

OPUS2

Manchester Arena Inquiry

Day 69

March 2, 2021

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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

Tuesday, 2 March 2021

(9.30 am)

MR GREANEY: Good morning, sir. The gentleman in the witness box is Alan Topping, who, on the date of the arena attack, was a station manager with GMFRS, based at Bury Training Centre. I'm going to ask that he be sworn, please.

MR ALAN TOPPING (affirmed)

Questions from MR GREANEY

MR GREANEY: I do know, Mr Topping, that for you giving evidence here is a significant occasion. I would like to reassure you, please don't worry, we will take this at a slow pace and in any event at the pace that you want to take it at. But we'll begin by asking you, please, to give us your full name.

A. Alan James Topping.

Q. Mr Topping on 22 May 2017, were you employed by the Greater Manchester Fire and Rescue Service as a station manager?

A. I was.

Q. At that date had you worked for GMFRS for round about 29 years?

A. I had.

Q. In early 2018, and so after the attack, were you promoted to the position of group manager?

1

A. I was.

Q. As of today do you remain employed by GMFRS or have you left?

A. I have left, I'm retired.

Q. When did you retire?

A. I retired in September last year.

Q. So it follows, I think, that you had served for round about 32 years?

A. Correct.

Q. Let me tell you, so you know where I'm going, that my questions are going to be divided into three stages. First of all, matters of background, both generally and specifically so far as you're concerned, so I'll be asking you about your training and so on. Secondly, and principally, your involvement on 22 May 2017, so the night of the attack. And thirdly, your involvement in subsequent connected events and the concerns that you have, I know, about the reaction of GMFRS on the night of the attack. So I believe you know that I'm going to be asking you about your opinion, so not just about the facts but about your opinion. We'll get to that in due course.

So stage 1 then, matters of background. I'm going to begin with the mundane and seek your help in relation to the rank structure of GMFRS because, as you will

2

appreciate, a number of other officers, firefighters, are going to be giving evidence after you.

So when one joins the GMFRS, does one join in the rank of firefighter?

A. You do.

Q. And of course someone might spend their entire career in that rank; is that correct?

A. That's correct.

Q. But obviously there are ranks above that in the hierarchy and I could easily have all of this wrong and you'll tell me if I do, but above firefighter do we find crew manager?

A. We do.

Q. What is the difference in role of a crew manager from that of a firefighter?

A. As a crew manager, that's the start of your management career. You could be in charge of an appliance, also you could be still riding in the back of an appliance, so you are taking on a role of a firefighter and a manager, depending on what station you're at.

Q. So you've used the term appliance. We're going to hear another term used, which is pump. I might use the term fire engine. Do they effectively all mean the same thing?

A. They all mean the same thing, yes.

3

Q. Above crew manager, would we find a watch manager?

A. You would.

Q. And the difference between a crew manager and a watch manager is?

A. Essentially, a watch manager is in charge of the watch. If the watch manager is off or detached, the crew manager then generally takes on that role. But the watch manager is generally in charge of a watch.

Q. And what is a watch?

A. A watch is made up of personnel, firefighters and a crew manager. It could be a two-pump station or a one-pump station with specials. It could vary, the number of personnel a watch manager could be in charge of.

Q. We know a little bit more about the way in which the police operate and we know that they would operate through a shift; is a shift similar to a watch?

A. Yes.

Q. Above a watch manager -- and I'm trying to deal with the situation in May 2017, so if there have been changes since you'll tell me -- would we have found a station manager?

A. Yes.

Q. And the extra responsibilities of a station manager from a watch manager would be?

A. Essentially, they're in charge of the station, so in

4

1 charge of four watches. If you're station-based, you
 2 could be a station manager and have specialist roles
 3 either at Fire Service Headquarters or in training or
 4 fire prevention and protection. There's various roles
 5 for a station manager.
 6 Q. Above a station manager, a group manager?
 7 A. Yes.
 8 Q. And a group manager's responsibilities would be?
 9 A. Again, depending on the role you undertake as a group
 10 manager, you could be in charge of a number of stations,
 11 a borough, or a department such as the training centre
 12 or other various roles at Fire Service Headquarters.
 13 Q. Just pausing for one moment, I think it's the position
 14 that on 22 May 2017 you were a station manager?
 15 A. I was.
 16 Q. But that subsequently, you were promoted to the position
 17 of group manager?
 18 A. Correct.
 19 Q. And was that your position at the date of your
 20 retirement in September of last year?
 21 A. It was.
 22 Q. Above a group manager, was there an area manager?
 23 A. Yes.
 24 Q. Whose responsibilities were?
 25 A. Again, various. He could be in charge of a number of

5

1 boroughs, also in charge of departments, so they would
 2 take the lead regarding training or fire prevention and
 3 protection, et cetera. So again a number of roles they
 4 could undertake.
 5 Q. And above the area manager, would we start to see the
 6 structure of chief fire officers?
 7 A. Yes.
 8 Q. With, first of all, the assistant chief fire officer?
 9 A. Correct.
 10 Q. And then was there in May 2017 also a deputy chief fire
 11 officer?
 12 A. I believe there was.
 13 Q. And I think certainly you can confirm that in May 2017
 14 there was a chief fire officer?
 15 A. There was.
 16 Q. Mr O'Reilly?
 17 A. Correct.
 18 Q. From whom we'll hear in due course.
 19 SIR JOHN SAUNDERS: I'm never sure how these things work.
 20 Is the assistant above the deputy or the deputy above
 21 the assistant?
 22 A. Assistant, deputy, chief.
 23 MR GREANEY: I think in common with the police service,
 24 where there is a deputy, the deputy is above the
 25 assistant.

6

1 SIR JOHN SAUNDERS: Thank you.
 2 MR GREANEY: At the time of the attack, were you a station
 3 manager based at, I hope I get this pronunciation
 4 correct, Bury Training Centre?
 5 A. I was.
 6 Q. Were you responsible for what was called breather
 7 apparatus training?
 8 A. Breather apparatus training, yes, I was.
 9 Q. What did your day-to-day responsibilities in that role
 10 involve?
 11 A. It was delivering training to the operational
 12 firefighters and officers, mainly regarding anything
 13 would involve breathing apparatus which would obviously
 14 include firefighting. That was my main role, making
 15 sure that was delivered to the service.
 16 Q. Just to bring us more closely to the events of the night
 17 of the attack, did you also work as what was called
 18 a flex duty officer?
 19 A. Yes, flex duty officer, yes.
 20 Q. So flex being F-L-E-X?
 21 A. Yes.
 22 Q. What did that role involved?
 23 A. That was providing operational cover on a rota basis.
 24 During my day job, and also at certain points during the
 25 night and weekend, I would provide operational cover to

7

1 the service as a station manager.
 2 Q. What did operational cover involve?
 3 A. Basically, you would be part of the incident command
 4 team at operational incidents.
 5 Q. So if an incident occurred, you would be available
 6 on call to perform an operational role in relation to
 7 it?
 8 A. That's correct.
 9 Q. So the way in which you put it in your witness
 10 statement, page 1 of {INQ029438/1}, is this:
 11 "The on-call element means that I would, for
 12 example, work my normal 9 am to 5 pm, then be on call
 13 between 5 pm and 9 am, before working my normal role
 14 again between 9 am and 5 pm, and then going off duty."
 15 A. Yes. To be clear, I'd still be providing that
 16 operational cover during the day as well. So I'd be
 17 performing my normal role, which would be training, and
 18 during that time I would also be providing operational
 19 cover.
 20 Q. I understand. In your statement you describe
 21 Greater Manchester Fire and Rescue Service being divided
 22 into rotas; is that correct?
 23 A. For operational cover, yes.
 24 Q. Could you explain to us what rotas mean in this context?
 25 A. Because we're providing a 24/7 service, the elements of

8

1 providing operational cover at night and at the weekend
 2 is broken into four different rotas, so at any one time
 3 one rota would be providing cover at night and at the
 4 weekend.
 5 Q. In May 2017, was your line manager group manager
 6 Tony Bryan?
 7 A. He was.
 8 Q. And were you a member of rota group 4?
 9 A. I was.
 10 Q. Was Mr Bryan within that rota group?
 11 A. He wasn't.
 12 Q. Were there, however, group managers within rota group 4?
 13 A. Yes.
 14 Q. Who were they?
 15 A. They would be Group Manager Dean Nankivell, Group
 16 Manager Carlos Meakin, Group Manager Ben Levy...
 17 Q. And I think group manager John Fletcher as well?
 18 A. Group Manager John Fletcher.
 19 Q. And you refer in your statement to an area manager,
 20 Paul Etches.
 21 A. That's correct.
 22 Q. Was he the area manager for that group rota?
 23 A. He was.
 24 Q. Were there for each of those four rota groups their own
 25 station managers and other staff?

9

1 A. Yes.
 2 Q. So I just want to make sure that I've understood this
 3 correctly. Obviously for day-to-day operational
 4 activities, the Fire and Rescue Service is divided into
 5 shifts at different stations; is that correct?
 6 A. Correct.
 7 Q. But for what might be described as off-duty events,
 8 there were rotas?
 9 A. Yes.
 10 Q. And so we need to have in mind on the one hand shifts,
 11 on the other hand rotas, and you've just been telling us
 12 about the rota group you were part of, rota group 4?
 13 A. That's correct.
 14 Q. Next, training. You have kindly provided your training
 15 record. We don't need it on the screen, but the
 16 reference is {INQ039941/1}. It reveals, as you know,
 17 that on 8 July 2014 you attended a course called "Joint
 18 Emergency Training Interoperability Training --
 19 Operational".
 20 A. Yes.
 21 Q. You can maybe take that date from me, it's in the
 22 statement and in the record, but do you recall attending
 23 that training course?
 24 A. I vaguely recall.
 25 Q. Do you recall how long the course was?

10

1 A. No.
 2 Q. Do you remember who attended the course?
 3 A. No.
 4 Q. By that I didn't mean individuals, I mean do you recall
 5 whether the course was restricted to GMFRS or whether
 6 GMP and/or the Ambulance Service also attended?
 7 A. If it's the JESIP training you're referring to --
 8 Q. I am referring to that, yes.
 9 A. Yes, it would be the Greater Manchester Police attended,
 10 NWAS attended also.
 11 Q. And my next question is a rather open one, but are you
 12 able to tell us what you learnt on that course in a few
 13 sentences?
 14 A. Yes, it was a refresher on JESIP principles, so we were
 15 going through how we would formulate messages, when you
 16 would send a message for declaring a major incident, and
 17 just going through different scenarios what would be
 18 a major incident for each service. For some services
 19 it would be a major incident, for others it wouldn't,
 20 but the important thing is we all treat it as a major
 21 incident.
 22 Q. Right. So let me just understand that. Is what you're
 23 saying that any service might consider within its terms
 24 an event to be a major incident, the other emergency
 25 services might not necessarily regard it within its own

11

1 terms as categorised in that way, but once one service
 2 declared a major incident, all should treat it as such?
 3 A. That is exactly right.
 4 Q. You referred to the term refresher. Should we
 5 understand, therefore, that you had at some earlier
 6 stage than July 2014 attended training in the JESIP
 7 principles and in July 2014 you were being refreshed?
 8 A. Correct. You do your own job study, looking at the
 9 procedures but also some internal training, particularly
 10 for promotion and assessments, et cetera.
 11 Q. Let me ask you a very straight question: in May of 2017,
 12 did you consider that you had been adequately trained in
 13 multi-agency working?
 14 A. I felt I'd been trained to quite a high level, yes,
 15 personally.
 16 Q. You mentioned messaging. I think, but tell me if I'm
 17 wrong, you were referring to something called METHANE?
 18 A. That's one of the messages you can send, yes.
 19 Q. In fact, I don't know whether you were following our
 20 evidence yesterday, there's no particular reason why you
 21 should have been.
 22 A. I wasn't.
 23 Q. We heard from the author of METHANE, so the person who
 24 invented it.
 25 A. Okay.

12

1 Q. And we know that that stands for major incident, exact
 2 location, type of incident, hazards, access, number of
 3 casualties, emergency services. But to you, in
 4 May 2017, what did METHANE mean?
 5 A. METHANE was a message to share information with other
 6 agencies when declaring a major incident. So that could
 7 be a shared message if we all agreed that it was a major
 8 incident, for example police, ambulance and Fire Service
 9 together discuss whether this is a major incident for
 10 one or for all of us. If it was agreed it would be
 11 a major incident, then we would send a METHANE message,
 12 each of us would send a METHANE message.
 13 Q. To whom did you understand a METHANE message would be
 14 sent?
 15 A. If the Fire Service sent a METHANE message that would go
 16 to North West Fire Control. Likewise, if the ambulance
 17 sent it, it should go to their own control and with the
 18 police to their control.
 19 Q. Just two questions arising from that. First of all, who
 20 is the person who should have been within the Fire and
 21 Rescue Service sending a METHANE message in the event of
 22 a major incident?
 23 A. The incident commander.
 24 Q. And was it your understanding that if one emergency
 25 service passed a METHANE message to its control, NWFC,

13

1 in the case of the Fire and Rescue Service, that that
 2 should or should not be shared with the other emergency
 3 services?
 4 A. It should be shared.
 5 Q. Another term that may be relevant in this context, with
 6 which we are starting to become familiar, is RVP or
 7 rendezvous point. In May 2017, what did you understand
 8 an RVP to involve in the event of a major incident?
 9 That's a rather clumsy question but I hope you
 10 understand what I'm driving at.
 11 A. Yes. If an RVP is declared, which is generally by the
 12 police, it's somewhere where all the services could meet
 13 and gather information together to have a joint
 14 understanding of the risk and the plan and it should be
 15 a safe area.
 16 Q. You've referred to JESIP and what we understand is that
 17 co-location is an important part of joint working --
 18 A. It is.
 19 Q. -- because obviously it enables communication to occur.
 20 Was it your understanding that a common RVP played
 21 a significant role in that being achieved?
 22 A. At the incident?
 23 Q. At the incident, yes.
 24 A. Could you ask the question again, please?
 25 Q. Of course I can. It was not a very good question.

14

1 What we're talking about is co-location being
 2 important in a major incident so that the emergency
 3 services can discuss, as you put it, the plan, so that
 4 they can communicate between themselves and it should be
 5 in a safe area. So really what I was asking was: is the
 6 identification of a common RVP for the emergency
 7 services an important part of responding to a major
 8 incident?
 9 A. Of course it is, you need to know where to go.
 10 Q. You say of course it is. It may be that everyone can
 11 understand that you're just speaking ordinary common
 12 sense. But in the context of what happened on 22 May,
 13 did the RVP work properly?
 14 A. No.
 15 SIR JOHN SAUNDERS: It seems from the impression I've got
 16 with some evidence, it's actually the start of
 17 everything. Everything leads on from the RVP; is that
 18 fair or not?
 19 A. It depends. An incident, obviously, could start at the
 20 incident, depending on what type of incident it is. The
 21 RVP is declared, that's where you should go,
 22 particularly the incident commander, to gather that
 23 information and to have an understanding of what is
 24 required from each service.
 25 SIR JOHN SAUNDERS: So in some cases you'll go straight to

15

1 the fire or the incident but in other cases, where
 2 that's not appropriate for whatever reason, you go to
 3 an RVP for you all to meet up to decide what to do and
 4 where to go next?
 5 A. It depends on the level of the incident and the size of
 6 the incident and how you come across the incident, how
 7 you're informed. Each incident is different, but in
 8 general terms an RVP is somewhere where you should go
 9 and be able to get this information.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 MR GREANEY: We've heard this described as "situational
 12 awareness"; is that a term you're familiar with?
 13 A. Yes.
 14 Q. Putting the commanders together in a common RVP gives
 15 them this situational awareness?
 16 A. Joint situational awareness, so we all understand
 17 together the risks involved.
 18 Q. That's an important word, is it not, joint situational
 19 awareness?
 20 A. Yes, it is.
 21 Q. Because without that, how are you going to work
 22 together?
 23 A. Exactly.
 24 Q. And as we're going to come on to, that did not work on
 25 the night of the 22nd?

16

1 A. No.
 2 Q. I'm going to do what I do too often and jump ahead for
 3 a moment because that answer was an interesting one.
 4 Are you able to express in a few sentences why that did
 5 not work properly on the night of the 22nd?
 6 A. Because we didn't meet at the RVP.
 7 Q. And so there was no joint situational awareness?
 8 A. Not that I'm aware of, no.
 9 Q. Was there, so far as you knew, you were on the ground --
 10 did the Fire and Rescue Service have any situational
 11 awareness that night, certainly in the first couple of
 12 hours, or adequate situational awareness?
 13 A. I can only comment on what I observed and when I arrived
 14 at the incident, it was approaching 2 hours after the
 15 explosion. My awareness was from a conversation with
 16 North West Fire Control and what I was seeing on the
 17 news. So my situational awareness was different to
 18 what was going on on the ground. When I arrived, it was
 19 obvious that that situational awareness was different
 20 from our perspective to the ambulance and police. It
 21 wasn't clear what was going on at the arena from our
 22 point of view because we were getting different views
 23 and different information from different sources.
 24 Q. I'm not discounting the value of watching the news, I'm
 25 not discounting the value that social media might have,

17

1 although people might say any number of things on social
 2 media. But is what you're saying that a substantial
 3 part of your situational awareness, that's what it was
 4 on the night, before you arrived at the arena, was
 5 derived from the news and social media?
 6 A. From two points, from North West Fire Control, following
 7 a conversation I had with North West Fire Control, and
 8 snippets of news coming through, yes.
 9 Q. We're going to look at what you were told by
 10 North West Fire Control in due course. Would I be right
 11 to suggest that the sense I'm getting from you is that
 12 before you arrived at the arena, you didn't feel that
 13 you had anything remotely approaching proper situational
 14 awareness?
 15 A. My understanding of -- my thoughts, before I arrived, is
 16 we were in attendance and dealing with the incident.
 17 That was my understanding.
 18 Q. So you thought the Fire and Rescue Service were there?
 19 A. Yes.
 20 Q. Let's jump back to where we were in your training. In
 21 terms of what you understood in May 2017, did you
 22 understand something about what you describe in your
 23 statement as a multi-agency radio channel?
 24 A. I did, I was aware of the channel, yes.
 25 Q. Just dealing with it at a very high level, what did you

18

1 understand its purpose to be?
 2 A. At the time, it was for -- my understanding was it was
 3 for sharing information.
 4 Q. Between the Fire and Rescue Service members or between
 5 the different emergency services?
 6 A. All services.
 7 Q. Next, in May of 2017, specifically on the day of the
 8 attack, had you heard of Operation Plato?
 9 A. I'd heard the term, yes.
 10 Q. What did you understand Operation Plato to be on 22 May?
 11 A. I was aware of it and I was aware that it meant
 12 a terrorist incident had occurred, but I wasn't
 13 really ... I didn't have a great deal of depth of
 14 knowledge in that area.
 15 Q. I'm not going to suggest for a moment that's your fault,
 16 but you just said a moment ago it related to a terrorist
 17 incident. In fact, what we know, what the inquiry
 18 knows, is that it related to a particular type of
 19 terrorist incident, namely at the time a marauding
 20 firearms terrorist attack. Do you think that you had
 21 that specific knowledge as of 22 May?
 22 A. Looking back, perhaps not.
 23 Q. Had you received any training in the response by the
 24 emergency services to a marauding terrorist firearms
 25 attack?

19

1 A. Not that I can recall.
 2 Q. To be fair to you, in the witness statement that you
 3 gave, which was much nearer to the events, although not
 4 that proximate, it's dated 25 July 2019, you said that
 5 you had not received any training on marauding terrorist
 6 firearms attacks. It seems as if that's your
 7 recollection now and it was your recollection in 2019.
 8 A. Correct.
 9 Q. Did you, do you think, as you look back, know anything
 10 about the concept of hot, warm and cold zones back then?
 11 A. I had a vague understanding of it, referring to
 12 decontamination incidents, it is similar regarding hot
 13 zones, warm zones and cold zones. Basically, the
 14 hazard -- so the hot zone is more of a higher hazard
 15 than a cold zone.
 16 Q. That may be obvious, that when one applies hot, warm and
 17 cold to the idea of a hazard, obviously the hot zone is
 18 going to be an area of greater hazard than the cold
 19 zone, that's just an ordinary use of language perhaps.
 20 But it seems as if you didn't have much of an
 21 understanding beyond an ordinary linguistic one.
 22 A. Probably a bit more than that, but not the knowledge
 23 I should have had.
 24 Q. That's really what I was just driving at. Some hearing
 25 what you have to say would think that it wasn't ideal

20

1 that you as a station manager didn't have an absolutely
 2 clear idea of what hot, warm and cold zone meant in the
 3 context of a Plato attack. It is not a criticism of
 4 you, but would you agree that's somewhat less than
 5 ideal?
 6 A. For an operational officer, I should have had more of an
 7 understanding.
 8 Q. Connected with all of this, the inquiry has heard the
 9 term "NILO" and we're going to become extremely familiar
 10 with this. It stands for national inter-agency liaison
 11 officer. Were you a NILO?
 12 A. No.
 13 Q. As you understood it, did NILOs attend MTFA training?
 14 A. Yes.
 15 Q. In your view, should officers other than NILOs, by which
 16 I mean officers of GMFRS, also have received such
 17 training?
 18 A. Yes.
 19 Q. Which officers or category of officers should have
 20 received MTFA training?
 21 A. All operational officers, including firefighters.
 22 Q. Why?
 23 A. Because we could attend them incidents.
 24 Q. This may be a difficult question for you to answer, but
 25 I'll pose it nonetheless. If you had received

21

1 comprehensive training in MTFA response, do you think
 2 it would have made a difference on the night of the
 3 attack?
 4 A. From my personal involvement?
 5 Q. Yes.
 6 A. No.
 7 Q. Why not?
 8 A. Because I arrived 2 hours after the initial explosion.
 9 I would have had a clearer understanding of what the
 10 NILO role would have been, but 5 minutes after my
 11 arrival, we'd already attended the incident, so my
 12 arrival was too late to make a difference.
 13 Q. That's clear, I think. You should have received, in
 14 your view, such training but it wouldn't have made
 15 a difference to your personal response because you
 16 arrived too late to make any difference, come what may?
 17 A. Yes.
 18 Q. What training had you received in counter-terrorism
 19 prior to the arena attack?
 20 A. Training would be what you'd find -- doing online home
 21 personal training. I did attend a training course at
 22 GMP and that was based around -- it was for companies as
 23 well, it wasn't just for fire and rescue services, it
 24 was also for people who would be viewing -- like
 25 bouncers and managers of nightclubs, who might observe

22

1 things that they think, "That doesn't seem right", so
 2 identifying potential hazards, bombs.
 3 Q. We've heard about something called Operation Griffin;
 4 is that what you attended?
 5 A. I believe that was, yes, Operation Griffin.
 6 Q. So obviously it's important for any member of the public
 7 to be able to spot someone who is behaving suspiciously,
 8 but in terms of your role as a firefighter, was that
 9 training of any value to you?
 10 A. It was of some value, but it wasn't aimed specifically
 11 for a fire and rescue service.
 12 Q. Just to come to the point, really: as of 22 May 2017,
 13 was the response to a terrorist incident, such as
 14 occurred, something that was prominent in the thinking
 15 of GMFRS or not?
 16 A. Yes.
 17 Q. It was? In what way?
 18 A. We'd get alerts if the risk of a terrorist attack was
 19 increasing. We would get some safety alerts. So it was
 20 in our thoughts that there was a potential that
 21 Manchester might be attacked, have a terrorist incident,
 22 yes.
 23 Q. Were you properly trained to respond to such an
 24 incident?
 25 A. As an organisation or a personal level?

23

1 Q. Let's deal with both of those. As an organisation, did
 2 you feel that you were equipped to deal with a terrorist
 3 incident?
 4 A. As an organisation, I thought we was, yes. In fact
 5 I thought we were one of the leading services in the
 6 country at that type of incident.
 7 Q. And do you still hold that view?
 8 A. Following the incident?
 9 Q. Yes.
 10 A. No.
 11 Q. Why not?
 12 A. Because we didn't attend in appropriate time.
 13 Q. And from a personal point of view, did you feel that you
 14 were properly trained to respond to a terrorist
 15 incident?
 16 A. On a personal level I could have been -- had a greater
 17 knowledge.
 18 Q. Because as I'm sure you now know, the response to
 19 certainly an MTFA creates particular challenges, does it
 20 not?
 21 A. Of course.
 22 Q. From what you have said already, I don't think you were
 23 particularly aware, were you, of what those particular
 24 challenges were?
 25 A. Not to a great extent, no.

24

1 Q. Shall we turn to the night of the attack? Everyone,
 2 I am certain, will have a sense of your sense of
 3 disappointment about what happened that night and we'll
 4 bear that in mind in what you now have to tell us about.
 5 That night, 22 May, were you on duty?
 6 A. I was.
 7 Q. What was your role that night?
 8 A. I was undertaking cover for operational incidents and
 9 I was also undertaking the role of a command support
 10 officer .
 11 Q. Command support officer?
 12 A. Yes.
 13 Q. What did that role involve?
 14 A. That role would support an incident commander at a large
 15 incident .
 16 Q. So no doubt that was an operational role?
 17 A. Yes.
 18 Q. Had you been called out that night around 22.00 hours?
 19 A. I had, yes.
 20 Q. Obviously, that was before the arena attack, so what did
 21 that involve? Why had you been called out at that
 22 stage?
 23 A. That was an incident in Stockport, it was a mill fire .
 24 SIR JOHN SAUNDERS: Could you repeat that, a what fire?
 25 A. A mill.

25

1 SIR JOHN SAUNDERS: Thank you.
 2 MR GREANEY: So nothing to do with the arena, but
 3 nonetheless it related in you being away from your home,
 4 on duty and mobile?
 5 A. Correct.
 6 Q. I'm going to play in a moment the call from NWFC that
 7 gave you your first notice that something had happened
 8 at the arena, so can I warn all of those in the hearing
 9 room and all of those viewing that we are going to be
 10 listening to that call .
 11 But first we're going to listen to a call made by
 12 NWFC to Mr Nankivell, who you've mentioned already.
 13 He was the group manager, is that correct, on your rota?
 14 A. Yes, and he was the duty group manager that night.
 15 Q. So was he effectively , so far as being on call that
 16 night was concerned, your line manager?
 17 A. Not necessarily, no.
 18 Q. You tell me what the relationship was.
 19 A. Being the duty manager, he was the person you would
 20 contact if you had any queries or concerns during your
 21 operational duties .
 22 Q. I have no idea whether you've ever heard this before,
 23 but it does provide the context for your evidence. I'm
 24 going to play to you the call that he received from
 25 NWFC. I don't have the exact time. It's about

26

1 22.40 hours. Someone will give me the correct time in
 2 a moment, I'm sure.
 3 The recording is at {INQ004364/1}. Mr Lopez,
 4 I think you're ready to play this .
 5 SIR JOHN SAUNDERS: Have you heard it?
 6 MR GREANEY: I have heard it, sir, and indeed we heard it
 7 when Mr de la Poer went through the audio ---
 8 SIR JOHN SAUNDERS: Okay.
 9 MR GREANEY: --- on the 18th and 19th.
 10 SIR JOHN SAUNDERS: Can you say off the top of your head,
 11 how easy it is to follow from the audio?
 12 MR GREANEY: It's reasonably clear from the audio.
 13 SIR JOHN SAUNDERS: I know there's a transcript and if
 14 necessary we can no doubt put a transcript on the screen
 15 if it is difficult to follow .
 16 MR GREANEY: I've thought about that. I think it's
 17 difficult to put the transcript on the screen at the
 18 same time. We can certainly give you an INQ reference.
 19 SIR JOHN SAUNDERS: We can do that later if there are
 20 questions asked about it.
 21 MR GREANEY: I think Mr Smith on behalf of NWFC may have
 22 some questions about it. The timing of this call is
 23 22.52 hours. If you bear with me, sir, I'll see if
 24 I can find the reference for the transcript. I don't
 25 have it immediately to hand. We'll just play the

27

1 recording and if there's a problem, we'll find the
 2 transcript reference in due course. It's {INQ001224/1}.
 3 So we'll play the recording now, please.
 4 (Audio played to the inquiry)
 5 SIR JOHN SAUNDERS: I'm aware that a number of you found
 6 that very difficult to listen to. Are you all right?
 7 Do you want a break or are you all right carrying on?
 8 MR GREANEY: I did, as is my practice, speak to the families
 9 and say that I recognised this evidence was not going to
 10 be straightforward. If they have been caused distress,
 11 of course I am sorry. There are going to be more
 12 recordings played, but I will make sure that I telegraph
 13 each occasion on which that is going to occur.
 14 I don't know if you have ever heard that before?
 15 A. It's the first time I have heard that.
 16 Q. As I said, that was 22.52 hours. What I'm going to
 17 suggest to you is apparent from that recording is
 18 obviously it was apparent that it was known by that time
 19 that there had been an explosion and there were multiple
 20 casualties , was it not? There was talk of
 21 60 casualties . As I listen to it, and I can always be
 22 wrong, it was apparent from that messaging that the
 23 paramedics were present at the scene because there's
 24 a reference to paramedic Bronze being at the scene.
 25 A. Yes.

28

1 Q. And it was obvious as well that the police were also
 2 at the scene. So of the three blue light services, by
 3 22.52, two of them are present. You, as we are going to
 4 hear, spoke to Mr Nankivell later on that night. Did he
 5 ever communicate to you that of the three emergency
 6 services, two of them were already at the scene?
 7 A. I can't recall whether -- we discussed a lot of things.
 8 I can't recall whether he actually said the ambulance
 9 and police are at the scene.
 10 Q. That's a very fair answer. I think in fact, to be fair,
 11 at a point in due course you were to learn, were you
 12 not, that other emergency services were at the scene?
 13 A. Yes.
 14 Q. But what we can agree about is that anyone listening to
 15 the information provided by NWFC -- and it was a person
 16 called Joanne Haslam, I think, who was making the
 17 call -- she was making it clear that the other emergency
 18 services were there on the ground at the arena.
 19 A. It sounded that way.
 20 Q. Am I right, that's one of the things that gives you an
 21 enduring frustration, that you didn't get there for
 22 a number of hours?
 23 A. Yes.
 24 Q. I'm next going to play the call you received, I think
 25 from the same person, Joanne Haslam. The timing of this

29

1 call, I believe, is 23.34. Does that seem about right
 2 to you?
 3 A. Yes.
 4 Q. So the first you knew anything about this was 1 hour and
 5 3 minutes after the explosion, and we must bear that in
 6 mind.
 7 Mr Lopez, the reference is {INQ034357/1}. The
 8 transcript is the same INQ, but with a T {INQ034357T/1}.
 9 (Audio played to the inquiry)
 10 That's the end of the call that was made to you at
 11 23.34 hours.
 12 SIR JOHN SAUNDERS: It might be helpful if you were able,
 13 just briefly, to summarise the effect of that.
 14 MR GREANEY: Yes, sir, of course.
 15 SIR JOHN SAUNDERS: Obviously if it's contentious then no,
 16 but just the nature of the call.
 17 MR GREANEY: This was 1 hour and 3 minutes after the bomb
 18 had exploded. You were told that there had been an
 19 explosion at the arena?
 20 A. Yes.
 21 Q. It's apparent that you knew not a thing about it until
 22 you had received that call; is that correct?
 23 A. Yes.
 24 Q. You were told that a lot of pumps and officers had
 25 rendezvoused at Philips Park?

30

1 A. Yes.
 2 Q. Which is about 3.5 miles from the arena, as we
 3 understand it?
 4 A. Yes.
 5 Q. You were told that the crew manager at Hollins
 6 Fire Station had gone to the arena --
 7 A. Yes.
 8 Q. -- because of concern for relatives of his own. I'm not
 9 going to ask you to name that person. And you were told
 10 that the duty group manager, Mr Nankivell, had been
 11 contacted but was busy; is that correct?
 12 A. Yes.
 13 Q. You were told that a call had been received from the
 14 police and the ambulance?
 15 A. Yes.
 16 Q. You were told that there had been reports of
 17 a "shooter"?
 18 A. Yes.
 19 Q. And I might have mentioned this already, you were told
 20 that the duty group manager had been contacted but
 21 he was busy.
 22 A. Correct.
 23 SIR JOHN SAUNDERS: The purpose of the call was to get you
 24 to ring Hollins Station?
 25 MR GREANEY: Exactly.

