

# OPUS2

Manchester Arena Inquiry

Day 71

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(9.58 am)

MR DE LA POER: Sir, can I just indicate the shape of today before we begin with the gentleman who is in the witness box. We're anticipating hearing from three witnesses from the Greater Manchester Fire and Rescue Service: Mr Nolan, who will be first, then a Ms Turner, and finally a Mr Gray this afternoon. But we'll begin, please, with Mr Nolan.

MR JON NOLAN (affirmed)

Questions from MR DE LA POER

MR DE LA POER: Can we begin, please, with you stating your full name?

A. Jonathan Paul Nolan.

Q. Mr Nolan, you currently hold the rank of station manager, is that right?

A. Yes.

Q. And that is within the Greater Manchester Fire and Rescue Service?

A. That's correct.

Q. Before we come to your rank on the night of 22 May, let's deal with your role at the moment. Do you work within the Contingency Planning Unit?

A. I do, yes.

Q. Just give us an outline, please, briefly, of how that

1

differs or what the responsibilities are as compared to your role as watch manager.

A. Okay. In the Contingency Planning Unit I'm a station manager and I have certain references which include business continuity and airport liaison officer. Beyond that, there's miscellaneous activities I do as on request, like risk management things. I also turn out as a flexi duty officer operationally to operational incidents. How that differs from a watch manager is as the watch manager, I was in charge of a specific watch on a station with quite prescribed tasks.

Q. We'll come and look at those tasks in a moment. Is it right that in your role as a Contingency Planning Unit station manager, you authored a report in relation to Exercise Largo, which is an exercise which took place after the Manchester Arena attack?

A. Yes.

Q. And we will, at the conclusion of your evidence, just look briefly at what you said in that report, but that is to come.

Let's now take you back to the start of your career, which was over 27 years ago; is that right?

A. Yes.

Q. And have you always worked for the Greater Manchester Fire and Rescue Service?

2

A. Yes.

Q. So having started all those years ago, did you progress to the rank of watch manager?

A. Yes.

Q. When did you become a watch manager, please?

A. I think I became a permanent watch manager after about 20 years' service, it would have been about... Sorry, because I think I did lots of temporary positions --

SIR JOHN SAUNDERS: Don't worry, we'll find out. It's a matter of record, no doubt.

A. Yes.

SIR JOHN SAUNDERS: It's not a memory test.

MR DE LA POER: Absolutely not.

Is it right to say that you'd had a number of years of experience as a watch manager as at 2 May 2017?

A. Yes.

Q. That's perhaps sufficient for our purposes. Were you, on 22 May, in charge of Blue Watch?

A. Yes.

Q. You were at a particular fire station, which we are not going to identify between us, but did that fire station include a specialist response team capability?

A. Yes, it did.

Q. We're going to need to look together at what the specialist response team is, please.

3

Were you trained to participate in the specialist response team?

A. Yes.

Q. When had you joined the specialist response team approximately?

A. I originally came to the station as a crew manager and did some training then, so that would have been not long after -- not the initial team set-up, so maybe 2014, I would think.

Q. So again, you'd had a number of years', three, by the sound of it, experience as a member of that team?

A. Yes.

Q. Were you, on 22 May, effectively the leader of that team for your fire station in your role as watch manager?

A. Yes.

Q. The training that you'd had up until 22 May, had you received specialist training for your role as a member of the specialist response team?

A. Yes.

Q. Had that training started before you joined the team or was it once you joined the team that you received the training?

A. Once you join that station, you then pick up on the training and -- through input from people on the watch or on actual training days with the actual trainers.

