainly on a day-to-day basis.
 16 Q. Thank you. For anyone that wants to look at it
 17 separately -- I'm not going to ask Mr Lopez to display
 18 it on the screen -- it's {INQ004319/1} where there's
 19 a tab that deals with the SRT vehicle inventory.
 20 Can I deal with it at this high level with you then,
 21 appreciating that you have said it's a matter for
 22 Mr Gaskell. Is it right that the SRT vehicles would
 23 contain the ballistic helmets, jackets and plates?
 24 A. Yes, the plates. I think we ended up giving crews
 25 individual or personal issue helmets that they had in

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1 their bags with their coveralls.
 2 Q. Is it right that the SRT vehicles were also equipped
 3 with Nightingale dressings?
 4 A. They had Prometheus. The Nightingale isn't something
 5 that I can recall the name of and what they actually
 6 are.
 7 Q. So if I was to ask you about your knowledge about that
 8 being used re penetrating chest trauma --
 9 A. Yes.
 10 Q. Did it also included ChitoGauze dressing, which is
 11 a haemostatic gauze?
 12 A. Yes.
 13 Q. It also had Russell chest seals that again could be used
 14 for the treatment of penetrating chest wounds?
 15 A. Yes.
 16 Q. It also contained a number of oropharyngeal airways?
 17 A. Yes.
 18 Q. And also nasopharyngeal airways?
 19 A. Yes.
 20 Q. It contained a defibrillator?
 21 A. Yes.
 22 Q. There were two adult non-re-breathable masks?
 23 A. Yes.
 24 Q. Two paediatric non-re-breathable masks?
 25 A. Yes.

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1 Q. There was also a combat tourniquet contained within
 2 an SRT?
 3 A. Yes.
 4 Q. And so would you have any knowledge about a combat
 5 application tourniquet or are we better asking
 6 Mr Gaskell about that?
 7 A. I think you're better asking Mr Gaskell on that one.
 8 Q. In addition there were a number of separate bags,
 9 I think five, that also contained in addition to those
 10 matters, I presume those bags being that each of those
 11 staff crewed on an SRT could take a bag and
 12 (overspeaking). And so each of those five bags also
 13 contained a tourniquet each?
 14 A. Yes.
 15 Q. Another Russell chest seal?
 16 A. Yes.
 17 Q. ChitoGauze dressings?
 18 A. Yes.
 19 Q. Blast bandages?
 20 A. Yes.
 21 Q. And again, is it your understanding that the blast
 22 bandages can be used to package traumatic amputations
 23 but also treat burns and wounds?
 24 A. Yes, it is.
 25 Q. And also in addition that there were other dressings

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1 that would treat burns and blast injuries?
 2 A. Yes.
 3 Q. In terms of the equipment then that was on the SRT
 4 vehicles and in the bags, I think you tell us in your
 5 witness statement that that had been arrived at with the
 6 assistance of North West Ambulance Service for the
 7 equipment of that?
 8 A. It had, yes.
 9 Q. I wonder if you could help me then, and it may be we
 10 need -- the level of detail might be for Mr Gaskell. In
 11 terms of the personnel operating both the TRU and the
 12 SRT, is it right that they had received enhanced trauma
 13 training in blast and ballistic injuries?
 14 A. Yes, they had. There was training carried out in
 15 partnership with North West Ambulance Service.
 16 Q. And they were also equipped with ballistic personal
 17 protective equipment?
 18 A. Yes.
 19 Q. Whether their own, that they had their own personal or
 20 the PPE that was on the vehicle?
 21 A. On the vehicle, yes.
 22 Q. On the SRT vehicle?
 23 A. On the SRT vehicle, yes.
 24 Q. Thank you. It is right, isn't it, that the SRT vehicle
 25 also had five Skeds?

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1 A. Yes. They're the plastic roll-up means of extricating
 2 quickly casualties from hazardous areas. They're not
 3 stretchers, to be precise, I've heard it mentioned that
 4 they're stretchers, they're not. They're just a means
 5 of putting a casualty on them and very rapidly
 6 extricating them from a hazardous area.
 7 Q. So if we perhaps just do a compare and contrast between
 8 fire personnel who are on normal fire appliances, if
 9 I can describe them in those ways, so the fire personnel
 10 that would be on a normal fire appliance, not the TRU or
 11 SRT, they would -- the fire appliances themselves are
 12 equipped with a trauma bag that contains emergency
 13 medical equipment?
 14 A. Yes.
 15 Q. But it's not at the level that we've seen in the SRT?
 16 A. No.
 17 Q. And also those fire personnel are trained in basic life
 18 support techniques?
 19 A. Yes. You might have a trauma technician -- I think the
 20 aim was to have one trauma technician per appliance who
 21 had more advanced trauma training.
 22 Q. So each of the fire personnel would have basic life
 23 support techniques?
 24 A. Yes.
 25 Q. But in addition you're saying there was likely to be one

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1 trauma technician on a standard fire appliance?
 2 A. Yes, that was the intention.
 3 Q. So then with telling us that on an SRT, on a TRU, the
 4 staff would have enhanced trauma training in blast and
 5 ballistic injuries, are you able to give us any detail
 6 about what that training was?
 7 A. It was delivered by NWAS, usually through the HART team.
 8 There was an annual refresher training. They'd go
 9 through the dressing of different types of injuries and
 10 there'd be sort of a mini exercise that was run between
 11 the fire and the ambulance staff on the days that they
 12 attended the training.
 13 Q. In terms of the Skeds that you have described to us that
 14 are on the SRT vehicle, they are, would it be fair of me
 15 to say this, to enable quick evacuation?
 16 A. Yes. There'd be no immobilisation of the casualties:
 17 literally put the casualty on and drag them along the
 18 floor to get them out of harm's way, basically, so then
 19 they can receive better treatment in a safer area.
 20 Q. So I think you've already told us, but to clarify, the
 21 SRT would only be despatched if an Operation Plato or
 22 an MTFA had been declared?
 23 A. Yes.
 24 Q. Or Greater Manchester Fire and Rescue Service had been
 25 made aware of it?

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1 A. Yes.
 2 Q. And in terms of -- just to clarify then in terms of the
 3 fire staff that would be manning either the TRU or the
 4 SRT, with their PPE they are able then to work within
 5 a warm zone as defined by the JESIP principles?
 6 A. That's correct, yes.
 7 Q. Then you mentioned about the liaison that's taken place
 8 with NWAS, and I think also the HART team at NWAS, to
 9 essentially assist your fire personnel who are assigned
 10 to the SRT and the TRU to work in that scenario --
 11 A. Yes.
 12 Q. -- in blast and ballistic. Would it be fair to say that
 13 there has been good liaison between the staff that can
 14 work in the warm zone for Greater Manchester Fire and
 15 Rescue Service with the NWAS comparables at the HART
 16 team?
 17 A. Yes, there has been a lot of joined-up working between
 18 them.
 19 Q. Can I ask you, as part of the training exercises that
 20 have taken place, had that been trained and tested in
 21 terms of both the HART team and the Greater Manchester
 22 Fire and Rescue Service TRUs or SRTs working in a warm
 23 zone?
 24 A. Well, there was initial training that was carried out as
 25 part of the -- when anybody goes to a TRU station, it

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1 was delivered by North West Ambulance Service, I think
 2 that was over a day. And then annually, there would be
 3 refresher training that took place at Ashburton Point.
 4 And there was a mini exercise then, with usually just
 5 the Ambulance Service and the Fire present to deal with
 6 an MTFA-type situation.
 7 Q. Thank you. I want to move, please, to ask you now about
 8 JESIP. You give us some detail about JESIP within your
 9 statement, so if we can deal with those aspects, please.
 10 You say that JESIP was introduced nationally -- I'm at
 11 paragraph 51 now.
 12 A. Yes.
 13 Q. You tell us that:
 14 "JESIP was introduced nationally in 2013. We
 15 conducted initial training in 2014. [You] became
 16 concerned that JESIP was not being embraced fully across
 17 the emergency services in Greater Manchester."
 18 A. Yes. It was just a number of exercises that we'd been
 19 involved in and also it was the -- with the JESIP, it
 20 wasn't just the initial training to say it had been
 21 delivered, there had to be a sort of process for ongoing
 22 maintenance and embedding in the three emergency
 23 services.
 24 Q. In terms of -- just to be clear about where your concern
 25 was, was there one of the blue light services that had

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1 been flagged as a concern at that time?
 2 A. Just from my perspective, there was a couple of
 3 exercises that had taken place where the overall
 4 three—service response wasn't really tested. Once the
 5 one element had been addressed, the exercises were
 6 called to a halt rather than letting everything progress
 7 that involved the ambulance and fire services as well.
 8 Q. And would it be fair, you describe that in your witness
 9 statement as effectively once the police or the Fire
 10 Service had neutralised the threat in the scenario --
 11 A. The Police Service.
 12 Q. -- yes, sorry -- that was really seen from their
 13 perspective as the end of the exercise?
 14 A. Yes, and that was on a couple of occasions.
 15 Q. Rather than it being an opportunity to test the
 16 multi—agency working that's envisaged by JESIP?
 17 A. Yes.
 18 Q. By way of high—level summary, because I appreciate that
 19 comment is made at a point in time, would it be fair to
 20 say that the principles in JESIP that we see in JOPs are
 21 for co—location of commanders?
 22 A. Yes.
 23 Q. For communication?
 24 A. Yes.
 25 Q. Coordination?