31

1 A. Exactly that, yes, to sort out the crewing of that
 2 appliance. That appliance was off the run at that time
 3 because --
 4 SIR JOHN SAUNDERS: What does off the run mean, sorry?
 5 A. It means it wasn't available for fire calls.
 6 MR GREANEY: Really that's exactly what I wanted to
 7 understand arising out of this call. But first of all,
 8 why did you understand that you were being contacted?
 9 What were you being asked to achieve?
 10 A. Because the duty group manager, Dean Nankivell, wasn't
 11 available because there was a big job, as the control
 12 operator said, in Manchester. They were having
 13 difficulty getting in touch with him, which I would
 14 expect. If there was a big job going on, he'd be busy
 15 on the phone, so that was no surprise. It's of some
 16 urgency to get the appliance back on the run because
 17 it's not available for fire calls and they needed
 18 somebody to arrange that.
 19 Q. Arrange that for what purpose?
 20 A. To get the appliance back on the run, to get
 21 a firefighter over from Hollins to another station.
 22 Q. This is no responsibility of yours, but you were duty
 23 command support officer that night. Is it something
 24 that should surprise the inquiry that it was not until
 25 more than an hour after the explosion that you were even

32

1 informed that it had occurred?
 2 A. I was surprised that I didn't hear about it. I would
 3 have expected to be mobilised to the incident shortly
 4 after the explosion.
 5 SIR JOHN SAUNDERS: Because you were at an incident, weren't
 6 you?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: The incident you were on, when did that
 9 finish as far as you were concerned, roughly?
 10 A. Sorry, sir.
 11 MR GREANEY: Let me help, to help you and the witness.
 12 We know from your statement that having been called
 13 out at 22.00 hours -- I'm at page 3 -- you booked
 14 yourself as mobile and available having finished
 15 attendance at that incident at 22.45 hours.
 16 A. Okay.
 17 Q. And no doubt you would have said that from records that
 18 were available to you?
 19 A. Yes, correct.
 20 Q. And you were in Stockport where the mill fire had been
 21 at that time; is that correct?
 22 A. Yes.
 23 Q. Did you then travel to Bury in order to -- where did you
 24 go to in Bury?
 25 A. I was heading back home.

33

1 Q. And it was at that stage that you received the call
 2 we've just heard from North West Fire Control?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Just so I can understand the problem,
 5 this particular fire appliance was off the road because
 6 the crew manager had left to go elsewhere? Perfectly
 7 understandably, but is that why it was off the road?
 8 A. The term we use is off the run, sir. It's Fire Service
 9 jargon. It basically means the appliance is not
 10 available for fire cover.
 11 SIR JOHN SAUNDERS: And it was not available because?
 12 A. Because the crew manager had heard about the incident.
 13 SIR JOHN SAUNDERS: And had gone to --
 14 A. Was obviously concerned about his wife and made his way
 15 to the arena, which meant there was no officer for that
 16 appliance.
 17 SIR JOHN SAUNDERS: So you were trying to sort out getting
 18 it back on the run?
 19 A. Absolutely, sir, correct.
 20 MR GREANEY: And I have no doubt that you were able to
 21 understand, and many people will be able to understand,
 22 why that person behaved in that way given his concern
 23 for his own family.
 24 Can we just establish one other fact in relation to
 25 that call: it does not appear in that call that anything

34

1 was said to you that indicated that GMFRS resources were
 2 at the arena at that point.
 3 A. My understanding is when they said, "We've got a big job
 4 at" -- I'm not sure if he said arena or in Manchester,
 5 that --
 6 Q. "We've got a job at the MEN Arena and it's an explosion
 7 and we've got a lot of pumps and a lot of officers at
 8 Philips Park Fire Station rendezvousing there", is what
 9 you were told.
 10 A. Yes. How I interpreted that was that we were in
 11 attendance. Perhaps I missed the Philips Park element
 12 of it when I was listening because obviously your mind
 13 is racing, thinking I've got a job in Manchester,
 14 I heard "lots of officers and appliances", I probably
 15 missed the Philips Park. But in my mind, we was in
 16 attendance.
 17 Q. It's really -- obviously we can listen and read what was
 18 said in that call. What may be even more important is
 19 what you thought was happening.
 20 A. Yes.
 21 Q. And you are clear, I think, now, and you were clear in
 22 your statement, that your understanding from even that
 23 first call was that GMFRS were in attendance at the
 24 scene of the explosion?
 25 A. Yes.

35

1 Q. Do you think in part that belief that you formed was the
 2 result not only of how you heard what you were told by
 3 Joanne Haslam but also was in part a reaction to the
 4 fact that you would have expected GMFRS to have been in
 5 attendance promptly at such an event?
 6 A. Absolutely.
 7 Q. As duty command support officer, did you have access to
 8 something called the Ridership Situation Report?
 9 A. I did.
 10 Q. What is the Ridership Situation Report?
 11 A. Basically it gives an account of each station, who's
 12 available, what extra firefighters may be at a certain
 13 station, and what officers were on duty and what role
 14 they were undertaking.
 15 Q. Did you, having established those facts, contact Hollins
 16 Fire Station and speak to a firefighter who was able to
 17 act as crew manager?
 18 A. I did.
 19 Q. Did you also ask that firefighter to contact Agecroft
 20 Fire Station, where there was an extra firefighter?
 21 A. Yes, I think if I recall, I said maybe Moss Side has an
 22 extra firefighter, too.
 23 Q. So were you effectively trying to ensure that there were
 24 sufficient staff at Hollins Fire Station to crew an
 25 appliance?

36

1 A. Yes.
 2 Q. What was the significance of Hollins Fire Station in
 3 this situation?
 4 A. In the incident?
 5 Q. Yes.
 6 A. It was an appliance off the run for any incident. I was
 7 trying to get back on the run for any incident, not just
 8 for the Manchester Arena incident.
 9 Q. So you were just trying to ensure that every appliance
 10 that should be capable of operation was capable of
 11 operation with sufficient staff?
 12 A. Correct.
 13 Q. Let me say, just to confirm what you've said to us
 14 earlier, that in your statement at page 4, you said:
 15 "I was under the impression due to the operator's
 16 comments that we had made an attendance at the incident
 17 and that I would be mobilised shortly."
 18 A. I was — yes, I was thinking large incident, I should be
 19 attending that.
 20 Q. So you expected, when you say "mobilised shortly", you
 21 expected to be instructed within a short period of time
 22 to get yourself to the arena?
 23 A. Because it was quite a long time after the explosion,
 24 I thought I'd actually missed the incident, that other
 25 people would have been mobilised and I was not

1 mobilised.
 2 Q. So were you expecting that you were going to be told to
 3 go to the incident or were you uncertain about that
 4 fact?
 5 A. I probably made the assumption because it was quite
 6 a long time after the initial explosion that I would not
 7 be attending.
 8 Q. And in part was that because you were under the
 9 apprehension, misapprehension, as it has turned out,
 10 that there were already sufficient GMFRS resources
 11 at the scene?
 12 A. Correct.
 13 Q. Having been called by NWFC at 23.34 hours, did you then
 14 contact the duty group manager, Dean Nankivell?
 15 A. Yes.
 16 Q. I know, and so I can tell you, that telephone records
 17 reveal that that call was made at 23.41 hours.
 18 A. Okay.
 19 Q. We can look at the records if necessary, I dare say
 20 that's not required, and there was a call lasting for
 21 1 minute and 18 seconds.
 22 A. Okay.
 23 MR GREANEY: I hope we'll be in a position to play that
 24 call, but, sir, just so I can make sure that is readied,
 25 and bearing in mind the time, could we have a short

1 break at this stage, please?
 2 SIR JOHN SAUNDERS: Okay, quarter of an hour. We'll break
 3 until 10.50.
 4 (10.36 am)
 5 (A short break)
 6 (10.50 am)
 7 MR GREANEY: Mr Topping, where we were was at 23.41, so
 8 7 minutes after you received your first call from NWFC
 9 and you made contact with Duty Group Manager
 10 Dean Nankivell. Was that a call that you made by mobile
 11 telephone?
 12 A. It was.
 13 Q. So obviously we don't have a recording of that, but
 14 can you tell us what it was that you spoke to him about,
 15 please?
 16 A. First of all, I was informing Dean Nankivell that I'd
 17 received a call regarding Hollins and that he would have
 18 a call from North West Fire Control on his voicemail but
 19 to ignore it, I'd sorted it out regarding the pump at
 20 Hollins. I was asking him whether he was going to the
 21 command support room, he said he was, and I asked Dean
 22 if he needed my help at the command support room,
 23 because I was under the impression I wasn't going to be
 24 mobilised to the incident and obviously a large incident
 25 such as this, it would be very busy in the command

1 support room, so I was offering my help.
 2 Q. Where did you understand the command support room was?
 3 A. It was at Fire Service Headquarters.
 4 Q. By this stage had you seen reports on social media that
 5 something really terribly serious had happened at the
 6 arena?
 7 A. There were newsflashes, yes.
 8 Q. And the way in which you put it in your statement is
 9 this, at page 4:
 10 "I was concerned that I should not self-deploy to
 11 FSHQ [so Fire Service HQ] in case I was needed at the
 12 incident."
 13 Is that correct?
 14 A. Correct.
 15 Q. Where were you at the stage at which you made that call
 16 at 23.41?
 17 A. I was in my car.
 18 Q. In your statement you say that you subsequently, once
 19 again, contacted Mr Nankivell, who was now at the CSR
 20 and that you again asked if he needed you to come to CSR
 21 to assist.
 22 A. Correct. We'd agreed that — we'd make that decision
 23 when he arrived at command support room. When I rang
 24 him again, he was at the command support room and
 25 I offered my assistance at the command support room and

1 he had a discussion with the people who was present.
 2 Q. I'm going to ask you about that in a moment, but first
 3 we'll just fix this in time. The call records indicate
 4 that you made two subsequent calls to Mr Nankivell, one
 5 at 00.03 hours, for 38 seconds, and one at 00.04 hours
 6 for 1 minute and 32 seconds, so it may be that you were
 7 cut off for a period of time --
 8 A. That's right.
 9 Q. -- but at all events we know that there was contact.
 10 In your statement, you observe that:
 11 "[You were] under the impression in that call or
 12 those calls that we [so GMFRS] would have made
 13 a significant response and if I was being mobilised
 14 I would have been by now."
 15 A. Correct.
 16 Q. What do you mean by that?
 17 A. By a significant response, I would mean that an
 18 explosion in the arena with lots of casualties would
 19 have been a major incident and I expected something like
 20 10 or 12 pumps with specialist teams would have attended
 21 the incident with a lot of officers as well, forming the
 22 incident command element.
 23 Q. So in your mind at that stage, you were thinking that at
 24 the scene, at the arena, there would have been a very
 25 significant attendance by officers of Greater Manchester

1 Fire and Rescue Service?
 2 A. Yes.
 3 Q. Including, I think you said, specialist resources;
 4 is that what you said?
 5 A. Yes.
 6 Q. We're going to hear from you and from others about
 7 something called SRT; is that what you mean by
 8 specialist resources?
 9 A. One of them, yes.
 10 Q. I just missed what you said.
 11 A. That would be one of the specialist resources, but like
 12 the TRU, where you were in the conversation before with
 13 North West Fire Control, Dean asked for the TRU,
 14 specialist teams who were trained in rescues.
 15 Q. TRU standing for?
 16 A. Technical Rescue Unit.
 17 Q. And SRT standing for?
 18 A. Special Response Team.
 19 Q. I don't think I'm going into anything operationally
 20 sensitive by indicating that SRT firefighters are
 21 equipped with ballistic personal protective equipment --
 22 A. I believe so.
 23 Q. -- and specialist equipment to treat and move
 24 casualties?
 25 A. Correct.

1 Q. And amongst resources that you expected to be at the
 2 scene were such firefighters?
 3 A. Yes.
 4 Q. That was your expectation. You were just moving on to
 5 tell us about a conversation that you heard, overheard,
 6 whilst you were in discussion with Mr Nankivell. Would
 7 you tell us about that, please. This is 00.03/00.04.
 8 A. Yes. I asked Dean whether he wanted me at the command
 9 support room to help. I heard him ask other people
 10 whether they wanted me to come to the command support
 11 room. There was a discussion and it was agreed that
 12 I would go to the Thompson Street rendezvous point, so
 13 I would be on the incident log.
 14 Q. So effectively, you were instructed to go to the
 15 Thompson Street Station?
 16 A. Yes.
 17 Q. Which is Manchester Central Fire Station?
 18 A. Yes.
 19 Q. I'm next going to play a recording of a call that
 20 Mr Nankivell made at 00.06 hours to North West Fire
 21 Control. So you weren't party to this, but it forms
 22 part of the narrative, and I'm going to ask you if
 23 Mr Nankivell is accurately recounting the position at
 24 that stage as, I think from what you have said, he was
 25 doing.

1 Sir, can I say that Mr Tarn, who is the solicitor
 2 for GMFRS, has identified that certainly one recording
 3 that was played this morning was not on the evidence
 4 proposal. He is entirely right to raise that as
 5 an issue. I don't think that this recording is on the
 6 evidence proposal either. It's entirely my
 7 responsibility. But just to ease any concern that
 8 Mr Tarn has, which, as I have said, I would understand,
 9 I can let him know that I have said to Mr Topping that
 10 this recording is going to be played and he has no
 11 concern about it being played.
 12 Mr Lopez, over to you. I'm going to give you two
 13 INQs and see if we can do something that we haven't done
 14 before. The INQ reference for the recording, and don't
 15 start it until I indicate, please, is {INQ004430/1}.
 16 I don't know, Mr Lopez, is it possible to have the
 17 transcript on the screen at the same time? If it is,
 18 the reference is {INQ001197/1}.
 19 We'll just fix these timings in mind. 11.34, you
 20 get your call from NWFC. 11.41, you speak to
 21 Mr Nankivell. You speak to him again at 00.03 and
 22 00.04, and we're just going to hear a call that
 23 Mr Nankivell makes very shortly afterwards at 00.06.
 24 Mr Lopez, is what I've asked possible?
 25 (Audio played to the inquiry)

1 So that very much accords, does it not, with the
 2 outcome of the discussion or discussions you had had
 3 with Mr Nankivell?
 4 A. Yes.
 5 Q. Because Manchester Central is Thompson Street?
 6 A. Yes.
 7 Q. Why did you understand you were being deployed to
 8 Thompson Street Fire Station?
 9 A. My understanding is that Thompson Street --
 10 SIR JOHN SAUNDERS: Your understanding at the time. I just
 11 didn't want to confuse it with what may be your
 12 understanding now if that's different .
 13 A. Correct.
 14 SIR JOHN SAUNDERS: We're interested in your understanding
 15 at the time. That may have been clear, but it was the
 16 way you were beginning to answer, it might not be.
 17 A. My understanding at the time is that we'd made an
 18 attendance at the incident and Thompson Street was being
 19 used as a holding area, a rendezvous point type place,
 20 where appliance resources would go to, and then they'd
 21 be deployed to the incident. So I was expecting to help
 22 whatever way I could. I wasn't going as a specific role
 23 within the incident command structure, I was going there
 24 to help and to form some liaison between Manchester
 25 Central and the command support room.

1 MR GREANEY: Did you think that Thompson Street was some
 2 form of, my phrase, staging post?
 3 A. Yes.
 4 Q. Having spoken to Mr Nankivell, did you book yourself
 5 showing as mobile but assigned to an incident?
 6 A. Yes. We'd agreed that we'd need to be assigned to the
 7 incident, so I'm not used for anything else.
 8 Q. Did you arrive at Thompson Street at about 25 past
 9 midnight?
 10 A. Around about that time, yes.
 11 Q. I think you're able to have a degree of confidence about
 12 that time because you received a speeding ticket showing
 13 you nearby at 00.20.
 14 A. That's correct.
 15 Q. Did you have a pager with you, as was referred to,
 16 I think, in the call made by Mr Nankivell?
 17 A. Yes.
 18 Q. Did you at that stage, or thereabouts, look at your
 19 pager for a particular purpose?
 20 A. When I arrived to the station, yes, I looked at my
 21 pager.
 22 Q. And what did it show?
 23 A. I looked at the pager to make sure if I'd been nominated
 24 as a role. If you're nominated as a role, say a command
 25 support officer, it would say that. I wasn't nominated

1 a role, which wasn't surprising, I was just a station
 2 manager attending the incident.
 3 Q. When you looked at your pager, I think it showed SM,
 4 station manager, only?
 5 A. Yes.
 6 Q. Not NILO or command support officer?
 7 A. Correct.
 8 Q. But you were, as you've said, unsurprised by that
 9 because you fully expected a command structure already
 10 to be in place?
 11 A. Yes.
 12 Q. And you thought you were just going to help wherever was
 13 needed?
 14 A. Yes.
 15 Q. Did you park up nearby and then walk to the front of
 16 Thompson Street Fire Station?
 17 A. Yes, I did.
 18 Q. What did you see and what was your reaction to it?
 19 A. What I saw -- initially, I was expecting road closures
 20 as I was approaching to Manchester Central. I was
 21 surprised there were no road closures. Generally at
 22 major incidents like this roads are closed with police
 23 officers. That wasn't there. The road was still open,
 24 which I was surprised by. And I was concerned at first
 25 I wouldn't be able to park anywhere because I thought

1 it'd be that busy and when I arrived at the car park,
 2 I was the only car in the car park, which I was
 3 surprised by.
 4 When I approached the forecourt, I saw five fire
 5 engines with a lot of firefighters hanging around, some
 6 lying down. It just didn't feel right. It didn't feel
 7 like a normal incident to me.
 8 Q. Did you see Station Manager Berry, Group Manager Meakin
 9 and Group Manager Levy?
 10 A. Yes, I did, they were wearing the distinctive maroon
 11 overalls, which is the first time I'd seen the overalls
 12 at a real incident. They were discussing round a car,
 13 I recall.
 14 Q. And I think that they were not wearing the usual NILO
 15 tabard but you knew they were all NILOs and would be
 16 performing that role?
 17 A. Yes, I assumed they would be performing that role, yes.
 18 Q. In your statement, you observe that you were shocked
 19 when you saw only five pumps, a number of SRT personnel
 20 and the persons I have just named. Is that correct,
 21 were you shocked?
 22 A. I was shocked because I would have expected them
 23 appliances and personnel to be at the scene, not at
 24 Thompson Street.
 25 Q. How did things develop from that point?

1 A. What were my observations?
 2 Q. Yes.
 3 A. I was approached by Group Manager Levy, who was a NILO,
 4 and he asked me why I was there, basically, which
 5 I thought was rather a strange question. I said I'm
 6 here to help. It just didn't --- and I've said it --- it
 7 just didn't feel right. The demeanour of people, it
 8 felt like something wasn't quite right, something wasn't
 9 happening as I expected it to.
 10 Q. Do you mean by that, when you say things weren't
 11 happening as you expected them to, that there seemed to
 12 you to be a lack of urgency within the Fire and Rescue
 13 Service personnel who were present?
 14 A. They seemed to be --- well, there was a lot of anger,
 15 upset. There was confusion as to what was going on
 16 between the firefighters, because obviously there was
 17 some in groups, some on their own sat. It just felt
 18 odd.
 19 Q. Let me put to you what you said in that first witness
 20 statement, indeed your only witness statement, and ask
 21 you first whether it's correct and secondly to explain
 22 it.
 23 You said, and I'm at the top paragraph on page 5:
 24 "The atmosphere did not feel right."
 25 And really that's what you've been saying to us, is

1 it not?
 2 A. Yes.
 3 Q. You then added:
 4 "There seemed to be a lack of urgency within the
 5 GMFRS personnel. It didn't feel like they were
 6 responding to a 'real incident'."
 7 A. Correct.
 8 Q. So was your feeling at the time, your impression, that
 9 there was a lack of urgency within the Fire and Rescue
 10 Service personnel who were present?
 11 A. It wasn't a lack of urgency, I think because they'd been
 12 there --- subsequently, I found out --- for so long,
 13 waiting, they were impatient. They wanted to --- there
 14 wasn't a lack of urgency regarding --- they wanted to go.
 15 They were frustrated. There was, I think, a lot of
 16 anger and frustration, which people show in different
 17 manners, either with anger or just waiting.
 18 Q. It's very important that we capture your impression of
 19 the time. I think what you're saying to us is that the
 20 term "lack of urgency" may not properly capture what you
 21 were experiencing. What you were experiencing on the
 22 part of people who were there at the scene was anger?
 23 A. Yes.
 24 Q. Frustration?
 25 A. Yes.

1 Q. And a word you used earlier, confusion?
 2 A. Yes, there was confusion why they weren't attending the
 3 incident.
 4 Q. Those feelings you were detecting, were they feelings on
 5 behalf of all of the GMFRS personnel who were present,
 6 the firefighters, or the more senior officers such as
 7 Mr Levy, Mr Meakin and Mr Berry?
 8 A. There was a lot of emotions being shown by all those
 9 present, either in frustration, anger, so people were
 10 showing it differently. But there was definitely
 11 frustration for why we weren't attending that incident.
 12 Q. So those feelings were directed at the fact that they
 13 were at Thompson Street, about, I think, a mile away
 14 from the arena, in circumstances in which they knew that
 15 there had been an explosion and there were multiple
 16 casualties?
 17 A. Correct.
 18 Q. And the frustration was they were there, not at the
 19 scene?
 20 A. Correct.
 21 Q. Did you share that frustration?
 22 A. First of all, I was shocked that we weren't in
 23 attendance, and I was confused myself, why we weren't in
 24 attendance. Later, I was really frustrated, yes.
 25 Q. There is a report from a firefighter called Kyle Gray.

1 Is he someone that you're aware of?
 2 A. No, I can't recall him.
 3 Q. The name doesn't ring a bell?
 4 A. No.
 5 Q. We can look at this if needs be, the INQ reference is
 6 {INQ019416/1}. He describes being present at the scene
 7 that you are talking about. He's a firefighter and he
 8 says:
 9 "We asked on a number of occasions for an update and
 10 this was ignored. Station Manager Topping came over to
 11 speak to us, but he knew as little as we did regarding
 12 the incident."
 13 Does that seem like a fair thing to say?
 14 A. It is a fair thing to say. Because there was a lot of
 15 confusion, I was trying to find out myself what was
 16 going on so I could convey that information to the
 17 firefighters and officers. I had as little
 18 understanding of what was going on as much as the
 19 firefighters and officers there.
 20 Q. Did you see, can you recall, paramedics at
 21 Thompson Street?
 22 A. There was a lot of paramedics and ambulances at
 23 Thompson Street, yes.
 24 Q. And unlike the fire engines, were they coming and going?
 25 A. They was.

1 Q. Kyle Gray, to whom I've just referred, gives an account
 2 of a distressed female paramedic approaching him and
 3 other firefighters . I will quote from him and see if
 4 you have a recollection of this. I think you've seen
 5 this document. He recalled:
 6 "The paramedic came over crying, pleading with us to
 7 go and help. Her exact words were, 'What are you just
 8 doing stood around here? There are people dying. We
 9 need your help. I've just taken a 18 year-old girl in
 10 the back of my ambulance who died en route to hospital
 11 and you lot are just stood around.'"
 12 And he added:
 13 "When the lady told me this, I took her with me to
 14 Station Manager Topping, where she could speak to him
 15 and tell him what she told me."
 16 Do you recall that conversation or anything similar?
 17 A. I had a number of conversations with ambulance
 18 personnel, but this was later during the incident, a lot
 19 later. We had responded probably 5 to 10 minutes after
 20 my arrival, so we'd already made an attendance. It was
 21 mainly a discussion regarding the frustration why we'd
 22 not attended earlier. I don't recall that specific
 23 conversation, but I do remember having conversations
 24 with paramedics and ambulance staff, yes.
 25 Q. I dare say no one should criticise you for not recalling

1 a particular conversation. I think what you're saying
 2 is when you arrived at the scene, you do remember having
 3 discussions with members of other emergency services
 4 during the course of which they were saying, "Why didn't
 5 you get here earlier?"
 6 A. Not in those words, but there were conversations later
 7 during the hot debrief of why we weren't attending. But
 8 as I just said after 5 minutes, 5 to 10 minutes after my
 9 arrival, we'd made a response. So there's nothing else,
 10 we said, "We're there now". So that conversation I was
 11 having is what I could call -- is that we'd made an
 12 attendance.
 13 Q. We're going to come on to that and I do entirely
 14 understand what you're saying. But is the effect of
 15 this that at Thompson Street you realised that what you
 16 had understood was happening just wasn't happening?
 17 A. Correct.
 18 Q. You sensed on the part of the firefighters who were
 19 there a deep sense of frustration, indeed anger, at that
 20 state of affairs?
 21 A. Yes.
 22 Q. And in due course you were to understand that members of
 23 other emergency services were also frustrated that there
 24 had been a delay in the attendance of the Fire and
 25 Rescue Service?

1 A. Yes.
 2 Q. I just want to come back to one thing you did mention
 3 that I want to develop slightly. You told us that Group
 4 Manager Levy came over to you to ask what you were doing
 5 at Thompson Street and you thought it was a strange
 6 thing to ask.
 7 A. Yes. I think I felt like he didn't expect me to be
 8 there, and I thought, why would I not be here to offer
 9 my help. I just felt strange, I think it was a strange
 10 thing to ask. Probably, again in hindsight, reporting
 11 what my feelings were at the time, he was probably just
 12 asking what role I was undertaking.
 13 Q. You said you told him you were there to help?
 14 A. Yes, because I didn't go in a specific incident command
 15 role. It was mainly to offer my help where I could and
 16 to report back and liaise with the command support room.
 17 Q. In your witness statement you say:
 18 "At that stage Group Manager Levy turned his back on
 19 me and the three NILOs returned to their deep
 20 conversation."
 21 A. Yes.
 22 Q. You added that the response of Group Manager Levy made
 23 you feel as though he and the other NILOs felt that
 24 you were intruding on their incident.
 25 A. It did feel -- it did give me a strange feeling that

1 I wasn't... Not welcome, that's the wrong word, but
 2 I wasn't... There was a brief conversation with myself
 3 obviously regarding the incident and I felt like they
 4 weren't... They were fully involved with that and that
 5 I'd be probably better off doing something else.
 6 SIR JOHN SAUNDERS: It's possible, isn't it, that that
 7 reaction from you, perfectly understandable, was the
 8 result of your frustration and they were having
 9 a conversation about what they had to do next and they
 10 were just getting on it?
 11 A. That's a fair assumption, yes. I was confused, I wanted
 12 some answers, but because they were busy and they wanted
 13 to get, you know -- they wanted information, they were
 14 frustrated as well.
 15 SIR JOHN SAUNDERS: We can all understand how you felt.
 16 It's just maybe it's an interpretation which -- there
 17 may be another interpretation for it.
 18 A. Absolutely.
 19 MR GREANEY: Whatever the reason, and the chairman's point
 20 is certainly fairly made, was the upshot that
 21 information about what was going on or not going on was
 22 not shared with you?
 23 A. Not fully, no.
 24 SIR JOHN SAUNDERS: And the reason why it should be shared
 25 with you would be so you could report back or just so

1 you knew what was happening?
 2 A. To be honest, sir, it'd be because -- I can see they
 3 were in deep conversation and I didn't really want to --
 4 if I was incident commander, I would expect to be shared
 5 that information. I wasn't the incident commander,
 6 I was there to offer help, so I merely thought, well,
 7 let them have a conversation, I'll go and sign out the
 8 others, which was the ambulance.
 9 SIR JOHN SAUNDERS: Okay, thank you.
 10 MR GREANEY: Let me just remind you of the way in which you
 11 express things in your witness statement, although
 12 you've covered some of this, and then we'll move on.
 13 You said:
 14 "I saw ambulances continually being mobilised in the
 15 direction of the incident."
 16 Is that correct?
 17 A. Correct.
 18 Q. "I liaised with the NWS officer to ease congestion
 19 at the entrance to the rear yard of the station."
 20 A. Correct.
 21 Q. "The police also had a large presence and were
 22 responding to the incident."
 23 A. Correct.
 24 Q. "There seemed to be a good relationship between myself,
 25 the police and NWS..."

57

1 A. Seemed to be, yes.
 2 Q. "... and we were working well together."
 3 A. Seemed to be.
 4 Q. And you're talking about the situation at
 5 Thompson Street?
 6 A. Correct.
 7 Q. "It was apparent [as you have told us] that firefighters
 8 and SRT personnel were expressing concern that they were
 9 not being mobilised and asking me why."
 10 A. Correct.
 11 Q. "I asked the NILO officers why the SRT were not
 12 mobilised and was told that they were not being
 13 allowed."
 14 A. That's correct.
 15 Q. Let's move these events forward. As you've told us,
 16 about 5 or 10 minutes after you arrived at
 17 Thompson Street, were resources mobilised to the
 18 incident with Station Manager Berry?
 19 A. The call was for three pumps and Station Manager Berry
 20 to mobilise, yes.
 21 Q. Did you make a call yourself, another call, to Group
 22 Manager Nankivell at about this time?
 23 A. I made a number of calls. Whether it was at that time,
 24 I don't recall, but I made a number of calls during the
 25 evening to Group Manager Dean Nankivell, yes.

58

1 Q. Did you make a call once you had realised at
 2 Thompson Street that resources were not being deployed
 3 or being deployed in numbers?
 4 A. Yes, I did ask him why they weren't being deployed.
 5 Q. And did you inform him of the frustration on behalf of
 6 the firefighters about that?
 7 A. Yes, I did.
 8 Q. What did he say or how did he react to that?
 9 A. I can't recall the exact conversation, but the feeling
 10 I got was that they were not being allowed to attend.
 11 I also felt frustration with Dean as well in his voice,
 12 that he couldn't really talk openly.
 13 Q. The way in which you put it in 2019 was this:
 14 "It was obvious from his [Mr Nankivell's] tone that
 15 he couldn't talk openly."
 16 Do you recall that?
 17 A. Yes.
 18 Q. "But it was apparent that a decision had been made at
 19 command support not to attend."
 20 A. It seemed to me that decision had been made at the
 21 command support room, yes, not to attend.
 22 SIR JOHN SAUNDERS: So this is in the 5 to 10 minutes before
 23 anyone attended or is it after that?
 24 A. This is after, sir.
 25 SIR JOHN SAUNDERS: Okay, thank you.

59

1 MR GREANEY: Did you yourself attend the scene?
 2 A. No.
 3 Q. The witness statement that we've referred to was not the
 4 only account that you gave, was it? You also gave an
 5 account in a debrief form.
 6 A. Yes.
 7 Q. I'm going to ask that we see just two parts of that on
 8 the screen. {INQ004245/1}. We'll start, please, at
 9 {INQ004245/3}.
 10 Was this a form that you were asked to complete
 11 shortly after the arena attack?
 12 A. It was.
 13 Q. Did you complete it frankly and fully?
 14 A. I believe so.
 15 Q. I'm not suggesting you didn't. I just wanted that
 16 confirmation.
 17 From your own role perspective, what aspects of
 18 Operation Newtown did not go as well? Operation Newtown
 19 being the response to the arena attack:
 20 "No command structure mobilised for five pumps."
 21 A. Correct.
 22 Q. What did you mean by that?
 23 A. I would have expected the mobilisation of five pumps and
 24 there to be a command structure mobilised with that, so
 25 basically a minimum of a station manager should have

60

1 been mobilised with that five pumps.
 2 Q. At what stage should we be saying?
 3 A. I would have expected that as a PDA.
 4 Q. PDA being?
 5 A. Predetermined attendance.
 6 Q. "NILO incident commander --- should have been another
 7 flex duty officer."
 8 What did you mean by that?
 9 A. I meant that the NILO shouldn't be the incident
 10 commander, it's a functional role.
 11 Q. "No one went to the scene to make an assessment."
 12 What did you mean by that?
 13 A. That there was a lack of information coming from other
 14 sources and that. To get information, we should have
 15 attended, somebody should have attended the scene.
 16 Q. Is another way of putting that someone should have been
 17 at the scene in order to gain situational awareness?
 18 A. Correct.
 19 Q. And to coordinate with the other emergency services?
 20 A. Correct.
 21 Q. "Three NILOs in attendance --- why?"
 22 What did you mean by that?
 23 A. I meant that there was three NILOs together and I really
 24 couldn't understand why we'd need three NILOs in the
 25 same location. I could understand that they may need

1 three NILOs doing different roles in different areas,
 2 but not together.
 3 Q. Then the point at which the chairman put a different
 4 perspective to you:
 5 "NILOs too secretive. On attendance I was asked why
 6 I was there. Made me feel like I was gatecrashing
 7 a NILO incident."
 8 And I think, as you've understandably conceded, that
 9 was your perception, but you can see how it might not
 10 have been the intention of the NILOs to make you feel
 11 that way?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: By too secretive, were you just meaning
 14 too secretive with you or were they not sharing
 15 sufficient information with the rest of the people who
 16 were there, in your view?
 17 A. In my view, at the time, I felt like there was an
 18 information void and that it wasn't being shared. Now
 19 I'm not saying it was the NILOs' fault, they were feeling
 20 as frustrated as everybody else. It was just ... I put
 21 that it felt like it was a NILO incident because they
 22 turned their backs to talk to each other. They probably
 23 wasn't pushing me out.
 24 SIR JOHN SAUNDERS: I'm not saying it wasn't, I'm saying
 25 there's possibly more than one interpretation.