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1 Q. We're going to look at the detail of a small amount of  
 2 that training in a moment, but I'd just like to ask you  
 3 a general question about it. As at 22 May of 2017, did  
 4 you feel that your training was adequate to equip you  
 5 for dealing with an Operation Plato marauding firearms  
 6 terrorist incident?  
 7 A. At the time I thought it was reasonably sufficient.  
 8 I don't think it would have dealt with the chaos around  
 9 it. It probably is a bit, looking... At the time we  
 10 probably thought it was a bit too formalised and didn't  
 11 deal with the potential chaos that may ensue.  
 12 Q. Let's just have a look at a part of that training now  
 13 and we'll come back to the answer you've given. I don't  
 14 want to leave that altogether. Let's have a look at  
 15 some of the detail.  
 16 {INQ039928/1}. We are not going to look at all of  
 17 your training, I just want to look at the most recent  
 18 and just explore with you the nature of it. Can you  
 19 see -- about seven lines down in the far right-hand  
 20 column, we see the date of 26 April 2017?  
 21 A. Yes.  
 22 Q. We can see that that date repeats over a number of rows,  
 23 approximately 10 to 15 rows, where clearly you have  
 24 undertaken a number of modules of training on that day.  
 25 A. Yes.

1 Q. If we just read into the record a couple of them to get  
 2 the flavour of them.  
 3 We can see the first one is explaining the terms  
 4 hot, warm and cold zones. And the second, a reference  
 5 to the limit of exploitation, which the inquiry has  
 6 already received a substantial body of evidence  
 7 in relation to. Can you agree, if we read down there,  
 8 all of those modules are specific, aren't they, to your  
 9 SRT role?  
 10 A. Yes.  
 11 Q. And they are, each of them, different aspects of that  
 12 role were you to be deployed to an Operation Plato-style  
 13 incident?  
 14 A. Yes.  
 15 Q. So help us with this is training. Was that online  
 16 modules that you undertook or did you attend some sort  
 17 of classroom-based or practical training?  
 18 A. That could either have been classroom training with my  
 19 watch, going through it. Sometimes we did it in the  
 20 evening, so when we were doing maintenance equipment,  
 21 we'd talk through that. The actual specific date,  
 22 I wouldn't know if that was a formal training session  
 23 delivered by one of the trainers or whether it was me as  
 24 the watch manager or the crew manager delivering that  
 25 training at watch level.

1 Q. We can check that, but you plainly did deliver some  
 2 training in your role as watch manager. Did you feel  
 3 equipped to deliver that training to those you were  
 4 working with?  
 5 A. Yes. Yes. With regards the elements there, yes.  
 6 Because it's mainly donning equipment, how to use the  
 7 equipment, the roles and responsibilities -- yes.  
 8 Q. Was there a formal programme of training which required  
 9 you to undertake it at particular intervals of time or  
 10 was it very much when you found time to undertake it  
 11 that you took that opportunity?  
 12 A. There is a pre-prescribed programme of training.  
 13 I couldn't tell you exactly how often it was for this  
 14 particular type of training, but some things are every  
 15 2 months, some things quarterly -- I think every quarter  
 16 of the year -- six-monthly or annual. But for this  
 17 particular type of training I don't know.  
 18 SIR JOHN SAUNDERS: So for most people would this be  
 19 a refresher training essentially because it all looks  
 20 fairly basic stuff?  
 21 A. Yes. It would be refresher --  
 22 SIR JOHN SAUNDERS: I don't mean to be rude, but --  
 23 A. Yes.  
 24 SIR JOHN SAUNDERS: So when explaining the terms, hot, warm,  
 25 cold zones, most of your team would already know that

1 except people who had arrived very recently?  
 2 A. Yes, I'd be very surprised if they didn't know.  
 3 MR DE LA POER: Looking at the top of {INQ039928/3} for the  
 4 chairman's reference, you do speak about training  
 5 exercises that you undertook.  
 6 A. Yes.  
 7 Q. So before 22 May 2017, had you undertaken any practical  
 8 exercises in relation to the SRT response to an  
 9 Operation Plato declaration?  
 10 A. Yes.  
 11 Q. What were the frequency of those practical training  
 12 exercises, was it one or two, or were they regular  
 13 events?  
 14 A. I think at the time they were about every year. We did  
 15 get some extra ones drop in, but they may have just been  
 16 with the HART team. We did some bespoke first aid ones  
 17 with the HART team at their venue. But that's -- yeah,  
 18 probably once a year.  
 19 Q. We've heard different types of training exercises, some  
 20 are termed tabletop, some are more live action with  
 21 actors or people playing a role. What type of training  
 22 exercises were these that you were undertaking?  
 23 A. The ones I did were more the training exercises, not the  
 24 actual -- those named exercises where they come with  
 25 a name. Mine were like the training ones where we went