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1 A. Yes.
 2 Q. To agree who the lead service would be?
 3 A. Yes.
 4 Q. Joint understanding of risk?
 5 A. Yes.
 6 Q. And to ensure that there was a shared situational
 7 awareness by using the METHANE or the ETHANE?
 8 A. Yes.
 9 Q. And so would it be fair to say that JESIP is guided by
 10 that multi—agency interoperability?
 11 A. It is, yes.
 12 Q. Albeit making it clear which agency has to take the lead
 13 in given circumstances?
 14 A. Yes.
 15 Q. You go on to tell us that firstly there had been no
 16 ongoing joint training at a tactical level for JESIP.
 17 A. That's correct, yes.
 18 Q. You say:
 19 "We had already started to foster closer working
 20 relation with NWAS around this time. Having done our
 21 annual MTF training with NWAS at Ashburton Point, we
 22 had reached a stage where police were routinely not
 23 involved in joint training. The crews were concerned
 24 that we were not training with police frequently enough.
 25 That, coupled with the experience in Winchester Accord,

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1 focused minds and persuaded [you] that [you] needed to
 2 take the lead in creating a JESIP user group."
 3 A. Yes. I sort of asked around, was there any -- because
 4 JESIP really fell under training. It didn't sit under
 5 my area of reference. It wasn't (inaudible) any agency
 6 in particular, it was all three. There wasn't anything
 7 ongoing, we'd done the initial training, but the JESIP
 8 was about embedding it and continuing to embed it within
 9 the services, and that didn't seem to be in place. That
 10 was across the three services.
 11 Q. I think you tell us that you asked Superintendent
 12 Leor Giladi of Greater Manchester Police to chair the
 13 JESIP user group.
 14 A. I did, yes.
 15 Q. Because the police hold the coordinating role in a major
 16 incident?
 17 A. Usually. It obviously depends on the scenario, but any
 18 major incident usually starts with the police, although
 19 it could be a major fire and then we would take the
 20 lead, but in general terms that's correct, yes.
 21 Q. You also say that:
 22 "[You were] also conscious of the need to commit GMP
 23 to participate on a regular basis."
 24 A. Yes. It was just to get that level of buy—in to the
 25 process. The group was going to be new. I think it was

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1 going to take quite a while for it to find its feet and
 2 establish itself, so it was just a matter of getting all
 3 the three services committed at that level to working on
 4 the JESIP principles.
 5 Q. I think you tell us that you drafted the terms of
 6 reference, Leor Giladi agreed to chair, however he only
 7 actually attended a couple of meetings and retired
 8 shortly thereafter?
 9 A. Yes, he agreed to chair the group. When he retired,
 10 I can't actually remember. The police were always in
 11 attendance, always attending, but it was a bit of a --
 12 there wasn't a consistency across what there was for the
 13 other agencies.
 14 Q. I think you, as part of the information you have been
 15 provided with in advance of today, have seen Mr Giladi's
 16 statement --
 17 A. I have, yes.
 18 Q. -- where he deals with his perception of matters.
 19 A. Like I say, I've read that, I've read the paragraph.
 20 From what I put in my statement, there was no intended
 21 intent -- there's no intent to imply that Mr Giladi
 22 himself was not committed to JESIP or the implementation
 23 of the JESIP principles. Obviously, with the meetings,
 24 I can't comment. It's not mandatory for certain
 25 individuals to attend. We couldn't mandate who attended

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1 those meetings and I don't know what the work
2 requirements were for the day-to-day business of certain
3 individuals .

4 What I will say is that the police did regularly
5 attend the meetings, that was good, but there was, as we
6 went forward, an inconsistency of who was attending
7 apart from, I think, Steve Henderson who was the
8 sergeant in one of the emergency planning departments.
9 He was always there, which was good, and Steve is
10 a very, very capable police officer who works well
11 within the emergency planning community.

12 SIR JOHN SAUNDERS: The general impression from your
13 statement is that the police did not appear to be as
14 committed to getting JESIP principles working between
15 the three emergency services, were not as committed as
16 the Ambulance and Fire Service were. Is that a wrong
17 impression or not?

18 A. I wouldn't say that they weren't committed. I think
19 it's the level of attendance at the meetings. We wanted
20 to keep -- at that JESIP meeting, a tactical level --
21 I was a group manager before I retired -- wanting to
22 get -- certainly when it was -- to get it established
23 with that level of people, presumably you can sort of
24 commit some organisational resources and commit to
25 training. It was just wanting to keep that level. The

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1 commitment to JESIP I think probably that has come
2 across as unfair, if I'm being honest.
3 MS CARTWRIGHT: We've referenced the response of Mr Giladi.
4 I appreciate it's in his witness statement, but we have
5 not heard the evidence from him. Perhaps if we briefly
6 draw that up. {INQ034424/1}. Page 4 of that document,
7 please, Mr Lopez, {INQ034424/4}.

8 Mr Giladi's response, paragraph 12:
9 "Insofar as [the quotation by you, the evidence that
10 you have just dealt with] is intended to imply criticism
11 of my appointment as the chair of the JESIP user group
12 or raise doubts to my commitment at the time to JESIP,
13 I do not accept any such criticism. The date of my
14 retirement was known at the time of the appointment and
15 I had a proven track record of joint working with other
16 emergency agencies even before the introduction of
17 JESIP."

18 A. Yes. Obviously, on that one, there was no intent for me
19 to imply any criticism of his appointment. In fact,
20 I was the one who asked him if he would chair it.

21 SIR JOHN SAUNDERS: Okay. The only way you can read
22 a criticism into it is it says:

23 "He agreed to chair, however he only actually
24 attended a couple of meetings and retired shortly
25 after."

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1 That gives the impression that there were meetings
2 which he didn't attend when he was chair.

3 A. I think that's the case, sir, yes.

4 MS CARTWRIGHT: Can we briefly look at the terms of
5 reference for that JESIP working group, please. It's
6 {INQ020531/1}, please, Mr Lopez.

7 So is this the terms of reference for that JESIP
8 group?

9 A. I think that's the one for the strategic group. We
10 initially established a tactical group and then
11 a strategic group was formed that sits on top of -- the
12 terms of reference are generally the same.

13 Q. So if we turn over the page, please, to {INQ020531/2}.
14 We can see the aims of that JESIP working group set out
15 there. Would you have had a role drafting these as
16 well?

17 A. Yes, I did draft them. We worked in consultation with
18 the group. We actually looked at other areas, other
19 brigades or areas that had a JESIP group running at the
20 time. This is based on Merseyside's. But the thread
21 just runs straight through, yes.

22 Q. We can see under one of the aims:

23 "To establish and maintain appropriate stakeholder
24 links and communication channels with regard to
25 embedding JESIP principles in each of the

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1 Greater Manchester blue light services."

2 A. Yes.

3 Q. I'm not going to go through each of those, the chairman
4 can read each of those. We can see by way of governance
5 there was to be a strategic lead identified for each
6 agency?

7 A. That's correct.

8 Q. A tactical level officer identified in each agency to
9 facilitate the role of the delivery officer?

10 A. Yes.

11 Q. The strategic lead group were to determine priorities to
12 be implemented and communicated to the delivery leads?

13 A. Yes.

14 Q. The delivery leads were to develop and implement
15 appropriate plans to achieve the strategic aims?

16 A. Yes.

17 Q. And the delivery leads were to be responsible, just over
18 the page to {INQ020531/3}, for ensuring lessons
19 identified are recorded on the JOL toolkit.

20 A. Yes.

21 Q. But also that:

22 "The chair of the delivery lead group will ensure
23 that, where appropriate, liaison takes place with the
24 Greater Manchester Resilience Forum Training and
25 Exercise Coordination Group for large scale exercises

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1 and training events to ensure consistency.”
 2 A. That’s correct. Obviously, we have talked about the
 3 chair of the group. As it moved forward, once the
 4 strategic group was established, they ran on
 5 a peripatetic chairman basis, so whoever hosted the
 6 meeting chaired it and as we went through, that’s when
 7 the tactical group followed a similar format. I wasn’t
 8 particularly happy with that, but that was the
 9 democratic choice of the group.
 10 Q. I think we can see that the strategic leads would have
 11 met twice a year.
 12 A. Yes.
 13 Q. And the delivery leads would have met quarterly?
 14 A. Yes, that’s correct.
 15 Q. Although you reference the creation of the JESIP group
 16 in and around 2014 — sorry, can I just be clear as to
 17 when this group was established?
 18 A. Obviously the time frame I’m struggling with. I think
 19 it was in early 2016. It was around the time — I think
 20 there was a bit of a crossover between establishing this
 21 group and then obviously the Winchester Accord exercise.
 22 So I think this was slightly just before
 23 Winchester Accord, so it’d be about spring 2016, if
 24 memory serves.
 25 Q. And we know that Winchester Accord ran over a number of

1 days, I think 9 to 11 May 2016.
 2 A. That’s correct, yes.
 3 Q. So this was certainly in place before Winchester Accord?
 4 A. Just before, but as I said before, it wasn’t — we might
 5 have had one meeting. The group was still finding its
 6 feet as to what it was actually going to do because it
 7 was a combination, really, of a blue light group, which
 8 was sort of operational, and then the JESIP group, which
 9 was more about the training and embedding that into
 10 operational procedures.
 11 Q. I think we can see the membership of the strategic group
 12 in terms of each of the individuals identified : for
 13 police, John O’Hare; for fire, Damian O’Rourke; for
 14 NWAS, Mr McFadden; and then there was also
 15 a representative from the Association of
 16 Greater Manchester Authorities, Kathy Oldham?
 17 A. Yes.
 18 Q. Was that to cover re resilience forum type angle?
 19 A. It was. When we first set up the group, it was just the
 20 three blue light services, but it was felt appropriate
 21 that somebody from the resilience forum, certainly the
 22 Civil Contingencies Resilience Unit, sat on the group.
 23 Kathy Oldham sat on the group and a member of her team
 24 sat on the practical group.
 25 Q. If we turn over the page to {INQ020531/4}, we can see