1 A. Yes.
 2 SIR JOHN SAUNDERS: We'll find out later whether they were
 3 pushing you out.
 4 A. Probably not.
 5 SIR JOHN SAUNDERS: Should they have been sharing the
 6 information with the rest of the firefighters who were
 7 getting more and more frustrated?
 8 A. Yes.
 9 MR GREANEY: I think we're going to see that in the final
 10 bullet point in your own list. The penultimate bullet
 11 point:
 12 "Decisions being made at CSR. This is against the
 13 ethos of the CSR. They should not make incident command
 14 decisions."
 15 What did you mean by that?
 16 A. I meant by that, the command support room is there to
 17 support and advise the incident commanders, and this
 18 could be at one incident or a number of incidents.
 19 You're always conscious when you're in a command support
 20 room you don't make command decisions, it's down to the
 21 incident commander. You can advise, but it's down to
 22 the incident commander to make them decisions.
 23 SIR JOHN SAUNDERS: Is this laid down somewhere or is this
 24 just accepted practice? Presumably in the command
 25 support room you will have perhaps the most senior

1 officers on duty that night. They wouldn't make the
 2 decisions, they wouldn't direct the people on the scene?
 3 A. They shouldn't do.
 4 SIR JOHN SAUNDERS: So where's that laid down or is it just
 5 everyone knows?
 6 A. Where it's written down, I couldn't ---
 7 SIR JOHN SAUNDERS: You're just saying they shouldn't do it.
 8 I just wonder where we get that from.
 9 A. It's just ... It's just known that you shouldn't do it.
 10 It's a frustration when you're in the command support
 11 room that you do want to offer your help and it's
 12 sometimes perceived that you are making decisions when
 13 you're not, you are offering advice. And again it's
 14 down to personalities and how people run the command
 15 support room. Sometimes it is perceived, that
 16 impression that they're trying to influence how the
 17 incident is being run. But to say it's actually written
 18 down, it probably is, but I couldn't direct you to it
 19 now.
 20 SIR JOHN SAUNDERS: I just wondered where it came from. You
 21 said it in definite terms. I wondered if that would be
 22 accepted by everyone as the correct procedure.
 23 A. Yes, I think if you asked any officer who's worked in
 24 a command support room I think they would all agree they
 25 shouldn't be making incident command decisions.

1 MR GREANEY: Are you expressing that view based on those
 2 years of experience that you told us very much earlier
 3 you have?
 4 A. Yes.
 5 Q. And the final bullet point, which we have touched on:
 6 "Lack of information given to the crews."
 7 A. Yes.
 8 Q. And that perhaps speaks for itself.
 9 SIR JOHN SAUNDERS: And the bullet point, "Decisions being
 10 made at CSR", this is what you're being told by the
 11 NILOs at the scene, is it?
 12 A. The impression I was being given by discussions between
 13 the NILOs is that decisions had been made at the command
 14 support room that we were not to attend the incident.
 15 SIR JOHN SAUNDERS: Right. And they were just doing that
 16 despite the fact that what you say is not the right
 17 practice, for decisions to be made at the CSR?
 18 A. They were showing a level of frustration that they were
 19 being told that.
 20 SIR JOHN SAUNDERS: Okay, thank you.
 21 MR GREANEY: We'll look at just one more section of this
 22 debrief form and then we'll move on. It's page 6,
 23 please, Mr Lopez {INQ004254/6} --
 24 SIR JOHN SAUNDERS: Okay, sorry, just on that, and the CSR:
 25 presumably the CSR is having all the information, or

65

1 should have all the information, being funnelled into
 2 it. I wonder whether they would have just a better
 3 impression of what was happening overall.
 4 A. Not necessarily, no. At an incident it's probably the
 5 other way round. They feel frustrated that they're not
 6 getting information. They are generally asking the
 7 incident commander for information. Probably on this
 8 incident, which is unusual, they probably got more
 9 information than the people at the scene.
 10 SIR JOHN SAUNDERS: And the incident commander should have
 11 got, you think, or whoever was in charge, should have
 12 got someone at the scene to look for themselves and see
 13 what's needed?
 14 A. Yes, if there was an incident commander.
 15 SIR JOHN SAUNDERS: Okay, thank you.
 16 MR GREANEY: Mr Lopez, could we go to page 6, please?
 17 {INQ004245/6}.
 18 Question 3:
 19 "What would be your key recommendations for future
 20 similar events?"
 21 First:
 22 "NILO should undertake a functional/specialist role,
 23 not incident command."
 24 Is there anything you'd wish to add to that?
 25 A. Yes, like I say, the NILO is a specialist role, they're

66

1 there to undertake a specific role at an MTFA incident.
 2 They're there to advise the incident commander, they are
 3 not incident commanders.
 4 Q. The specialist role that they have, particularly in
 5 an MTFA, to your mind in May 2017 was what?
 6 A. They would offer advice to other agencies on what the
 7 capability of the Fire and Rescue Service was. They
 8 would also advise the incident commander, who should be
 9 formulating the plan. And they would undertake
 10 a specialist role at the scene if it was still
 11 a terrorist incident.
 12 Q. "Pumps and officers should be involved in all MTFA
 13 exercises. They have not been previous to this
 14 incident."
 15 And you have dealt with that already:
 16 "Mobilise someone to the scene to make an
 17 assessment."
 18 Which you have explained:
 19 "Mobilise an appropriate command structure relevant
 20 to the pumps mobilised."
 21 Is there anything you would wish to add to that?
 22 A. No. Generally, and 99.9% of the time, that occurs.
 23 This particular incident, because of what I mentioned
 24 before, because pumps and officers had never been
 25 involved in MTFA exercises, I think that's where it's

67

1 fallen down with this incident.
 2 Q. And then finally something you have explained:
 3 "CSR to undertake a supportive role, not make
 4 incident command decisions."
 5 A. Yes.
 6 Q. Could we take that from the screen, please?
 7 SIR JOHN SAUNDERS: Just before you do, sorry to come back
 8 to it, but the first one:
 9 "NILOs should undertake a functional/specialist
 10 role, not incident command."
 11 Who should have been the incident commander at this
 12 particular scene and this particular incident or should
 13 someone other than those who were there have been sent
 14 to become the incident commander?
 15 A. There should have been a full incident command
 16 structure, say, which would include an incident
 17 commander separate to the NILOs.
 18 SIR JOHN SAUNDERS: Sent from where?
 19 A. Mobilised from the rota group. As I mentioned the rota
 20 group is made up of a number of officers. The officer
 21 with probably a fire pump -- it should have been
 22 a station manager sent. His role would have been
 23 incident commander and they would understand (inaudible:
 24 distorted) for that.
 25 SIR JOHN SAUNDERS: I understand that NILO is a specialist

68

1 job in that it's liaison, they're meant to understand
 2 better what the other rescue services do --
 3 A. Yes.
 4 SIR JOHN SAUNDERS: -- and liaise with them. But does that
 5 mean that they would not have the necessary knowledge
 6 and experience to act as an incident commander? They're
 7 quite senior officers who were there, as I understand
 8 it.
 9 A. Correct, they would -- they absolutely had the right
 10 skills and knowledge and experience to be an incident
 11 commander. What you can't do is take too many roles on
 12 because each role is specific. In incident commander
 13 plan, they're in charge of the incident and the NILO
 14 advises.
 15 SIR JOHN SAUNDERS: So we've got three NILOs there? As you
 16 said before, an excess of NILOs.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: If you only need one, why shouldn't one
 19 of them say, "Right, I will act as incident commander,
 20 you will act as my NILO, and we'll do it rather than
 21 getting someone else who has to travel here"?
 22 A. That would be one way of doing it.
 23 SIR JOHN SAUNDERS: But you didn't think that was happening?
 24 A. Well, it did because I asked Group Manager Levy -- when
 25 I saw this scene there was nobody in charge, because the

1 reason I knew nobody was there, there was nobody wearing
 2 the incident command tabard, which is one of the ways
 3 you instantly find out who is in command, so I asked
 4 Group Manager Levy who was in charge and he said he was.
 5 Then I replied, "You can't be, you are a NILO". Then
 6 I got thinking maybe at this type of incident -- because
 7 my knowledge wasn't as great as what
 8 Group Manager Levy's was, I thought perhaps I'm wrong
 9 and you can be an incident commander. So we started to
 10 respond then. I thought it's not the time and the place
 11 to have an open discussion about who should be an
 12 incident commander.
 13 SIR JOHN SAUNDERS: So actually, if he was saying, "I am the
 14 incident commander", and he's got the necessary
 15 experience to do it, is this something which has gone
 16 wrong on the particular night, on this particular
 17 incident?
 18 A. What went wrong is that because there wasn't an incident
 19 command structure sent -- that incident command
 20 structure comes with supporting officers and supporting
 21 vehicles and they weren't there. So if, quite rightly,
 22 Group Manager Levy made a decision to be an incident
 23 commander, which was a good one, that should have been
 24 his sole job, not also as a NILO. The NILO role should
 25 have been removed. If they needed three NILOs, ask for

1 another NILO.
 2 SIR JOHN SAUNDERS: So the real problem may be because he
 3 didn't appear to be to you to be acting as the incident
 4 commander solely that he couldn't necessarily override
 5 what was coming from the CSR?
 6 A. They felt that they couldn't override it. There was
 7 great frustration between the three NILOs that they
 8 wasn't being allowed to do what they wanted to do.
 9 SIR JOHN SAUNDERS: Right, thank you, Mr Greaney.
 10 MR GREANEY: And what did they want to do?
 11 A. Attend the incident.
 12 Q. I just want to ask you in the context of the chairman's
 13 questions about Mr Berry. In your statement at the top
 14 of page 7 you say:
 15 "There was an awful lot of pressure on Andy Berry
 16 and I really felt for him. It was not feasible for him
 17 to have made decisions whilst travelling on blues."
 18 Can I ask you two things. First of all, what did
 19 you understand Andy Berry's role was, and secondly, what
 20 was this pressure that was upon him?
 21 A. At the time of incident, I didn't know that Andy was the
 22 duty NILO -- sorry, I did know he was duty NILO.
 23 I didn't really understand what his role was regarding
 24 taking messages. This was in conversations after and
 25 reflection on it during my statement. I think -- well,

1 it's difficult to make sound decisions while you're
 2 trying to drive on blues to an incident. You're not
 3 really getting information -- it's difficult enough to
 4 drive on blues and twos, you need to concentrate, but
 5 trying to make decisions, to make phone calls is really
 6 difficult and trying to make sound decisions during
 7 driving conditions is really difficult.
 8 Q. I now understand. This was a view that you came to
 9 subsequently once you developed an understanding of the
 10 responsibilities Mr Berry had on the night?
 11 A. Yes.
 12 Q. But on the night itself, you didn't realise that?
 13 A. No.
 14 Q. Next I'm going to ask you about a passage that's at the
 15 bottom of page 6 and the top of page 7 of your
 16 statement. I judge that the fairest way of doing this
 17 is simply to read out your words, they're words that
 18 I know that you will want to be said and that the public
 19 will feel they ought to hear. What you say is:
 20 "The period immediately after this incident was the
 21 lowest point of my career. I felt ashamed to be
 22 a firefighter. We didn't respond and we didn't do our
 23 jobs to make a difference. It took me a couple of days
 24 to put my shirt back on, such was the strength of my
 25 feelings."

1 Does that reflect how you felt during that period?
 2 A. It does.
 3 Q. Do those feelings remain with you to this day?
 4 A. Not to the depth it was immediately after. I'm not
 5 ashamed, but I'm still saddened that we didn't make an
 6 attendance. I'm not ashamed -- when I say I'm not
 7 ashamed I know, particularly now, the reasons why we
 8 didn't attend, but I'm deeply saddened we didn't make an
 9 initial attendance as we should have done.
 10 Q. When you made your statement in July 2019, you said:
 11 "I don't think things have changed a lot since
 12 May 2017."
 13 Was that the view you held then?
 14 A. Yes.
 15 Q. So obviously that was 2 years after the arena attack.
 16 You said, at that stage certainly :
 17 "The emergency services are still not training
 18 together."
 19 Was that the position?
 20 A. Yes.
 21 Q. At that stage, you said:
 22 "We are still not adhering to JESIP in the truest
 23 sense."
 24 Was that your view at that stage?
 25 A. Yes.

1 Q. "The NIOs and the crews do not train together either,
 2 so do not know what to expect from each other in these
 3 situations."
 4 Was that correct in your view at that stage?
 5 A. Yes.
 6 Q. And you gave, did you not, two examples of why you felt
 7 that to be so?
 8 A. Yes.
 9 Q. First of all, on 31 December 2018, there was a knife
 10 attack at Victoria Railway Station.
 11 A. Yes.
 12 Q. That was thwarted by BTP officers. And on 2 May 2019,
 13 there was a suspicious package incident at
 14 Oldham Library, was there not?
 15 A. Yes.
 16 Q. And I think what you're saying in your statement is on
 17 neither of those occasions had there been proper, or
 18 adequate, to put it another way, joint working by the
 19 emergency services?
 20 A. Yes.
 21 Q. Out of fairness to you and perhaps also to the
 22 organisation for which you worked until recently,
 23 I ought to observe that obviously time has passed since
 24 then and since you gave your statement. At the time at
 25 which you retired in September of last year, had things

1 improved in your estimation or not?
 2 A. They had improved.
 3 Q. Had they improved in your view sufficiently?
 4 A. No.
 5 MR GREANEY: Mr Topping, thank you very much indeed for
 6 answering my questions. I know that Mr Smith on behalf
 7 of North West Fire Control has questions and I would ask
 8 him to pose those at this stage, please.
 9 Questions from MR SMITH
 10 MR SMITH: Mr Topping, without going through the whole
 11 chronology, which I certainly don't intend to do, which
 12 would be counterproductive, could I begin by asking you
 13 about the call at 23.34, 1 hour and 3 minutes after the
 14 explosion, when you received the call from North West
 15 Fire Control?
 16 A. Yes.
 17 Q. Mr Greaney has established that the purpose of that call
 18 was not to mobilise you to the arena incident; is that
 19 correct?
 20 A. That's correct.
 21 Q. In your statement which you made to Greater Manchester
 22 Police, you gave an account of your recollection of that
 23 call, and I want to ask you about something that you've
 24 explained already today. And that is that when you
 25 received that call, you may not have understood or heard

1 the reference to Philips Park Fire Station; is that
 2 correct?
 3 A. That is correct.
 4 Q. Because in your statement to Greater Manchester Police,
 5 and it's probably not necessary to look at it, I can
 6 remind you about it, you said that you were told by
 7 North West Fire Control that there were loads of
 8 officers at the incident. Now, the audio that's been
 9 played today and the transcript establishes that
 10 Joanne Haslam in the control room at North West Fire
 11 Control said in the course of that call :
 12 "We've got a lot of pumps and a lot of officers at
 13 Philips Park Fire Station rendezvousing there."
 14 So that's the difference between your statement and
 15 the transcript of the call. What I want to ask you is
 16 this: was your belief that GMFRS had mobilised to the
 17 incident scene possibly based on a misunderstanding of
 18 what had been said to you in the course of that call?
 19 In other words, that you believed that you were being
 20 told that all those resources had been sent to the
 21 incident rather than to Philips Park?
 22 A. No. I first heard that we'd got a big job at -- for me
 23 a big job is we're attending an incident. I also would
 24 expect that appliances would be attending another area
 25 to maybe rendezvous or at a holding area to proceed to

1 the incident as pumps were being released. This might
 2 be a long incident, so the impression I got is that
 3 we were in attendance and other appliances were being
 4 mobilised elsewhere. But I was under the impression
 5 that we'd made an attendance.
 6 Q. But did you hear the words Philips Park?
 7 A. At the time I can't recall. I can't recall if I heard
 8 Philips Park. The impression I got was that we were in
 9 attendance at the arena.
 10 Q. Well, whatever the explanation, is the position that you
 11 would have expected that GMFRS would either have been in
 12 attendance at the arena or very close to the incident?
 13 A. I would have expected we would attend the incident.
 14 Q. I want to ask you next about a call that you made to
 15 Duty Manager Dean Nankivell at 4 minutes past midnight.
 16 We don't have a transcript of that call because it was
 17 made using your mobile telephone.
 18 A. Correct.
 19 Q. But in the context of that call, do you recall that by
 20 now, Mr Nankivell was at the command support room?
 21 A. The number of calls I made, I'm not sure regarding the
 22 4 minutes past 12. Was that the second conversation
 23 I've had with Mr Nankivell?
 24 Q. Yes, it was, and it lasted 1 minute and 32 seconds.
 25 A. Yes. In the second conversation I realised he was at

1 command support room.
 2 Q. And it was at that point, wasn't it, that Mr Nankivell
 3 instructed you to go to Manchester Central?
 4 A. It was.
 5 Q. I want to ask you whether you agree with something that
 6 Mr Nankivell has said in a statement in relation to his
 7 instruction to you. So I'm just going to quote from
 8 Mr Nankivell's statement and ask for your comment as to
 9 whether you agree with it or not.
 10 The passage I'm referring to is, for reference
 11 purposes only, paragraph 69 of his statement:
 12 "I asked Station Manager Topping to mobilise to
 13 Manchester Central..."
 14 And these are the important words I'd like you to
 15 consider, please:
 16 "... to be the forward communication point for me,
 17 to support General Manager Levy and to be the person to
 18 coordinate resources."
 19 Is that what he asked you to do?
 20 A. Not in those words, but -- not in those exact words, but
 21 in essence that's the role I'd be undertaking. When
 22 I say help, help in any way possible by supporting the
 23 incident and reporting back when necessary to the
 24 command support room.
 25 Q. That's what I wanted to establish. So let's not worry

1 about the precise words used. But the functions that
 2 Mr Nankivell expected you to discharge were, first of
 3 all, to be the forward communication point for him;
 4 is that correct?
 5 A. In essence, yes.
 6 Q. To support General Manager Levy at Manchester Central?
 7 A. He didn't instruct me to support Group Manager Levy in
 8 person. It was mainly to help the incident commander,
 9 whoever that was. I didn't know who was in charge, so
 10 didn't say -- he didn't mention Group Manager Levy in
 11 person to me.
 12 Q. What about these words: to be the person to coordinate
 13 resources?
 14 A. Again, them are Dean Nankivell's words. My impression
 15 of what we discussed is to help in any way possible and
 16 that would be -- one of the roles I could undertake is
 17 regarding helping resources and coordination.
 18 Q. That would fit with your experience and your position on
 19 the night, wouldn't it?
 20 A. With what the -- the duties I performed on the night,
 21 yes.
 22 Q. May I take you, please, to the circumstances when you
 23 arrived at Manchester Central. When you say "the
 24 atmosphere did not feel right", was your impression that
 25 the three NILOs who were there, Station Manager Berry,

1 Mr Meakin and Mr Levy, were just as frustrated as the
 2 crews of the appliances that Greater Manchester Fire and
 3 Rescue Service was being held back from the incident?
 4 A. That was my impression.
 5 Q. So one mustn't assume, do you agree, that this was
 6 frustration only on the part of the crews?
 7 A. Correct. All officers who was in attendance at
 8 Manchester Central all felt frustrated.
 9 Q. When you said that there seemed to be a lack of urgency
 10 within the GMFRS personnel, did it occur to you at the
 11 time that one possible explanation for that is that the
 12 NILOs were clearly being bound by decisions being made
 13 in the command support room?
 14 A. During this attendance, I didn't have that impression at
 15 first. We said at 5 to 10 minutes we had responded. It
 16 wasn't until subsequent conversations during the night
 17 that I learned that they were being held back and the
 18 NILOs were frustrated that they weren't being allowed to
 19 mobilise to the incident.
 20 Q. Certainly, is it correct that when you arrived at
 21 Manchester Central, it was obvious that the
 22 Ambulance Service were responding to the incident by
 23 moving in and out of Thompson Street?
 24 A. It was.
 25 Q. And would the frustration that the NILOs and the crew

1 members felt and expressed in your view be attributable
 2 to the fact that they would all be aware that they could
 3 provide support to the Ambulance Service in terms of
 4 casualty management?
 5 A. Absolutely. We could have helped that incident.
 6 Q. You had there, first of all, what I might call, you'll
 7 forgive me for this, ordinary appliances in the form of
 8 the two Manchester pumps and the Philips Park pump;
 9 is that correct?
 10 A. Correct.
 11 Q. In addition to that, were there two SRT appliances
 12 there?
 13 A. SRT appliances were there. I don't recall one or two.
 14 They were definitely in attendance, yes.
 15 Q. And those crews and the equipment they carried had the
 16 additional advantage, is this correct, of being well
 17 trained in managing severe trauma?
 18 A. I believe so.
 19 Q. Did you become frustrated as well?
 20 A. We all had mixed emotions during that night, from shock
 21 to frustration and anger. So yes, I was frustrated.
 22 Q. I want to ask you next about an observation that you
 23 made in the debrief that Mr Greaney has asked you about
 24 and that is your opinion that you would have expected
 25 someone from Greater Manchester Fire and Rescue Service

1 to go to the incident scene to make an assessment;
 2 is that correct?
 3 A. Yes.
 4 Q. Could you assist the chairman, please, by explaining,
 5 first of all, what category of officer could have been
 6 sent to the incident scene?
 7 A. I would expect, again in hindsight, that a NILO -- there
 8 were three NILOs there -- a NILO could have come down
 9 and made an assessment at the scene.
 10 Q. Is the position that a NILO, for example, could have
 11 travelled in one of the Fire Service vehicles, down to
 12 the incident, and obtained what we would know as
 13 situational awareness by meeting GMP officers or
 14 Ambulance Service staff and obtaining information?
 15 A. It's difficult for me to make a comment because I wasn't
 16 in attendance until approximately 12.30, so I don't know
 17 the circumstances them officers were confronted with and
 18 what they were being told. Again, in hindsight, which
 19 is a wonderful thing, as we know, yes, we'd like to
 20 think we'd have attended, whether that would be with
 21 appliances, the full incident command structure, or a
 22 NILO in a car to have that initial discussion with the
 23 other agencies.
 24 SIR JOHN SAUNDERS: You say that about hindsight, but the
 25 fact of the matter is you would expect someone on the

1 scene to be the incident commander.
 2 A. Yes.
 3 SIR JOHN SAUNDERS: He needed to know what was required or
 4 what was possible and therefore he needed someone to go
 5 there and the best person to do that would be a NILO,
 6 who was best to liaise with the other people. Does that
 7 require hindsight?
 8 A. It easy to me now to say it doesn't require hindsight
 9 but I wasn't in that position --
 10 SIR JOHN SAUNDERS: You can't speak for them?
 11 A. I can't speak for them and it was circumstances which --
 12 other circumstances made that situation as it was.
 13 SIR JOHN SAUNDERS: Sorry to interrupt, Mr Smith.
 14 MR SMITH: Well, I wasn't seeking to identify personalities
 15 or these three particular NILOs, I just wanted to
 16 identify the fact that certainly, based on your
 17 operational experience, do you agree, a decision could
 18 certainly have been made to send a GMFRS officer to the
 19 incident scene at an early stage. There's no reason why
 20 not, is there?
 21 A. Again, I'd say I don't know what information they had,
 22 why they wouldn't go. Yes, the best course of action,
 23 if they've not got information or there's an information
 24 void, is to go where the information is and the
 25 information is at the scene.

1 Q. If the Fire Service resources were deployed to
 2 Philips Park, 3.5 miles from the incident, and the Fire
 3 Service became starved of information, had no
 4 information effectively about what was going on in terms
 5 of multi-agency liaison. One option, is this correct,
 6 based on your operational experience, could have been to
 7 have sent somebody to the incident scene to obtain
 8 information? Do you agree?
 9 A. That is an option.
 10 Q. What type of information could have been obtained in
 11 those circumstances in your experience?
 12 A. Information would have been gathered regarding the risk,
 13 the type of event, and what help we could give to the
 14 casualties and other agencies.
 15 Q. And as to the involvement of the other agencies in
 16 particular, do you agree?
 17 A. Correct.
 18 Q. I would like to turn next to the question of whether
 19 you have a particular recommendation to make to the
 20 inquiry arising from the issue of training between NILOs
 21 and crews. You've said on a number of occasions, both
 22 in writing and in your evidence, that NILOs and crews do
 23 not train together; is that correct?
 24 A. My experience is that not only crews but operational
 25 officers like myself don't train with NILOs.

1 Q. So the point is not just whether crews should be trained
 2 in MTFA response, but is the point that crews should
 3 train with NILOs and other officers should train with
 4 NILOs? In other words they should train together?
 5 A. To train as a whole. The incident wouldn't be run by
 6 just specialist teams and NILOs, it'd be run by full
 7 incident command structure with appliances, NILOs,
 8 specialist teams, and North West Fire Control mobilising
 9 them teams and appliances.
 10 Q. Is it your view that in terms of training this should be
 11 a joint effort?
 12 A. Correct.
 13 Q. With all those that you've just mentioned involved,
 14 including the control room?
 15 A. Correct.
 16 Q. As far as the command structure is concerned, which,
 17 with respect, and the chairman has asked some questions
 18 about, you've given evidence about the role of the NILO,
 19 the role of an incident commander and the role of the
 20 command support room. May I just be clear about the
 21 three roles.
 22 Traditionally, is the NILO expected to perform
 23 a tactical role?
 24 A. It depends on the incident.
 25 Q. In an incident of this nature?

1 A. At the incident, depending on the nature of the
 2 incident, what's occurring, if there is still a
 3 terrorist attack and there is still a threat, yes, he
 4 would be performing a tactical role at the scene.
 5 Q. In your view, and based on your operational experience,
 6 should the NILO be operating as an incident commander in
 7 these circumstances?
 8 A. No.
 9 Q. As far as the incident commander is concerned, you've
 10 given evidence already that in your view there should
 11 have been somebody of the rank at least of station
 12 manager involved in that. Should the command support
 13 room under any circumstances be issuing directions to
 14 the incident commander rather than advising?
 15 A. It's difficult to say in any circumstances because they
 16 could bring a circumstance where they might have to make
 17 a decision regarding --- if there was a danger occurring.
 18 But generally, 99.9% of the time they shouldn't be
 19 making incident command decisions, they're there to
 20 advise the support.
 21 Q. So in simple terms therefore, if the NILOs at
 22 Manchester Central before deployment, when you were
 23 there, were receiving orders from the command support
 24 room and being prevented from mobilising to the scene,
 25 would that run contrary to your understanding of the

1 normal process whereby the command support room provides
 2 support and advice rather than making decisions?
 3 A. Can you ask the question again, sorry, sir?
 4 Q. Yes. If the situation was that the NILOs at the scene
 5 wanted to deploy to the incident but were being
 6 prevented from deploying to the incident on instructions
 7 from the command support room, does that seem to you,
 8 based on your operational experience, to be an unusual
 9 situation and not one that you would normally expect?
 10 A. Very unusual.
 11 Q. Finally, I just have to ask you, please, about two more
 12 calls. The call records show that at 04.23 in the
 13 morning Mr Nankivell called you via your mobile
 14 telephone and that the call lasted for 12 minutes and
 15 78 seconds (sic). This is 04.23 in the morning of
 16 23 May.
 17 A. Okay.
 18 Q. Mr Nankivell has said in his statement this, and I'd be
 19 grateful if I could just read it to you for your
 20 comment:
 21 "Station Manager Topping did inform me that on his
 22 arrival at Central he was met with the cold shoulder by
 23 the attending NILOs to the point that they asked, 'Why
 24 are you here?'"
 25 Did you say that to Mr Nankivell at some stage?

1 A. I did have discussion of the whole incident and, as I've
 2 already stated in some of the previous questions, that
 3 was the impression I had at the time, whether that was,
 4 as the chair has said, the correct --- you know.
 5 SIR JOHN SAUNDERS: It's your evidence, not mine.
 6 A. That was the impression I had. That was the feeling
 7 I had.
 8 MR SMITH: Mr Nankivell goes on to say:
 9 "The command support officer is a vital functional
 10 role at any incident and Station Manager Topping should
 11 have been seen as a crucial part of the response by the
 12 NILO cadre."
 13 Do you agree with that?
 14 A. I don't necessarily agree with that statement because
 15 you wouldn't expect a command support officer to be
 16 mobilised on their own. A command support officer works
 17 in conjunction with the incident commander and a command
 18 support team. So I wouldn't expect the NILOs to see me
 19 in that role.
 20 Q. The two calls I want to ask you about are this one at
 21 04.23 and another call at 09.53 that morning, which
 22 lasted for just over 8 minutes. During either of those
 23 calls did Duty Manager Dean Nankivell tell you why there
 24 had been such a delay in GMFRS's response to the
 25 incident and what the reasons were?

1 A. I've had lots of conversations with lots of people of
 2 the reasons why there was a delay, so to recall the
 3 exact conversation at them times, I can't. But there
 4 was assumptions made why we weren't being delayed -- why
 5 we were delayed, sorry, but I can't recall the exact
 6 conversation I had at them times with Dean Nankivell,
 7 no.
 8 Q. Do you recall that morning if he told you at any stage
 9 that the responsibility for this rested with the chief
 10 fire officer, Mr O'Reilly?
 11 A. Again, them conversations and the blame towards the
 12 chief were heard by a number of people. Whether Dean
 13 said that at that particular time, I don't know. If he
 14 said he did, he must have. I don't recall him saying
 15 it.
 16 Q. Forgive me, Mr Topping, I'm not saying that he did say
 17 that. I don't want to mislead you into believing that
 18 that's something in a statement that he's made. I'm not
 19 quoting from a statement. I'm just asking you for your
 20 recollection of whether you have any recollection that
 21 Mr Nankivell may have explained to you the reasons why
 22 GMFRS was held back, if you like, and not deployed to
 23 the incident more quickly.
 24 A. The blame on the chief was heard by a number of people,
 25 yes.