1 down to the police firearms and we did the training  
 2 there.  
 3 Q. So just help me to understand that a little bit better.  
 4 You would go down to the police firearms in the example  
 5 you have given?  
 6 A. Yes.  
 7 Q. And would they give you a presentation or would it be  
 8 a discussion or how would that training operate?  
 9 A. We'd do a presentation on zoning, equipment that we  
 10 carry, that GMP specialists carry and what HART carry.  
 11 And then we would later on, probably in the afternoon,  
 12 there'd be an exercise run by the NILOs -- basically  
 13 a scenario would be given and the NILO officers and  
 14 ambulance team leaders and GMP firearms -- not always --  
 15 there wasn't always a tactical firearms officer there  
 16 but generally someone from the training team took that  
 17 role on.  
 18 Q. You indicate in your statement that there wasn't  
 19 generally an incident commander present.  
 20 A. No. Generally speaking, it was the NILOs who were  
 21 giving tactical advice and they would deploy us as the  
 22 specialist response team.  
 23 Q. And in your view, would the training that you'd done  
 24 have benefited from having a separate incident commander  
 25 role present or was it adequate for the NILOs to play

1 that role?  
 2 A. In one respect it's adequate for the NILOs to play that  
 3 role, but the way we run an incident, we always have an  
 4 incident commander, so it would have been beneficial,  
 5 I would say, to have a non-NILO incident commander or  
 6 another incident commander there.  
 7 Q. I'm just going to come back now to the answer you gave  
 8 earlier about perhaps the training lacking giving you  
 9 the necessary understanding of the chaos of a live  
 10 incident. The sort of exercises that you've described  
 11 sound, and tell me if I've misunderstood, quite  
 12 classroom-based, not an attempt to recreate an actual  
 13 situation. Do you think that if you'd had access to  
 14 such training that would have improved your  
 15 understanding?  
 16 A. I would say more training is always beneficial. The  
 17 training that we did was a bit of classroom and then  
 18 practical, especially the stuff we did at GMP, and there  
 19 was -- I suppose in the initial stages of an incident  
 20 it is chaotic, no matter what type of incident. That  
 21 type of training we had was more reminiscent of an  
 22 incident that's almost been stabilised and then  
 23 deployed. So I do think a bit more training towards the  
 24 start of an incident would have benefited.  
 25 SIR JOHN SAUNDERS: Before you go on, and it may be you're

1 coming to this, but we have heard quite a lot of an  
 2 exercise called Winchester Accord, which was a live  
 3 exercise, which took place approximately a year before  
 4 the actual incident at the arena. Were you already at  
 5 that time part of the SRT?  
 6 A. Yes, I was.  
 7 SIR JOHN SAUNDERS: Did you take part in Winchester Accord?  
 8 A. No, I was off duty for that exercise.  
 9 SIR JOHN SAUNDERS: But your team did take part in it?  
 10 A. One of the other watches at the station would have taken  
 11 part.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR DE LA POER: What I would like to do now, please,  
 14 Mr Nolan, is look at a little more detail at the  
 15 categories of additional training that you had received  
 16 as a member of the SRT.  
 17 A. Okay.  
 18 Q. I'll make clear in a moment what I mean by that. Let's  
 19 do this by reference to the vehicles. An SRT vehicle is  
 20 different from a fire appliance, isn't it?  
 21 A. Yes.  
 22 Q. It has a number of additional aspects as well as its  
 23 firefighting capacity; is that right?  
 24 A. It doesn't have any firefighting capacity.  
 25 Q. None at all?