1 the delivery group was again across the three services :
 2 Leor Giladi for the police, yourself for fire,
 3 Phil Howcroft for NWAS and Tom Walley for AGMA.
 4 A. Yes.
 5 Q. In terms of — we’ll come in a moment to look at
 6 Winchester Accord. We can see that you raised concerns
 7 following on from Winchester Accord with Leor Giladi.
 8 A. Yes.
 9 Q. Was that following established links through this group?
 10 A. Yes, it was, and also, as I’ve said, I had contact with
 11 Leor previously and his role in the head of the
 12 firearms.
 13 Q. So in terms of dividing the group between strategic and
 14 then delivery, was any part of that to try and get the
 15 three services thinking in terms of a Gold/Silver
 16 tactical framework?
 17 A. Not to get into the Gold/Silver tactical framework, it
 18 was more like — we were just having the delivery group.
 19 If there was elements that wanted to — there might be
 20 certainly cost implications for the brigade — wanted
 21 the strategic overview and the strategic level of
 22 governance really that we could go to and that — they
 23 could then sort of employ other organisations to follow
 24 that through.
 25 Q. You tell us that, as we have already covered, Mr Giladi

1 chaired, but you also said that:
 2 “Chair responsibilities were then delegated to
 3 whichever agency hosted the meeting following his
 4 retirement and that [you weren’t] keen on that
 5 arrangement because there was a lack of ownership and
 6 follow-up actions. However, that was the process being
 7 adopted by the strategic group and then the tactical
 8 group followed suit.”
 9 A. Yes, that’s just the comment that I made previously. It
 10 was decided that the tactical group — the strategic
 11 group had decided that for themselves and it was decided
 12 then that the tactical group would follow suit. My
 13 personal choice, I prefer if somebody’s — the ownership
 14 of the group, they maintain the chair because any
 15 actions that come out, you might have a bit more of
 16 a drive to make sure they’re delivered.
 17 Q. Thank you. You tell us that the meetings would look at
 18 matters like setting up joint training?
 19 A. Yes.
 20 Q. Operational experiences and issues, national impacts?
 21 A. Yes.
 22 Q. The meetings were well attended and with the exception
 23 of GMP, the other attendees had a consistent individual
 24 present?
 25 A. That’s correct. As I said before, Steve Henderson,

1 I would say, was regular from the police and they did
 2 attend all the meetings. Sometimes there would be
 3 a chief inspector there, occasionally there would be an
 4 inspector. So they were at the meetings, but it wasn't
 5 always the same person who attended.
 6 SIR JOHN SAUNDERS: So how would actions get followed up if
 7 there wasn't a chair who's monitoring whether they were
 8 actually being carried out?
 9 A. Well, actions probably -- what we would do -- every
 10 meeting, there would be -- the chair would go through
 11 the action summary, where are we up to with progress.
 12 I wouldn't say exactly at this group that things weren't
 13 followed up, it was just a personal choice of mine from
 14 a history of dealing with managing groups, I prefer that
 15 a single chair -- it was just this peripatetic, whoever
 16 hosted it, it wasn't something -- a personal choice,
 17 I preferred somebody to run the group and I just felt
 18 that it gave them more drive sometimes to make sure that
 19 actions didn't drag on. But I can't -- I wouldn't say
 20 that the JESIP group had lots of actions that were
 21 outstanding.
 22 MS CARTWRIGHT: Can I ask you then this by way of high level
 23 at this stage because we're going to deal with what
 24 happened on the night and then the steps that were taken
 25 on 26 May, essentially around 15 minutes round a table

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1 in the canteen at GMP, where an issue was resolved
 2 relating to the Airwaves and communication channels.
 3 At the time these meetings were taking place before
 4 the incident, had the issue around the communication
 5 channels to be used across the three services been
 6 looked at?
 7 A. I think it had been discussed because what we didn't
 8 know was what that three-way communication looked like.
 9 Going back from memory, I think I asked Neil, "What's
 10 this three-way communication? Is it a conference call
 11 facility? Is it an Airwave radio channel? What is it?"
 12 I think on the -- it was discussed, but it also -- the
 13 outcome of that meant -- promoted the discussion we had
 14 at Exercise Hawk River.
 15 Q. In answering that question, are you referencing back to
 16 what was contained in JOP 3 around the three --
 17 A. Yes, three-way communication. Like I say, it was in the
 18 JOPs, but as I say I didn't know what -- I asked the
 19 question, "What does this look like, what is it? Is it
 20 an Airwave channel, is it conference call facility? Is
 21 it just that the telephone line -- there's a call and
 22 the line's left open?" I didn't know because it was
 23 obviously something that was really between the control
 24 rooms.
 25 SIR JOHN SAUNDERS: So was it discussed at a number of

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1 meetings or (overspeaking) know what it was?
 2 A. I think, sir, it was discussed possibly at one meeting
 3 to look at: is Airwave a possibility? That JESIP group
 4 wouldn't be the place that a protocol would be
 5 developed. It would be something from the -- well,
 6 certainly, like I say, the police to lead on because the
 7 police own the interoperability channels.
 8 SIR JOHN SAUNDERS: It's part of JESIP. It's part of how
 9 JESIP operates, to have a three-way communication
 10 channel, isn't it?
 11 A. Yes, it is.
 12 SIR JOHN SAUNDERS: So why isn't it a matter for this group?
 13 A. I'd say a matter for dealing with -- getting the
 14 Airwaves channel established would be -- probably one of
 15 the groups to lead and possibly the police on that one.
 16 SIR JOHN SAUNDERS: I think the point being made to you very
 17 politely is: after the attack, it took a meeting of
 18 10 minutes to sort it out. You had had meetings
 19 beforehand when it would be at least brought up and it
 20 had not been sorted out.
 21 A. I think the truth of the matter is the Hawk River
 22 exercise, which occurred in the March of that year, the
 23 three-way communication was brought up, it was discussed
 24 at great length. The action then was for the police to
 25 lead on setting up this channel that was identified.

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1 I think a lot of the background work had gone in to
 2 establishing the channel. From the Fire Service
 3 perspective, I think in late April the measures were in
 4 place, but they were still waiting for the final
 5 agreement.
 6 The meeting in the canteen on 26 May, although we
 7 established the -- or put the protocol together, the
 8 background work had already been done. It was just
 9 literally getting it into place, so if there was another
 10 attack we didn't end up in the same position.
 11 SIR JOHN SAUNDERS: And the background work had been done by
 12 when?
 13 A. The background work, I believe, had been done by the end
 14 of April. What I'm saying is I had a conversation with
 15 our control SPOC, Mr Ben Levy, and they'd had a meeting
 16 with the police, a person who was leading on the
 17 formation of that or establishment of that tactical
 18 three-way communication. They'd gone through it at
 19 North West Fire Control. Everything in there was in
 20 place, and we were just waiting really for the final
 21 say: yes, this is -- go for it. We did obviously try on
 22 the night on the chance that maybe it was open as
 23 another means of communication with the force duty
 24 officer.
 25 MS CARTWRIGHT: Perhaps finishing that point off, sir, the

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1 channel that had been agreed for the interoperability
 2 channel for the three services —
 3 A. Yes.
 4 Q. — you're saying it was tried on the night by
 5 Greater Manchester Fire and Rescue Service?
 6 A. Yes, it was.
 7 Q. Was it being used?
 8 A. No. I believe we tried it. I think the police came on,
 9 on the night, later on to do a "Is anybody listening on
 10 the channel?" I think North West Fire Control did
 11 respond. I don't think North West Ambulance responded,
 12 but by that time it was way into the attack.
 13 Q. Perhaps we will look at the detail next time because
 14 I think it touches upon matters later.
 15 A. Yes.
 16 Q. You just mentioned about the date when it had been
 17 envisaged, but was it right that there had been an
 18 agreement that this was going to be in place by the end
 19 of April?
 20 A. I can't answer that the agreement would be in place by
 21 the end of April. That was my understanding. Whether
 22 it was a formal agreement or not, I don't know.
 23 Q. But certainly you mentioned North West Fire Control, but
 24 in terms of the steps that the police were taking, they
 25 had been and checked at North West Fire Control —

1 A. They had been, yes.
 2 Q. — that they could access this channel?
 3 A. Yes.
 4 Q. And, yes, that was possible?
 5 A. Yes.
 6 Q. And your evidence is that they did respond when you used
 7 that channel on that night?
 8 A. Yes. Well, you'd probably have to ask North West Fire
 9 Control as to how that was communicated. I don't want
 10 to get into things on the night because obviously I'll
 11 be coming back. I did make a request when I became
 12 aware because we couldn't get any information, we tried
 13 the Airwave channel but it was more of a hope than an
 14 expectation.
 15 Q. Thank you. Can we then just briefly look to the section
 16 of the JOP 3 that deals with that communication.
 17 Mr Lopez, it's {INQ008372/10}.
 18 The bottom of the page, 4.4, please. We can see
 19 there:
 20 "The police will instigate a three-way
 21 communications link between the emergency services
 22 control rooms. This line of communication should be
 23 maintained until Ambulance and Fire and Rescue Service
 24 representatives are operational within an agreed
 25 tactical coordinating group."