1 Q. And did Mr Nankivell, this is my final question, please,
 2 ever explain to you why the SRT capability was not
 3 deployed to the incident?
 4 A. My recollection is that the NWAS -- it was
 5 Steve Hinds -- I don't know if I've got the name
 6 wrong -- asked for a number of trauma technicians at the
 7 scene. And rather send the SRT, a decision was made to
 8 send appliances only where there are a number of
 9 trained -- there would be a number of trained trauma
 10 technicians, but not necessarily -- I think 12 was the
 11 figure used, and the simple fact that four would
 12 probably be -- four people would be on each fire
 13 appliance. That's why three were sent and not the SRT.
 14 Q. Is that the explanation that was given to you by
 15 Mr Nankivell?
 16 A. That's how I recall it occurring. Whether it was
 17 Dean Nankivell telling me or somebody else, I can't
 18 actually recall, thinking back now, but that's the
 19 impression that I've got, that's the reason why the SRT
 20 wasn't sent.
 21 Q. These calls lasted in total 20 minutes that morning,
 22 didn't they?
 23 A. They lasted a long time, but there was a lot to discuss.
 24 This wasn't a -- this was a difficult incident we all
 25 attended and I'm surprised it only lasted 20 minutes,

1 sir.
 2 Q. I'm only trying to establish whether any guidance was
 3 provided by way of explanation in these calls for the
 4 delay in deployment.
 5 A. Regarding the calls, the conversations later, I cannot
 6 recall the exact conversation we had. But we did
 7 discuss the incident, what went wrong, why we didn't
 8 attend. We all felt frustrated why we didn't attend.
 9 MR SMITH: Thank you very much, Mr Topping. That concludes
 10 my questions.
 11 SIR JOHN SAUNDERS: Before we move on, you have described
 12 your frustration or the general frustration at
 13 appliances not attending. That only lasted for you for
 14 5 to 10 minutes because that's when the appliances did
 15 go in.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: In relation to the SRTs, either one or
 18 two, they never did go in. Was that a matter of
 19 frustration for you at the time?
 20 A. Two hours after the incident, we wasn't really going to
 21 offer that much help, to be frank. We needed to be at
 22 that incident within 5 or 10 minutes. We were there to
 23 help and we couldn't help.
 24 SIR JOHN SAUNDERS: Okay. Thank you.
 25 MR GREANEY: Sir, thank you. This is probably a convenient

1 time for a break, after which I will invite Mr Cooper,
 2 who leads with this witness on behalf of the bereaved
 3 families, to ask his questions.
 4 SIR JOHN SAUNDERS: Is 10 minutes long enough? We will do
 5 longer if anyone wants it.
 6 MR GREANEY: No, I think 10 minutes is a good idea, sir, and
 7 then there's a fighting chance that Mr Cooper will
 8 finish his questions before about 1 o'clock on the
 9 estimate he's given me. Then I think it will just be
 10 GMCA to ask their questions if they have any.
 11 SIR JOHN SAUNDERS: So by this clock, 12.22 or thereabouts.
 12 (12.14 pm)
 13 (A short break)
 14 (12.24 pm)
 15 MR GREANEY: Sir, it is Mr Cooper next, who is on the
 16 screen.
 17 Questions from MR COOPER
 18 MR COOPER: Thank you.
 19 Mr Topping, as you've heard, I ask questions on
 20 behalf of the families in this matter and we thank you
 21 for your attendance. As is always the case, many of the
 22 issues we were going to raise with you have been raised
 23 by other advocates and it's not our intention to repeat
 24 those.
 25 There are three main categories that I'd like to

1 develop with you. One comes under the category of
 2 training and preparation for terrorist attacks. The
 3 second category will be filling in perhaps some gaps as
 4 far as the 22nd is concerned. Then thirdly, very
 5 briefly, I would like to ask you about the debriefing
 6 process and post-detonation events so far as you can
 7 help us.
 8 Let's go back, if we can, without covering old
 9 ground, to training and preparation. As I understand
 10 it, from your evidence, you had attended one example of
 11 JESIP training, hadn't you, before this atrocity?
 12 A. Yes.
 13 Q. And again, as we've established, that was on
 14 8 July 2014. We've got that from your training records.
 15 It's a general question so far as training is concerned,
 16 but who is responsible for arranging that training
 17 schedule? Put another way, who is responsible for
 18 arranging the training that you go to?
 19 A. Regarding the JESIP training, I think it was a joint
 20 responsibility between the Fire and Rescue Service, GMP
 21 and NWAS. It was a joint training day. The
 22 responsibilities of actually implementing it, I don't
 23 know who was -- to name them, I wouldn't know.
 24 Q. Forgive me, I'm not asking you about who's implemented
 25 it, I'm asking you about whose responsibility it is to

1 ensure that you attended, for instance, the JESIP
 2 training sessions.
 3 A. If you're nominated to train, you will attend. If you
 4 don't attend, they would want to know the reason why you
 5 don't attend. So it's your individual duty to attend
 6 a nominated training.
 7 Q. Right. I'll put it another way: who nominates you to
 8 attend, who's responsible for nominating you to attend?
 9 A. You get nominated via a training team. I can't think of
 10 the word at the moment, but you get nominated by the
 11 training department.
 12 Q. You see, what I'm trying to dig into here is whose
 13 decision, firstly, it was to sent you on JESIP training
 14 in 2014 and whose decision was it that you didn't go on
 15 another one.
 16 A. I don't know, sir.
 17 Q. Because 2014 was the last JESIP training event you
 18 attended and there were new JESIP principles developing
 19 all the time, weren't there?
 20 A. I attended further training following the incident.
 21 What I'm referring to in my statement is prior to the
 22 incident.
 23 Q. Of course, and I'm only asking you questions at the
 24 moment about prior to the incident. Were there any
 25 other JESIP training events, for instance, after the one

1 that you attended but prior to the 22nd?
 2 A. There would have been further events, but it'd be
 3 covering the same topics, so basically the same
 4 training.
 5 Q. The same training, so nothing new was added so far as
 6 JESIP training was concerned so far as you are aware
 7 between 2014 and 2017?
 8 A. Looking back, no, I can't think of anything that would
 9 have been -- if another training event had occurred
 10 I didn't attend. It was the one event.
 11 Q. So if you attended in 2014, it was considered by whoever
 12 was responsible to be perfectly adequate for someone
 13 attending on 22 May 2017?
 14 A. That's a difficult question to answer.
 15 SIR JOHN SAUNDERS: No, it's not a difficult question; it's
 16 an impossible question to answer. I think the training
 17 department just decided, presumably, that you weren't
 18 required to go on another one.
 19 A. Because it was the same -- whatever.
 20 SIR JOHN SAUNDERS: For whatever reason, that wasn't your
 21 decision?
 22 A. No, it wasn't my decision.
 23 MR COOPER: But are you aware -- if I may say, with this
 24 subsidiary then, are you aware, one way or the other, if
 25 you're not so be it, whether JESIP training changed

1 between 2014 and 2017? Or do we understand it remained
 2 the same, which is why you didn't need to attend another
 3 one?
 4 A. As far as I were aware, and I can recall, it was the
 5 same event. As you'll appreciate, if you're trying to
 6 train numbers in Greater Manchester Police, NWAS and
 7 Greater Manchester Fire and Rescue Service, it would
 8 need a large number of events.
 9 Q. All right. On the issue of training in relation to
 10 marauding terrorist firearms incidents, I'm not going
 11 over old ground, but you've told us that before the
 12 event on 22 May 2017, you had received no training on
 13 that particular matter; is that right?
 14 A. Not in a structured event, no, I don't recall.
 15 Q. And you'll tell us -- I won't take you to it directly,
 16 but it's there for others to look at. At page 3 of your
 17 statement, you say that only NILOs were invited to
 18 attend that training.
 19 A. That was my understanding.
 20 Q. So in short, and this is no criticism of you, I don't
 21 want you to misinterpret my questions, Mr Topping, these
 22 aren't personal criticisms, but as far as marauding
 23 terrorist firearm attacks are concerned you never
 24 trained with a NILO prior to 22 May 2017?
 25 A. That's correct.

1 Q. And is it now a possibility or even a direction that
 2 from now on you do train or your colleagues, I should
 3 say, train with NILOs? Has that changed since this
 4 atrocity?
 5 A. Not that I'm aware of.
 6 Q. So ---
 7 A. It may have changed.
 8 Q. Sorry? You carry on. I was simply going to clarify.
 9 As far as you're aware, still to this day, as far as
 10 MTFA is concerned, people who occupy your role and other
 11 roles in your former profession do not train with NILOs?
 12 Still to this day?
 13 A. I don't know about to this day. I can't answer that
 14 question.
 15 SIR JOHN SAUNDERS: Did they up until the date of your
 16 retirement in 2019? Had that training started or
 17 happened?
 18 A. I never attended any training, so I don't know.
 19 SIR JOHN SAUNDERS: Were you aware of it?
 20 A. Not that I am aware of, no.
 21 SIR JOHN SAUNDERS: Since 2019, do you have any knowledge
 22 whether or not it's started or happens?
 23 A. I don't.
 24 MR COOPER: I will move on.
 25 Again I'm referring to something you said in your

1 statement, Mr Topping, for clarification of it. You
 2 were dealing on page 2, and I emphasise these are pages
 3 and not paragraph numbers, on page 2 of your statement
 4 matters relating to the national Airwave channel. And
 5 then you say this:
 6 "Four days after the attack an interim initial
 7 Airwave communication protocol for major incident
 8 standard operations procedure was established and it was
 9 only sent to [you] after [you] asked for it a few weeks
 10 ago."
 11 Is that right? "A few weeks later", I should have
 12 said.
 13 A. I can't recall now but if it's in my statement, that
 14 must have occurred, yes.
 15 Q. As far as you receiving that interim initial Airwave
 16 communication protocol, was it of assistance when you
 17 received it 4 days after the attack?
 18 A. Sorry, sir, can you repeat the question?
 19 Q. By all means.
 20 SIR JOHN SAUNDERS: Sorry, I have just read it.
 21 So what you said in that statement is that 4 days
 22 after the attack, the interim Airwave communication was
 23 sent to John Fletcher from GMP and then you go on to
 24 say:
 25 "I know of its existence because it was sent on to

1 me a few weeks ago."
 2 So a few weeks from the making of your statement?
 3 A. That would sound right.
 4 SIR JOHN SAUNDERS: Thank you, Mr Cooper. I wanted to get
 5 the sequence.
 6 MR COOPER: Thank you.
 7 Would you have expected to have received it before
 8 then?
 9 A. Regarding the use of the channel, the Airwave we would
 10 use?
 11 Q. Yes.
 12 A. Yes, I think we should have had an understanding of how
 13 it's used, yes.
 14 Q. And how would that have assisted?
 15 A. It would have assisted so that incident commanders would
 16 know what that channel should be used for, not only
 17 regarding Greater Manchester Fire and Rescue Service but
 18 other agencies as well.
 19 Q. I want to move on to 22 May, please, 2017. You are
 20 working as, if I understand this, as duty command
 21 support officer on the night; is that right?
 22 A. That was one of my roles I could have fulfilled during
 23 my operational duties, yes.
 24 Q. You have told us, and I'm not going to go over it again,
 25 that you had not been made officially aware of the

1 explosion on the night; is that right?
 2 A. That's right.
 3 Q. You were surprised, no doubt, about that?
 4 A. I was.
 5 Q. In your view, how should you have been made aware of it,
 6 expeditiously, quickly?
 7 A. By being mobilised. When I say I weren't aware, as
 8 I said, I was under the impression we'd mobilised to
 9 that incident, so we had made a mobilisation, we had
 10 attended the incident. So I was surprised I hadn't gone
 11 and I felt frustrated I hadn't gone. But we all can't
 12 attend the incident in the rota group because the
 13 structure is that so many people go to form a structure
 14 and some will remain available. But I would have
 15 expected to go. So I was surprised I wasn't going
 16 because I was the duty command support officer.
 17 Q. Thank you.
 18 When you arrived at Thompson Street, you arrived at
 19 about, we learn, 00.25 on 23 May and you have told us,
 20 and I'm not going over that again either, that you felt
 21 effectively at the time that you were intruding,
 22 certainly so far as some officers were concerned.
 23 I want you to look, please, at {INQ019420/1}, which
 24 is a GMFRS report form, please, and I'd like you to look
 25 at pages 4 and 5 {INQ019420/4-5} of that document.

1 This is authored by you. You give just a little
 2 more detail on the issue that you were asked about
 3 a moment ago. If you look at the top of page 4 you say
 4 this:
 5 "It was clear that NWSA were already attending the
 6 incident and had a substantial number of ambulances
 7 located on the yard behind the station. I saw
 8 ambulances continually being mobilised in the direction
 9 of the incident. I liaised with an NWSA officer to ease
 10 the congestion at the entrance to the rear yard of the
 11 station. The police also had a large presence and were
 12 also responding to the incident."
 13 From that paragraph, do we understand it, you have
 14 indicated the police had a large presence,
 15 ambulance services also had a significant presence from
 16 what you could see; is that right?
 17 A. That's right.
 18 Q. You say this:
 19 "It was apparent that firefighters and SRT personnel
 20 were expressing concern that they were not being
 21 mobilised to the incident and asking me why."
 22 So you were receiving direct questions from
 23 colleagues at the time; correct?
 24 A. Yes.
 25 Q. And were there a lot of people, a lot of your colleagues

101

1 asking you questions?
 2 A. A lot, yes.
 3 Q. And that's where the frustration and anger no doubt was
 4 beginning to build?
 5 A. It was.
 6 Q. I want to ask you about a sentence in the next paragraph
 7 where you say:
 8 "I asked why the SRT was not being mobilised and the
 9 NILO officers responded that they were not being
 10 allowed."
 11 "Not being allowed." Can you just develop that?
 12 When the NILO officers said they were not being allowed,
 13 what were they precisely, if you can remember, saying to
 14 you about the SRT?
 15 A. Just as I stated there, they asked why the SRT weren't
 16 being mobilised and they were saying they weren't being
 17 allowed --
 18 Q. Did they say --
 19 A. -- from the command support room.
 20 Q. And did they indicate to you why they were not being
 21 allowed?
 22 A. They didn't know. They felt frustrated why they weren't
 23 being allowed. They didn't really give me a reason why.
 24 Q. Did you ask them?
 25 A. I did ask. The simple reason of asking is so I could

102

1 inform the crews why they weren't being mobilised to the
 2 scene.
 3 Q. What did the NILOs say to you when you pressed them, why
 4 aren't they being allowed?
 5 A. They were told they couldn't go.
 6 Q. And not given a reason?
 7 A. Not that I recall, no. They may have been given
 8 a reason, but I can't recall the reason. If they did
 9 give me a reason I can't recall it.
 10 SIR JOHN SAUNDERS: Sorry to interrupt you, Mr Cooper.
 11 You told me, I recall, you thought it was a bit late
 12 anyway by now.
 13 A. Absolutely, sir. Two hours after the initial -- it was
 14 too late.
 15 SIR JOHN SAUNDERS: Thank you. Mr Cooper, do you mind if
 16 I ask a question about the next sentence, unless you're
 17 about to deal with it?
 18 MR COOPER: To use Mr Greaney's structure, I was about to
 19 ask it myself.
 20 SIR JOHN SAUNDERS: I will leave you to ask it, Mr Cooper,
 21 and I will ask if I need to.
 22 MR COOPER: So be it. Looking at the next response, you say
 23 this in your document, Mr Topping:
 24 "I phoned GM Nankivell and asked him why we were not
 25 being allowed to attend the incident and there was a lot

103

1 of concern being shown by the firefighters."
 2 You go on:
 3 "It was obvious from his tone he could not talk
 4 openly but it was apparent a decision had been made at
 5 command support not to attend."
 6 My question is this: what was it that gave you the
 7 impression that he could not talk openly to you?
 8 A. I've known Dean Nankivell a long time, we've had plenty
 9 of discussions, so I know he can be honest and open and
 10 he would give me a reason if he could. It felt like
 11 he was as frustrated as the firefighters and officers
 12 at the scene. I felt frustration in his voice and
 13 I felt he couldn't openly and honestly speak to me in
 14 the room we were speaking.
 15 Q. Is there from your experience or was there at the time
 16 a culture where colleagues, whether or not they were
 17 in the control room, couldn't speak openly on issues
 18 that they might disagree with or have a point of view
 19 on?
 20 A. Knowing Dean Nankivell as I do, he would make his views
 21 known. I don't know what went on in the command support
 22 room, I wasn't there. That's for others to discuss.
 23 Regarding the culture, other people have mentioned that.
 24 I would not be afraid of viewing (sic) my concerns.
 25 SIR JOHN SAUNDERS: Can I just ask my question now, which is

104

1 slightly different ?
 2 MR COOPER: Of course.
 3 SIR JOHN SAUNDERS: When you phoned Mr Nankivell, they had
 4 actually by then -- the three pumps had been mobilised
 5 with Mr Berry.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: So when you're asking him why we were
 8 not being allowed to attend the incident, are you
 9 talking about you thought there should be more pumps
 10 going or was it because of the SRT machines not going
 11 that you were expressing that frustration or asking that
 12 question?
 13 A. A bit of both and more -- more regarding why we have not
 14 made an attendance initially, earlier, because them were
 15 the questions people were asking. The question I asked,
 16 I wanted to ask why we would not go. Also why was just
 17 the appliances going and not the specialist teams.
 18 I think I put in my statement there that they must have
 19 some other reason, the bigger picture, as I said in my
 20 statement, that there may be another threat somewhere
 21 else, where they were holding specialist teams back
 22 because 2 hours into the incident, they're probably not
 23 as useful as they could have been at the initial stages.
 24 SIR JOHN SAUNDERS: It was a built-up frustration about a
 25 number of things, really?

105

1 A. Absolutely.
 2 SIR JOHN SAUNDERS: Thank you, Mr Cooper. I will try to
 3 stop interrupting you.
 4 MR COOPER: Not at all, sir. It is always helpful.
 5 Going back to that latter paragraph where it begins
 6 "It was obvious", you add:
 7 "It was apparent a decision had been made at command
 8 support not to attend."
 9 Why was it apparent to you at that time when you
 10 were speaking to Mr Nankivell that that was apparent?
 11 Was it something he said or?
 12 A. No, it was the discussions regarding the NILO, that they
 13 weren't being allowed, that decision came from the
 14 command support room. Dean was also feeling frustrated.
 15 I felt like there was something not quite right going on
 16 in the command support room and that decisions were
 17 being made at the command support room.
 18 Q. That's something I wanted to explore just shortly with
 19 you about the command support room; others will give
 20 evidence on it as well. Who was in the command support
 21 room at this time so far as you're aware, do you know?
 22 A. At the time I was aware that the chief was there. Also
 23 ACO Harris was in attendance. Group Manager Nankivell
 24 and Area Manager Etches.
 25 Q. In terms of the decision-making process in that room, do

106

1 you know from your experience how it would go? Would
 2 someone say what goes or would there be a discussion,
 3 within reason given, obviously, this is an emergency?
 4 A. As I stated before, the decisions, the incident command
 5 decisions for an incident shouldn't be made at a command
 6 support room, but if an officer, particularly the chief,
 7 high-ranking, makes a decision it would be of very
 8 strong character and it would have to be justified to go
 9 against what the chief says.
 10 Q. We may hear in evidence that as far as senior management
 11 were concerned at the time, there was potentially
 12 a bullying culture. Are you aware of a bullying culture
 13 that was taking place at the time?
 14 A. Not in my experience, no.
 15 Q. All right. Clearly there was some form of conflict,
 16 would you accept, going on within the command room
 17 at the time these decisions were being made, so much so
 18 that Mr Nankivell felt uncomfortable?
 19 A. It was my impression, speaking to Dean Nankivell, that
 20 there was something odd. What was going on in the
 21 command support room, I cannot answer that, I wasn't
 22 in that room.
 23 Q. I quite understand. I'll move on. You go on in
 24 a paragraph:
 25 "I explained to the crews that we must await

107

1 instruction as there must be a reason why we are being
 2 held back. The command support room will have the
 3 bigger picture."
 4 So that was your assumption, a perfectly reasonable
 5 one, but that was your assumption as to what was going
 6 on and what you were telling your colleagues; is that
 7 correct?
 8 A. Yes. I was trying to give them some reassurance that
 9 they would -- they may have some other -- an incident
 10 may be evolving somewhere else, I don't know. To be
 11 honest, I was just trying to give them some information.
 12 Q. I'll take you just a little further down this document
 13 now because the other matters have been dealt with by
 14 others. You say this in terms of Thompson Street:
 15 "I was now concerned for the welfare of the large
 16 number of people attending Thompson Street. I asked the
 17 command support room if I could open up the training
 18 centre for toilets, et cetera. They informed me they
 19 would get back to me. I contacted the centre again and
 20 informed them I had placed [blank] in the mess room of
 21 Thompson Street Fire Station. I was then informed by
 22 GM Nankivell that three appliances would be sent to
 23 Thompson Street."
 24 And you go on. What aspect of welfare for a large
 25 number of people attending Thompson Street were you

108

1 concerned about?
 2 A. This incident is over 2/3 hours old. A lot of these
 3 other agencies had travelled quite a long way. I'd
 4 known from the ambulances it had been noted there had
 5 been one from the East Midlands. So just general
 6 welfare of people, they might need the toilet and some
 7 refreshments, because some of these ambulances were
 8 coming back from seeing the hospital. So it was just
 9 general welfare facilities for other agencies and
 10 colleagues.
 11 Q. I'll move swiftly off the point, not because it's not
 12 important of course. In general, did you get the
 13 impression that colleagues in the emergency services
 14 were being looked after as far as they're concerned
 15 during the course of this crisis?
 16 A. Obviously particularly NWS were very busy. They were
 17 continually being mobilised, they seemed to have that in
 18 hand. The person I spoke to at the back of
 19 Thompson Street was aware that facilities were available
 20 to them, but obviously the needs of the incident were
 21 most important, so they were proceeding all the time to
 22 the incident.
 23 Q. Thank you. We can take that document off the screen
 24 now, please.
 25 When you indicated during the course of your

109

1 evidence this morning, and I just want to clarify this,
 2 that some firefighters were lying down and you saw the
 3 general demeanour within the area, this was all part and
 4 parcel of the anger, frustration and concern that they
 5 were just not being mobilised; would that be right?
 6 A. Correct.
 7 Q. And when you used the expression, which I just want to
 8 clarify, please, "something not quite right", do you
 9 mean by that, it may be a classic understatement, that
 10 things were very wrong?
 11 A. Yes.
 12 Q. And they were very wrong because important resources
 13 that you and your colleagues were trained to provide and
 14 services to give were simply being wasted?
 15 A. Correct.
 16 Q. I'll move on again from that, because as I say, other
 17 questions have been asked of you on it.
 18 In your statement, and again if you want to refer to
 19 it, it's on page 6 of your statement, you say something
 20 which you've partly dealt with and I want to clarify.
 21 You felt it was not right for GM Levy to assign himself
 22 in charge. Is that, just so I can move on from it, the
 23 evidence that you gave later (sic) today because you
 24 felt he couldn't necessarily be a NILO and in charge at
 25 the same time? Is that the issue that you were raising

110

1 within your statement with that observation?
 2 A. Yes.
 3 Q. So when you indicated it wasn't right for him to assign
 4 himself, and I think the chair clarified this but I want
 5 to be absolutely clear about this, what he did was
 6 probably the right thing to do but he should perhaps
 7 have relieved himself of other duties?
 8 A. Somebody needed to be incident commander and Group
 9 Manager Levy made, in my view, a good call to make
 10 himself incident commander because somebody needed to be
 11 incident commander.
 12 Q. You again observe in your statement, and I want to ask
 13 you about it, that decision, you say obviously, had been
 14 made at command support not to attend. So it wasn't
 15 just a matter, this is page 5 of your statement, just
 16 a matter of events dictated that they didn't attend, but
 17 you got the impression that a decision had been taken at
 18 command support not to attend and that such a decision,
 19 you add, should have been made on the ground. Could you
 20 just develop that, why such a decision should have been
 21 made on the ground?
 22 A. It should have been made by an incident commander.
 23 Q. Yes.
 24 A. To attend (overspeaking).
 25 Q. We're talking across each other. It's the system. I'll

111

1 let you talk.
 2 A. As I stated before, decisions regarding mobilisation,
 3 resources, tactics, plans, et cetera, should be made
 4 at the scene by an incident commander, not a command
 5 support room.
 6 Q. And that's for obvious reasons, because someone on the
 7 ground has a far better impression, to put it mildly, of
 8 what actually is going on; is that right?
 9 A. That is one of the reasons, yes.
 10 Q. Is there any good reason why such decisions should be
 11 made in the control -- in command support?
 12 A. There could be some decisions made in the command
 13 support room, eg a very large incident occurring over
 14 numerous sites where decisions may be made by someone
 15 who has an overall picture of what's going on in the
 16 service, not necessarily for one incident but a number
 17 of incidents where decisions may be made to reduce
 18 mobilisations because resources are low. So some
 19 decisions can be made in the command support room to aid
 20 the service to run effectively, but regarding specific
 21 incidents themselves, they should just be made at the
 22 incident.
 23 Q. So to top and tail that, as far as the incident on
 24 22 May is concerned, is it your view that there was no
 25 good reason why the decision needed to be taken in

112

1 command support and that it should have been on ground
 2 level?
 3 A. Unless, as I stated, they had a bigger picture and there
 4 may have been other events unfolding, which we weren't
 5 aware of, and that decision was made to hold back
 6 specialist resources in case they were needed elsewhere,
 7 which would have been -- sorry, sir?
 8 SIR JOHN SAUNDERS: Could you let me explore that a bit
 9 more? Suppose you had a situation where the command
 10 room had been told by the police, maybe, that they had
 11 real fears that another bomb was about to explode and
 12 that it really wasn't safe to go in. Could they not
 13 then give a direction to the incident commander saying,
 14 "You are not to go in, it's dangerous"?
 15 A. I'd say in that situation, sir, where they'd be
 16 advising, they'd be advised strongly to attend, and if
 17 that came from a high-ranking officer, the incident
 18 commander would think strongly about that, but as we've
 19 stated, they have the knowledge on the ground,
 20 information, and if people need help, that's what we're
 21 there for. They might overrule that decision.
 22 SIR JOHN SAUNDERS: So strong advice maybe, but not actually
 23 direction?
 24 A. That's my understanding of what should happen.
 25 SIR JOHN SAUNDERS: Thank you.

113

1 MR COOPER: Thank you, sir.
 2 I want to now move briefly on to the
 3 debriefing/post-events section of my questions of you.
 4 Did you attend a debrief with ACO Harris shortly after
 5 the --
 6 A. I did.
 7 Q. -- event. Effectively that went very poorly, didn't it,
 8 for everyone?
 9 A. Very poorly.
 10 Q. To cut a long story short, ACO Harris had no answers to
 11 give anyone, did he?
 12 A. That's what I put in my statement and that's what
 13 occurred, yes. All the questions being asked by
 14 firefighters and officers he couldn't answer.
 15 Q. In fact it got so bad that many, if not all,
 16 firefighting officers turned their back on him?
 17 A. I've been to many hot debriefs in my career and that was
 18 the most emotional debrief I've ever attended.
 19 Q. And your colleagues, brave men and women who wanted to
 20 mobilise and give whatever help they could, were very
 21 angry with ACO Harris, weren't they?
 22 A. Not necessarily to ACO Harris, they were frustrated. It
 23 was being directed at ACO Harris because he was the
 24 high-ranking officer in attendance and he was there to
 25 provide answers and he couldn't provide any answers.

114

1 Q. I put to you a moment ago and I clarify it: people
 2 actually did turn their backs on him, didn't they?
 3 A. There wasn't a conscious decision to -- I think it was
 4 just when you're not being answered, people show their
 5 emotions differently, whether it's turning away, walking
 6 away, people were crying. I have never seen
 7 firefighters crying at a debrief. Never. That's the
 8 level of emotion that was going on. We all express out
 9 emotions differently. It wasn't to disrespect him,
 10 ACO Harris, it was just their -- the firefighters and
 11 officers felt such shame, disappointment, all words you
 12 could use to say, to describe why we didn't attend that
 13 incident to help, help people.
 14 Q. You say in your statement, after that, it took you
 15 a couple of days to put your shirt back on, meaning your
 16 uniform, back on.
 17 A. Correct. As I said, I felt ashamed to be a firefighter
 18 and I felt like we'd let the people of
 19 Greater Manchester down. We're there to help and we
 20 didn't do our job.
 21 Q. I'm not, and I won't, out of duty of humanity, I want to
 22 tell you, I'm not directly blaming you for anything on
 23 behalf of the families. I don't want you to go away
 24 with that. You understand that, don't you?
 25 A. I totally understand that, yes. Again, even with

115

1 information later, as I said, it's not ashamed, I just
 2 feel so sad we didn't attend for the families.
 3 Q. Just to clarify, you've left the Fire Service now,
 4 haven't you?
 5 A. I'm retired, sir.
 6 Q. That had nothing to do with your frustration, your anger
 7 or whatever emotions you were feeling as a result of the
 8 arena? That's a totally separate matter, is it?
 9 A. No, I've always been proud to be a member of
 10 Greater Manchester Fire and Rescue Service and I still
 11 am. I still see it as a great service. I am not
 12 ashamed of the service at all, I'm still proud of it,
 13 but we didn't show ourselves in our best light and show
 14 what we could do on that night.
 15 MR COOPER: Thank you, sir. I have no further questions.
 16 SIR JOHN SAUNDERS: Thank you very much.
 17 Further questions from MR GREANEY
 18 MR GREANEY: Sir, that leaves Mr Warnock to ask his
 19 questions on behalf of GMCA. He is there. Just before
 20 he does so, in case it's something that he wants to deal
 21 with, you posed a question about whether there was any
 22 written guidance on the role of the CSR during the
 23 course of an incident in the context of whether they
 24 should assume command. The answer to your question is
 25 yes, there is, and I'll draw this to the witness'

116

1 attention as well. I'm grateful to Mr Smith for drawing
 2 this to our attention. The INQ reference is
 3 {INQ004450/1}.

4 Mr Lopez, if we go to the final page, I can see that
 5 there is a date. {INQ004450/6}. Can we enlarge the
 6 bottom half? Whether it is a printing date or the
 7 actual date of the document, I am not certain at the
 8 moment. We can establish that in due course.
 9 Nonetheless, even if it post-dates the events of
 10 May 2017 it may be informative. The date on it is
 11 21 December 2018.

12 Can we go to {INQ004450/1}, please, again, Mr Lopez?
 13 Mr Topping, we can see this is a guidance document,
 14 "Command support room emergency response". Do you
 15 recall this document at all?
 16 A. I've seen it before, yes.
 17 Q. Do you remember whether this is a document that was in
 18 existence in May of 2017? Or something --
 19 A. Something similar would have been, yes.
 20 Q. If we go to {INQ004450/5}, the top half of the page --
 21 let's go back to {INQ004450/1}, a very good spot by
 22 Mr Suter. Sorry to jump around.
 23 {INQ004450/3}. Can we enlarge the top half, please?
 24 My suspicion that the other date was a printing date
 25 seems to be correct. We can see this is version 1 and

117

1 the date is 27 September 2014.
 2 Finally, we can go to the two relevant paragraphs
 3 which are at {INQ004450/5}. The top half of that page,
 4 Mr Lopez.
 5 Paragraph 3:
 6 "When the CSR is activated, the PO..."
 7 Is that principal officer?
 8 A. Correct.
 9 Q. Who was the principal officer on the night of 22 May?
 10 A. The chief.
 11 Q. "When the CSR is activated, the PO, the assistant
 12 principal officer, APO, or the command support room
 13 officer, CSRO, are not in command of the incident or
 14 incidents. The command of an incident is the sole
 15 responsibility of the incident commander at the scene."
 16 So that, you might feel, very much accords with your
 17 own sense of the position on the night?
 18 A. Yes.
 19 Q. But then we ought to add in paragraph 5:
 20 "It is recognised though that there will be
 21 incidents of such magnitude, complexity or of special
 22 interest that a PO may decide to assume command of the
 23 CSR. In such cases the PO will be assisted by the APO
 24 and CSRO."
 25 So if I'm reading that correctly, it seems that your

118

1 understanding, as you've described it to us, would be
 2 what was to be expected, but there were circumstances in
 3 which a different approach might be adopted?
 4 SIR JOHN SAUNDERS: I wonder whether it does mean that.
 5 It's command of the CSR rather than the incident, which
 6 is what talking about. Anyway, someone no doubt will
 7 enlighten us, but in normal circumstances the incident
 8 commander takes command, so what you said was correct,
 9 and your caveat too was right.
 10 MR GREANEY: Thank you very much. I just wanted to draw
 11 that to your attention.
 12 SIR JOHN SAUNDERS: I'm grateful to Mr Smith for doing that.
 13 It is quite remarkable, bearing in mind the quantity of
 14 documents we have in this case, how speedily someone
 15 finds a document when anyone makes a request.
 16 MR GREANEY: Mr Warnock now, please.
 17 Questions from MR WARNOCK
 18 MR WARNOCK: Mr Topping, you've described how, when you
 19 arrived at Central Station, you found things weren't
 20 right. The firefighters were frustrated, you said that
 21 there was confusion and impatience and some anger, and
 22 that you and the firefighters had no understanding of
 23 what was going on. You also said the NIOs seemed
 24 frustrated as well. Did they seem to know what was
 25 going on?

119

1 A. Regarding a deep conversation what was going on, as
 2 stated before, I had an initial conversation with them
 3 when I arrived, it was obvious that they were discussing
 4 things together and that -- I didn't ask them
 5 specifically that question. I was helping elsewhere,
 6 like NWSA and the police. But during the night it came
 7 back that they were being -- decisions were being made
 8 elsewhere, they felt as frustrated as anybody else that
 9 they couldn't attend and upset as well that they
 10 couldn't attend.
 11 Q. Did they say to you whether or not they knew what was
 12 actually happening at the arena?
 13 A. I cannot recall. If they did, I can't recall what they
 14 said to me because there was a lot of information coming
 15 from firefighters via social media, some was actually
 16 speaking to paramedics, a couple of firefighters had
 17 partners who were paramedics and they were getting
 18 information from them. So I was getting information,
 19 but I can't now recall where that information was coming
 20 from.
 21 Q. You talked about in your debrief document afterwards how
 22 one of the issues you raised was the lack of information
 23 given to crews. Do you know if the NIOs themselves
 24 actually had any information to give to the crews?
 25 A. I didn't see -- when I was there, I didn't see any of

120

1 the NILOs discussing what was going on with the crews.
 2 As stated, within 5 to 10 minutes we'd mobilised, so
 3 prior to my attendance, whether the NILOs had approached
 4 the crews, they could very well have done, but I didn't
 5 see it during my time there. They were making
 6 attendance when I was there. The first NILO I met,
 7 Station Manager Berry, and then Group Manager Meakin
 8 went so things were happening within a few minutes of my
 9 arrival .
 10 Q. One of the other points you made in relation to your
 11 debrief after the incident was that one of the things
 12 you thought should have happened was there should have
 13 been a command structure mobilised for five pumps.
 14 A. Yes.
 15 Q. And when you were asked about this earlier, you said
 16 there should have been -- you said there should have
 17 been a predetermined attendance. Can you just explain
 18 to the inquiry what a predetermined attendance is?
 19 A. A predetermined attendance is made for all incidents
 20 at the initial stages. So when you get a call to attend
 21 an incident, RTC, house fire or an explosion, there is
 22 a -- basically the amount of work what is required at
 23 that incident is calculated and that calculation will
 24 predetermine the number of appliances and officers what
 25 that incident will require at that initial stage to cope

121

1 with it safely and effectively . It doesn't mean them
 2 appliances are enough to deal with the incident, but an
 3 incident commander when they arrive can make up the
 4 incident. What I mean by that is ask for additional
 5 resources.
 6 Q. You said it involves a calculation as to the number
 7 of -- the response requirements for a particular type of
 8 incident. That's a calculation that's done before the
 9 incident has happened, is that right, it's
 10 a predetermined calculation?
 11 A. Correct. It's done prior to the --
 12 Q. Is that the case?
 13 A. It is the case, yes.
 14 Q. Right.
 15 SIR JOHN SAUNDERS: You'll have to explain that. Sorry.
 16 Do you mind if I take that up? I don't understand that
 17 bit of evidence. If it's a house fire, there's
 18 a standard instruction that X number of appliances will
 19 attend. If it's an explosion, there's a standard
 20 instruction that X plus Y attend?
 21 A. Simply, yes.
 22 SIR JOHN SAUNDERS: Thank you. I now understand,
 23 Mr Warnock. Thank you very much.
 24 MR WARNOCK: How does that get implemented? Who actions
 25 that predetermined attendance?