1 A. None at all. The vehicle where I was based in -- for  
 2 a while there was a vehicle based with one of the other  
 3 teams, which was to all intents and purposes a fire  
 4 engine, but at the time ours was just a van.  
 5 Q. All right. The design of that vehicle makes it suitable  
 6 for going into areas where there may be firearms;  
 7 is that right?  
 8 A. Yes, it does have some ballistic protection.  
 9 Q. Let's look at the equipment, but before we do, can  
 10 I just give this warning. My expectation is that going  
 11 into this level of detail may be upsetting for some  
 12 people, so I just make clear what we're going to do  
 13 before we do it so people can make a decision about how  
 14 they arrange themselves for this period of your  
 15 evidence.  
 16 We're going to look at the specifics of the  
 17 equipment that was on an SRT vehicle and we're going to  
 18 explore the training that you had had in order to be  
 19 able to use that equipment. All right? So I'll just  
 20 give a moment for people to understand that. It's  
 21 difficult to estimate precisely how long this will take,  
 22 but I would have thought it will occupy the next 5 to  
 23 10 minutes.

(Pause)

We will begin perhaps with the less controversial

1 aspects of this, in some people's minds at least.  
 2 Firstly, personal protective equipment. Within that SRT  
 3 vehicle are there ballistic jackets and ballistic plates  
 4 which will give some protection to those who put them  
 5 on?  
 6 A. Yes.  
 7 Q. So is there an expectation that when you operate one of  
 8 these vehicles, those who are leaving it don't have that  
 9 equipment so they have that protection?  
 10 A. Yes.  
 11 Q. Had you received training in the capabilities of that  
 12 equipment?  
 13 A. Yes.  
 14 Q. Next, first aid kits. This is where I suspect some  
 15 distress may be caused.  
 16 Tell us, please, whether these were basic first aid  
 17 kits or whether they had additional elements over and  
 18 above that which would normally be carried by a fire  
 19 appliance?  
 20 A. It was additional. There was some basic stuff, but  
 21 there was more blast dressings and blood clotting type  
 22 dressings.  
 23 Q. It's not a memory test. I'm going to take you through  
 24 the items that you identify in your witness statement.  
 25 Sir, I'm looking at page 2, the second paragraph.

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1 You indicate that it contained haemostatic  
 2 dressings. What do you understand a haemostatic  
 3 dressing to be for?  
 4 A. It will aid blood clotting in the event of a large blood  
 5 loss.  
 6 Q. Chest seals?  
 7 A. A puncture wound to a chest, it would help with that.  
 8 Q. An airway?  
 9 A. Airway, again, they're carried in standard first aid  
 10 kits as well, but an airway can be inserted into  
 11 a casualty's mouth to maintain their airway.  
 12 Q. Tourniquet?  
 13 A. Tourniquet, in the event of a massive bleed in one of  
 14 the limbs, a tourniquet can be tightened around that  
 15 limb to reduce the catastrophic bleeding.  
 16 Q. You have just made a hand gesture there with a twisting  
 17 motion.  
 18 A. Yes.  
 19 Q. We've already heard some evidence from  
 20 a Brigadier Hodgetts about tourniquets. Is this  
 21 a tourniquet which includes a lever that allows you to  
 22 get a mechanical advantage in terms of the tension?  
 23 A. Yes.  
 24 Q. And would it be just one tourniquet or a number that  
 25 were carried within this kit?