1 A. Yes.
 2 Q. So at a high level, is the thinking essentially that all
 3 of the control rooms can be on the same line, speaking
 4 to one another until the three commanders are
 5 co-located?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: The date of this document?
 8 MS CARTWRIGHT: January 2016.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MS CARTWRIGHT: It goes on:
 11 "All three agencies will agree when it is
 12 appropriate to discontinue the link."
 13 Because essentially once the three commanders are
 14 together, you have that face-to-face communication?
 15 A. And that situational awareness, yes.
 16 Q. "Because whilst control rooms may be best positioned to
 17 gain an overview of the incident, which could be
 18 multi-sited, it is imperative that on-scene commanders
 19 are fully supported and kept updated in fast time as the
 20 situation develops."
 21 A. Yes.
 22 Q. "The provision of unbroken communication links between
 23 the emergency services' control rooms should enable the
 24 timely passing of information and intelligence that will
 25 inform deployment decisions. It will also facilitate

1 the effective management of a coordinated response in
 2 deploying key decision-making personnel, ie on-scene
 3 commanders, at the scene of attacks."
 4 {INQ008372/11}:
 5 "The method of communications should be resilient
 6 throughout. Police control rooms will set up
 7 a conference call between the other emergency service
 8 control rooms. This may also include other agencies who
 9 can directly contribute to the information sharing for
 10 that incident."
 11 When you referenced before about not understanding
 12 what that conference call was, is that by reference to
 13 this particular paragraph?
 14 A. It is. Obviously, the interoperability communications,
 15 but I think the — certainly the decision here in
 16 Greater Manchester was it would be the Airwave channel,
 17 radio channel, that would be used. That was a question
 18 I was asking previously: what does this three-way
 19 communication look like? That's what I asked Neil:
 20 Gaskell: is it a conference call facility, is it just
 21 a telephone line that's open? And certainly post-arena,
 22 with the development — and obviously for the officers
 23 and the NIOs, the NIOs were given an additional radio
 24 handset so they could monitor that channel whilst
 25 en route to the incident.

1 Q. In terms of a NILO in an MTFA or an Operation Plato,
2 their role can be cut to become an on-scene commander at
3 the forward command point?
4 A. That's correct. They would have the necessary training
5 and the personal protective or ballistic protective
6 equipment with them to enable -- because obviously
7 a flexible duty officer will mobilise from their home
8 address, so they had personal issue kits to enable them
9 to operate in that environment.
10 Q. In terms of the answer you gave earlier where you said
11 about what does it look like, this three-way
12 communication, is it an Airwave, is it a conference
13 call --
14 A. Yes.
15 Q. -- as the chairman has already elicited, this JOP 3 had
16 been in place from January of 2016. Would it be fair to
17 say by the time of May of 2017 there should have been no
18 ambiguity about what that interoperability looked like
19 between the three blue-light services?
20 A. No, I think that's a fair comment.
21 Q. And in particular would it be fair to say that that
22 issue around interoperability had been identified by
23 exercising?
24 A. Probably not the Airwave channel because most of the
25 exercising took place with all the resources already

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1 established. So the links with the controls at that
2 time really hadn't been tested to that degree.
3 Q. But I think you tell us in your witness statement that
4 that had been an issue identified by Hawk River and by
5 the debrief in Hawk River?
6 A. Hawk River, that's where it was really, as I say,
7 discussed, and the solution and obviously the allocation
8 then for the police to establish the channel. The
9 actual channel was identified during that discussion.
10 I think it was a police officer from another police
11 force who was -- because it was a north-west exercise --
12 identified a specific channel and then obviously the
13 recommendations after the exercise was: let's get it
14 established in Greater Manchester.
15 SIR JOHN SAUNDERS: Okay. At some stage the reason for not
16 using the channel was because the FDO didn't have the
17 time to do a running commentary. Can you just remind me
18 when that is? Is that Hawk River?
19 A. Sorry, it was discussed at Hawk River, the force duty
20 officer who was in attendance -- I think to be fair to
21 them we'd already --
22 SIR JOHN SAUNDERS: Just tell me what happened and then --
23 A. At Hawk River, they got to this element of the JOPs,
24 there was a discussion about this communication, this
25 unbroken communication link. It promoted a discussion

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1 about the Airwave that we were already talking about.
2 And the force duty officer said, "In this instance, in
3 a Plato terrorist incident, I will be really busy",
4 because we were talking about us trying to get in touch
5 with them, for the NILO to get in contact, and they were
6 saying, you will be lucky to get in contact because I've
7 got so many other things to do, so I think that was
8 identified as a means to try and cut down the workload
9 of the force duty officer to make sure that all agencies
10 were contained within the information loop.
11 MS CARTWRIGHT: We'll be looking very briefly at the
12 Hawk River debrief in a moment.
13 Can we have back on the screen the 4.4 of the
14 JOPs 3, please, at {INQ008372/11}.
15 We've dealt with the first bullet point around the
16 conference call. We can see then at the second bullet
17 point -- you have the setting-up of the conference call
18 which we have dealt with, but then secondly:
19 "Establish interoperable voice communications to
20 support commanders."
21 A. Yes.
22 Q. "This will normally be on a radio system. These will
23 not be seen as an alternative to the co-location of
24 commanders. They will support communication if
25 co-location is difficult or if the process of

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1 co-locating is protracted."
2 A. Yes.
3 Q. So again, would it be fair to say that what the JOPs was
4 requiring was a number of clear lines of communication?
5 A. Yes.
6 Q. Clear communication between the three services' control
7 rooms?
8 A. Yes.
9 Q. And a clear line of communication between the strategic
10 commanders?
11 A. Obviously the strategic commanders... Because obviously
12 we operate slightly differently for the incident command
13 than the Fire Service.
14 Q. Perhaps we'll look at that in Hawk River, but certainly
15 what JOPs was encouraging there to be is clear processes
16 in place for the commanders to communicate with one
17 another as well, not just the control rooms, but also an
18 open communication between the commanders?
19 A. Yes, but as I say, the strategic commanders wouldn't
20 necessarily be the ones going to the incident scene.
21 Q. But I think certainly for the tactical commanders?
22 A. Yes.
23 Q. And then I think there's also reference in some of the
24 material, which we may look at next time around, about
25 the consideration of a tactical commander's Airwave

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1 group.

2 A. Yes. Obviously I'm sort of struggling with the

3 strategic commanders element because they will come

4 together for an SCG meeting. So that will be remote

5 from the incident. Again, if I can put some context

6 into this, the Airwave channel, the unlimited(?)

7 interoperable links, there should be information going

8 through to the controls. Certainly in the Fire Service,

9 as I said before, after the arena, the NILOs would have

10 an additional radio set because there would be a radio

11 channel for the incident and obviously this

12 interoperability channel as well.

13 Again, with the Airwave, there's a little bit of

14 confusion, there's also -- you might hear about the ES

15 channels, the emergency service channels. They are

16 primarily for use when the commanders are in attendance

17 at the incident. Yes, co-location is absolutely ideal,

18 but if individuals have to move around the incident

19 ground and can't be together then that channel can be

20 used but the police will instigate that.

21 Q. Thank you.

22 Could we move to training, please. You have already

23 touched on Winchester Accord but you deal specifically

24 with your experience of Winchester Accord in your

25 witness statement. You tell us that -- we're at

1 paragraph 57 now -- Mr Lawlor and Mr Gaskell led the

2 fire and rescue service element of the planning for

3 Winchester Accord.

4 A. That's correct.

5 Q. That you were located in the management suite at the

6 Trafford Centre to observe and provide guidance to

7 delegates on the Greater Manchester Fire and Rescue

8 Service's MTFA capability and that you were not in

9 contact with the Fire Service crews as you were required

10 to turn off your mobile device.

11 A. That's correct yes.

12 Q. And you describe it from your experience within that

13 management suite, your impression was you were surprised

14 at the length of time it was taking to deploy the Fire

15 and Rescue Service and NWSA personnel?

16 A. I was.

17 Q. That you were watching the response on CCTV without any

18 sound, and you were conscious throughout that it was

19 principally a military and police exercise.

20 A. Yes.

21 Q. And you only found out later on that the police

22 inspector at the inner cordon at the Trafford Centre

23 would not permit fire and ambulance into the cordon.

24 A. Yes.

25 Q. So in terms of that -- that was a significant JESIP

1 failure would you say?

2 A. It was. I think what it appeared to be was a lack of

3 understanding as to what our capabilities entailed upon

4 that type of scenario.

5 Q. And you do say that the officer in question was not

6 a trained tactical or operational firearms commander.

7 A. That was what was fed back to me from the Fire Service

8 officers who were at the scene.

9 Q. I think you say that certainly that individual seemed to

10 be oblivious to the role of the Fire and

11 Ambulance Service in the response?

12 A. Yes, that was what was fed back to me.

13 Q. Does that feed back to one of the answers you gave

14 earlier about your impression sometimes at these

15 training exercise that the police saw their role simply

16 to neutralise the threat at a training exercise?

17 A. To clarify, on that one, we'd done a number of -- well,

18 a number, there was two exercises where it was the

19 specialist teams and they didn't involve general police

20 officers: it was firearms, it was HART, and it was the

21 specialist response team personnel. Once the decision

22 had been taken for the fire and ambulance to go in, when

23 the police had neutralised the threat in the exercise,

24 they called an end to the exercise. That happened in

25 January of that year.

1 There was quite a robust discussion about that and

2 then we were asked to come back at another exercise

3 later on in the year. NWSA -- we stipulated that we

4 wanted to make sure that we got the full benefit out of

5 it. North West Ambulance Service put quite a bit of

6 money into bringing the casualties in action to make it

7 much more realistic. And during that exercise again,

8 the same thing happened: the exercise was called to an

9 end before we had fully deployed, but on that one we

10 refused to end the exercise and we carried on.

11 Q. We'll perhaps touch on that in a minute, but can I just

12 then deal with -- you tell us in your witness statement

13 that your experience in Winchester Accord concerned you

14 such that you didn't wish to wait for the debrief but

15 emailed Leor Giladi --

16 A. Yes, also on that, the morning after the exercise,

17 I phoned a colleague called Brian Welch, who was

18 a Merseyside officer who was seconded into the JESIP.

19 He was the fire JESIP lead at that time and he basically

20 said to me, "JESIP didn't work on the night". He was

21 there in an observation capacity. That was his words to

22 me, "JESIP didn't work".