122

1 A. Regarding how are they mobilised?
 2 Q. Yes.
 3 A. Or where it's stored? It's the system at
 4 North West Fire Control --
 5 Q. Sorry, right. Sorry, I interrupted you. You said it's
 6 the system at North West Fire Control.
 7 A. Yes. If North West Fire Control receive a call for
 8 a house fire, they will put in the system that they're
 9 attending a house fire, and from that will come
 10 a predetermined attendance for a house fire, which in
 11 Greater Manchester is three pumps. Them three pumps
 12 will mobilise to the house fire.
 13 Q. Right. So when you said in your evidence earlier, you
 14 felt there should have been a predetermined attendance
 15 in this case, were you suggesting that there should have
 16 been a predetermined attendance sent for this type of
 17 incident?
 18 A. I would expect for this type of incident, that there
 19 would have been a predetermined attendance calculated to
 20 mobilise at this type of incident, yes.
 21 Q. When predetermined attendance happens, how does that
 22 feed into incident command? How does incident command
 23 fit with that?
 24 A. It sits with the number of appliances what are being
 25 mobilised. The larger -- put simply, the larger number

123

1 of appliances, the more high-ranking an officer will be
 2 in charge. At a simple level what I've described as
 3 a house fire requiring three pumps, that would require
 4 a watch manager in charge. As we go up to --
 5 Q. So if a predetermined attendance is sent to an incident,
 6 is there an incident command created by that?
 7 A. Yes.
 8 Q. And you said it's the -- who takes the incident command?
 9 Sorry, I missed -- the feed broke up slightly in your
 10 answer on that.
 11 A. It could occur in two ways. If at an initial stage we
 12 take it as the house fire, to make it simple again,
 13 three pumps in attendance, the first attending watch
 14 manager would be the person in charge, the incident
 15 commander. Going on from that, when we get a make-up,
 16 asking for more resources, depending how many pumps get
 17 asked for and other specialist appliances, then the
 18 system would nominate an incident commander and
 19 generally the nearest officer of suitable rank would be
 20 nominated as incident commander and they would be told
 21 via the pager, as I mentioned before about looking at
 22 the pager, that they are incident commander. From that,
 23 further functional officers would be nominated to deal
 24 with that size of incident, the appliances and the
 25 command structure required to cope with them appliances

124

1 to deal with that incident.

2 Q. Does that all flow from the predetermined attendance
3 being mobilised?

4 A. It could. It all flows — yes, it all flows — when
5 I say there would be a predetermined attendance for
6 incidents there's also, you could say, predetermined
7 attendance for make-ups. So when you ask for, say,
8 10 pumps, from that will come a structure. That will
9 require so many different appliances, the command unit,
10 supporting officers, that will flow from that. The
11 incident commander can ask for additional resources,
12 including functional officers, but that is predetermined
13 what you will receive if you make up a certain number of
14 appliances.

15 Q. You were asked some questions about the command support
16 room and its role and you said correctly, in line with
17 the policy that Mr Greaney has just taken you to, that
18 incident command decisions should normally be made by
19 the incident commander, not in the command support room,
20 and I think you said in 99.7% of cases, that should be
21 so. Where in most cases would the incident commander
22 actually be?

23 A. At the scene.

24 Q. In this incident, was anyone actually at the scene?

25 A. Not until approximately 2 hours, which — it was a NILO

125

1 (overspeaking) pumps.

2 Q. In this incident, given that no one was at the scene,
3 would those in Thompson Street have had any better
4 awareness, do you think, than those in the command
5 support room?

6 A. I'd probably say the awareness —

7 Q. Awareness of what was going on.

8 A. Regarding going on at the arena?

9 Q. Yes.

10 A. A lot of information was being received, as I said
11 before, via phone calls made to paramedics, whose
12 partners were firefighters, also just by observing NWS
13 and other ambulance services attending the incident. It
14 was obvious that they was making attendance and that
15 help was required. Whether the command support room had
16 more information, you'd have to ask the command support
17 room who was in attendance that question, I don't know.
18 But it was obvious that other agencies were making
19 attendance and we wasn't.

20 MR WARNOCK: Thank you very much, Mr Topping. That's all
21 I wanted to ask you.

22 SIR JOHN SAUNDERS: Thank you very much, Mr Warnock.

23 MR GREANEY: Sir, I have no further questions for
24 Mr Topping. I don't know if you do.

25 SIR JOHN SAUNDERS: No. 2.15?

126

1 MR GREANEY: Yes.

2 SIR JOHN SAUNDERS: Mr Topping, I'm very grateful for your
3 evidence. Thank you very much for coming. Obviously
4 a very difficult occasion for you to come and give
5 evidence about.

6 (1.18 pm)

7 (The lunch adjournment)

8 (2.15 pm)

9 MR GREANEY: Sir, good afternoon. The gentleman in the
10 witness box is Watch Manager Andrew Simister. Could he
11 be sworn, please?

12 MR ANDREW SIMISTER (sworn)

13 Questions from MR GREANEY

14 MR GREANEY: Would you begin, please, by telling us your
15 full name?

16 A. Andrew Simister.

17 Q. Mr Simister, on 22 May 2017 were you a watch manager
18 with Greater Manchester Fire and Rescue Service?

19 A. Yes.

20 Q. I'm going to take these periods from a document prepared
21 by you on behalf of Greater Manchester Police. In 2017
22 had you worked for GMFRS for 23 years?

23 A. That's correct, yes.

24 Q. And had you been a watch manager for 11 of those
25 23 years?

127

1 A. That's correct.

2 Q. On the night of the attack, were you the watch manager
3 of Blue Watch?

4 A. That's correct, yes.

5 Q. Blue Watch being based at Manchester Central
6 Fire Station?

7 A. Yes.

8 Q. On Thompson Street?

9 A. Yes.

10 Q. As of that date, had you worked at that station and
11 in that role for a considerable period?

12 A. Yes, approximately 11 years.

13 Q. So you were well familiar with the role of watch
14 manager?

15 A. Yes.

16 Q. And well familiar with that particular fire station?

17 A. Yes.

18 Q. We have been provided with your training records and I'm
19 going to ask Mr Lopez, who operates the system, to put
20 on the screen, please, {INQ040450/1}.

21 The document we're going to see I think must deal
22 just with a part of the training that you had
23 undertaken.

24 Are you familiar at all with this document?

25 A. Yes. I've seen it, yes.

128

1 Q. We can see that it covers a period from 2013 up to 2016
 2 and also the years in between, although for some reason
 3 the dates aren't in chronological order.
 4 There are various courses, it seems, that you
 5 attended, but the theme of all of these was firearms and
 6 active shooter?
 7 A. Yes. They're not courses, what they are is e-learning
 8 packages, so it's like a PowerPoint and then there will
 9 be a couple of questions at the end of the PowerPoint.
 10 So they're not actual courses which you attend.
 11 Q. That's a very helpful clarification .
 12 SIR JOHN SAUNDERS: And you do them on your own, do you?
 13 A. Yes, they're like e-learning packages.
 14 MR GREANEY: Is this something you're required to do as
 15 a form of continuing professional development or
 16 something of that sort or is it something you chose to
 17 do?
 18 A. No, it's something that's programmed in that you have to
 19 complete on a yearly basis.
 20 Q. Did any or all of these e-learning programmes deal with
 21 marauding terrorist firearms incidents?
 22 A. Yes, it's more of an awareness really rather than
 23 procedural. Like I say, TRU and the SRT will get far
 24 more training. With us, I would say it's more of an
 25 awareness training.

129

1 Q. I just want to make sure that I understand that. Is
 2 what you mean that these programmes made you aware of
 3 the possibility or risk that there might be an MTFA?
 4 A. Yes, I think they cover things like the zones, what to
 5 do if you're caught in a -- if you go to an incident and
 6 you're caught in a terrorist event, like "See, Tell and
 7 Act", and things like that. It wasn't very good
 8 training, it was just like an e-learning package. I can
 9 only say it was like a familiarisation with the
 10 incident.
 11 Q. Really, I suppose what we'd like to know is whether you
 12 had received any training as a firefighter in how
 13 in that capacity you would respond in an Operation Plato
 14 type situation, so in an MTFA situation.
 15 A. From our point of view, from your standard firefighter,
 16 basically, we were told to, like, withdraw or if there
 17 was an MTFA incident going on, we wouldn't operate
 18 in the warm zone, we'd be outside.
 19 Q. Your understanding was that you wouldn't enter either
 20 the warm or the hot zone given the type of firefighter
 21 that you were?
 22 A. Yes, yes.
 23 Q. Were you given any training in what would be expected of
 24 you in such a situation? This is before May 2017 I'm
 25 talking about.

130

1 A. No, not really, no. We understood the zones and like
 2 the police would be in charge of that type of incident.
 3 But really, from -- your standard firefighter didn't
 4 receive hardly any training in this sort of thing. It
 5 was more, like I've said, an awareness, really, of zones
 6 and things like that, really.
 7 Q. Thank you. I did have a question in my notes to ask you
 8 whether you remained an officer with GMFRS, but it's
 9 obvious from your appearance that you do.
 10 A. Yes, same watch.
 11 Q. And same position on that watch?
 12 A. Same position on that watch, yes.
 13 Q. Let's move then to the events of 22 May 2017. Were you
 14 working a night shift that day?
 15 A. Yes, we was. We started at 7 o'clock that night.
 16 Q. And how many engines were operational within the station
 17 that night?
 18 A. Two fire engines.
 19 Q. And on those fire engines, was each of them crewed by
 20 four firefighters, including yourself?
 21 A. Yes, that's correct.
 22 Q. Was your engine, and we'll identify this because it's
 23 relevant when we look at a log, was your engine
 24 designated G16P/1?
 25 A. Yes, we call Golf 16 Papa 1.

131

1 Q. Was that crewed by Firefighters Bradbury?
 2 A. Yes, sir.
 3 Q. Collins?
 4 A. Yes.
 5 Q. Baker?
 6 A. Yes.
 7 Q. And of course you. The second engine was designated
 8 G16P/2.
 9 A. Correct, yes.
 10 Q. That was crewed by Crew Manager Turner?
 11 A. Yes.
 12 Q. And Firefighters Redfern, Bird and Ludley; is that
 13 correct?
 14 A. That's correct, sir.
 15 Q. Was each of those engines G16 because G16 is the
 16 designation of the fire station that you were based at?
 17 A. Yes. It's the radio call signs.
 18 Q. Is that fire station the nearest station to the
 19 Manchester Arena?
 20 A. It is.
 21 Q. You may know better than Google, but Google suggests
 22 it's just under a mile away from the arena.
 23 A. Yes, it's 1.2 kilometres.
 24 Q. Let's get to how long it takes to get there when we get
 25 nearer to the relevant events.

132

1 At 22.31 hours on 22 May, were you at the station?
 2 A. Yes, sir.
 3 Q. Did you hear a loud bang?
 4 A. I did. I heard a very loud bang at the station. It's
 5 not uncommon for us to hear bangs in the city centre
 6 station. We hear a lot of industrial fireworks going
 7 on. We had the Wing Yip cash and carry, which is next
 8 door, who tend to throw lot of skips about and we get a
 9 lot of loud bangs from that, we get cars backfiring and
 10 with the building work that's going on in Manchester,
 11 you do hear crashes. But on that night, the bang was
 12 louder than normal and it did make me bolt up in my seat
 13 because it was that loud. But I didn't put it down to
 14 it being a bomb, it was just a loud bang.
 15 Q. So at 22.31 hours, you heard a bang, which obviously you
 16 now realise was the explosion at the arena?
 17 A. Yes, louder than normal, but yeah, at that time I didn't
 18 know that that's what it was.
 19 Q. At the time you put it down to some other innocent
 20 explanation?
 21 A. Yes.
 22 Q. At about 22.38 hours, was something called a pre-alert
 23 received at Fire Service Control, the address being
 24 Manchester Arena?
 25 A. Yes. That pre-alert pre-alerted the station, so what

133

1 the pre-alert did was, as far as I am aware, a call's
 2 come into Fire Control and we've been pinged as the
 3 nearest station. We will get an alert saying that we
 4 may turn out. It was done on a trial period, so we were
 5 trialling pre-alerts at the time. So the idea of
 6 pre-alert was to get the crews up to the console, get
 7 the address, and I think it said NCP car park,
 8 Manchester Arena. So we stand near the console, get
 9 dressed in our fire gear and we wait to be mobilised.
 10 If the call turns out in control not to be
 11 a mobilisation, we then stand down and go back to
 12 whatever we was doing on station.
 13 Q. So effectively it's a warning that you might be
 14 deployed?
 15 A. Yes.
 16 Q. So you get yourself ready to get moving as quickly as
 17 possible?
 18 A. That's correct.
 19 Q. And then if a number of minutes pass without you
 20 actually being mobilised, then you will stand down and
 21 return to whatever else you were doing?
 22 A. That's correct.
 23 Q. On this occasion, having received that pre-alert at
 24 22.38 hours, in fact after 5 minutes had you received no
 25 further information to turn out?

134

1 A. No, no further — normally, if we was going to turn out,
 2 the mobilisation bells would go off, but in this
 3 instance the mobilisation bells didn't go off, so after
 4 approximately 5 minutes we stand ourselves down.
 5 Q. Is that what you did on this occasion?
 6 A. Yes, that's correct.
 7 Q. At 22.46 hours, was another pre-alert received at
 8 Manchester Central Fire Station for the same address?
 9 A. That's correct, yes.
 10 Q. At the same time, or shortly afterwards, did your
 11 station receive a phone call from Gorton Fire Station?
 12 A. That's correct, yes.
 13 Q. What was the effect of the information they provided to
 14 your station?
 15 A. I think it was my crew manager that answered the phone
 16 and it was Gorton Fire Station and they basically said,
 17 "Why are you still on station? A bomb's gone off at the
 18 arena". It was at that point we put the bang that we
 19 heard being the explosion and the two pre-alerts to be
 20 to do with the arena.
 21 SIR JOHN SAUNDERS: Can you help me where Gorton
 22 Fire Station is? How far away from you?
 23 A. It's quite a way from us. It's about 3 miles up
 24 Hyde Road, towards Denton.
 25 SIR JOHN SAUNDERS: Thank you.

135

1 MR GREANEY: So substantially further from the arena than
 2 you were?
 3 A. Yes.
 4 Q. So at that stage, having received a pre-alert, and
 5 therefore stood up, having received information via
 6 another station that there had been a bomb and why
 7 hadn't you been mobilised there, where did you think you
 8 were going?
 9 A. I thought any minute going we're going to be mobilised
 10 to the Manchester Arena. So I instructed my crews, get
 11 to the machines, we opened the engine house doors, there
 12 was a sea of blue lights heading towards the arena. So
 13 any minute, I thought, we were going to get mobilised to
 14 the Manchester Arena.
 15 Q. When you say "a sea of blue lights heading towards the
 16 arena", do you mean —
 17 A. Police, mainly police.
 18 Q. So other emergency services going in the direction of
 19 the arena?
 20 A. Yes, and also once we got that phone call, and the
 21 information from Gorton, my watch members got on their
 22 phones, their social media platforms, and again it was
 23 all over the social media platforms on their phones.
 24 Q. So it was obvious to you, was it, that this was no false
 25 alarm, it was real?

136

1 A. Something was happening, something was going on, yes.
 2 Q. And you expected to be mobilised to the incident?
 3 A. Yes.
 4 Q. Where did you and your crew, you and your watch, want to
 5 go?
 6 A. To the arena.
 7 Q. Why?
 8 A. Because that's our job, we put two and two together,
 9 there's been an explosion at the arena, and that is my
 10 job, you know, to ride a fire engine. We've got first
 11 aid capabilities. I don't know if that explosion has
 12 resulted in a fire, but after an explosion, people are
 13 in distress and that's our job to go.
 14 Q. At that time, so just gone half past 10 or now just gone
 15 quarter to 11, if you had got into your fire engines,
 16 put on your lights and siren and headed to the arena,
 17 how long would it have taken you to get there?
 18 A. It would have took us less than 3 minutes. That was
 19 from being dressed because we were already dressed from
 20 the pre-alert, so if the mobilisation bells had gone,
 21 we'd have been down there in about 3 minutes.
 22 Q. In the result, were you mobilised to the arena at that
 23 stage?
 24 A. No, no. The bells dropped and I was expecting to read
 25 the sheet to say the Manchester Arena, but it said

137

1 "Rendezvous point: Philips Park Fire Station".
 2 Q. So you said the bell dropped, I think, does that mean --
 3 A. The mobilisation bells. The pre-alert bell was slightly
 4 different than a mobilisation bell.
 5 Q. Instead of the arena, you were going to rendezvous at
 6 Philips Park Fire Station?
 7 A. That's correct, yes.
 8 Q. Is that fire station in fact in the opposite direction
 9 from the arena?
 10 A. It's 2 miles in the opposite direction.
 11 Q. So rather than driving to the arena, you were driving --
 12 A. Away, yes.
 13 Q. You completed on 20 June 2017 what Greater Manchester
 14 Police called a self-administered interview, which
 15 essentially involved you writing down what you could
 16 recall of the incident, did it not?
 17 A. Yes, sir.
 18 Q. I'll give the INQ reference, although it's a very short
 19 passage, so I'm not going to ask for it to go on the
 20 screen. {INQ019426/1}. That is the document itself.
 21 I'm going to ask you about something that you wrote on
 22 {INQ019426/6}.
 23 You describe the decision to deploy you to
 24 Philips Park as being:
 25 "A massive decision error."

138

1 A. That's correct. When we got the sheet, it said
 2 Philips Park, we did study the sheet long and hard as if
 3 to say: Philips Park, Philips Park, why are we going
 4 there, why are we going there? We thought we were going
 5 there because it was a plan, they've got a plan. That's
 6 why they're sending us there and not to the arena.
 7 Q. Did it become apparent to you, and I'm just asking about
 8 your view, whether there was in fact a plan?
 9 A. There was no plan.
 10 Q. Indeed, that's very much to repeat what you were to say
 11 to the Kerslake Panel when you said of the deployment to
 12 Philips Park, this is {INQ023524T/11}:
 13 "I thought there was a plan but there obviously was
 14 not."
 15 A. Correct, sir.
 16 Q. As you were moving off from Manchester Central to drive
 17 to Philips Park, did you see anything in particular?
 18 A. Yes, we saw a couple of ambulances start to pull on the
 19 forecourt of the station. I think my driver jumped out
 20 and spoke to them and they said, "Oh, we've been told to
 21 come here". My driver jumped back in the cab and we
 22 drove to Philips Park.
 23 SIR JOHN SAUNDERS: In order to come on to your fire station
 24 to park, would the Ambulance Service have told the Fire
 25 Service what they were doing?

139

1 A. They wouldn't have told the station. I don't know if
 2 they had communications through their control rooms,
 3 sir.
 4 SIR JOHN SAUNDERS: Right, thank you.
 5 MR GREANEY: I'm next going to ask you to give a narrative
 6 account of what happened at Philips Park and how you
 7 felt about it. Then I'm going to take you to two
 8 recordings of calls that we believe you made, but you'll
 9 be able to confirm that one way or the other.
 10 On arrival at Philips Park, did you receive any
 11 official information from control about what was going
 12 on?
 13 A. No. I had to ring them to get some information about
 14 what was happening.
 15 Q. As I've said, we'll come on to a call we believe you
 16 made. So it may be one thing to obtain official
 17 information, but were you in receipt of information from
 18 a non-official source?
 19 A. When we arrived at Philips Park, I think Philips Park
 20 was surprised to see us because we were all booted in
 21 fire gear, all hyped up, and I think I spoke to
 22 Neil Helmrich, who was the watch manager of Blue Watch
 23 at Philips Park, and he just said, "I had a phone call
 24 from control who just said there might be an active
 25 shooter at the arena".

140

1 So then I explained that it's not a shooter,
 2 a bomb's gone off. Once I got that information off him,
 3 I think they turned the television on, and it was there
 4 on Sky News, I think. It was at that point I went
 5 downstairs to ring control and find out why we were
 6 here.
 7 Q. Did you know a fire officer called Nick Mottram?
 8 A. Yes, Nick Mottram was there. He was a crew manager from
 9 Gorton Fire Station. He was detached in that night to
 10 Gorton and his fire engine was brought in as one of the
 11 four pumps that was rendezvousing at Philips Park.
 12 Q. He had been brought in from Gorton?
 13 A. Yes, to make the four fire engines.
 14 Q. Did he tell you about a call that he'd received from
 15 someone close to him?
 16 A. Yes, his wife was a paramedic and she'd phoned him to
 17 say it was a nail bomb that had gone off at the arena.
 18 Q. Was he able to tell you where she was?
 19 A. I can't remember. I think she said she might have been
 20 on our yard at Manchester Central.
 21 Q. Just to remind you of what you said in a witness
 22 statement that you made on 5 December 2017 as I'm quite
 23 sure things will have been fresher in your mind at that
 24 time.
 25 A. Yes.

141

1 Q. This isn't a memory test. You said:
 2 "It was only because CM Mottram from Gorton
 3 Fire Station, who had also arrived at G18 Philips Park,
 4 had himself received a mobile call from his wife. His
 5 wife was a paramedic and was on scene at the
 6 Manchester Arena and was asking where we were."
 7 A. Yes.
 8 Q. You'd seen police cars going in the direction of the
 9 arena at any rate?
 10 A. Yes.
 11 Q. You'd received information now that paramedics were,
 12 it would seem, at the arena. So were you realising from
 13 this time, even if it wasn't obvious before, that the
 14 other two emergency services were at the arena?
 15 A. Yes.
 16 Q. Was it as a result of that that you spoke to your
 17 Fire Control?
 18 A. I spoke to our Fire Control to try and find out what was
 19 happening and why we hadn't been mobilised to the arena.
 20 Q. We'll come to the details, but in short, they were able
 21 to tell you that this was a really very serious incident
 22 and that a supervisor officer was on his way to
 23 Philips Park?
 24 A. Yes. I think she said there were three NILOs on their
 25 way to us.

142

1 Q. Who was the first NILO to arrive?
 2 A. It was Group Manager Carlos Meakin.
 3 Q. About how long after the bomb had gone off did he arrive
 4 there?
 5 A. I think it was about 25 past 11.
 6 Q. So going on for an hour?
 7 A. Yes.
 8 Q. When he arrived at Philips Park, did you speak to him?
 9 A. Yes. A few of my colleagues were with me, myself,
 10 I think Crew Manager Mottram was there, and
 11 a firefighter, Tom Ludley. Because the frustration had
 12 boiled over as soon as -- because we were sick of
 13 waiting for someone to come and tell us what we were
 14 doing. Carlos Meakin was the first one to pull up in
 15 his car and as soon as he got out of the car, he was
 16 bombarded with all the information that we knew and
 17 we were asking, why are we here and we've not been
 18 mobilised to the arena.
 19 Q. So did you leave him in any doubt about the frustration
 20 that you and your officers were feeling?
 21 A. Yes. In the end he told us to back off because we were
 22 aggressive, if you like, because of frustration and
 23 anger that we hadn't been sent.
 24 Q. Do you recall that a second NILO, Group Manager Levy,
 25 also attended at about this time?

143

1 A. That's correct. As soon as we knew that Ben Levy had
 2 turned up, we went over to him again and gave him the
 3 same information.
 4 Q. Did you explain to him also that in your view, in any
 5 event, Philips Park was not a suitable rendezvous point?
 6 A. It wasn't for the arena -- and because of the size of
 7 the station.
 8 Q. Let's take those in reverse. You say the size of the
 9 station. What about the size made it an unsuitable RVP
 10 point?
 11 A. Just because it's not a big yard. Manchester Central
 12 would have been the best rendezvous point. We should
 13 have stayed there and the pumps should have come to us.
 14 (1), it was closer to the arena, and (2), the yard is
 15 massive. We've got two yards, two large open areas.
 16 Q. The way you express it in your statement is:
 17 "By this time [so by the time you have spoken to
 18 GM Meakin and also to GM Levy] I was extremely
 19 frustrated at the lack of action and I had to walk away
 20 from the NILOs."
 21 A. Yes. Just the sheer frustration and anger.
 22 SIR JOHN SAUNDERS: Could I just stop and go back, because
 23 otherwise I shall forget it. You told us how you put on
 24 the television and saw an incident had occurred on
 25 Sky TV.

144

1 A. Yes, I think it was Sky.
 2 SIR JOHN SAUNDERS: What sort of time are we talking about?
 3 A. I think we had arrived at Philips Park, so it must have
 4 been around 10.55.
 5 SIR JOHN SAUNDERS: Were they showing live images on Sky TV,
 6 ie did they have a cameraman there, or can't you
 7 remember?
 8 A. I can't remember. I don't know if they were social
 9 media pictures or Sky had had a cameraman there
 10 (overspeaking).
 11 SIR JOHN SAUNDERS: But you could actually see pictures on
 12 the television of what was going on at the arena?
 13 A. Pictures of the arena, yes. Something was going on,
 14 yes.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR GREANEY: About 20 minutes after you had been at
 17 Philips Park for a period of time were you in fact
 18 deployed somewhere else?
 19 A. Eventually we were deployed back to Manchester Central
 20 en masse, everyone that was at Philips Park
 21 Fire Station. In a large convoy we redeployed to
 22 Manchester Central Fire Station.
 23 Q. So you'd been sent away from Manchester Central to
 24 Philips Park and now you were being sent back?
 25 A. Again, yes.

145

1 Q. Not to the arena, back to your home station?
 2 A. Yes.
 3 Q. In convoy with other vehicles?
 4 A. With SRT, TRU, and the four pumps and the three NILOs.
 5 Q. As this was happening, how were you feeling as you drove
 6 back to your station?
 7 A. Again, just frustration and anger and, like, you know,
 8 "What is going on here?"
 9 SIR JOHN SAUNDERS: Do you remember who actually gave that
 10 order?
 11 A. I think with the information that we gave to the NILOs
 12 as they came, the fact that the Ambulance Service were
 13 pulling on our yard and using it as a rendezvous point,
 14 I think that is — I think Ben Levy said he was going to
 15 speak to the chief or something. I believe he was on
 16 the phone to the chief asking if he could relocate the
 17 rendezvous point back to Manchester Central or to
 18 Manchester Central.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR GREANEY: When you arrived back in the yard of your
 21 station, what did you notice?
 22 A. It was just a sea of ambulances. We had to move the
 23 ambulances to get the fire engine back into the engine
 24 house there was that many ambulances on the
 25 fire station.

146

1 Q. Were the ambulances coming and going or just going or
 2 were they just staying?
 3 A. From what I remember, I think they were just going,
 4 coming on and going. So obviously the Ambulance Service
 5 must have been using Manchester Central as a holding
 6 area and then calling them in to the arena.
 7 Q. I indicated that we would listen to recordings of two
 8 calls that you're believed to have made. I'll give them
 9 their times. The first is a call at 23.06 and it's
 10 a very short call, 23.06.
 11 Again, Mr Lopez, could we have on the screen the
 12 transcript and then we'll listen to the audio. The
 13 transcript is {INQ001176/1} and the audio is
 14 {INQ029806/1}.
 15 This is a call to NWFC.
 16 SIR JOHN SAUNDERS: Where were you at the time?
 17 A. When I made this call, I was at Philips Park
 18 Fire Station.
 19 SIR JOHN SAUNDERS: Thank you.
 20 (Pause)
 21 MR GREANEY: I'm going to check with Mr Lopez whether
 22 there's a problem playing that audio. I know it's on
 23 the system.
 24 (Pause)
 25 MR GREANEY: Was this call made by you fairly soon after you

147

1 arrived at Philips Park?
 2 A. Yes, I was finding out what to do with the appliance,
 3 whether I stay on the radio of the appliance or we close
 4 the appliance down at that station.
 5 Q. In a moment we'll listen to it and then I'll just ask
 6 you to explain what's happening. You can give your
 7 answer in light of the recording that we'll listen to.
 8 (Audio played to the inquiry)
 9 This is the first call that you make in relation to
 10 this incident. What was it that you were seeking to
 11 achieve in making that call or to understand?
 12 A. (1), do I close down on the station, which means we then
 13 mobilised on the station bells, not sitting on the radio
 14 waiting for a call to come in on the radio. So we are
 15 closing down at that station if that makes sense.
 16 Q. I'm sure it makes sense to someone informed about the
 17 procedure, but can you just break it down and explain
 18 again? Perhaps not using technical language, exactly
 19 what you were aiming for.
 20 A. If I put it another way, say if the rendezvous point was
 21 a point on Oldham Road, then because it's not
 22 a fire station, someone would have to stay on the radio
 23 and be a contact point. Because we've gone to another
 24 fire station, then all the fire engines can close down
 25 at that fire station and we could turn out via the

148

1 station turnout system.
 2 Q. What does "close down" mean in this context?
 3 A. It means you come off your radio and you close down as
 4 if that was your home station.
 5 Q. So I've understood, I hope. There are obviously two
 6 ways in which you can be contacted and deployed --
 7 A. Yes.
 8 Q. -- in a fire station. One is on the radio system?
 9 A. Yes.
 10 Q. And the other is a system which is within the station?
 11 A. Built into the station.
 12 Q. And you wanted to know whether you should stay on the
 13 radio or whether you would be deployed via the station
 14 system?
 15 A. That's correct, sir.
 16 Q. What were you told?
 17 A. To close down at that station.
 18 SIR JOHN SAUNDERS: To stay on the radio means -- that means
 19 you can get going quicker? Does it or not?
 20 A. In this situation, no, not really, because we're all
 21 dressed in our fire gear ready to go. We wasn't doing
 22 anything else, just stood by waiting to go.
 23 SIR JOHN SAUNDERS: It's simply a matter of how they would
 24 contact you?
 25 A. Yes, they'd put the bells on and everyone would hear the

149

1 bells and we'd all respond together.
 2 MR GREANEY: You just needed to know by what means you were
 3 going to be contacted?
 4 A. Yes, sir.
 5 Q. The second call is timed at 23.25 hours. I think we're
 6 going to get a sense of the frustration that you've told
 7 us about from this.
 8 Mr Lopez, it's probably my fault, the delay earlier,
 9 because I didn't give you the audio reference. I'll
 10 give you that first this time. The audio reference, and
 11 then I'll give you the transcript in a moment, is
 12 {INQ040476/1}. If you could let me know when you're
 13 ready for the transcript reference and I'll give you
 14 that as well.
 15 (Pause)
 16 The INQ for the transcript is {INQ040474/1}, and
 17 there are two to three pages to this transcript, so if
 18 you can flip them over when we get to the correct point.
 19 (Audio played to the inquiry)
 20 So you were told by the operator, "It sounds like
 21 it's still a hot zone". Can we just put that back on
 22 the screen, Mr Lopez?
 23 Do you remember her telling you that?
 24 A. I don't, until I read the transcript now, but even that
 25 would -- we still should have been there.

150

1 Q. Thank you, Mr Lopez, we can now take that down.
 2 So that was at 23.25 hours, and by the sounds of it,
 3 Group Manager Meakin was not far away.
 4 A. Yes. I think at the end of the telephone call, she told
 5 me that he had just pulled on the yard, so I was ready
 6 to go off the phone and go and find him.
 7 Q. So in terms of the chronology it was very shortly after
 8 the end of that call, about I suppose 23.27, that you
 9 will have spoken to Group Manager Meakin?
 10 A. Yes, as soon as I put the phone down I went outside
 11 through the engine house and the yard and he was just
 12 there pulling up in his car.
 13 Q. How long after that do you believe you spoke to Group
 14 Manager Levy?
 15 A. I think it was a couple of minutes later and then we
 16 realised that Ben Levy had pulled up as well.
 17 Q. So we're now at probably just gone 11.30. How long
 18 after that were you deployed from Philips Park back to
 19 Manchester Central?
 20 A. I couldn't say without looking at a log.
 21 Q. We can find a log, I'm sure, if it becomes important.
 22 A. I think it was more or less near enough midnight by the
 23 time we got back to Manchester Central.
 24 Q. About midnight, something like that?
 25 A. Yes.