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1 A. We would have access to a number.  
 2 Q. Scissors, which probably speaks for themselves in terms  
 3 of being a useful item to have.  
 4 A. Of course, yes.  
 5 Q. To cut away clothing or adjust dressings?  
 6 A. Yes.  
 7 Q. A whistle.  
 8 A. Yes.  
 9 Q. And then a pen for writing on a tourniquet.  
 10 A. Yes.  
 11 Q. Now, help us to understand why a pen would be necessary.  
 12 A. It's just to indicate the time when the tourniquet went  
 13 on. I think at the time of that training, it was quite  
 14 vital that the tourniquets were not kept on for  
 15 a massively long period, so the time of application was  
 16 a benefit as the casualty was passed down -- was passed  
 17 along the medical care.  
 18 Q. Information useful to those who might come into contact  
 19 with a patient after the tourniquet had been applied?  
 20 A. Yes.  
 21 Q. You specifically said then "at the time of the training  
 22 that that was important"; do you understand that that  
 23 training has changed since?  
 24 A. I believe so. Although they would still indicate when  
 25 the tourniquet was put on, I think there's less

15

1 apprehension to the amount of time they are left on for  
 2 at the moment.  
 3 Q. So a number of items of first aid equipment, which will  
 4 be particularly useful when responding to a terrorist  
 5 attack?  
 6 A. Yes.  
 7 Q. In terms of your knowledge of that equipment, you've  
 8 obviously been able to speak to what they do. Had you  
 9 received training in their use?  
 10 A. Yes.  
 11 Q. Was it your understanding that if you were deployed to  
 12 those sorts of incidents that you would be expected to  
 13 call upon that training and become involved in giving  
 14 first aid with that equipment?  
 15 A. Yes.  
 16 Q. So that we're clear about it, this wasn't training that  
 17 you might need to use, it was training that you were  
 18 expected to use if you were in that sort of incident?  
 19 A. Yes.  
 20 Q. In your statement you use this phrase about the  
 21 equipment:  
 22 "It can be topped up when NAWAS arrive."  
 23 A. Yes.  
 24 Q. Just help us to understand what you mean by that top-up  
 25 process.

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1 A. We carry a limited amount of those dressings and when  
 2 NWAS turn up with their HART team, they have access to  
 3 far more. So we carry rucksacks, which we can top up  
 4 with those blast bandages, et cetera, and take back into  
 5 the incident so we wouldn't run short.  
 6 SIR JOHN SAUNDERS: HART teams are your equivalent, as it  
 7 were, with the Ambulance Service?  
 8 A. Yes, that's their specialist response team for marauding  
 9 terrorism --  
 10 SIR JOHN SAUNDERS: Do you train specifically with them as  
 11 to the roles you'll take?  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: So presumably on dealing with medical  
 14 issues the HART team would take the lead, as it were?  
 15 A. Very much so.  
 16 SIR JOHN SAUNDERS: Give you direction?  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: And you would perhaps take the lead on  
 19 the safety of the premises, things like that, or --  
 20 A. Yes. The ambulance would always -- well, the HART team  
 21 would always take the lead on what care and triage and  
 22 we would assist them in that process. The safety side  
 23 of things we would be looking at to keep us safe.  
 24 SIR JOHN SAUNDERS: And do you rehearse this together? you do  
 25 the exercises train you how to work together in

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1 cooperation?  
 2 A. Yes, very much so.  
 3 MR DE LA POER: For example, the top-up process. Had you  
 4 had training exercises with HART before, anticipating  
 5 that you would run out of the equipment that you were  
 6 carrying and how you would then or where you would  
 7 access further equipment so you could carry on treating  
 8 casualties?  
 9 A. Yes.  
 10 Q. In answer to the chairman's questions you have indicated  
 11 that you will operate under HART. In the event that you  
 12 arrived at a scene before there were any HART paramedics  
 13 available, they had yet to arrive, did your training  
 14 envisage you simply waiting for them to arrive or did  
 15 your training mandate that you became involved in the  
 16 treatment up to the period that they took over?  
 17 A. The training generally reflected we were all in  
 18 attendance, but if you're referring to the current joint  
 19 operating principles at the time, the absence of one  
 20 service shouldn't stop you attending an incident, and  
 21 that was always -- I would have thought that was always  
 22 mentioned at every training session. But yes, we always  
 23 did seem to train as we were all there, all three  
 24 services.  
 25 Q. So we're clear about it, obviously you were on duty on