23 Q. Thank you. So can we then look at the email that you

24 sent to Mr Giladi also copying in your NWSA colleague.

25 It's at {INQ004520/1}, please.

1 I'm going to read through the email. We can see
 2 it's an email from you, 13 May 2016, to Mr Giladi -- and
 3 Joe Barrett, I think, is NAWAS?
 4 A. Yes.
 5 Q. And you set out this:
 6 "Following the exercise on Monday and not wishing to
 7 circumvent the debrief process I was wondering if you
 8 would be up for a meeting with myself and Joe to cover
 9 an issue with the command and control situation."
 10 And you repeat that you're not seeking to bypass the
 11 debrief process. You say this:
 12 "An issue for us from Monday was the linkage in
 13 particularly in the initial stages of the incident with
 14 the tactical firearms commander and the
 15 Greater Manchester Fire and Rescue Service NAWAS
 16 commander.
 17 "Quite understandably, the police firearms Tac
 18 commander located in the control room of the TC with
 19 access to CCTV, et cetera. However, there was only
 20 a marshalling officer deployed to the initial RVP to
 21 liaise with GMFRS/NWAS commanders. This officer had no
 22 knowledge of our capability, and linkage with the Tac
 23 commander was very limited. This led to an excessive
 24 delay in Fire and Rescue Service and NAWAS resources
 25 moving forward and it was approximately 2.5 hours before

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1 personnel were committed to carry out triage and
 2 rescues. If this was a firearms ops commander, this
 3 might have been a little slicker."
 4 A. Yes, I think that was a slip of the keyboard, it should
 5 have been 1.5 hours.
 6 Q. Thank you. You then go on to reference:
 7 "As with everything, it all works much better when
 8 individuals know each other. In the exercise last year
 9 at the Arndale..."
 10 And is that one of the Lionheart exercises?
 11 A. It is, yes.
 12 Q. "... ran differently due to the commanders knowing each
 13 other quite well."
 14 And you reference there particular individuals,
 15 Mr Nutter, Joe Barrett and yourself?
 16 A. It was, and Mr Nutter was involved in one of the airport
 17 exercises, so we'd already had a debrief on that one.
 18 Q. You then say this:
 19 "As a potential development going forward I would
 20 welcome your views on perhaps putting together a 1-day
 21 awareness course for commanders from the emergency
 22 services, ie firearms Tac/Ops commanders and GMFRS/NWAS
 23 NILOs. We could use this opportunity to discuss
 24 individual agency capabilities, including
 25 a demonstration of our SRT vehicle, which we have

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1 developed into a mini multi-agency command and control
 2 facility. We could also demonstrate how we can
 3 downstream live pictures from our drone which could be
 4 extremely beneficial to the Tac commanders in a real
 5 incident, and look at case studies from previous
 6 exercises, finishing with a TTX."
 7 What is a TTX?
 8 A. A tabletop exercise.
 9 Q. Thank you:
 10 "I realise this is a big ask but think it would go a
 11 long way in stopping repetition of the same learning
 12 outcomes from multiple exercises. Joe does support this
 13 from the NAWAS perspective."
 14 So you are the author of the email, but would it be
 15 fair to say that what you set out within that email had
 16 the full support of your NAWAS colleague?
 17 A. It did.
 18 Q. "Happy to discuss further, Leor, and hope this doesn't
 19 come across as negative."
 20 So in terms of what was being flagged there can
 21 I ask particularly you reference the SRT vehicles that
 22 we've looked at today. Why were you offering that
 23 opportunity as well for there to be a full understanding
 24 of the resource that GMFRS had?
 25 A. So that the other agencies -- I think the ambulance had

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1 a good understanding of what our capability was because
 2 obviously we were doing the ongoing training with NAWAS.
 3 But the firearms commanders and even other -- it wasn't
 4 necessarily limited to firearms, it could have been
 5 anybody at the sort of inspector level upwards, if that
 6 was the case -- have a look at the capability and get an
 7 understanding as to what we could actually provide
 8 at the incident.
 9 Q. Again, would it be fair to say that that would make
 10 clear as well that in an Operation Plato it made a big
 11 difference to Greater Manchester Fire and Rescue Service
 12 because that would then have mandated deployment of the
 13 SRT?
 14 A. Yes.
 15 Q. You reference within your witness statement, just to
 16 touch upon this, that I think there have been a number
 17 of Lionhearts, not just one, it is a number of
 18 exercises, the Lionheart. You describe on one occasion
 19 in a Lionheart exercise, the first Arndale exercise
 20 in April 2015, where the police tactical firearms
 21 commander thought that Greater Manchester Fire and
 22 Rescue Service were there to deliver the vehicle to be
 23 used during the training exercise rather than to
 24 actively participate --
 25 A. Yes, that was the first exercise. That's based on

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1 feedback that I received from one of our officers who
 2 was the NILO on the night. The second exercise was the
 3 one that I attended, the one in May.
 4 Q. I think you describe that that tactical firearms
 5 commander climbed into your SRT vehicle and shut the
 6 door?
 7 A. That's the feedback I received, yes.
 8 Q. And that Mr Levy was the NILO on that exercise?
 9 A. Yes.
 10 Q. And do you know who the female TFC was --
 11 A. I don't know.
 12 Q. I think you do then go on to describe that a subsequent
 13 exercise for Lionheart worked much better when it had
 14 colleagues that knew one another?
 15 A. It did.
 16 Q. The commander training that was then being recommended,
 17 following on from the issues of Winchester Accord, was
 18 that then the commander training that took place in the
 19 January of 2017 or was other commander training --
 20 A. No, the January and the February of 2017, and we also in
 21 tandem sorted more training out for the operational
 22 crews, so again working with the firearms teams --
 23 because when we put the original training together, the
 24 firearms teams were part of that. Over the up to
 25 18 months/2 years, the firearms teams weren't engaged

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1 in that training. It wasn't the fact that they refused
 2 to turn up, I think it was more we'd focused on the
 3 ambulance side of it, but the crews were saying, you
 4 know, that was feedback to us from the SRT crews that we
 5 need more training with the police, which was fair
 6 comment, so that's what we put in, a programme of
 7 ongoing training with them so again we would have
 8 tactical -- tactical firearm police firearms commanders
 9 at that training as well.
 10 Q. And that's the 3 days with the MTFA commander training,
 11 2 days in January and 1 day in February?
 12 A. No, that's in addition to that. The commander training
 13 was for the supervisory officers -- so for the Fire
 14 Service it wasn't just the NILOs, it was officers who
 15 were on our flexible duty system rota, so that was
 16 station managers and above, the same option for police
 17 and ambulance counterparts -- but the --
 18 SIR JOHN SAUNDERS: That was set up to meet the concerns
 19 which you expressed in your email?
 20 A. It is, yes.
 21 SIR JOHN SAUNDERS: You expressed them in an email rather
 22 than waiting for the debrief because?
 23 A. I just felt we needed to start the process. I think
 24 Mr Lawlor stated quite correctly yesterday these things
 25 take quite a bit of time to get together. You're

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1 talking three organisations. It's quite a training
 2 commitment, training plans, training needs analysis.
 3 Resources have already been allocated probably for that
 4 year. This is quite a big addition to put into that
 5 programme, so it'd be basically -- it was trying to get
 6 the wheels moving on it quicker. We knew it was going
 7 to come out as an issue in the debrief.
 8 SIR JOHN SAUNDERS: So 8 months was getting the wheels
 9 moving quicker?
 10 A. In reality, that's what it took, sir. To get those
 11 people at -- together in a room, it doesn't sound great,
 12 but that's the reality of --
 13 SIR JOHN SAUNDERS: It doesn't sound great when you have
 14 a severe threat level, does it?
 15 A. I can't disagree with you, sir, but the reality is
 16 trying to get that level of training together does take
 17 time.
 18 SIR JOHN SAUNDERS: So as far as you're concerned, it was
 19 done as quickly as it could be?
 20 A. Yes.
 21 MS CARTWRIGHT: Can we briefly go into the actual debrief
 22 report for Winchester Accord, please. It's
 23 {INQ004521/1}.
 24 We can see there, following on from your email, this
 25 was the actual formal structured debrief report for

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1 Winchester Accord.
 2 A. Yes.
 3 Q. If I could ask, please, Mr Lopez, if we could go,
 4 please, to {INQ004521/4} of that document. The chairman
 5 asked a question a moment ago about which exercise --
 6 where there was an issue with the FDO. Can we see at
 7 the top of that page one of the issues identified from
 8 Winchester Accord is:
 9 "If the FDO is busy, the person who answers the
 10 phone may not know what to do. We need a different
 11 route to the FDO for the setting-up of an SCC"?
 12 A. Yes. Again one of the problems we had was the
 13 communication. It was an area of concern at the
 14 conclusion of the exercise, but I was sort of reassured
 15 a little bit because the FDO in that exercise, GMP were
 16 trying an exercise in the relocation. I think in there,
 17 as it says in the action, in reality the FDO would have
 18 had a bigger team of supervisors and staff to assist.
 19 So it wasn't sort of a real time impact on the FDO if
 20 that makes sense, he didn't have his full team there.
 21 Q. I'm not going to go through the debrief report with you
 22 today.
 23 Can I then ask you this: you have told the chairman
 24 that one of the Winchester Accord matters that followed
 25 on by way of what needed to be done was the commander

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1 training --
 2 A. Yes.
 3 Q. -- that took place in the January and the February.
 4 A. Yes.
 5 Q. Can I ask you, were you involved in that commander
 6 training?
 7 A. I was a participant in it. As I say, Neil Gaskell, who
 8 was the MTFA lead in the Fire Service, who worked for
 9 me, he was tasked -- basically, what happens for the
 10 chronology is I sent the email to Mr Giladi. Myself,
 11 Mr Giladi and Mr Barrett met. We agreed to commit to
 12 this training. I then came back, spoke to Mr Gaskell
 13 and he spoke to his peers in NWAS and GMP and the
 14 training was organised. But I was a delegate, if you
 15 want, on the training itself.
 16 Q. Can I ask you, what was your understanding about GMP's
 17 attendance at that commander training?
 18 A. Well, from when I was there, it seemed to -- there was
 19 quite a few police officers in attendance, but they
 20 would have -- they would probably need more spaces than
 21 us. It was fed back to me later that there was a bit of
 22 a disappointment from the police at the level of
 23 attendance, but that was being fed back internally from
 24 the police attendee at that exercise.
 25 SIR JOHN SAUNDERS: What paragraph are we on at the moment?