151

1 Q. Did you then spend a period of time at
 2 Manchester Central before being deployed somewhere else?
 3 A. Yes. We pulled up at Manchester Central, parked the
 4 fire engines back inside the engine house or the
 5 station, and then we waited around again. By that time
 6 I just thought we're not going to go because of the
 7 amount of time that's passed.
 8 Q. Were you throughout this period finding out more and
 9 more information through the kinds of routes that
 10 you have told us about, social media and the like?
 11 A. Yes. Some firefighters were still looking at social
 12 media, some of my firefighters had wandered off to talk
 13 to the ambulance crews. Like I say, when I phoned
 14 control, control already had all this information from
 15 what I gathered about the fatalities and things like
 16 that. I just didn't think we were going. By the time
 17 we got there at Central, I was deflated, frustrated, and
 18 I just didn't think we were going to go.
 19 Q. This morning we heard evidence from Mr Topping. He was
 20 describing the situation and he described a sense of
 21 anger amongst people who were -- amongst the
 22 firefighters who were present and amongst their
 23 supervisors. Is that in your view to put it too high?
 24 A. There was anger. There was a lot of anger. We should
 25 have gone. The firefighters wanted to go, we just

152

1 needed mobilising to the scene. There was a lot of
 2 anger.
 3 Q. In the end were you mobilised to the scene?
 4 A. Yes, yes. Two pumps from Manchester Central and one
 5 pump from Philips Park.
 6 Q. Did one of the NILOs, Station Manager Berry, travel
 7 along with you, perhaps in convoy in his own fire
 8 vehicle?
 9 A. That's correct, yes.
 10 Q. We'll just identify the time of that. I can help with
 11 that one at least. I'm going to put on the screen
 12 a log. It's the NWFC log. The reference is
 13 {INQ008375/1}. Once you have that, we're going to go to
 14 {INQ008375/29}, please.
 15 We're going to look at an entry which is towards the
 16 top of that page, timed at 00.22.08. Can you enlarge
 17 the top half of the page, please, and enable us to read
 18 all of that line?
 19 "00.22.08. Comment by phone from GM Nankivell.
 20 G16P/1, G16P/2, G18P/1 are proceeding to Victoria
 21 Station to meet HART."
 22 That presumably being a reference to the paramedic
 23 team?
 24 A. Yes, that's correct.
 25 Q. "Proceeding up Corporation Street and Miller Street with

153

1 SM Berry. Can control then mobilise three appliances
 2 into G16 so pool of appliances is back to four
 3 appliances."
 4 We know that you are G16P/1 and the other
 5 Manchester Central vehicle is G16P/2. Does it appear
 6 from this log that at 00.22 hours, you were on your way
 7 to the arena?
 8 A. Yes. Correct.
 9 Q. As will be obvious to you now, and I suspect was obvious
 10 at the time, that was not far from 2 hours after the
 11 explosion.
 12 A. That's correct, sir.
 13 Q. An hour and 51 minutes.
 14 Was the journey to the area of the arena
 15 a straightforward one?
 16 A. Yes. The roads were clear. There was a bit of
 17 confusion about where we had to meet the HART team, so
 18 we did stop at the junction of Corporation Street and
 19 Miller Street for a short period of time to find out
 20 where the scene of operations -- the Victoria Station
 21 bit wasn't passed to us, it was only when we asked
 22 a police officer on the cordon that said all the
 23 ambulances had gone towards Victoria Station.
 24 Q. So did that cause some delay, further delay, in --
 25 A. Yes, a small delay, yes.

154

1 Q. I don't know whether it's going to be of any importance,
 2 let alone significant importance, but we'll just
 3 identify precisely where it was that you pulled your
 4 vehicle up or where it was pulled up. I'm going to ask
 5 that we have on the screen a plan that we've seen many
 6 times but not for a while. It's {INQ033841/1}.
 7 (Pause)
 8 A. Can I just add to something while we're waiting?
 9 Q. Of course you can.
 10 A. When we were at the junction of Miller Street and
 11 Corporation Street, I think that's when Andy Berry got
 12 the message about -- informed of Ops Plato. He said to
 13 me, it's Ops Plato, and if I'm being perfectly honest,
 14 I didn't know what that was, and then he said active
 15 shooter, and I dismissed it because of the time that
 16 we'd not responded to the arena.
 17 Q. So do you mean that you dismissed --
 18 A. There being an active shooter there, knowing information
 19 that paramedics were on the scene, police were on the
 20 scene.
 21 Q. So you were told it's Operation Plato. You were
 22 uncertain or didn't know what that was, so you asked
 23 Mr Berry --
 24 A. I think he told me it's active shooter.
 25 Q. But you thought to yourself, it's going on 2 hours, if

155

1 not 2 hours, since the bomb went off (overspeaking)
 2 police are there, ambulance are there --
 3 A. Yes, I just dismissed it.
 4 Q. Thank you very much, Mr Lopez. We've got it on the
 5 screen now.
 6 Does this plan help you to identify where your
 7 vehicle pulled up? It probably won't do now.
 8 A. It's right next to the Beer House pub is where we pulled
 9 up. So if you -- it was more or less at the end of
 10 Victoria Station Approach.
 11 Q. I see, yes.
 12 A. Just before it bends round to the left on to Hunts Bank.
 13 So we all parked along that big Victoria Station
 14 Approach to the left-hand side so we didn't block the
 15 road.
 16 Q. I believe I know where you're talking about. If I stand
 17 in front of the station, looking at it, and I can see
 18 the war memorial entrance.
 19 A. It was just near the war memorial.
 20 Q. To the left?
 21 A. Yes.
 22 Q. Near to where the Beer House pub is?
 23 A. Yes, the main entrance we went through.
 24 Q. And the other two fire engines that travelled with you
 25 and the vehicle of Mr Berry, did they park up in the

156

1 same kind of area?
 2 A. Yes, I know the two fire engines did. I don't know
 3 where Andy Berry did. We made sure we parked to the
 4 left so we didn't block the road.
 5 Q. I'm going to come on to what you did whether you arrived
 6 at the scene in a moment. In your self-administered
 7 interview, so {INQ019426/7} -- we don't need it on the
 8 screen -- you stated that the crews trained in MTFA
 9 never reached the arena.
 10 A. That's correct, sir.
 11 Q. Why was it that you made that observation?
 12 A. Because they had the ballistic gear. When they turned
 13 up at Philips Park they were getting their ballistic
 14 gear on. It's basically like a purple --
 15 Q. We probably don't need to know too much about the
 16 equipment. They have specialist equipment?
 17 A. Yes, I imagine bulletproof vests. They have certain
 18 dressings and certain stretchers.
 19 Q. Is the point that you were making in that interview in
 20 2017 that there had been a very substantial delay in any
 21 fire officer arriving at the scene and, when fire
 22 officers were eventually deployed to the scene, those
 23 who were best placed to deal with it, this was an MTFA,
 24 they weren't the ones who went there?
 25 A. Um... Any fire engine should have gone there. Not just

157

1 MTFA. Any fire engine. We should have gone together,
 2 MTFA capability fire engines and your standard fire
 3 engines.
 4 SIR JOHN SAUNDERS: Okay, but they are specially equipped to
 5 deal with that sort of incident, so you might have
 6 expected them to be there.
 7 A. Yes, I would have said because they can work in a warm
 8 zone, we can work in the cold zone, so together -- we
 9 should have all gone together.
 10 MR GREANEY: Are you talking about SRT officers?
 11 A. Yes, SRT and the TRU.
 12 Q. We understand that certainly the SRT officers have
 13 available particular equipment that assists them in
 14 treating and moving casualties?
 15 A. Yes, that's correct.
 16 Q. So again, that might be a particular reason why they
 17 would be of value at the scene?
 18 A. In the early stages, yes. Unfortunately, by the time we
 19 got there, they weren't needed, their capabilities.
 20 Q. It was too late?
 21 A. It was too late, yes, sir.
 22 SIR JOHN SAUNDERS: Can you help me about this? Mr Meakin
 23 is the first NILO to arrive.
 24 A. Yes, sir.
 25 SIR JOHN SAUNDERS: By that time, had the two special

158

1 vehicles arrived?
 2 A. They were already there, yes, sir.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR GREANEY: I'm going to ask that there be put on the
 5 screen a policy document for GMFRS. We saw it just
 6 before lunch. It was drawn to our attention by
 7 Mr Smith, who represents North West Fire Control. The
 8 reference is {INQ004450/1}. I think it's page 5 that
 9 we were looking at {INQ004450/5}.
 10 Sorry, let's go back to page 1, so Mr Simister can
 11 look at the document. Is this a document you have ever
 12 seen before?
 13 A. No, sir.
 14 Q. Nonetheless I'll press on and draw something to your
 15 attention. Page 5, please {INQ004450/5}.
 16 Paragraph 3:
 17 "Where the CSR is activated, the PO, the assistant
 18 principal officer, or the command support room officer
 19 are not in command of the incident. Command of an
 20 incident is the sole responsibility of the incident
 21 commander at the scene."
 22 In the end when you arrived at the scene, who was
 23 the incident commander?
 24 A. Andy Berry.
 25 Q. In the course of the inquiry, we've become familiar with

159

1 terms such as Gold or strategic commander, Silver or
 2 tactical commander, and Bronze or operational commander.
 3 The incident commander that you have just described,
 4 Mr Berry, which of those, if any, was he?
 5 A. He'd be the Bronze.
 6 Q. The operational commander?
 7 A. Yes, operational commander.
 8 Q. Was he the incident commander just from the moment he
 9 arrived at the scene or was he the incident commander
 10 from some earlier point and, if so, when?
 11 A. If ... When control got the call or explosion at the
 12 arena and they mobilised the PDA straightaway, of which
 13 I would have been part of, when I arrived at that scene
 14 I would have been the incident commander straightaway
 15 because I've arrived at an incident, I've been mobilised
 16 to an incident. So if I had arrived, I'd have been
 17 incident commander.
 18 We were sent to a rendezvous point and not an
 19 incident, so I would say that Andy Berry was in charge
 20 because he made the decision not to mobilise us but to
 21 send us to a rendezvous point at Philips Park.
 22 Q. So does that mean that to your mind, he was the
 23 incident commander throughout that period of time,
 24 including but not restricted to when he arrived at the
 25 scene?

160

1 A. I would say he was incident commander until he arrived
 2 at Philips Park and then I thought he would give us the
 3 direction and tell us what was happening, whether
 4 we were mobilising to the incident. So we were waiting
 5 for Andy Berry. I thought Andy Berry was in charge
 6 until he arrives at Philips Park.
 7 MR GREANEY: I don't know if there's anything that you
 8 wanted to ask about that.
 9 SIR JOHN SAUNDERS: It just seems we have
 10 a Gold/Silver/Bronze structure, and it seems that the
 11 Bronze is the person who makes the decision, the final
 12 decisions at the scene.
 13 A. Yes, take any incident, like I say, I'm -- on the
 14 fire station, the bells drop and I'm sent to an incident
 15 and the first appliance to arrive at that incident takes
 16 charge. If a more senior officer comes up, like a flex
 17 duty station manager, he will take over from me, we'll
 18 do a handover and then he will become the
 19 incident commander. Or if it is a small scale incident,
 20 he can choose not to take command and leave me in charge
 21 of that incident.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR GREANEY: As you got out of the fire engine, having
 24 arrived at the arena, were you met by a paramedic that
 25 you recognised?

161

1 A. Yes, sir, Dan Smith. I recognised him because he's done
 2 a lot of training with the Fire Service.
 3 Q. Did he effectively give instructions to all of the fire
 4 officers who'd arrived at the scene?
 5 A. Yes, he did.
 6 Q. In what terms?
 7 A. As soon as we arrived and pulled up, he more or less
 8 said, "Where have you been? Where have you been?", and
 9 then quickly he started to say what he wanted from the
 10 Fire Service. Basically what he wanted us to do is grab
 11 a stretcher out of a waiting ambulance, and blankets,
 12 tag on to a paramedic, go to the station
 13 concourse/forecourt and pick up a P1 casualty.
 14 Q. P1 being?
 15 A. Priority casualty and urgent -- immediate, sorry.
 16 Q. What I don't want to do is to go into any detail with
 17 you about who you assisted and what level of injury they
 18 had sustained. So far as I'm concerned, that isn't
 19 relevant and may be distressing.
 20 But in short, did you give such assistance as you
 21 could?
 22 A. I did. I helped one casualty. All my other colleagues
 23 split into pairs with a stretcher and with a paramedic
 24 and they just went round the concourse doing what we was
 25 asked to do. I then broke off from helping the

162

1 casualties and became like a link between Andy Berry and
 2 the crews inside.
 3 Q. For my purposes, I don't need to ask you any more about
 4 that, save this: at one stage were you informed by
 5 SM Berry that you and the fire crews would have to leave
 6 the scene?
 7 A. That's correct. We'd not been there long and he said,
 8 "We're going to have to leave the scene". I said why,
 9 and it was because of this Ops Plato, he said, "You're
 10 not wearing ballistic gear". I pointed out to him that
 11 there was hardly anyone wearing ballistic gear by that
 12 time, apart from him and the armed police and I don't
 13 think we were going to leave. So he said then that he
 14 would have to speak to the chief.
 15 Q. In other words, you refused to leave?
 16 A. We wouldn't have left, no.
 17 Q. The way in which you put it in your statement, which
 18 very clearly illustrates your feelings, perhaps, is
 19 this:
 20 "I pointed out to him that we could not leave now
 21 because we were needed and as a service we would be
 22 crucified even more."
 23 A. That's correct, sir.
 24 Q. Did you remain on the scene until all casualties had
 25 been removed?

163

1 A. That's correct, yes.
 2 Q. And then did you head to your home fire station,
 3 Manchester Central, for what was called a hot debrief?
 4 A. Yes, sir.
 5 Q. We heard this morning that that was conducted by
 6 Assistant Chief Fire Officer Harris; is that your
 7 recollection?
 8 A. Yes, that's correct.
 9 Q. Were you and your colleagues keen to get answers from
 10 him as to the senior officers' decision-making and the
 11 overall response or lack of from the Fire and Rescue
 12 Service?
 13 A. Yes.
 14 Q. Did you get those answers?
 15 A. No. He said he wasn't part of the command making
 16 decisions that night, but we found out since that he was
 17 in the command support room, so he must have been. It
 18 was a horrible scene. Everyone surrounded him and he
 19 basically said he had no answers for what happened that
 20 night. So quite rightly, the firefighters just ripped
 21 into him. The semi-circle was getting smaller and
 22 smaller and smaller. Everybody was angry, all ashamed
 23 to be wearing the uniform. Very angry, very angry.
 24 Q. In the end did you and other firefighters turn your
 25 backs on ACFO Harris and walk away from him in what you

164

1 describe in your statement as disgust?
 2 A. Yes, sir, that's correct.
 3 Q. I'm now at page 4 of your statement. At that page you
 4 express, just as you had expressed in the
 5 self-administered questionnaire, a series of questions
 6 about the performance of GMFRS on the night. I'm going
 7 to take you through those.
 8 You begin that section of your statement by saying
 9 this:
 10 "As a watch commander with over 26 years' service
 11 I am responsible for the well-being of my crews and the
 12 public. The poor response of Manchester Fire and Rescue
 13 Service is, in my opinion, a matter of grave concern and
 14 questions need to be answered concerning the following."
 15 A. Yes, sir.
 16 Q. Is that how you felt at the time?
 17 A. Yes, sir.
 18 Q. And do you still feel that way now?
 19 A. Yes, sir.
 20 Q. "(1). Why was a predetermined attendance not sent on
 21 the first pre-alert minutes after the bomb had gone off?
 22 We could have carried out a risk assessment and passed
 23 information to Fire Control about the situation. This
 24 information we would have obtained from the police and
 25 Ambulance Service, which were in attendance. We could

165

1 then have instigated a major incident and, from the Fire
 2 Service point of view, provided a suitable RV point or
 3 forward control point for it."
 4 A. Correct, sir.
 5 Q. "(2). Why were appliances sent to Philips Park
 6 Fire Station at around 22.50 hours, nearly 20 minutes
 7 after the bomb had gone off?
 8 "(3). Why did it take so long for the NILOs, the
 9 senior supervisor officers on the ground, to attend the
 10 RV point at Philips Park?"
 11 A. Correct, sir.
 12 Q. "(4). Why were there no updates or briefings? Was it
 13 because the police and Ambulance Service were not
 14 talking to the Fire Service? Or was it because we had
 15 no one from the Fire Service at the incident?"
 16 A. Correct, sir.
 17 Q. "(5). Why was it that it was nearly 2 hours after the
 18 bomb went off, Greater Manchester Fire and Rescue
 19 Service made an attendance only to be greeted by the
 20 ambulance staff saying words to the effect, 'Where have
 21 you been'?"
 22 A. Correct, sir.
 23 Q. "(6). Where the bomb was detonated, casualties would
 24 have had to be helped down a set of stairs on to the
 25 station concourse. This must have been done by members

166

1 of the public, railway staff, arena staff, the homeless,
 2 police and ambulance staff, using advertising boards.
 3 We sat in two fire station yards with the equipment, the
 4 manpower and the training for just this sort of
 5 incident. We are all first aid trained and we have the
 6 capability to summon a large number of firefighters by
 7 sending an assistance message from the scene."
 8 Then you said this:
 9 "This may have made a difference to the incident if
 10 we had been allowed to do our job."
 11 A. All correct, sir.
 12 Q. That sixth point that I've just drawn your attention to,
 13 is that a matter that you feel very deeply and strongly
 14 about?
 15 A. Yes, sir.
 16 Q. "(7). If there was a confirmed active shooter, this
 17 didn't stop every other emergency service worker and
 18 members of the public from helping at the scene or was
 19 this information not passed to GMFRS?
 20 "(8). A number of weeks have now passed and
 21 firefighters still do not know why they were held back
 22 more than 2 hours after the bomb was detonated. We have
 23 been hit with a wall of silence from brigade management.
 24 Everyone understands that the victims and their families
 25 are the most important matter at this present time, but

167

1 it was our public duty to have responded straightaway
 2 and helped those people."
 3 A. Correct, sir.
 4 Q. And indeed, was it your opinion, as you said at the very
 5 end of this statement:
 6 "It is my opinion that as a service we failed
 7 because of poor decision-making and it must not happen
 8 again."
 9 A. That's correct, sir.
 10 Q. Does that remain your view?
 11 A. Yes, sir.
 12 MR GREANEY: Mr Simister, those are my questions.
 13 It's a matter for you, sir, we'll need a break at
 14 some stage. I don't think Mr Smith will have very many
 15 questions.
 16 Mr Simister, would you like to have a break at this
 17 stage?
 18 SIR JOHN SAUNDERS: You looked a bit like you might like
 19 a break after that.
 20 A. Thank you, sir, I'll take a break.
 21 SIR JOHN SAUNDERS: Ten minutes?
 22 MR GREANEY: Yes, thank you, sir.
 23 (3.22 pm)
 24 (A short break)
 25 (3.35 pm)

168

1 MR GREANEY: Sir, thank you. Mr Smith is the next to ask
 2 questions, on behalf of North West Fire Control.
 3 SIR JOHN SAUNDERS: Mr Smith, this is not directed at you in
 4 particular, but I just want to say generally, in case
 5 it's not apparent to anyone who's not in the room,
 6 Mr Simister, I think, has found this quite distressing
 7 evidence to give. I'm quite sure many of the people
 8 listening to it have found it quite distressing to
 9 listen to. Can I make it entirely clear to everyone
 10 that I have really got the picture. So please don't
 11 think -- that's not to stop anybody asking the questions
 12 they wish to, I make that clear, but equally I have
 13 a clear impression of the way Mr Simister feels about
 14 what happened on that night and obviously it is now for
 15 me and the rest of the people involved in this inquiry
 16 to investigate as to why it happened.
 17 MR SMITH: Sir, may I just say that I've felt some specific
 18 times might be helpful to you for the purposes of the
 19 evidence, so that was one thing I was going to deal
 20 with.
 21 SIR JOHN SAUNDERS: I'm not stopping you in any way, so
 22 please do deal with the things you were going to deal
 23 with. I just make that general observation for
 24 everybody.
 25

169

1 Questions from MR SMITH
 2 MR SMITH: Mr Simister, at one point in the course of your
 3 evidence, in answer to Mr Greaney, you explained that in
 4 your judgement the five appliances should all have gone
 5 to the arena, and by that I think you meant the two
 6 Manchester pumps, the Gorton pump and the two SRTs;
 7 is that correct?
 8 A. Yes, sir.
 9 Q. Did you have in mind that if by the time they arrived
 10 there was in place the relevant zones, the two
 11 Manchester pump appliance crews and the Gorton crews
 12 could have worked in the cold zone, and the SRTs could
 13 have deployed into the warm zone, thereby maximising the
 14 assistance to the Ambulance Service; is that correct?
 15 A. Mobilise straightaway when we got the first call -- are
 16 you talking about when the first call came in or are you
 17 talking about when we arrived 2 hours later at the
 18 incident?
 19 Q. Well, I had in mind your evidence, and it was related to
 20 the point at which the five appliances were all
 21 assembled together, so not at the beginning of the
 22 incident but at a later stage when the SRTs had joined.
 23 A. Right. I don't really know what you're trying to ask
 24 me. Are you on about when we eventually got to the
 25 arena?

170

1 SIR JOHN SAUNDERS: There came a stage when you were at
 2 Philips Park Fire Station and there were the five lots
 3 of fire engines there.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: What's being suggested to you is that at
 6 that sort of stage, you could all have gone together to
 7 the arena and you could have worked in your relative
 8 areas. Is that right, Mr Smith?
 9 MR SMITH: It is, sir, yes.
 10 A. Yes. We could have been mobilised from Philips Park to
 11 the arena, yes. I agree with that.
 12 MR SMITH: Thank you. I'm going to come to some specific
 13 timings in just a moment, which I think might assist
 14 everybody. I hope they will. But before we do that,
 15 can I deal with the pre-alert system, which you made
 16 mention of.
 17 The first pre-alert was at 22.38?
 18 A. Correct.
 19 Q. Am I correct in my understanding that the pre-alert that
 20 goes to the fire station arises from the computer system
 21 at the control room so that when the -- forgive me,
 22 that's the trouble with the video link, Mr Simister, we
 23 sometimes speak over each other. I didn't mean to
 24 interrupt you either.
 25 SIR JOHN SAUNDERS: You finish your question, Mr Smith.

171

1 MR SMITH: As far as the system in the control room is
 2 concerned, once the address of the incident is
 3 established by the control room from the caller the
 4 system then sends automatically a pre-alert to the
 5 relevant station, which is usually the nearest station.
 6 A. Yes, that's correct, sir. As far as I'm aware.
 7 Q. In this case, the nearest station for the arena would be
 8 G16, Manchester Central; is that correct?
 9 A. That's correct, sir.
 10 Q. Just looking at a few timings, just a few for the
 11 moment. At 22.46, a second pre-alert was received at
 12 Manchester Central; is that correct?
 13 A. That's correct, sir, yes.
 14 Q. At 22.54.14, according to information from the incident
 15 logs, all three pumps, that's the Gorton pump and the
 16 two Manchester pumps, were in attendance at Philips Park
 17 Fire Station?
 18 A. Yes, that's correct, sir.
 19 Q. So it would be after that, at 23.06, that you made the
 20 first call to North West Fire Control, wouldn't it?
 21 A. Yes, sir.
 22 Q. In which you were seeking information?
 23 A. Yes, sir.
 24 Q. At 23.22, the first SRT arrived at Philips Park?
 25 A. Yes, sir.

172

1 Q. And at 23.25.29, you made the second call to
 2 North West Fire Control, which we've heard today?
 3 A. Yes, sir, that's correct.
 4 Q. As we can learn from the transcript and listening to the
 5 audio, General Manager Carlos Meakin, one of the
 6 assigned NILOs, was actually in the course of arriving
 7 at the end of that call; isn't that correct?
 8 A. Yes. When I finished the call, he'd parked up on the
 9 yard, yes, sir.
 10 Q. At 23.31, the second SRT arrived at Philips Park?
 11 A. Yes. I can't remember which order they came in. You've
 12 got [REDACTED].
 13 Q. And then at 23.34, General Manager Ben Levy arrived at
 14 Philips Park, so he would be the second NILO to arrive.
 15 A. Yes, that's correct.
 16 Q. Would that fit with your recollection?
 17 A. Yes. Not sure of timings but in that order, yes.
 18 Q. Thank you. Then there was, is this correct, an elapse
 19 of time between his arrival and the Manchester and
 20 Gorton pumps, together with the Philips Park pump and
 21 the SRTs and the NILOs, all leaving Philips Park to go
 22 to Manchester Central?
 23 A. Yes, there would have been. I don't know what the
 24 timings are. I presume you will have the timings in
 25 front of you. Once we had discharged our information to

173

1 the NILOs, the NILOs then got together and I assume
 2 they're on the phone to the chief to make some form of
 3 decision, but that would be that time delay that you're
 4 on about.
 5 Q. So there'd be about half an hour still at Philips Park,
 6 is this correct, before you left for Manchester Central
 7 again after the arrival of Mr Levy?
 8 A. Without looking at timings, I wouldn't know. If you've
 9 got the timings in front of you, then that's what did
 10 happen. But my recollection...
 11 Q. I'll give you these timings. At 00.02, you were all in
 12 attendance at Manchester Central again. Does that fit
 13 with your recollection, broadly?
 14 A. Yes, sir.
 15 Q. Then at 00.21, both of the Manchester pumps and the
 16 Philips Park pump were mobilised to the incident scene
 17 with Station Manager Berry in the Fire Service vehicle.
 18 A. That's correct, sir.
 19 Q. Was there a slight delay en route, just trying to be
 20 clear about the route and the location?
 21 A. Yes, just the location of where they were.
 22 Q. At 00.36.59, the closed-circuit television shows the
 23 three pumps and Station Manager Berry pulling up outside
 24 Victoria Station.
 25 A. That'd be correct, sir, yes.

174

1 Q. Can I go next to the information that was available to
 2 you when you were leaving Manchester Central when you
 3 were first mobilised and then when you arrived at
 4 Philips Park. I'm going to suggest that there were
 5 three categories of information available to you. I'll
 6 recite them and then ask for your view.
 7 First of all, when you left Manchester Central, the
 8 ambulances were pulling on to the forecourt and some
 9 information would obviously be obtained by one of the
 10 appliance crews.
 11 A. Yes.
 12 Q. Secondly, when you arrived at Philips Park and met with
 13 Mr Mottram, Mr Mottram was able to tell you the
 14 information that his wife had provided to him, which
 15 indicated that the Ambulance Service was in fact at the
 16 incident scene.
 17 A. Yes. I remember having a conversation. I don't know if
 18 he said she was at scene or she was going to the scene.
 19 Q. Thank you. Then you passed that information to
 20 North West Fire Control in the second call that you
 21 made, didn't you?
 22 A. Yes, sir.
 23 Q. Then the third category of information was social media
 24 and, I believe, a television set at Philips Park.
 25 A. Yes, sir.

175

1 Q. Did you ever look at the television at Philips Park
 2 yourself?
 3 A. No, sir, I just -- it was a glance to know that there
 4 was some sort of incident at Victoria Station, the
 5 arena. I didn't stand there and watch it. I knew
 6 something was happening and that's when I went
 7 downstairs to make the phone call.
 8 Q. As a result of those three categories of information, do
 9 you agree that it was obvious to you that the
 10 Ambulance Service was working at the incident at
 11 Victoria Station?
 12 A. Someone from the Ambulance Service was there. I don't
 13 know in what capacity, but I would expect them to be
 14 there.
 15 Q. And of course the police were there as well?
 16 A. Which I'd expect to be there.
 17 Q. And as a result, did you expect that at any moment the
 18 Fire Service would be deployed to the incident?
 19 A. Yes, sir.
 20 Q. As the period of delay continued, did you therefore
 21 become more and more frustrated in the belief that you
 22 and your colleagues ought to have been mobilised to the
 23 incident by this time?
 24 A. Yes, sir.
 25 Q. All I want to ask you now is something that Mr Greaney

176

1 has made reference to in your statement. But I preface
 2 my question by reading out once more what you said on
 3 this particular issue so you have it fully in mind and
 4 I am also asking you to confirm that you had long
 5 operational experience, didn't you, by this time?
 6 A. Yes, sir.
 7 Q. What I would like to read out is this:
 8 "Why was a predetermined attendance not sent to the
 9 first pre-alert minutes after the bomb had gone off? We
 10 could have carried out a risk assessment and passed
 11 information to Fire Control about the situation. This
 12 information we would have obtained from the police and
 13 Ambulance Service, which were in attendance. We could
 14 have then instigated a major incident and, from the Fire
 15 Service point of view, provided a suitable RV point or
 16 forward control point for it."
 17 A. That's correct.
 18 Q. I'd just like to break that down, if I may, Mr Simister.
 19 First of all, did you have in mind that, shortly after
 20 the Fire Control room had been informed of the incident,
 21 if your appliances had been mobilised direct to the
 22 incident, even if you had not been able to enter the
 23 station at that point for security reasons, you would
 24 nonetheless have been in a position to pass information
 25 back to the control room?

177

1 A. That's correct, sir.
 2 Q. Is that what you had in mind when you said that?
 3 A. Yes, sir.
 4 Q. Is it the position that if you would have no means of
 5 contacting much more senior GMFRS officers, you would
 6 have been obliged in those circumstances to contact the
 7 control room, North West Fire Control's control room?
 8 A. Yes, by the appliance radio.
 9 Q. And that's how it would have been done? Forgive me.
 10 A. Yes. I would have contacted control by the appliance
 11 radio to send a message, but any officers that were
 12 en route to that incident, ie the NILOs, would be on the
 13 same radio channel on their Sanjay radios.
 14 Q. This is what I was going to ask you. Although you
 15 wouldn't have been able to make perhaps telephone
 16 contact, the radio contact with the control room should
 17 have been shared, do you agree, on the same channel
 18 which the NILOs would have been listening in to or
 19 utilising?
 20 A. Yes, sir. That's my understanding, yes, sir.
 21 Q. Is that what you had in mind then when you said this in
 22 your statement?
 23 A. Yes, sir.
 24 Q. So when you went on to say:
 25 "This information we would have obtained from the

178

1 police and Ambulance Service, which were in attendance.
 2 We could have then instigated a major incident and, from
 3 the Fire Service point of view, provided a suitable RV
 4 point or forward control point for it."
 5 What exactly did you have in mind by way of
 6 information that you could have then passed to North
 7 West Fire Control?
 8 A. It was my understanding that when the message was sent
 9 to control, the police gave a rendezvous point of the
 10 car park opposite the cathedral, the NCP car park. But
 11 I believe that rendezvous point wasn't used. If we was
 12 mobilised to the incident or to that rendezvous point,
 13 in the appliance, and we got there and there was nobody
 14 there, then we would have turned round and found
 15 a suitable location where the scene of operations was.
 16 That's the hardest part of an incident, is finding out,
 17 especially with the size of the arena, with a train
 18 station adjoining, and the hardest thing would be to
 19 find the scene of operations, and once we find that
 20 scene of operations, that's what I would make the
 21 rendezvous point. So if I was to make requests for
 22 further appliances then that's the rendezvous point from
 23 the Fire Service point of view, if that makes sense.
 24 Q. And would you have anticipated that if you had passed
 25 that information on to North West Fire Control, had it

179

1 happened, the control room would have been in a position
 2 to share that information with other agencies?
 3 A. Yes, sir. All control rooms, I presume, should be
 4 talking to each other right from the start. But that's
 5 my understanding of control rooms.
 6 Q. Finally this, please: what was, in your operational
 7 experience and in your opinion, the actual consequence
 8 of being deployed to Philips Park?
 9 A. I thought we were being deployed to Philips Park because
 10 there must have been a plan, because obviously
 11 departments within the Fire Service must plan for this
 12 eventuality and I thought it must be part of their plan,
 13 there must have been a reason why we were going to
 14 Philips Park. Like I say, we're a disciplined service,
 15 I was mobilised, but it was to Philips Park and
 16 I thought when I get to Philips Park, I expected someone
 17 there to greet us, brief us, and deploy us.
 18 Q. But that didn't happen, did it?
 19 A. No, sir, it didn't.
 20 Q. And did you wonder how you and your colleagues were
 21 going to co-locate with the ambulance service and the
 22 police in this situation?
 23 A. Once I got to Philips Park?
 24 Q. Yes.
 25 A. We weren't, we were in isolation. When we were at

180

1 Philips Park, we were in isolation. I was hoping that
 2 somebody else of a more senior rank, whether a flex
 3 duty, was making them calls. We was waiting at
 4 Philips Park to be deployed.
 5 MR SMITH: Thank you, Mr Simister. That's all I wanted to
 6 ask you.
 7 SIR JOHN SAUNDERS: Thank you, Mr Smith. Just before you
 8 go, I think I'll institute a system of over and out when
 9 we're having these sort of conversations by video. But
 10 not for the moment.
 11 Can you help me on your timetable with when Mr Berry
 12 arrived? I think that was the only thing missing on the
 13 times you gave me.
 14 MR SMITH: Yes. Mr Berry arrived, as I understand it,
 15 shortly after the arrival of Mr Levy at about, and
 16 I don't have a precise time, 10.40.
 17 SIR JOHN SAUNDERS: Okay, thank you very much. 11.40,
 18 I expect.
 19 MR SMITH: 11.40. I will check that on the incident log and
 20 I'll do that now and then come back to you if I may.
 21 SIR JOHN SAUNDERS: Yes, thank you very much, Mr Smith.
 22 MR GREANEY: Thank you, sir.
 23 Next, Mr Cooper on behalf of the families.
 24 Questions from MR COOPER
 25 MR COOPER: Thank you, sir.