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1 the night of the 22nd. Had it been the case that you  
 2 had been deployed to the arena and arrived before there  
 3 were any HART paramedics on site, would you have  
 4 commenced treatment with your team or would you have  
 5 held back waiting for them to arrive?  
 6 A. We would have commenced treatment.  
 7 Q. Obviously you've mentioned HART. In the event that  
 8 there was an NWAS paramedic who wasn't HART-trained  
 9 there, would you place yourself under them or is that  
 10 a -- the line of authority?  
 11 A. Yes.  
 12 Q. You would still do so?  
 13 A. Yes, NWAS paramedics take the lead for all casualty  
 14 care. In the event there's a limited amount of them,  
 15 we would do what we could under our training. We have  
 16 trauma technicians as well which have a bit more  
 17 enhanced training with regards first aid. So we would  
 18 either go under their direction or preferably an NWAS.  
 19 Q. So trauma technicians. The way you've described it  
 20 doesn't sound as if you were a trauma technician.  
 21 A. As a watch manager, no. I was previously, as  
 22 a firefighter and a crew manager, a trauma technician,  
 23 but not as a watch manager.  
 24 Q. You'd had that enhanced level of training?  
 25 A. Yes.

19

1 Q. In terms of your team, and we are going to come in a  
 2 moment to the five of you who were on duty in your team,  
 3 would you have had a trauma technician amongst those  
 4 other four?  
 5 A. Yes, there was one on that night, yes.  
 6 Q. And of course you who'd had the training, although you  
 7 were no longer in that role?  
 8 A. Yes.  
 9 Q. Let's turn now to JESIP on the subject of training. You  
 10 say in your witness statement that the first  
 11 JESIP-specific training that you'd had took place on  
 12 4 October 2018; is that right?  
 13 A. Yes.  
 14 Q. That's described in your training log as a "tactical  
 15 refresher".  
 16 A. Mm-hm.  
 17 Q. We don't need to bring it up. That rather suggests that  
 18 it followed up from an earlier piece of training.  
 19 In fact, had you not had an earlier piece of  
 20 training that that was a refresher for?  
 21 A. Reading back through my statement I would say that  
 22 I have a quite a few other training sessions which did  
 23 involve JESIP, incident command training, but I think  
 24 that was the first specific JESIP workshop that I'd been  
 25 on. I can't recall the actual training itself, but

20

1 I would have done JESIP throughout my career as a junior  
 2 officer .  
 3 Q. We need to understand the limits of what you say when  
 4 you say that was your first JESIP training in your  
 5 training. What you mean is that was your first  
 6 free-standing training solely focused on JESIP, it  
 7 wasn't the first time you were introduced to it?  
 8 A. No.  
 9 Q. And you were in fact a trained incident commander at the  
 10 time?  
 11 A. Yes.  
 12 Q. And you mentioned already that you'd had some JESIP  
 13 training as part of that. As at 22 May, do you think  
 14 you had a clear understanding of JESIP?  
 15 A. I'd say so, yes. I think most incidents that you attend  
 16 as a crew and watch manager, you always do some sorts of  
 17 JESIP -- multi-agency working with the other agencies.  
 18 The formal words around JESIP is, you know, it's what --  
 19 it's always done, but it does formalise it .  
 20 SIR JOHN SAUNDERS: So if there were more than one emergency  
 21 service at an incident, you would inevitably cooperate  
 22 with each other with how you did it?  
 23 A. Yes. I would always approach -- if we were there first,  
 24 I would always approach, as the incident commander,  
 25 oncoming services, give them a brief, and likewise if