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1 MS CARTWRIGHT: We're not, I'm just touching -- I'm about to
 2 go to the final paragraph. I just wanted this witness's
 3 impression of that commander training.
 4 SIR JOHN SAUNDERS: I just wondered where it was in the
 5 training.
 6 MS CARTWRIGHT: I think we're going to hear some evidence
 7 from Mr Gaskell, because certainly, I think from memory
 8 in paragraphs 70 and 71 of Mr Gaskell's statement, he
 9 provides a comment about his impression about the
 10 attendance of GMP that the training exercise, but let's
 11 leave that for Mr Gaskell.
 12 SIR JOHN SAUNDERS: No, no, let's have your impression.
 13 A. In the room, and again I'm going back a number of years
 14 now, there was quite a few GMP attendees. But this was
 15 what was fed back to Mr Gaskell from his partner from
 16 the police who was dealing with the training, that they
 17 were a little bit disappointed in the level of GMP
 18 attendance. But that was being fed back in --
 19 SIR JOHN SAUNDERS: So is it number or rank?
 20 A. The number, I believe, sir.
 21 MS CARTWRIGHT: Finally, for my part, could we just deal
 22 with Hawk River, today, please. You set out in your
 23 witness statement:
 24 "Another training exercise was Hawk River, which was
 25 run by the North-west Counter-terrorism Unit and

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1 sponsored by the Home Office on 3 March 2017.
 2 A learning outcome from this was how the three agencies,
 3 GMP, the Fire Service and NWAS, communicate. As
 4 a result we agreed to establish an Airwave radio channel
 5 for all three agencies to use in the event of an
 6 incident. It was for GMP to lead on implementing this,
 7 but it was not done at the time of the arena incident
 8 and information about this dedicated radio channel is
 9 contained within pages 6 and 7 of the debrief report."
 10 A. Yes. That was what we've discussed previously on the
 11 Airwave channel, that exercise.
 12 Q. Perhaps then if we briefly go to that debrief report for
 13 Hawk River. It's {INQ004529/1}.
 14 SIR JOHN SAUNDERS: Just so I understand, this is all what
 15 you were telling me about, that the Airwave channel was
 16 set up and you actually tried to use it on the night of
 17 the attack --
 18 A. We did, sir.
 19 SIR JOHN SAUNDERS: -- but it wasn't being used?
 20 A. Just for clarity, I think all the background work to
 21 setting it up had been done. I hadn't received --
 22 I spoke to Mr Levy, Mr Levy said they had the meeting
 23 with North West Fire Control and so far as the Fire
 24 Service is concerned it's good to go, but we haven't had
 25 any sort of formal notification that everything had been

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1 done. There was still a couple of loose ends to tie up
 2 with the police, which -- I don't know what they were.
 3 But as I say, in essence, it was pretty much ready to
 4 go. It's tragic really that it happened so close to the
 5 implementation. But we did try to use it on the night
 6 in any case, but as I said, that was more in hope than
 7 in expectation.
 8 MS CARTWRIGHT: There is one final matter, but I think now
 9 may be a good time to take a short break, please.
 10 SIR JOHN SAUNDERS: Okay, 10 minutes?
 11 MS CARTWRIGHT: Thank you.
 12 (12.42 pm)
 13 (A short break)
 14 (12.52 pm)
 15 MS CARTWRIGHT: Mr Lopez, could I have, please, displayed on
 16 the screen, {INQ004529/1} at page -- thank you.
 17 Briefly, Mr Fletcher, to complete my questioning of you
 18 today, you have mentioned pages 6 and 7 of the
 19 Hawk River debrief. We can see there, this is the
 20 debrief document that confirms that the exercise date
 21 for Hawk River was 1 March 2017.
 22 A. Yes.
 23 Q. This debrief report wasn't completed until 7 April 2017?
 24 A. Yes.
 25 Q. And then we can see that as part of the document -- on

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1 the first page we can see facilitators from the Fire and
 2 Rescue Service, GMP and the North-west Counter-terrorism
 3 Unit. Is that the facilitators of the exercise or in
 4 this debrief process?
 5 A. That would be in the --- to be fair, I wouldn't...
 6 I wouldn't be able to comment on that one.
 7 Q. Okay.
 8 A. I just can't remember.
 9 Q. I'm going to take you now to the aspects that deal with
 10 the communication issue you've identified. If we could
 11 turn to page 6, please, Mr Lopez {INQ004529/6} and
 12 expand the centre of the page. We can see there's
 13 a heading "Communication". It says this:
 14 "A consistent theme throughout the exercise was
 15 Airwaves, particularly around the tri-service
 16 communication protocols with conference calls."
 17 And then use of a number of lines is identified : one
 18 for the Bronze and operational and then another line for
 19 the Silver and tactical level. And then it makes clear
 20 that:
 21 "There was an Airwave line set up and available for
 22 all three blue-light services and this should be
 23 accessed for Silver tactical decision-making. Multiple
 24 agencies deployed have no single Talk Group, and no
 25 ability to broadcast to all agencies for either

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1 instruction to minimise Talk Group usage, stop telephony
 2 over Airwave, minimise point to point, and no ability
 3 for an individual to warn or inform. This is further
 4 complicated when assets such as BTP, CNC, MOD and
 5 Highways are involved."
 6 So is this the section of the report
 7 (overspeaking) ---
 8 A. Yes.
 9 Q. --- one of the sections?
 10 Then can I ask you a question because we can see the
 11 issues in respect of the tri-service but a note was also
 12 being flagged about when other agencies need to be
 13 involved in decision-making. We can see a particular
 14 reference there to BTP.
 15 A. Yes.
 16 Q. Was there any consideration or discussion after
 17 Hawk River in the debrief as part of the discussions
 18 around Airwaves about if an incident involved BTP and
 19 there were (inaudible) on the communication side of
 20 things?
 21 A. Not that I am aware, but that's not to say that it
 22 didn't take place. As I say, the police were leading on
 23 the implementation of that Talk Group. From my
 24 perspective, I didn't hear anything on that, no.
 25 Q. Thank you. We can see it goes on:

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1 "There could be numerous Airwaves channels in use by
 2 various responders and agencies and this would need
 3 a significant amount of coordination."
 4 It goes on:
 5 "All blue light services highlighted they have
 6 communication protocols in place to ensure the safety of
 7 unarmed staff attending a major incident. All
 8 responders require clear unambiguous instructions on the
 9 nature of the incident and their individual and team
 10 responsibilities ."
 11 So then just focusing on the Airwaves, would it be
 12 fair to say that the issue was identified around which
 13 of the communication Airwaves each of the individuals
 14 should be using?
 15 A. For that three-way --- from my memory it was the
 16 three-way communication link that was the main issue.
 17 Q. But in terms of what took place afterwards, the system
 18 effectively existed, an Airwave existed that enabled
 19 that to take place?
 20 A. It did.
 21 Q. Turning over the page to {INQ004529/7}, I'm going to
 22 focus on the section. It says:
 23 "Good practice. An Airwave is identified and
 24 utilised as the tactical tri-service communication
 25 channel and another Airwaves are utilised for any

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1 Bronze/operational activity."
 2 Then:
 3 "It was identified to appoint an Airwaves tactical
 4 adviser at the earliest opportunity. All responders to
 5 consider the development of a fast time briefing product
 6 for any major incident. For example the police could
 7 send out a briefing via the force duty officer to
 8 responding staffs' smart phone devices. In multi-sited,
 9 multi-agency response, clarify command protocols and the
 10 responsibilities of the communication staff/call takers
 11 in each agency in a major incident. Command and control
 12 structure is required to oversee all media messaging."
 13 And it's actually not relevant, that last one.
 14 Again, we can see the recommendation there is:
 15 "Create a SOP for appropriate use of Airwave
 16 channels in the event of any major incident. All three
 17 services default to ..."
 18 And then there's an Airwave identified for the
 19 Silver and tactical. Then another Airwave identified
 20 for the Bronze operational activity if not co-located?
 21 A. Yes.
 22 Q. And it was also recommended to produce a guidance
 23 document to raise awareness in relation to the use of
 24 national Talk Groups' Airwaves?
 25 A. Yes.

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1 Q. And to review communication protocols to ensure
2 interoperability between services to ensure best
3 protection for all attendees.

4 SIR JOHN SAUNDERS: Right. It's no doubt entirely my fault
5 for being stupid, but I really don't understand that.
6 So we've got Winchester Accord where we have the problem
7 about there is no three-way Airwave communication system
8 where all three emergency services can all be hearing
9 what's going on together.

10 A. I think, yes, the Winchester Accord one was more for the
11 communications side of it, it was for us the links into
12 the force duty officer and the communication with the
13 NILO on the night. I don't think at that stage, even
14 though you're quite right, sir, it was in the JOPs for
15 years, that the tri-service communication was the issue
16 that we was initially looking at. As I said, when the
17 debrief report came out it was said that the force duty
18 officer on that occasion — the police were trialling
19 a location, the full team wasn't [indistinct].
20 So that would have had an influence on what the
21 breakdown of the communication was. The Hawk River was
22 where really the full identification of the tri-service
23 communication link was discussed in earnest.