181

1 As you heard, Mr Simister, I ask questions on behalf
 2 of the bereaved families.
 3 Just picking up, if I may, from the last question or
 4 so that you were asked by Mr Smith, you indicated that
 5 the attendance of you and your colleagues at
 6 Philips Park, you assumed there was a reason for it,
 7 that senior brigade management, for instance, had
 8 planned for this eventuality? Do I understand that was
 9 your understanding at the time?
 10 A. Yes, sir.
 11 Q. In terms of planning for the eventuality, you mean
 12 planning for a terrorist attack of this particular
 13 nature?
 14 A. Yes, sir.
 15 Q. Because at the time, as we've heard in this inquiry, the
 16 threat level was at severe, you and your colleagues knew
 17 that, didn't you?
 18 A. Yes, sir.
 19 Q. And one can assume that senior management were acutely
 20 aware of the risks that Manchester faced?
 21 A. Yes, sir. Like I say, we have some big buildings, big
 22 events, the arena, the Etihad. Yes, sir. Manchester is
 23 a big (overspeaking).
 24 Q. And indeed as far as the brigade is concerned,
 25 Manchester in fact is the second biggest fire brigade

182

1 next to London, isn't it?
 2 A. Yes, sir. Closely followed by West Midlands.
 3 Q. Yes. What sort of training or, if I put it another way,
 4 what sort of assistance were you and your colleagues
 5 given by senior management into bringing you up to speed
 6 prior to 22 May as to the risks you all faced, the risks
 7 Manchester faced, and any special procedures that might
 8 be in place to deal with them? Were you given any
 9 assistance?
 10 A. Not as far as I can remember. Only what we read in the
 11 press and, because of the job we do, we expect something
 12 to happen at some point.
 13 Q. So as far as you're concerned, and I ask you this
 14 question but perhaps you on behalf of many of your
 15 colleagues, despite the fact that Manchester was
 16 potentially such a target, and despite the fact that
 17 Manchester had a very big fire brigade that would no
 18 doubt be called into action should something happen, and
 19 the fact that the terrorist level was at severe and all
 20 the risks that that entails, very little extra was done,
 21 it seems, would you agree, to assist and train you and
 22 your colleagues into the potential special requirements
 23 of you should there be a terrorist atrocity?
 24 A. No, it's -- and I've always said this, I've never agreed
 25 with specialist teams and I think every firefighter

183

1 should be trained in MTFA capabilities. The reason for
 2 that is, there's no delay on who to mobilise and you'll
 3 get the closest appliance to the incident as quickly as
 4 possible.
 5 Q. Would you agree that at the time of the arena, given all
 6 that I have prefaced the question with, the training
 7 that you and your colleagues were given to deal with
 8 a terrorist situation such as that that befell you was
 9 pitifully lacking at the time?
 10 A. If you take the terrorist training, yes. But for first
 11 aid, we were very good at first aid during that time
 12 period because we were doing a trial period with NWS
 13 where we were turning out to cardiac arrests. So if
 14 someone phoned the ambulance control and said someone's
 15 in cardiac arrest, what they did was they mobilised an
 16 ambulance and the fire engines simultaneously, and
 17 sometimes the fire engine was getting to the cardiac
 18 arrest first, so the firefighters were doing the CPR,
 19 bagging the casualty, breathing for them, defibbing
 20 them, and the ambulance would come and they would --
 21 we'd carry on doing the CPR, they'd manage the airway,
 22 apply the drugs, and it was -- basically all I can
 23 describe it as being like an F1 pit team. We were
 24 really good, it was a team approach, and it was all
 25 focused on that casualty. So taking terrorism out of

184

1 it, I say that during that period, the average
 2 firefighter was the best they've ever been at first aid
 3 because we were turning out to cardiac arrests. Some of
 4 them emergencies didn't turn out to be cardiac arrests,
 5 they turned out to be all kinds of medical emergencies
 6 but because the fire was the first in attendance we had
 7 to deal with that medical emergency until the ambulance
 8 arrived.
 9 Q. So effectively, all that training and all that expertise
 10 that you and your colleagues could have provided to
 11 those at the arena, you were prevented from doing so for
 12 the reasons you've explained?
 13 A. Yes, sir. We didn't get there timely, we didn't get
 14 there quickly.
 15 Q. I'm leaping ahead, but it links into your answer. Did
 16 that training include dealing with heavy blood loss and
 17 that sort of thing?
 18 A. Yes, sir, it did. We carried tourniquets. Every fire
 19 engine in Greater Manchester carries a minimum of one
 20 tourniquet. We have bandages, we have trauma
 21 technicians, but every firefighter is trained in trauma.
 22 It's just our trauma technician is like your lead on
 23 your watch. He's had more hands-on training and he is
 24 like the trainer for the watch in trauma. So whatever
 25 he's learned when he does his course, he comes back and

185

1 teaches the watches. So we have been taught with
 2 tourniquets, applying dressings, CPR. Like I say, at
 3 that time, we were very good at it.
 4 Q. How soon could you have been on the scene? I think you
 5 told the learned chair you could have been there in
 6 about 3 minutes literally. But how soon do you think
 7 you could have actually been in the City Room helping
 8 these people?
 9 A. Again, to get to the arena, it would have took us about
 10 3 minutes, but it's that key bit, isn't it? It's
 11 finding the scene of operations. If we come down and we
 12 went past Station Approach and we saw people coming out
 13 with injuries, we'd have probably stopped there. If
 14 we'd have found the scene of operations, which is the
 15 hardest thing to do on an incident, sometimes we'll get
 16 an incident address, we'll get to that area, but that's
 17 not the incident, the incident is further away. So like
 18 you say, that first key message of putting in the
 19 rendezvous point, reinforcing appliances to arrive (?),
 20 I would like to think we were pointed in that direction
 21 when we arrived.
 22 But to get on scene in that area, 3 minutes. To
 23 actually get into the City Room, if we'd been pointed
 24 in that direction early, it would have been another
 25 2 minutes on top of that. But saying that, I would have

186

1 had to have done a risk assessment, where my
 2 firefighters were going, get the information. We could
 3 have been there very quickly.
 4 Q. Putting all that together and totally accepting that,
 5 of course, you and your colleagues would certainly have
 6 been on the scene in the City Room, applying
 7 tourniquets, assisting people in distress, certainly
 8 within, say, 20 minutes?
 9 A. Yes. Easily within 20 minutes, sir, yes.
 10 SIR JOHN SAUNDERS: Okay. I think Mr Cooper, there is
 11 a caveat about that, which I think we need to bear in
 12 mind, which is -- I doubt if you'd have been allowing
 13 your men into the red zone, would you, until it had
 14 been --
 15 A. If I was told about the zones. If the zones weren't
 16 mentioned to me, we'd have gone in.
 17 SIR JOHN SAUNDERS: But if they were?
 18 A. It'd be very hard to stop my firefighters going in, sir.
 19 I think we'd have gone in.
 20 MR COOPER: So a hot zone or not --
 21 A. If the armed police were allowed to go in, we would have
 22 gone in.
 23 Q. Thank you.
 24 We did leap ahead there, but I'll take us back
 25 a little to the training again that I wanted to ask you

187

1 about. You indicated, Mr Simister, that you experienced
 2 a PowerPoint training, PowerPoint and questions,
 3 effectively an e-learning on firearms issues and that
 4 sort of thing; is that right?
 5 A. That's correct, sir.
 6 Q. And you pointed out that it wasn't very good training
 7 and perhaps couldn't really be termed training at all,
 8 it was perhaps a little bit of a tick-box exercise.
 9 Would that be fair?
 10 A. Yes, familiarisation, tick box. That's as far as we
 11 went, the average firefighter -- I keep saying average
 12 firefighter -- the standard firefighter does on MTFA or
 13 active shooter. Again, it was more your TRU and your
 14 SRT. They did all that training, we didn't get involved
 15 in it at all.
 16 Q. It's an issue that we certainly in our team are pursuing
 17 a little here subject to the chair's permission. It's
 18 how were people allotted to these courses? Who decided
 19 that you would be doing these e-learning courses and
 20 others may be going to training? Who made those
 21 decisions or what section made those decisions?
 22 A. Like I say, we've got our TRU, technical rescue unit,
 23 they deal with rope, water, RTCs. I don't know who made
 24 the decision for them to do it. But like you say, on
 25 duty, you could have just about 15 trained in it and

188

1 that's it and that's provided they're not on annual
 2 leave, they're not on the sick or not doing a course.
 3 So we have a very limited people that are actually
 4 trained in MTA on duty at any one time.
 5 Q. Is there any overall oversight, as it were, as to the
 6 general training that you and your colleagues get or is
 7 it just random and you, Mr Simister, will do a series of
 8 e-learning, Mr Smith or Mr Brown will go and do some
 9 training? Is there any general idea or ethos as to who
 10 gets the training and how many get the training?
 11 A. I don't know what the TRU do for their training. Their
 12 training's different than ours. But every firefighter
 13 in Greater Manchester, at the moment we have like
 14 a two-year cycle where we know what training we've got
 15 to do and we've got to cover that training within
 16 2 years. Some of it is done by e-learning and some of
 17 it is done by practical. Say we have bi-monthlies, you
 18 know, every firefighter should cover the same training
 19 over a two-year period.
 20 Q. Did you get any JESIP training?
 21 A. JESIP training, again, we've done it. It's done on the
 22 PowerPoints. The acronyms. JESIP. Things like that.
 23 But for JESIP, as a firefighter that rides on a fire
 24 engine, we do a mini JESIP every time we turn out. The
 25 police and ambulance are in attendance when we get

189

1 there, we speak to them. JESIP training is really for
 2 higher level multi-agency meetings for senior officers
 3 if I'm being honest. But again, JESIP for us was done
 4 on e-learning.
 5 Q. And looking at your training course, as we have done,
 6 the last reference we have on it is, I think,
 7 11 November 2016. There's nothing in that schedule that
 8 indicates you had any JESIP training at all. I'm not
 9 criticising you by the way, I'm talking about the
 10 system. There doesn't seem to be any reference in there
 11 to JESIP training. Is that because you hadn't been
 12 offered it?
 13 A. No, it'll be on the e-learning. I've probably refused
 14 to do it because it didn't work on the night, if I'm
 15 being perfectly honest.
 16 Q. What do you mean, you refused to do it?
 17 A. It didn't work on... The JESIP, you know... Before the
 18 arena, I made a comment about JESIP to Andy Berry that
 19 the brigade, just before the arena, were harping on at
 20 us to do the JESIP training, and he said, "Do you know
 21 why you had to do that?" We all had to complete it by
 22 a certain time and again it was a PowerPoint exercise.
 23 He told me on that night, the reason you had to do that
 24 JESIP training is because the brigade was being audited.
 25 I was taken aback by that.

190

1 Q. I want to take -- you keep pushing me on, which is
 2 probably not very popular -- to another aspect which I
 3 was going to ask you about but I'll take you to it now.
 4 {INQ004498/1}, please. Forgive me, I'm leaping
 5 ahead. Could I go to your Kerslake interview instead?
 6 The Kerslake reference is INQ023524 and pages 57 and 58.
 7 This is your Kerslake interview.
 8 MR GREANEY: Kerslake is {INQ023524T/1}.
 9 MR COOPER: T, thank you.
 10 If I can take you, please, to {INQ023524T/57-58} of
 11 that report. If we could magnify it a little .
 12 There it is, that's the reference to JESIP. I would
 13 like to take you to that.
 14 Can you see it, Mr Simister?
 15 A. Yes, sir .
 16 Q. Towards the bottom of that first page, on 57, you say
 17 this:
 18 "JESIP, yeah, well, I found out previous to that
 19 that the brigade -- just before the incident, the
 20 brigade were harping on that I had to do this e-learning
 21 on JESIP. I had to chase all my watch, get on the
 22 e-learning, tick a box. So that, right, I mentioned it
 23 to them, I said, 'It's, funny, you know, you're harping
 24 on about us having to do all this JESIP and it's not
 25 worked tonight, has it?' And they said, 'Oh, do you

191

1 know why you had to do that?' So I said no. They said,
 2 'Because the brigade were being audited'. I thought,
 3 'You can't really tell me that tonight'. But that's why
 4 we had to do the tick in the box for JESIP because the
 5 brigade were being audited about JESIP. And it was --
 6 I didn't -- we didn't learn anything from it, it was
 7 just a tick in a box. And that's the way the training
 8 seems to be going, e-learning, you know, I don't even
 9 have to read the policies to answer the questions."
 10 That was in your Kerslake interview. You seem to be
 11 quite scathing there about the brigade's attitude to
 12 JESIP learning; is that right?
 13 A. That's correct. It's in the statement and it's correct,
 14 sir .
 15 Q. Was that your view as to the brigade's attitude to JESIP
 16 learning at the time of this atrocity on 22 May?
 17 A. Like I say, the JESIP is more for senior management
 18 level. I tried to explain it. It's the senior managers
 19 that do the JESIP training. They're the ones that
 20 together, they write these policies. The firefighters,
 21 as I've said, we do a mini JESIP, and like I was trying
 22 to explain, attending an incident, say with a road
 23 traffic collision, the ambulance and paramedics are
 24 involved, the police will come, then myself, the
 25 paramedic and the police, we will talk about JESIP,

192

1 really . Situational awareness. What's best for the
 2 casualty? Do we need to close the road, get the police
 3 to do that? So we do a mini JESIP. But the way the
 4 JESIP PowerPoint runs through, it's more for senior
 5 managers to run a multi-agency incident. Again, it's
 6 more like an introduction, if you like, or an overview
 7 of JESIP. That's what the PowerPoint tells us, really .
 8 Q. So how did you take the remark that you have recorded in
 9 your Kerslake interview:
 10 "When they said, 'Do you know why you had to do it?'
 11 So I said, 'No', and they said, 'Because the brigade
 12 were being audited'."
 13 Not because --
 14 A. I was gobsmacked because of what happened, what was
 15 happening, or entailing that night, because JESIP was
 16 obviously not working.
 17 Q. I was just tempted to ask you to develop that, but
 18 I want to keep to the question I'm asking at the moment:
 19 "They didn't say [and I'm looking at the top of
 20 page 58], 'The reason the brigade wants you to look and
 21 do this e-learning is so that you at least know from the
 22 work you do what JESIP involves'. They didn't say that.
 23 They said, 'The only reason they're asking you to do it
 24 is because the brigade were being audited'."
 25 What did you take from that answer as to the

193

1 brigade's attitude to the importance of you at least
 2 having a look at JESIP?
 3 A. There's posters all around the station of JESIP this,
 4 JESIP that, you know. And on the night, it wasn't
 5 working, it didn't work. It's been -- not rammed down
 6 our throats, but I think every station has a JESIP
 7 poster with the key points in it, you know, co-locate,
 8 communicate, and everything else. You know, I was just
 9 taken aback that night when it was said because it
 10 didn't work and it's obvious it didn't work on that
 11 night.
 12 Q. Would you agree, looking at this, the attitude being
 13 given to you was: we just want to make sure we've ticked
 14 the boxes to get past the audit? That's what they're
 15 more concerned about, was it, as far as you and your
 16 colleagues were concerned, about JESIP, not the safety
 17 of individuals but ticking the boxes? Do you agree?
 18 A. That's correct, yes, sir .
 19 Q. And with what we have heard throughout this inquiry so
 20 far of how much the brigade thinks JESIP is important,
 21 but in reality were they applying lip service to it?
 22 A. I think that's for this inquiry to know. Was the Fire
 23 Service following JESIP and no one else was? That's not
 24 for me to say.
 25 Q. But certainly would you accept on what we see here, that

194

1 what the Fire Service say about JESIP being important
 2 seems to be the only thing they felt important at this
 3 stage was ticking the boxes, do you agree?
 4 A. Yes, sir .
 5 Q. I'll move on from that if I can and go back to the night
 6 in question. I'm referring to your statement and
 7 I won't necessarily take you to it, to save some time,
 8 but I want to clarify a few things as far as
 9 mobilisation is concerned. I'll give you the references
 10 in your statement if you want to refer to it, but
 11 I don't need it highlighted.
 12 On page 1 of your statement, there are no paragraph
 13 numbers, you say that Gorton Fire Station, G19, called
 14 G16, which is Manchester Central Fire Station, asking
 15 why it had not mobilised; is that right?
 16 A. That's correct, yes.
 17 Q. Was that unusual for another fire station to be ringing
 18 the fire station G16, so close to the arena, and asking
 19 them why they had not mobilised?
 20 A. I presume that they would be phoning the station, were
 21 expecting to get no answer, because we'd have been sent.
 22 So no, they were making us aware by what -- how they got
 23 that information that a bomb has gone off at the arena.
 24 So I'm expecting when they rang the station, they were
 25 expecting us not to answer the phone.

195

1 Q. Andy Berry was travelling during much of the time when
 2 this atrocity was unfolding, wasn't he?
 3 A. Yes.
 4 Q. He lives in Wigan, doesn't he?
 5 A. Yes, sir .
 6 Q. And he was driving, I presume; is that right?
 7 A. Yes, sir .
 8 Q. Would you agree that Andy Berry was unfamiliar with the
 9 City of Manchester?
 10 A. I would say so. Yes, definitely, because
 11 Thompson Street -- we were already there at a suitable
 12 rendezvous point. So yes, I would say that he must have
 13 been.
 14 SIR JOHN SAUNDERS: Sorry, forgive me. You're saying
 15 he wasn't familiar with Manchester because of the
 16 rendezvous point that he chose?
 17 A. Yes, sir . In relation to the arena, he thought --
 18 SIR JOHN SAUNDERS: I know, I understand that.
 19 A. -- it would be too close, but in my view it's not.
 20 SIR JOHN SAUNDERS: That's the basis for your belief he
 21 didn't know?
 22 A. Yes.
 23 MR COOPER: It was Andy Berry that chose Philips Park?
 24 A. Yes.
 25 Q. Which of course, would you agree, someone with a little

196

1 more knowledge of Manchester city centre and the role
 2 that was required of the Fire Service probably wouldn't
 3 have chosen Philips Park? Would you agree?
 4 A. No, sir.
 5 Q. What do you mean, no? You wouldn't agree with me or --
 6 A. Sorry, Philips Park was the wrong location.
 7 Q. The wrong location?
 8 A. I agree with what you said.
 9 Q. It's a clumsy question. So is it right then that anyone
 10 at all familiar with the City of Manchester would not
 11 have chosen Philips Park?
 12 A. It depends where your incident is. If the incident was
 13 at the Manchester Arena, so Manchester Central, if
 14 that's what he wanted, was a good rendezvous point
 15 because of the distance. If there had been an incident
 16 at the Etihad --
 17 SIR JOHN SAUNDERS: I think I understand the point: it would
 18 be better to be at the central station for this
 19 particular incident?
 20 A. Yes.
 21 MR COOPER: That's all I was getting to.
 22 And Philips Park is about 2 miles away, we can
 23 remind ourselves, can't we? Is that right?
 24 A. Yes, sir.
 25 Q. You were getting or your colleagues were also getting

197

1 information from Mr Mottram's wife, weren't you, who was
 2 a paramedic at the scene?
 3 A. Yes, sir.
 4 Q. Again, I'll try and short circuit these questions.
 5 There was delay in the Fire Service attending at the
 6 City Room and at the arena because of concerns as to the
 7 safety of fire personnel. Would that be right, putting
 8 it broadly?
 9 A. That's what they were saying. It's an explosion that's
 10 gone off. We take risks. Someone else was making that
 11 call, not me.
 12 Q. And the reason I just wanted to clarify that is just to
 13 establish this question. Would you accept that the
 14 brigade at that time, and we can deal with later, but
 15 the brigade at that time was risk averse?
 16 A. I would say so, yes, sir, or, again, it's only -- did
 17 control pull the wrong action card? It was an
 18 explosion. I would expect to go.
 19 SIR JOHN SAUNDERS: Okay, I need to understand. Are you
 20 saying that they were generally risk averse or they
 21 appeared to be risk averse on this particular night and
 22 this particular incident? If you don't feel able to
 23 answer that, then do say so.
 24 A. I think on this night they were risk averse.
 25 SIR JOHN SAUNDERS: Okay. Thank you.

198

1 A. Like I say, this type of incident hasn't happened before
 2 in Manchester. I think on this night, risk averse,
 3 2 hours for the Fire Service to get on scene was too
 4 long.
 5 MR COOPER: You link that to the action card point. Do you
 6 mean by that effectively that the action card for a bomb
 7 was used and moved from explosion, so the bomb protocol
 8 was used rather than the explosion protocol?
 9 A. I can't say.
 10 SIR JOHN SAUNDERS: Okay. Just hang on for a minute.
 11 I think now we're going into Mr Simister commenting on
 12 the evidence of other people of which was used and which
 13 was the appropriate one, which we're going to look at
 14 with the relevant people.
 15 MR COOPER: I will move on, sir.
 16 It took over about an hour, then, didn't it, for
 17 a NILO to arrive?
 18 A. Yes, sir.
 19 Q. A blunt reason for that was that Mr Berry got lost?
 20 SIR JOHN SAUNDERS: He wasn't the first NILO to arrive.
 21 A. (Overspeaking) Meakin was the first.
 22 MR COOPER: Was Mr Meakin the first NILO to arrive?
 23 A. Yes. Mr Meakin was the first NILO to arrive, Mr Levy
 24 was the second NILO, and then Mr Berry was the third.
 25 Q. And Mr Berry was the third. So Mr Meakin arrived just

199

1 over an hour later; is that right? Let me get that
 2 clear.
 3 A. Yes, about 20 past, yes. 11.20.
 4 Q. And it's Mr Berry -- I was putting to you the issue of
 5 him getting lost. He got lost, didn't he, on his way
 6 there?
 7 A. At the time of the night, I didn't realise that he'd got
 8 lost and hit roadworks. It was only after the night
 9 that we realised why it took him so long. But on the
 10 night I didn't know why it took him so long to get to
 11 Philips Park.
 12 Q. All right. But ultimately, it was because he got lost?
 13 A. I believe so, yes, sir. Roadworks.
 14 Q. You indicated to us this afternoon that you had -- when
 15 I say you, you mean the team, had difficulty finding the
 16 HART team, didn't you?
 17 A. Yes, sir. We were supposed to meet them, but I can't
 18 remember seeing them that night, to be honest. Like
 19 I say, we got in front of Victoria Station and that's
 20 when I was met by Dan Smith, the paramedic.
 21 Q. So far as Dan Smith is concerned, he was very blunt,
 22 wasn't he, as to asking where you'd been?
 23 A. Yes, he was. We know Dan from previous training with
 24 him. He's a familiar face, a senior paramedic or
 25 consultant paramedic.

200

1 Q. In fact, if the real time transcript can take it, I'll
 2 put exactly what he said, and it's from your Kerslake
 3 interview. He said:
 4 "Where the fuck have you lot been?"
 5 That was his opening salvo, was it, effectively?
 6 A. Yes, sir, and we accepted that.
 7 Q. Dan Smith was a paramedic who taught and teaches trauma
 8 training to GMFRS staff? He was at the time, wasn't he?
 9 A. Yes, sir.
 10 Q. And he immediately said to you, after giving you that
 11 greeting, to pair up with a paramedic and, apart from
 12 other things, get stretchers?
 13 A. Yes, get stretchers and blankets from an ambulance, pair
 14 up with a paramedic, and go and pick up casualties off
 15 the floor.
 16 Q. And no doubt, and this comes out loud and clear from
 17 your evidence, you and your rank and file colleagues
 18 were anxious to get on and do that, weren't you?
 19 A. Yes, we wanted to do our jobs.
 20 Q. Were you stopped from doing that?
 21 A. No. I know Andy Berry had concerns because 10 minutes,
 22 5 minutes earlier, he'd realised that Plato had been
 23 declared, Operation Plato.
 24 SIR JOHN SAUNDERS: I thought you told me he said you were
 25 to move out of there, and you said you're not going, in

201

1 effect.
 2 A. Sorry, yes. I'm getting the two -- the two are the same
 3 but in different ... Yeah, we'd already started to go in
 4 by then, but then Andy Berry said to me, "We're going to
 5 have to go, we're going to have to withdraw". By that
 6 time I think the crews were already in there and already
 7 committed.
 8 MR COOPER: The question really is designed to get to this
 9 point: when the crews were in there, the service and the
 10 help offered to survivors and, sadly, those dying as
 11 well was a paramedic paired up with a firefighter?
 12 Would that be right?
 13 A. That's correct, yes.
 14 Q. That firefighter would have all the equipment, the
 15 medical equipment, that you described at the start of
 16 your answers to me? Is that right?
 17 A. We didn't need any medical equipment. The
 18 Ambulance Service, we used their medical equipment.
 19 SIR JOHN SAUNDERS: You were there to get the stretchers,
 20 get them out, get them in ambulances --
 21 A. We didn't administer any first aid, we were there to
 22 pick people off the floor. We didn't use any of our
 23 equipment.
 24 MR COOPER: I want to take you back to what we submit is
 25 a rather helpful paragraph in your Kerslake interview

202

1 again, please, which I hope is at page 10. Could we go
 2 back to that, please? {INQ023524T/10}.
 3 I hope page 10 is the place I want you to go to.
 4 It's the section that starts with you at the top:
 5 "So I would like to say ..."
 6 SIR JOHN SAUNDERS: We can't see it at the moment,
 7 Mr Cooper, so if you'd like to read it out unless it's
 8 very long.
 9 MR COOPER: I can if you'll bear with me.
 10 (Pause)
 11 I'll read it then. It's right at the top. You say:
 12 "Like I say, Andy Berry arrives at Park now, so
 13 that's the three NILOs arriving at Park, and this is,
 14 like I say, over an hour from the bomb blast. You know
 15 we've been waiting around long enough. Like I say, in
 16 the meantime, while we was at rendezvous point there was
 17 no one in charge of the incident, no one in charge of
 18 the rendezvous point. You know, I'm there mobilised to
 19 a rendezvous point. You know, a senior officer should
 20 have come to the OIC or incident commander or
 21 something."
 22 And you go on. It's just the paragraph and you
 23 encapsulate it all in this paragraph:
 24 "There was no incident commander present, there was
 25 no information given to us than what we gleaned off

203

1 social media and by me phoning control twice. So like
 2 I say, we were left in limbo for a long, long time.
 3 Again, if we'd have proceeded straight to the incident,
 4 you know, we -- everyone would have had the information
 5 they needed to make an informed decision."
 6 That's the paragraph. I'm sorry you haven't got it
 7 in front of you.
 8 A. I recall the paragraph, yes, sir.
 9 Q. You encapsulate, don't you, within that paragraph in
 10 your Kerslake interview -- there it is now. You
 11 encapsulate within that paragraph in your Kerslake
 12 interview the kernel, in many respects, of what you say
 13 went wrong on the night; is that right?
 14 A. Yes. Like I say, if we'd been mobilised straightaway to
 15 the arena, as I keep saying, the first appliance in
 16 attendance would have been the OIC, and the incident
 17 would have built on from there. But we were just sent
 18 in isolation to Philips Park with no information.
 19 I thought there was a plan, I thought --
 20 SIR JOHN SAUNDERS: Okay, thank you very much, Mr Simister.
 21 I'm not criticising you. I've got that message very
 22 clearly.
 23 A. Have I answered your question or could you just repeat
 24 the question?
 25 MR COOPER: No, part of the exercise was just to bring that

204

1 paragraph particularly to the inquiry's attention, you
 2 adopting that paragraph, which you do adopt,
 3 Mr Simister, as some of the significant concerns you had
 4 at the time; is that right?
 5 A. Yes, sir.
 6 Q. Thank you.
 7 Now, one of the matters -- that can be taken down
 8 now -- I want to put to you, it's a matter that concerns
 9 those we represent. At the time you were an officer,
 10 a watch commander of 26 years' experience, weren't you?
 11 A. At the time I think it was 23 years, by that time, sir.
 12 Q. Well, significant experience.
 13 A. Yes.
 14 Q. We hear, and the chair hears your frustrations, and the
 15 anger and frustration expressed by you and your
 16 colleagues during this period. You could have
 17 self-mobilised, couldn't you?
 18 A. By the time from us hearing the explosion, getting the
 19 two pre-alerts, getting the phone call from Gorton,
 20 that's when we realised at that point that something was
 21 happening at the arena. Then we did get a mobilisation
 22 and it was to Philips Park. My window of self-deploying
 23 was very small, but I was mobilised to Philips Park and,
 24 like I've said in this inquiry, I thought I was going to
 25 Philips Park because there was a plan.

205

1 Q. It's an important answer. Certainly for those we
 2 represent to hear from you. Are you saying you didn't
 3 have chance to self-mobilise or you decided not to
 4 self-mobilise?
 5 A. We was waiting -- as soon as we found out what was
 6 happening at the arena, the second pre-alert, we was
 7 waiting to be mobilised and the mobilising came. It's
 8 only afterwards in hindsight you think we should have
 9 gone down and self-deployed to the incident. Like
 10 I say, we did stand there, we looked at the turnout
 11 sheet: Philips Park, there must be a plan, there's
 12 a reason why we're going to Philips Park.
 13 They told me -- when I got on shift tomorrow and we
 14 hear an explosion and I know it's the arena, then
 15 I would self-mobilise. But that's in hindsight.
 16 Q. I'm not going to challenge you on hindsight because
 17 that's a very cowardly thing to do and I'm not going to
 18 do that. We are obviously trying to learn about this.
 19 Would one option perhaps have been to send at least one
 20 person, one of your colleagues, on in advance to see
 21 what was going on and report back?
 22 A. Again, I would expect control to have done that, send
 23 a NILO to the arena. I don't know, I'm thinking because
 24 we've been mobilised to Philips Park, there's a plan.
 25 If there was a plan and I've turned one fire engine down

206

1 to the arena, and that plan involved the four fire
 2 engines of which I've sent one to the arena, I don't
 3 know. But I would have expected control to have sent
 4 someone because they've got the mobilising there,
 5 they've got the appliances, the officers, to send one of
 6 them down to the arena. I've been sent to Philips Park
 7 because of mobilisation. Why didn't they send one of
 8 the NILOs to the arena in his ballistic gear to find out
 9 what was happening? Or one of the flex duty officers on
 10 duty that night.
 11 Q. The essence of this is that you trusted brigade
 12 management to do their jobs?
 13 A. I did.
 14 Q. Would you agree they should be hanging their heads in
 15 shame?
 16 SIR JOHN SAUNDERS: I think that's a comment.
 17 A. Yeah, I think --
 18 SIR JOHN SAUNDERS: We'll see what they say when they come
 19 along. Everyone can make up their own mind about
 20 whether that's right or not.
 21 MR COOPER: Of course. That was a difficult one.
 22 I want to take you to {INQ004498/1}, a debrief.
 23 I want you just to explain something to me if you can.
 24 Let me identify those documents.
 25 SIR JOHN SAUNDERS: If there's a particular page, the page

207

1 tends to stay settled.
 2 MR COOPER: Can I try and get us to {INQ004498/5}, please?
 3 It's a debrief report. There we are.
 4 On page 5, I want to ask you whether you can help us
 5 with this expression. Do you see the word "debrief"?
 6 A. Yes.
 7 Q. "A hot debrief was not carried out immediately after the
 8 incident."
 9 Then this:
 10 "The impact of criminal investigations on the
 11 debrief processes need to be considered. Potential
 12 delays in debriefs need to be avoided and crews should
 13 debrief as soon as possible."
 14 Did you know what is meant by that:
 15 "The impact of criminal investigations on the
 16 debrief processes needs to be considered"?
 17 And if so, in what way?
 18 A. I think the firefighters wanted a debrief as soon as
 19 possible, but management was using the excuse that there
 20 may be criminal proceedings so that's why we can't
 21 conduct a debrief.
 22 Q. Why? Were they asked why (overspeaking)?
 23 A. I can't answer that question. You'd have to ask the
 24 brigade management why they --
 25 Q. (Overspeaking) who gave that information? Who gave you

208

1 the information so I know who to ask the question of?
 2 A. (Overspeaking) the person who conducted this debrief
 3 because they will know that answer. I was just a watch
 4 manager on the night.
 5 Q. All right.
 6 SIR JOHN SAUNDERS: It sounded like the debrief process
 7 which did take place was a fairly lively affair .
 8 A. It was just a slagging match, someone to vent off at.
 9 We got no answers. Yeah, we got nowhere with it. It
 10 was just a load of firefighters venting and that was it.
 11 SIR JOHN SAUNDERS: I think we'll find, Mr Cooper, this was
 12 a comment by a particular person who's identified by the
 13 number 32. I don't know whether it is possible for us
 14 to find that out.
 15 MR COOPER: We'll move on.
 16 You've been asked questions about the debrief as far
 17 as Mr Harris is concerned. I'm not going to repeat
 18 those questions. But I will ask you this and it's based
 19 on your Kerslake interview. At page 18 you say:
 20 "Geoff Harris said he was not part of any decision
 21 but he was in the operations room."
 22 Do you remember that? That's your Kerslake
 23 interview, page 18? Geoff Harris actually said to you
 24 he was not part of any decisions?
 25 A. That's what he said and that's what got everyone's back

209

1 up later on when we realised that he was in the command
 2 support room, so he would have had some of them answers
 3 that we wanted answering.
 4 Q. So one would expect -- we already established with
 5 Mr Topping that he was there with a number of others, so
 6 one would expect that if he's in the command room, he's
 7 simply not holding the coats?
 8 A. He will know what was going on, what decisions were
 9 being made and what was happening in that room, yes.
 10 Q. And be part of those decisions?
 11 A. Yes, sir, yes, being assistant county fire officer, yes.
 12 Q. Did it look at the time, not only as we have understood
 13 up until this moment, that Geoff Harris wasn't answering
 14 questions about what decisions were made, it's more than
 15 that, isn't it, from your evidence? He was actually
 16 saying he wasn't part of them. He wasn't not answering,
 17 he was saying he wasn't part of them?
 18 A. That's correct, sir.
 19 Q. Which is incredulous, isn't it, to say that if he's
 20 in the control room, a man of that seniority?
 21 SIR JOHN SAUNDERS: I think you have made the point. We may
 22 be hearing whether there's any explanation for it.
 23 MR COOPER: Yes, sir.
 24 I just want to clarify something because it's fair
 25 I do clarify this for all sides. In your Kerslake

210

1 interview at page 62, you mention a bullying culture of
 2 senior officers. I want to be clear in fairness to the
 3 present senior officers. Were you referring to
 4 a bullying culture of past senior officers that were not
 5 there on 22 May or a bullying culture of senior officers
 6 who were in situ on 22 May?
 7 A. Um...
 8 SIR JOHN SAUNDERS: Just before we go there, do you agree,
 9 is it your case that there was a bullying culture at
 10 that time?
 11 A. Let's say the relationship between senior officers
 12 wasn't good at that time.
 13 SIR JOHN SAUNDERS: Between them or between them and --
 14 A. Between us and them. Again, you're bringing in debriefs
 15 and things like that -- after the arena incident, the
 16 firefighters were desperate to find out what went wrong
 17 and the answers to that, but all the senior officers,
 18 they all closed ranks, they wouldn't speak to us, they
 19 said they hadn't spoken to each other about the
 20 incident.
 21 Paul Argyle came down to speak to my watch on our
 22 first or second day on of the following tour because the
 23 arena happened on our last night of duty, so we went off
 24 for 4 days. It was on our second day that Paul Argyle
 25 came to see us and he said he hadn't spoke to the chief

211

1 and he didn't know what happened that night, which
 2 at the time I found incredible, being the deputy chief
 3 fire officer, and also he was asked to come off his
 4 holiday or conference early. So again, that got
 5 everyone's backs up again. We didn't know where the
 6 chief was. We asked him where the chief was and he said
 7 he didn't know where he was.
 8 SIR JOHN SAUNDERS: Relations were not good between
 9 firemen --
 10 A. Yes, firefighters and the senior officers. The trust
 11 had gone.
 12 SIR JOHN SAUNDERS: Is it the right thing to describe it as
 13 a bullying culture? If it is, then say so.
 14 A. I would say bullying was a bit. At the time, I was very
 15 emotional still when I wrote the Kerslake. I'd rather
 16 rephrase it as relationships between senior management
 17 and firefighters wasn't good.
 18 SIR JOHN SAUNDERS: They just didn't come after this
 19 incident and explain to you what had happened when you
 20 were all desperately upset about it all?
 21 A. Yes, everyone closed ranks.
 22 SIR JOHN SAUNDERS: Mr Cooper, over to you.
 23 MR COOPER: Let me be clear. The expression "bullying
 24 culture" wasn't something you just made up, Mr Simister,
 25 they were your words in the Kerslake interview.

212

1 A. They were my words.
 2 Q. Let me press you on this. I know it's difficult because
 3 you're still serving.
 4 A. Yes.
 5 Q. But you're an intelligent man, you might have been and
 6 obviously were very upset about what had happened. But
 7 I'm trying not to have that expression just simply
 8 dismissed with, "Oh, I was emotional at the time". It
 9 doesn't do you justice. Let's go back to it again
 10 because it doesn't do you justice by simply saying,
 11 "I was emotional at the time". I am not against you
 12 here, I am just trying to establish this. You used the
 13 expression there was a bullying culture and now you
 14 must --
 15 A. It felt like there was a bullying culture.
 16 Q. Give us some detail about that.
 17 A. I don't think I can. I just think if I can phrase it as
 18 relationships between senior management and firefighters
 19 wasn't good. Wasn't good.
 20 Q. How did that manifest itself and then maybe the chair
 21 can decide whether it's bullying?
 22 A. Um... I think it was... They disjointed themselves
 23 from the firefighters. That's what it felt like.
 24 I think bullying is probably a strong word that I used.
 25 I'd just say relationships weren't good.

213

1 Q. Let me use another word. You have indicated they
 2 separated themselves, as it were, from the Fire Service.
 3 They were arrogant?
 4 A. Yes, I'd have that.
 5 Q. So at the time of the Manchester Arena atrocity, brigade
 6 management had an arrogant attitude towards the
 7 firefighters? You just agreed a moment ago, I was
 8 hoping it would be quicker --
 9 SIR JOHN SAUNDERS: Hang on, Mr Cooper. What we need to
 10 identify I think -- I'm not stopping him from saying it,
 11 I just need to make sure we're clear.
 12 So at what stage are you saying they had an arrogant
 13 attitude to you? Was it before and continuing through
 14 but had gone on for years, or are we talking about
 15 after, an attitude then? I just need to understand
 16 exactly what's being said. You must say exactly as you
 17 view it. We need to make sure that I understand what
 18 you're saying.
 19 A. Yeah, it's... I don't know how I can describe it,
 20 really. It just felt like they weren't listening.
 21 SIR JOHN SAUNDERS: When were they not listening? Never?
 22 They just didn't really want to know generally?
 23 A. It just seems like the senior officers then were not
 24 interested in the operational side of firefighting.
 25 SIR JOHN SAUNDERS: Right.

214

1 A. More after their own careers, to get promoted as quickly
 2 as they could. And at the end of the day, they've all
 3 started where we've all started from as firefighters.
 4 But I must say, the culture has changed recently. We've
 5 got some good station managers moving up, we've got
 6 a new chief that listens, that comes on his own to speak
 7 to watches, so things are changing. I don't know if
 8 that -- I don't think that answers your question.
 9 SIR JOHN SAUNDERS: I think it answers the question.
 10 Mr Cooper.
 11 MR COOPER: Yes, it helps. So at the time of the
 12 Manchester Arena atrocity, you had senior management,
 13 brigade management, who were more interested in their
 14 own careers and getting promoted as quickly as they
 15 could, yes, as you've indicated?
 16 A. Yes, sir, and not answering questions about the night.
 17 Q. And that manifested itself in a totally dysfunctional
 18 response from the brigade; would you accept that?
 19 A. I'd like to think for an incident like that, everybody
 20 would want to respond and be there.
 21 Q. Yes?
 22 A. No matter what rank and file you are.
 23 Q. I'm sure we all would. But you've indicated that at the
 24 time of this atrocity the senior --
 25 A. If I've said management were bullying, a bullying

215

1 culture or anything like that, would bear -- for them to
 2 make decisions about that night, that would have nothing
 3 to do with it --
 4 Q. I'm more interested --
 5 A. -- (overspeaking) information they got.
 6 SIR JOHN SAUNDERS: They made the wrong decisions that night
 7 which, in your view, led to a complete negation of what
 8 the fire service is all about.
 9 A. Yes, sir.
 10 SIR JOHN SAUNDERS: And then they wouldn't tell you what
 11 went wrong afterwards, leaving lot of very angry
 12 firemen?
 13 A. Yes, sir.
 14 MR COOPER: I am pushing a little harder than that,
 15 Mr Simister, if I may, because that is one phase of
 16 perhaps their behaviour. The other I wanted to examine,
 17 and I know it's difficult for you: is your evidence
 18 again that they were more concerned about their own
 19 careers and to get promoted as quickly as they could?
 20 That's the attitude you've told us of brigade management
 21 at the time of the Manchester Arena bomb and I'm asking
 22 you, if I can be permitted to, how did that manifest
 23 itself in keeping safe the people of Manchester
 24 (overspeaking) this concert?
 25 A. What you find is people use the fire -- the people who

216

1 ride the fire engines, the firefighters, what you'll
 2 find is people parachute out of headquarters and they'll
 3 do 6 months as a station manager, they'll go through the
 4 ranks in a back office department, and come out of that
 5 back office department as a station manager or something
 6 like that or get to a watch manager. They'd then
 7 parachute on to the fire engines, do 6 months, get the
 8 tick in the box, and then they would start moving up the
 9 rank structure. That's what I meant by that.
 10 I've always said it. We should have two career
 11 paths: one where you go up and get promoted and you run
 12 departments within the Fire Service, and the other one
 13 where you remained operational and become dedicated
 14 incident commanders, so these flex duty officers are in
 15 charge of more incidents, gaining more experience, and
 16 becoming good at the job. Because to do the job, you've
 17 got to be doing it for a while in post instead of --
 18 what you find in the Fire Service is people not so much
 19 on the fire engines but in headquarters, they do the job
 20 for not a long time and they move on and they move on
 21 and they move on. There's no consistency in people
 22 within them departments.
 23 Q. Would it be right (overspeaking). I'll move on after
 24 this question: would it be simply right to say that
 25 at the time of this atrocity, the people in the control

217

1 room, the people in command, brigade management, had
 2 little idea what it was like actually to be out there on
 3 the ground, doing the jobs you and your colleagues do,
 4 because of that career path or whatever you'll call it?
 5 A. Yes, I would, sir.
 6 Q. Thank you. The chair will be reassured to know I'm
 7 cutting out a number of my questions, not because
 8 they've been asked, but because I'm conscious of timing.
 9 I want to ask you about something you said in
 10 Kerslake, page 21. You referred to control rooms and
 11 a private company handling calls to Greater Manchester
 12 Fire and Rescue Service in Warrington. You made some
 13 criticism of perhaps private companies handling calls
 14 into Greater Manchester. Do you want to develop that or
 15 simply in a sentence explain why you think the quality
 16 of service has fallen because of it?
 17 A. It's one of the ex-chiefs, Steve McGuirk, it was his
 18 idea to use one of the regional control rooms that the
 19 government spent a lot of building money. Manchester,
 20 like we said, it's the second biggest city and we had
 21 our own control room in headquarters, but now our
 22 control room is in Warrington, it's not in
 23 Greater Manchester, it deals with four different
 24 brigades, it deals with four different police forces.
 25 Had it been in headquarters, where it used to be, the

218

1 command support room may have been in the same room or
 2 on the same floor. I am led to believe the number of
 3 control staff is not very many covering that wide area.
 4 I think they had as many control staff in Manchester as
 5 it was and they've got the same number in control as
 6 it is now, but they're covering the whole of the
 7 north-west.
 8 Q. And how is this (overspeaking).
 9 A. I prefer to have our own control room. I think when we
 10 move control rooms (overspeaking).
 11 Q. I'm simply going to ask you the question: how is that
 12 a potential disadvantage or -- inhibits the good work of
 13 the Fire Service?
 14 A. I should imagine if we had our own control room, we'd
 15 have more local knowledge, information would be passed
 16 a lot quicker. It's just better having your own control
 17 room rather than dealing with a private company,
 18 I think.
 19 Q. In terms of -- I've got two more questions left. In
 20 terms of money, funding and how money is spent,
 21 I referenced Kerslake and 46 of your evidence. You
 22 indicated brigade management were spending money in the
 23 wrong places. You say:
 24 "Lots of money on new tables and chairs and not on
 25 appliances, fire engines and that sort of thing."

219

1 Do you remember saying that?
 2 A. I do remember saying that, yes.
 3 Q. What did you mean by that, that management spent more
 4 money on tables and chairs than on important life-saving
 5 equipment?
 6 SIR JOHN SAUNDERS: You probably meant what it said, didn't
 7 you?
 8 A. Yes. I was seeing new toilets being built in stations,
 9 I was seeing tables and chairs in stations, but the
 10 appliances were breaking down. They were a mess. And
 11 like I say, I would like to see the money spent on every
 12 firefighter being trained in MTA. That's what I would
 13 like to see.
 14 Q. Who was making the decisions to spend money on tables
 15 and chairs rather than life-saving?
 16 A. You'd have to ask brigade management about that. I'm
 17 a watch manager.
 18 Q. I think that probably gives me my answer anyway.
 19 Simply this: do you say at Kerslake, page 40:
 20 "We had been poorly led for quite a number of years
 21 now?"
 22 That's what you said?
 23 A. Yes. That's what I said then, yes. I think things are
 24 getting better now, but then, yes, I stick by that.
 25 Morale was low. Yes, I stick by that at that time.

220

1 Q. And simply this, Mr Simister: one of the tragedies, many
 2 tragedies, of the Manchester Arena bomb is that it came
 3 at a time when the brigade was in a complete state of
 4 dysfunctionality?
 5 SIR JOHN SAUNDERS: Okay, do you agree with the complete
 6 state of dysfunctionality in Mr Cooper's question?
 7 A. Not in a complete state because we were still turning
 8 out to other operational incidents and having
 9 a conclusion to them incidents. So again, strong words
 10 in my statement because Kerslake was the only people
 11 that would listen to me.
 12 SIR JOHN SAUNDERS: We've listened to you, I think.
 13 A. Yes, thank you, sir.
 14 MR COOPER: I'm grateful, sir, for your indulgence.
 15 Thank you.
 16 SIR JOHN SAUNDERS: Mr Cooper, when I've stopped you it's
 17 because I need precise answers. That's why I have tried
 18 to drill down.
 19 MR COOPER: Sir, what I said was genuinely meant. I realise
 20 I've gone over my time and I realise time is precious
 21 and I meant that absolutely genuinely because I know
 22 you've indulged me and I've gone over my time.
 23 SIR JOHN SAUNDERS: Thank you, Mr Cooper.
 24 MR GREANEY: Mr Smith is going to help with a matter of
 25 detail.

221

1 MR SMITH: Sir, can I just mention, before Mr Warnock asks
 2 any questions, the time of arrival of Station
 3 Manager Berry at 18 Philips Park was 23.41.
 4 SIR JOHN SAUNDERS: Thank you very much, I'm very grateful
 5 to you.
 6 MR GREANEY: Thank you, Mr Smith.
 7 MR WARNOCK: Sir, I can confirm that.
 8 SIR JOHN SAUNDERS: Thank you, Mr Warnock.
 9 MR GREANEY: Mr Warnock has indicated to me by email he
 10 thinks he will be 10 to 15 minutes and I'm told that
 11 we can carry on without causing too much inconvenience
 12 to the shorthand writer.
 13 SIR JOHN SAUNDERS: I'm happy to carry on for 10 to
 14 15 minutes to finish this witness. It's obviously not
 15 an easy experience for you to come back and give
 16 evidence. If you're happy, can you manage another
 17 10/15 minutes?
 18 A. Yes, sir.
 19 Questions from MR WARNOCK
 20 MR WARNOCK: Thank you.
 21 Mr Simister, can I just start with a question of
 22 clarification from you about the call that was received
 23 from Gorton whilst you were at Manchester Central. This
 24 was the call some time or shortly after 22.46. Were you
 25 the person who took that call?

222

1 A. No, I think it was Crew Manager Turner, my crew manager.
 2 Q. Do you know who the caller was?
 3 A. I think it was Watch Manager Bob Walker in charge of
 4 Blue Watch at Gorton.
 5 Q. You were asked some questions by Mr Smith on behalf of
 6 North West Fire Control about the information which
 7 could have been passed back through North West Fire
 8 Control had you been mobilised direct to the scene of
 9 the attack. When you went to Philips Park, we listened
 10 to a call that you made to North West Fire Control at
 11 that point, do you remember that, at about 23.06?
 12 A. Yes, sir.
 13 Q. One of the things you told North West Fire Control was
 14 that ambulances were pulling into Central Station as you
 15 were leaving it.
 16 A. Yes, sir.
 17 Q. Do you recall that?
 18 A. Yes, sir.
 19 Q. Why were you telling North West Fire Control that?
 20 A. Because I thought, you know, why have we been sent --
 21 I thought they would tell me more information, why we've
 22 been sent to Philips Park when the Ambulance Service is
 23 pulling on to our yard. What was the rationale?
 24 Q. The information that you gave to North West Fire
 25 Control, did you expect something to be done with that?

223

1 A. They're the control room, they're getting the
 2 information, so I thought I was just passing it to them
 3 so they could build a bigger picture of what was
 4 happening because they are the control room. I was
 5 hoping to pass that information on to the NILOs as they
 6 arrived as well.
 7 Q. When you were eventually deployed to Victoria Station
 8 from Central, you told the chairman that on arrival you
 9 met Dan Smith, who teaches trauma training to GMFRS,
 10 including yourself; is that right?
 11 A. Yes, sir.
 12 Q. So you yourself had had training dealing with trauma
 13 injuries; is that right?
 14 A. Yes, sir, yes.
 15 Q. And the firefighters who were with you, they had all had
 16 training in dealing with trauma injuries; is that right?
 17 A. Yes, sir. Like I say, I mentioned, we were like the
 18 best we've ever been dealing with trauma, really,
 19 because of the trial of turning out to Red 1s, cardiac
 20 arrests, with the Ambulance Service.
 21 Q. At the time you arrived at Victoria, were you in fact at
 22 any stage required to use that trauma training?
 23 A. No, we wasn't. By that time, we didn't administer any
 24 first aid, from what I can recollect, we just went with
 25 the paramedics. The paramedics were dressing the

224

1 casualties and we were just helping lift them on to the
 2 stretchers.
 3 Q. So at that time, the level of training that you and the
 4 firefighters had had, was that adequate for the tasks
 5 that you were being asked to perform by the ambulance
 6 personnel?
 7 A. Yes, it was.
 8 Q. Whilst you were at Victoria, did you think that there
 9 was a need for more firefighters to be in attendance?
 10 A. I think they sent two more fire engines from Salford --
 11 was that after they arrived or before?
 12 Q. Well, first of all, before did you think you needed more
 13 firefighters in attendance and then after their arrival,
 14 did you think --
 15 A. I can't remember, but the more firefighters the better.
 16 If they'd given us another job to do, we'd have done it,
 17 whether it wasn't casualty-led. It was just good to see
 18 more firefighters, if I'm being perfectly honest. I do
 19 recall by the time Salford got there, there wasn't a lot
 20 for them to do.
 21 Q. Whilst you were there, did you consider that there was
 22 a role for the MTFA capability?
 23 A. Not at the time we arrived, no.
 24 Q. You said earlier that you didn't use any of the -- you
 25 and the firefighters you were with didn't use any of the

225

1 GMFRS first aid equipment. Did you form any impression
 2 of the sufficiency or otherwise of the equipment that
 3 was available from NWAS at the station when you were
 4 there?
 5 A. They were using their equipment. All we did was
 6 basically take a stretcher out of the ambulance and
 7 wheel it into the concourse of the station. I think the
 8 equipment that was already there, there was big piles of
 9 equipment all over the place, NWAS equipment.
 10 Q. Did you at any time feel that you were short of
 11 equipment?
 12 A. No. No, not that I can recall.
 13 Q. Moving on to another topic, you were asked some
 14 questions about the training you had received with
 15 particular reference, first of all, to MTFA. You said
 16 that you'd undertaken an e-learning course in relation
 17 to that and that at the conclusion of that training, one
 18 of the things you understood was the different types of
 19 zones.
 20 A. Yes.
 21 Q. And the difference between a cold, warm and hot zone?
 22 A. Yes, sir.
 23 Q. And you also understood, did you, what you should do if
 24 you came across an MTFA event in terms of what action
 25 you should take?

226

1 A. Yes, sir.
 2 Q. It was put to you that the training was really nothing
 3 more than a tick-box exercise; is that fair?
 4 A. I'd say probably not. More of an awareness training:
 5 you need to know it, you need to be aware of it.
 6 Q. And did you feel at the conclusion of the training you
 7 were aware of it?
 8 A. That's the only training I had, really. We didn't do
 9 any practical training in MTFA, so that's all the
 10 training we had. We understand the zoning of an
 11 incident. If an active shooter happens while I'm there,
 12 then we know what to do. But like I say, it's more for
 13 the TRU and SRT who get the hands-on practical training.
 14 As firefighters, we don't.
 15 Q. And is that because, to your understanding, that's
 16 because they can be deployed into the warm zone?
 17 A. Yes. At that time, with the arena, TRU and SRT were the
 18 only ones that could be deployed into the warm zone.
 19 The subsequent new policy now says that we can deploy
 20 into the warm zone as well.
 21 Q. You were also asked about JESIP and the training you'd
 22 received in relation to that. You said that there are
 23 JESIP posters at every fire station; is that right?
 24 A. Yes, I've seen them dotted around on the training boards
 25 on the fire station, yes.

227

1 Q. You also, I think, were suggesting -- or do you? Are
 2 you aware of what those posters say and what the
 3 principles of JESIP are?
 4 A. Yes, yes, I am.
 5 Q. As I understood what you were saying, but tell me if
 6 I've got it wrong, you in fact put those principles into
 7 practice at every road traffic collision you attend?
 8 A. We do. Like in a way, yes, we do, because we
 9 communicate with the other emergency services on -- if
 10 we have a house fire, a person has reported someone
 11 trapped in machinery, the ambulance turn up and the
 12 police turn up and I'm the incident commander and I will
 13 have a conflag with -- so we are co-working
 14 (overspeaking).
 15 Q. Bearing all of that in mind -- sorry, Mr Simister.
 16 I interrupted you. Say what you were going to say.
 17 A. I was just saying we do. On small-scale incidents, you
 18 know, I'm the incident commander, the police turn up,
 19 I'm wearing the white helmet, they come to me, we have
 20 a chat. Same as the paramedics, on a small-scale
 21 incident, we're doing it, we're co-locating because
 22 we're there, we are sharing our situational awareness,
 23 what the situation is, so we do it on a small scale.
 24 The JESIP model that we see printed around the
 25 stations is for major incidents, which high-ranking

228

1 officers will do, co-locate, and all the rest that comes
 2 with it .
 3 SIR JOHN SAUNDERS: Is it necessarily senior officers?
 4 Suppose you had self-located, I'm not suggesting you
 5 should have done, to the arena on that night and you got
 6 there first .
 7 A. Yes.
 8 SIR JOHN SAUNDERS: According to JESIP, as I understand it,
 9 you would then be required to ring in to your control
 10 room?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: Give them a METHANE message and do your
 13 best and your part in ensuring that all the partners got
 14 to know what was required. So it's not quite the same,
 15 is it? You might have been the first person on the
 16 scene, mightn't you?
 17 A. Quite possibly, yes.
 18 SIR JOHN SAUNDERS: Would you have done that then, rung the
 19 control room and given a METHANE message?
 20 A. Not straightaway would I give a METHANE message, but
 21 I would certainly find out information. You've got to
 22 get them facts right of what's going on. If I could get
 23 that clear information within the first 5 or 10 minutes,
 24 then yes, I probably would have sent that message. But
 25 what I would have done definitely is, like I've said

229

1 earlier , get a suitable rendezvous point at the scene of
 2 operations, judge what the situation is and what I need.
 3 I probably would have sent an assistance message to get
 4 more fire engines in. Then, when I've got a bit more
 5 time, I may have formulated my METHANE message.
 6 SIR JOHN SAUNDERS: Forward control point or is that the
 7 same as your rendezvous point?
 8 A. For me it would be the same. I would locate my fire
 9 engines as close to the incident as I could, therefore
 10 in line of sight (overspeaking).
 11 SIR JOHN SAUNDERS: (Overspeaking) everyone else could join
 12 in too and you could talk about it?
 13 A. Yes, yes.
 14 SIR JOHN SAUNDERS: That sounds the JESIP principles.
 15 A. It does, sir .
 16 SIR JOHN SAUNDERS: Sorry, Mr Warnock.
 17 MR WARNOCK: It sounds like from the answer you have just
 18 given that you knew what a METHANE message is --
 19 A. Yes.
 20 Q. -- or was?
 21 A. Yes.
 22 Q. And you also knew about rendezvous points?
 23 A. Yes.
 24 Q. And forward control points?
 25 A. Yes, sir .

230

1 Q. I think it was being suggested to you by Mr Cooper that
 2 the Fire Service hadn't really taken JESIP seriously or
 3 embedded it. Do you agree that's a fair comment or not?
 4 A. It's funny because if we spoke to a police officer , as
 5 we did after the incident , and said, oh, JESIP didn't
 6 work, the police officer looked at us and said, "What's
 7 JESIP?" So probably the Fire Service did know, cascaded
 8 JESIP down to the firefighters , whereas maybe the police
 9 hadn't. Because a number of police officers we spoke to
 10 and we said an off-the-cuff comment that JESIP didn't
 11 work, then they looked at us and said, "What's JESIP?"
 12 So probably the firefighters were aware of JESIP more
 13 than any of the other organisations .
 14 SIR JOHN SAUNDERS: Maybe the Ambulance Service were as
 15 well .
 16 A. Yes.
 17 MR WARNOCK: You were asked about whether or not you could
 18 have self-deployed. If you and other firefighters are
 19 told to go somewhere, would it be appropriate for you to
 20 self-deploy?
 21 A. No. Again, because I don't know what the bigger picture
 22 is , if I am told to deploy somewhere, I've got to go
 23 there. So no, I've been mobilised to a rendezvous point
 24 for a reason. So --
 25 Q. Sorry. As a firefighter , how important is it to be

231

1 disciplined? That sounds perhaps an obvious question,
 2 but since this was raised with you, I ask it .
 3 A. Yes. It is important. They've got to be disciplined
 4 because it's the reaction to -- if someone's
 5 disciplined , it's their reaction to orders. If I'm
 6 barking orders, I want their reaction, their attention,
 7 and for them to follow them orders. We've moved away
 8 from being militaristic , but we have still got an
 9 element of it in there. We're a uniformed service and
 10 a discipline -- being disciplined is important still and
 11 for me it's the reaction to orders. If I bark orders at
 12 my firefighters , I want them to react quickly and safely
 13 and drilled and carry out that what I'm asking of them.
 14 Q. With that in mind, do you think it would be appropriate
 15 for firefighters to take it upon themselves to
 16 self-deploy if told to rendezvous somewhere?
 17 A. I think we do -- we can self-deploy in certain
 18 circumstances. I'll just give an example of
 19 self-deploying. Self-deploying could be that someone's
 20 knocked on the station door and said that there's a
 21 house fire just down the road. Therefore we would jump
 22 on the fire engine, contact control, "We are mobilising
 23 ourselves to a house fire". That's reasonable.
 24 We can be driving along the streets of
 25 Manchester city centre and get flagged down and

232

1 someone's lay on the pavement in cardiac arrest.
 2 We would then make that an incident and that's
 3 self --mobilising.
 4 But most of the time, if you're on station, I'd
 5 expect to get mobilised by control unless, just for them
 6 incidents, someone come banging on the door and control
 7 weren't aware of what's gone on and they said, "There's
 8 something happened at the arena", and someone's knocking
 9 on the door telling me that, no bells have gone off.
 10 In that situation I could self --deploy and let control
 11 know that that's what I'm doing and that's where I'm
 12 going.
 13 On this occasion, by the time I had found out the
 14 information of what was happening at the arena, then the
 15 bells dropped, and they mobilised us to the rendezvous
 16 point of Philips Park.
 17 Q. Just turning to another topic. You were asked some
 18 questions about the relationships between firefighters
 19 and management. Can I just ask you to be clear one way
 20 or the other about this: as far as you were aware, did
 21 any dispute or bad relations between management and
 22 firefighters affect the response of GMFRS on
 23 22 May 2017?
 24 A. No. No. They made their decisions and they'll answer
 25 to this inquiry. But the firefighters on that night

1 were just angry because we hadn't been mobilised. It's
 2 up to the people who come after me to answer them
 3 questions on why they made them decisions, but the
 4 firefighters were just angry and trying to pressure
 5 people to mobilise and send us.
 6 SIR JOHN SAUNDERS: Okay. To get a balanced picture, as I'm
 7 sure Mr Warnock will expect me to do, it didn't affect
 8 what happened on the night?
 9 A. No.
 10 SIR JOHN SAUNDERS: Did it affect morale in the force
 11 thereafter?
 12 A. Yes, it did, and again it's because of the debrief
 13 process as well and people not telling us what happened.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR WARNOCK: I ask this again because of the way the
 16 questions were asked of you: are you suggesting or do
 17 you think that anyone at GMFRS put their own career
 18 above helping people that night?
 19 A. No, no.
 20 SIR JOHN SAUNDERS: Okay. I think your point -- this is so
 21 I get it completely right, Mr Warnock -- your point is
 22 you actually think there should be more emphasis on
 23 doing the job that you do, the hands--on job?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: And less emphasis for people who go up

1 in the ranks being in the back office, being an
 2 administrator.
 3 A. Yes.
 4 SIR JOHN SAUNDERS: It could be true of a number of jobs but
 5 that's your view of the Fire Service generally?
 6 A. Yes. I didn't particularly understand your question.
 7 If you could repeat it.
 8 SIR JOHN SAUNDERS: That I've just asked?
 9 A. That Mr Warnock asked, sorry.
 10 SIR JOHN SAUNDERS: Mr Warnock.
 11 MR WARNOCK: I think it was being put --
 12 SIR JOHN SAUNDERS: Did it affect what happened on the
 13 night, the attitude that senior fire officers weren't
 14 hands--on enough?
 15 A. No, I don't think it did. I think it was just because
 16 of information, those early decisions, I think.
 17 MR GREANEY: The question was: had any officer put his own
 18 career development ahead of public safety.
 19 SIR JOHN SAUNDERS: Sorry.
 20 MR GREANEY: And I think you did answer that no.
 21 A. No.
 22 SIR JOHN SAUNDERS: You answered it understanding the
 23 question?
 24 A. Yes, I do now.
 25 SIR JOHN SAUNDERS: Right. Sorry, Mr Warnock.

1 MR WARNOCK: I'm sorry, it's rather late. Sir, those are
 2 the only questions I wanted to ask. Thank you very
 3 much.
 4 SIR JOHN SAUNDERS: Thank you, Mr Warnock.
 5 MR GREANEY: Sir, I have no further questions.
 6 SIR JOHN SAUNDERS: Right.
 7 I'm extremely grateful to you. It was obviously an
 8 extremely sad night for you, which has lived with you
 9 for a long time afterwards, and I'm sure it's been
 10 difficult for you to have to come here and tell us all
 11 about it, but I'm very grateful that you have done so.
 12 Thank you.
 13 MR GREANEY: Sir, could we start at 9.30 tomorrow morning,
 14 please?
 15 SIR JOHN SAUNDERS: We could. Thank you very much.
 16 Tomorrow morning we have how many witnesses to come?
 17 MR GREANEY: Two.
 18 SIR JOHN SAUNDERS: Are we going to finish those by
 19 lunchtime?
 20 MR GREANEY: I very much hope so, sir. Certainly CTI have
 21 listened to what you had to say earlier on this
 22 afternoon and we will ensure that our questions are
 23 focused upon matters which are new and important to the
 24 decisions that you have to make. That isn't for
 25 a moment to suggest that others who have questions to

1 ask will not do the same, but we hope that we will be
 2 much shorter tomorrow than we've been today.
 3 SIR JOHN SAUNDERS: We've covered a lot of ground with two
 4 very helpful witnesses.
 5 MR GREANEY: Quite so, sir, yes. Thank you.
 6 (5.20 pm)
 7 (The inquiry adjourned until 9.30 am
 8 on Wednesday, 3 March 2021)

9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

237

I N D E X

1
 2
 3 MR ALAN TOPPING (affirmed)1
 4 Questions from MR GREANEY1
 5 Questions from MR SMITH75
 6 Questions from MR COOPER92
 7 Further questions from MR GREANEY116
 8 Questions from MR WARNOCK119
 9
 10 MR ANDREW SIMISTER (sworn)127
 11 Questions from MR GREANEY127
 12 Questions from MR SMITH170
 13 Questions from MR COOPER181
 14 Questions from MR WARNOCK222

15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

238

239