24 SIR JOHN SAUNDERS: Right, okay.

25 MS CARTWRIGHT: I think just to complete this document with

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1 communication, at page 11, please, Mr Lopez. I think
2 we can see similar identification. It's the bottom of
3 the page, please, under "Communication". Thank you.

4 We can see there the issue you've identified around
5 the communication. You set out in your witness
6 statement about following on from Winchester Accord, it
7 was agreed to establish an Airwave radio channel for all
8 three agencies to use in the event of an incident.

9 A. Yes.

10 MS CARTWRIGHT: Thank you, Mr Fletcher.

11 Sir, those conclude my questions at this stage. Is
12 there anything you wish to deal with before we turn to
13 the core participants?

14 SIR JOHN SAUNDERS: No, thank you.

15 MS CARTWRIGHT: Could I turn to Mr Smith on behalf of
16 North West Fire Control.

17 Questions from MR SMITH

18 MR SMITH: Sir, could I just ask the witness to clarify one
19 matter arising out of a question which you asked a short
20 time ago?

21 SIR JOHN SAUNDERS: I probably confused everything
22 enormously, so please do.

23 MR SMITH: You were asked about using the Airwave channel on
24 the night of the attack. The chairman, with respect to
25 him, asked you to clarify that you tried to use it on

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1 the night of the attack. Do you remember that?

2 A. I do, yes.

3 Q. Could I assist your memory and ask you to consider this,
4 please. At 22 minutes past 11 that night, do you
5 remember that you booked yourself on duty with
6 North West Fire Control?

7 A. Yes, I do.

8 Q. In the course of a call that you made to North West Fire
9 Control for that purpose, which was dealt with by
10 a control room operator named Joanne Haslam, do you
11 remember saying to Joanne Haslam that she should speak
12 to Janine Carden, the operations manager, and to mention
13 to Janine Carden that it might be possible to put on the
14 SANJ radio channel —

15 A. Yes.

16 Q. This is operationally sensitive, the title.

17 A. Yes.

18 Q. The channel which in due course was implemented under
19 the protocol.

20 A. Yes. But as I was saying before, just for clarity, the
21 background work had been done. I know that North West
22 Fire Control with the SPOC and the police had been down
23 in April to make sure that the links, the protocol,
24 whatever you want to call it, was in place. So from the
25 Fire Service perspective, it was done, and I believe

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1 that there was a couple of, I'd say, loose ends, if
2 that's the right phrase, to tie up on the police side,
3 and on the night, obviously, I knew that this background
4 work had been done. As I say, we tried to put it on,
5 I asked Janine to put on the channel, and again, in more
6 of a hope than an expectation, that we would get some
7 key information.

8 Q. Did you subsequently learn that North West Fire Control
9 had begun to monitor that channel after your call?

10 A. Yes.

11 Q. But that it was not used as a means of communication
12 between the three agencies?

13 A. Yes. I think there was — what I picked up after, there
14 was a call that went after, it might have been after
15 midnight, that North West Fire Control answered.

16 Q. At one minute past midnight, does this jog your memory,
17 GMP put a call out on that channel, it was answered by
18 North West Fire Control but there were no communications
19 on the channel?

20 A. Yes, that sounds correct.

21 Q. That's your recollection as well, is it?

22 A. It is, yes.

23 Q. Thank you, Mr Fletcher. Could I turn as briefly as
24 I can, please, to just a few questions I would like to
25 ask you, hopefully without repeating any of the material

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1 that I asked Mr Lawlor to give evidence about.
 2 As far as the Exercise Winchester Accord is
 3 concerned, it's correct, isn't it, that you were
 4 monitoring the exercise with others from the management
 5 suite of the Trafford Centre?
 6 A. That's correct.
 7 Q. Looking at a closed-circuit television?
 8 A. Yes.
 9 Q. Who was there with you from Greater Manchester Fire and
 10 Rescue Service?
 11 A. In that room, I think I was the only Greater Manchester
 12 Fire and Rescue Service person there.
 13 Q. Once it became apparent that there had been failures in
 14 communication in the course of Exercise
 15 Winchester Accord, did you consider that the failures in
 16 communication were serious failures?
 17 A. Yes.
 18 Q. And not only were they serious failures, do you agree,
 19 but they could have very serious consequences if
 20 replicated in a real life incident for the saving of
 21 life? Do you agree?
 22 A. Yes.
 23 Q. As far as crews are concerned, I don't want to go over
 24 the evidence you've already given about the MTFA
 25 capability, but is it the case that even standard crews

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1 on standard appliances are trained in treatment of
 2 casualties?
 3 A. Yes. That was discussed with the counsel earlier.
 4 Q. So that if standard appliances are deployed to the scene
 5 of an incident which involves, let's say, blast and
 6 firearm injuries, putting aside the limits of
 7 exploitation for the moment, those standard appliance
 8 crews would have the ability to treat haemorrhage and
 9 that type of injury, wouldn't they?
 10 A. I would say probably a limited availability. I don't
 11 know what the content of the first aid equipment is on
 12 the appliances, certainly not these days.
 13 Q. But they have all been trained, have they not, in first
 14 aid and casualty management?
 15 A. They've been trained, my belief is, in first aid, and
 16 there was always a hope to have a trauma technician who
 17 had further advanced medical training.
 18 Q. Moving on from there to Exercise Hawk River, please.
 19 Would you look at the document that was on the screen
 20 not very long ago, {INQ004529/3}, please.
 21 If the lower half of the page could be enlarged by
 22 Mr Lopez, that would be helpful, please.
 23 One of the recommendations that you can see there
 24 in the last but one bullet point is that it was
 25 recommended to raise awareness to the ambulance and

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1 police service of the additional skills of the fire and
 2 rescue service and how they can support responding
 3 agencies; is that correct?
 4 A. Yes, that's how it reads.
 5 Q. Did you understand that one of the perceptions at
 6 Exercise Hawk River and discussed in the debrief was
 7 that other agencies might not fully appreciate or have
 8 fully appreciated the abilities of the fire and rescue
 9 service to assist North West Ambulance Service in the
 10 management of casualties?
 11 A. This obviously came out as a recommendation in that
 12 exercise, but previously that's one of the outcomes of
 13 the training that we'd done in the January and
 14 the February that year.
 15 Q. So did you at any time consider that other agencies
 16 might not have fully appreciated the capabilities of the
 17 fire and rescue service in the management of casualties?
 18 A. I would say that, yes, and that's why we did -- arranged
 19 the training in the January and the February of that
 20 year.
 21 Q. As far as page 1 of this document is concerned, and
 22 could Mr Lopez take us to that, please, {INQ004529/1},
 23 and again could Mr Lopez enlarge the lower half, please?
 24 I would like to take you to these words:
 25 "It is also important to note that a Plato incident

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1 is distinct from any other form of firearms incident.
 2 The identification criteria that may indicate an attack
 3 of this nature is unfolding might include the
 4 following."
 5 And then you see there, there's a list of bullet
 6 points; is that correct?
 7 A. Yes, sir.
 8 Q. Do you see the words "explosive devices used"?
 9 A. Yes.
 10 Q. Did you consider that all of these components, when you
 11 read this, needed to be present in combination or, on
 12 reading this, did you interpret this document as
 13 indicating that if explosive devices were used, that
 14 might indicate that an attack of this nature was
 15 unfolding?
 16 A. Well, it's one of the bullet points there. I would say
 17 you couldn't look at one in isolation. As I say, it
 18 could be a combination of any of the following items on
 19 that list.
 20 Q. Why couldn't you look at it in isolation?
 21 A. Because as I say, with the Plato, you know, it could be
 22 that a bomb or an IED has exploded, but as I say, my
 23 interpretation, looking at that, would be more of a sort
 24 of a combination of one, maybe two, or even more of
 25 those elements.

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1 Q. What do you mean by a combination of one?
 2 A. Sorry — well, that was a misquote. A combination of
 3 elements in that list .
 4 Q. And are you saying, Mr Fletcher, that the fact that an
 5 explosive device, in other words a bomb, might have been
 6 used and had exploded would not in your mind necessarily
 7 indicate that an attack of that nature was unfolding?
 8 A. Well, I mean, at that time, as well, we were looking
 9 at — thinking about the attacks in Paris and the
 10 Bataclan, which started off with an explosion and then
 11 transcended into an MTFA attack. So it's quite
 12 reasonable to be thinking along those lines .
 13 Q. And do you agree, therefore, that it 's quite reasonable
 14 as well, looking at this document, from your point of
 15 view and with your experience, to see that that
 16 proposition, that an explosive device had been used, in
 17 other words a bomb had exploded, would be sufficient to
 18 somebody with your experience to realise that this might
 19 be the beginnings of an Operation Plato incident?
 20 A. Yes.
 21 Q. Can I move on now to the preparedness of the control
 22 room at North West Fire Control to respond to incoming
 23 calls and to mobilise GMFRS assets. Do you agree that
 24 this was never tested in any exercise until after the
 25 attack at the arena?

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1 A. Yes, that's correct. We were looking at trying to do
 2 one, a mobilisation exercise, but it wasn't done until
 3 after the arena, no.
 4 Q. And I think, as you explained in your statement, after
 5 the attack at the arena, it was realised that
 6 Greater Manchester Fire and Rescue Service and
 7 multi—agency partners never conducted MTFA training from
 8 the point of mobilisation onwards.
 9 A. That's correct, yes. Yes.
 10 Q. So before Operation Powerhouse, which took place on
 11 20 November 2017, there had never been an attempt to
 12 test the preparedness of the control room at
 13 North West Fire Control in responding to an MTFA; is
 14 that right?
 15 A. No. As I say, the mobilisation side of it, from the
 16 fire stations, from the initial point of call, we hadn't
 17 done a mobilisation exercise, no.
 18 Q. When you came to Operation Powerhouse on
 19 20 November 2017, it was a no—notice exercise, wasn't
 20 it?
 21 A. It was. In operation — yes, it was.
 22 Q. North West Fire Control was on notice that it was going
 23 to happen at some stage; is that correct?
 24 A. I don't know if they were on notice. We tried to keep
 25 it as quiet as possible to get the full benefit of the

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1 exercise. It might have been that they were on notice
 2 that there might have been an exercise, but certainly
 3 they wouldn't have known it was going to take place that
 4 night.
 5 Q. And did the personalities included in the arrangements
 6 for that operation include Station Manager Berry?
 7 A. Yes.
 8 Q. Obviously yourself?
 9 A. Yes.
 10 Q. And Janine Carden, who's the exercise coordinator for
 11 the operation, but also the operations manager at
 12 North West Fire Control?
 13 A. Yes, in consultation with the police as well, and
 14 ambulance.
 15 Q. Yes. Could we very briefly go to {INQ004526/13},
 16 please, Mr Lopez.
 17 This is your report, Mr Fletcher, that's coming up
 18 on the screen. Do you recognise the end of the
 19 document, which is appendix 2?
 20 A. Yes, I do.
 21 Q. We see there a list of recommendations. Recommendation
 22 1. Does that read:
 23 "For future exercises of this nature, allow North
 24 West Fire Control to practically mobilise the assets.
 25 This will be a realistic and timely test of procedures

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1 in North West Fire Control."
 2 A. Yes.
 3 Q. Was that recommendation put in place because North West
 4 Fire Control, for the purposes of this exercise, wasn't
 5 dependent entirely on its computer—aided despatch system
 6 but was handling, physically, action cards?
 7 A. I think obviously for that exercise there was some, if
 8 you talk about injects that were put in because — not
 9 the full mobilisation of assets. I think that is in the
 10 feedback that it would be better for North West Fire
 11 Control to physically mobilise the assets rather than
 12 relying on injects.
 13 Q. Then I'd like to take you to recommendation 3, please:
 14 "The role of the NILO coordinator to take up a more
 15 active role in the communication chain with other
 16 agencies."
 17 Then these words:
 18 "This is not to say that North West Fire Control
 19 should not interject too at appropriate times."
 20 And could Mr Lopez just take us, last of all, to
 21 page 5, please? {INQ004526/5}. Could you enlarge the
 22 part that deals with 3?
 23 Without me having to read the whole of that first
 24 paragraph — just a little bit further up the page,
 25 please, Mr Lopez. That's it. It 's recorded that

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1 Greater Manchester Police had to repeatedly ask
 2 North West Fire Control for clarification that they'd
 3 received the information, and then the next paragraph:
 4 "In addition, it seemed to be one-way traffic with
 5 the police as the main communicator and North West Fire
 6 Control and North West Ambulance Service on receive."
 7 A. Yes.
 8 Q. All I would like to ask you to confirm, please, is
 9 this: was the learning that emerged from
 10 Operation Powerhouse for the purposes of
 11 recommendation 3 that North West Fire Control could have
 12 been more proactive in terms of chasing information and
 13 passing it to other agencies?
 14 A. The outcome of that recommendation from the debrief
 15 basically came from the police representative, and what
 16 they felt was that when using the channel, for them it
 17 seemed to be one-way traffic. Obviously it was the
 18 first time that we'd used this Airwave channel and it
 19 was more of a comment that the other agencies --
 20 information comes in, contribute that back, so it was
 21 sort of a two-way communication rather than, as it seems
 22 to be on there, that the information was coming one way.
 23 Q. So it was emphasising the importance of all of the
 24 control rooms sharing information?
 25 A. Yes, it was.

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1 Q. Finally, this, please, and this is all I have to ask
 2 you. If Mr Lopez could put {INQ001057/1} on to the
 3 screen, please. Just take us to the very bottom of the
 4 document. I'm so sorry, it's page 2. {INQ001057/2}.
 5 If we could enlarge that.
 6 On 11 February of 2016, was there an MTFA assurance
 7 visit to --
 8 A. Yes, there was.
 9 Q. -- GMFRS?
 10 A. Yes.
 11 Q. And which organisation or agency was responsible for
 12 initiating that visit?
 13 A. That was done, I think, through the... I'll get my
 14 memory back now. The Fire Resilience Directorate --
 15 I might be wrong on that -- who led the audit.
 16 Q. Was the Chief Fire Officers' Association involved?
 17 A. Yes.
 18 Q. This is a reference, is it not, at the top of the page,
 19 as we see it on the screen, to the way in which Janine
 20 Carden, the operations manager at North West Fire
 21 Control, conducted herself in the course of that audit;
 22 is that correct?
 23 A. It is.
 24 Q. We can see that this email was sent by you. I'm just
 25 going to read the words aloud:

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1 "She really did North West Fire Control proud and
 2 I have already spoken to her to pass on the feedback,
 3 but just wanted to let you know how good she really was.
 4 This feedback was also given by the GMFRS officers who
 5 were in attendance with the assurance team."
 6 If Mr Lopez could just take us to the bottom of
 7 page 1 now, please. {INQ001057/1}.
 8 We can see -- and this is the earlier part of the
 9 email -- that you sent this email to Sarah Wilson, head
 10 of North West Fire Control, is that correct, and copied
 11 it in to Janine Carden herself and group manager
 12 Benjamin Levy?
 13 A. I did.
 14 Q. I would like to read these words as well:
 15 "I believe Dave Keelan will be emailing you later on
 16 the same subject, but I just wanted to pass on my
 17 appreciation for the efforts of Janine yesterday with
 18 the assurance visit. From the feedback given by the
 19 auditors, she gave a 'Stella' [sic] performance with her
 20 level of knowledge, not just around the mobilising
 21 procedures but also the wider MTFA incident
 22 implications."
 23 When you sent that email, which was the day after
 24 the assurance visit, you were obviously anxious to
 25 convey that message to North West Fire Control, weren't

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1 you?
 2 A. I was eager to pass that message on to Janine Carden's
 3 line manager to show how -- you know, the feedback that
 4 came for her was very positive. I copied in Mr Levy as
 5 he was the single point of contact for the
 6 Greater Manchester Fire Service, linking in with Janine
 7 Carden at North West Fire Control.
 8 Q. Did you consider that she obviously held a very full
 9 understanding of mobilising procedures from the point of
 10 view of the control room?
 11 A. Yes, I did.
 12 Q. Had you known her for some years?
 13 A. Only since the establishment of North West Fire Control.
 14 I think going back to memory, my first involvement --
 15 sorry?
 16 Q. That would be May 2014?
 17 A. Yes. My first involvement directly with Janine was when
 18 we were making plans for the Conservative Party
 19 Conference. I think that would have been the following
 20 year. Since then I've had regular -- I had regular
 21 contact with Janine, yes.
 22 Q. At the time when you sent this email, did you consider
 23 her to be a particularly competent operations manager?
 24 A. Yes, I did.
 25 Q. Did you know that she'd had earlier experience with

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1 Cheshire Fire and Rescue Service control rooms?
 2 A. Yes, I believe that's the fire service that she came
 3 from when North West Fire Control was established.
 4 Q. And that she occupied the role of specific point of
 5 contact between North West Fire Control and
 6 Greater Manchester Fire and Rescue Service?
 7 A. Yes.
 8 Q. Was your view of her, to your knowledge, shared by other
 9 senior officers and colleagues of yours?
 10 A. There was a number of officers who had a high regard for
 11 Janine, yes.
 12 Q. And did you find that when she acted as specific point
 13 of contact, she was particularly knowledgeable
 14 concerning the methods and protocols relating to
 15 mobilisation of GMFRS's assets in response to emergency
 16 calls?
 17 A. Well, I wouldn't have that direct knowledge, that would
 18 be more for the specific point of contact, Mr Levy, but
 19 any dealings that I'd had with her, I can only say I had
 20 the highest regard for her.
 21 MR SMITH: Thank you very much indeed, Mr Fletcher.
 22 MS CARTWRIGHT: Sir, I'm conscious that we're not sitting
 23 beyond 1.30. I was going to turn next to Mr Horwell,
 24 who indicated that he had 10 to 15 minutes of questions.
 25 MR HORWELL: Sir, I have no questions of this witness,

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1 at my remark.
 2 (1.27 pm)
 3 (The inquiry adjourned)

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1 thank you.
 2 SIR JOHN SAUNDERS: Thank you very much.
 3 MS CARTWRIGHT: Then the two remaining to ask questions
 4 under the Rule 10 process are Mr Cooper on behalf of the
 5 families and then finally on behalf of GMCA, so perhaps
 6 then, sir, if we — I think there's been some
 7 discussions about this witness and so the proposal is —
 8 and I'm very grateful to Mr Fletcher for indicating he
 9 could make himself available after the break that
 10 we have. So the plan would be that he returns on
 11 22 February to conclude the questioning of those CPs who
 12 have indicated during this phase of evidence that they
 13 wish to question him and he will be one of those
 14 individuals who'll have to come back on a further
 15 occasion to deal with his involvement on the night
 16 itself and post-incident matters.
 17 SIR JOHN SAUNDERS: Mr Cooper, does that cause you any
 18 difficulty or any problem?
 19 MR COOPER: Not at all. We're happy to assist the inquiry.
 20 SIR JOHN SAUNDERS: Thank you very much for that.
 21 I think the sort of stellar performance you were
 22 talking about is spelt rather differently from the way
 23 you spelt it.
 24 A. I'll take that on board, sir.
 25 SIR JOHN SAUNDERS: Mr Greaney is shaking his head in dismay

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