21

1 I wasn't first there, I would approach a representative  
 2 from either NWS or Greater Manchester Police and speak  
 3 to them and that's when you get that joint understanding  
 4 of what's expected.  
 5 SIR JOHN SAUNDERS: Did you have any specific training or  
 6 did you understand the need for JESIP principles to be  
 7 applied before you'd all arrived? Or was it really  
 8 focused on what you did when you got to the scene?  
 9 A. I would say that we did have some specific training  
 10 looking back now, yes.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR DE LA POER: Would your role have expected you to have  
 13 liaised with anyone from a different service before you  
 14 arrived at the scene or was your rank and role simply  
 15 engaging in JESIP once you arrived?  
 16 A. Once we arrived -- you're talking incidents in general?  
 17 Q. Sorry, that was a very poor question. What I'm really  
 18 trying to get to the bottom of, in terms of the  
 19 chairman's question, is that you clearly did have an  
 20 understanding of the need under JESIP to liaise  
 21 beforehand. I'm enquiring as to whether your role would  
 22 have required you to engage in that liaison or whether  
 23 it was your expectation that others would do so.  
 24 A. I would liaise as the incident commander initially, yes.  
 25 Q. Would that be at the scene or before you arrive?

22

1 A. At the scene, yes.  
 2 Q. So before you arrive it is for others to have that  
 3 inter-agency liaison, is it?  
 4 A. Yes. We just get a turnout sheet and we proceed to the  
 5 incident. Whether North West Fire Control gave us any  
 6 further information en route, nobody else would have,  
 7 you know.  
 8 Q. Your expectation is that would have happened before you  
 9 get there?  
 10 A. In some cases, yes.  
 11 Q. You say in some cases; why not in every case that has  
 12 a multi-agency response?  
 13 A. They would just be informing them and they might get to  
 14 an incident and then request another service. We may go  
 15 to a house fire, which is no persons, but then there's  
 16 somebody suffering the effects of smoke. Then we would  
 17 request additional resources.  
 18 SIR JOHN SAUNDERS: Would it be important to you, as you're  
 19 heading towards an incident, like something's happened  
 20 at the arena, which would involve multi-agencies, for  
 21 you to know in advance who were actually already on  
 22 scene so particularly for you, would it be important for  
 23 you to know before you got there that HART were on the  
 24 scene?  
 25 A. I would say, going towards an incident like the arena,

23

1 it would be good to know if HART and Greater Manchester  
 2 Police were on scene.  
 3 SIR JOHN SAUNDERS: You'd need to know particularly who you  
 4 need to coordinate with, presumably.  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: And particularly you need to coordinate  
 7 with HART.  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: So knowing where you're going to go  
 10 there and find them, must be quite important?  
 11 A. Yes, we would generally get told to go to either a  
 12 rendezvous point or the forward control point and pick  
 13 that up. But the NILO would be -- on an incident like  
 14 that would probably be doing that liaison on behalf of  
 15 the crews.  
 16 SIR JOHN SAUNDERS: Right. Sorry, I'll stop interrupting  
 17 now.  
 18 MR DE LA POER: Not at all, sir.  
 19 Before I come to 22 May, and I deliberately omitted  
 20 this because of its capacity to be upsetting, there was  
 21 one piece of equipment on the SRT that we haven't yet  
 22 mentioned so I'm just coming back to that. As I say,  
 23 I didn't want to deal with it as part of the piece  
 24 because I understand it can be particularly distressing .  
 25 We're going to now have a look at some images of some

24

1 Skeds. Before we bring those up, can I make clear that  
 2 there is a person on the Sked; that's right, isn't it?  
 3 A. It is.  
 4 Q. That's not an injured casualty, is it?  
 5 A. I think it's me.  
 6 Q. All right. It's for demonstration purposes only?  
 7 A. Yes.  
 8 Q. But nonetheless it is capable of being distressing, I'm  
 9 sure. Can you please just describe, before we look at  
 10 those images, what a Sked is?  
 11 A. A Sked is like a rolled-up piece of plastic with some  
 12 buckles, which basically is designed to place a casualty  
 13 in to move out, to assist you with quite a rapid  
 14 evacuation, either as a group carrying or basically  
 15 sliding across a floor, so fewer people can do the  
 16 evacuation.  
 17 Q. So it can be dragged?  
 18 A. Yes.  
 19 Q. But it can also be carried?  
 20 A. Yes.  
 21 Q. So were you dealing with a scenario with flights of  
 22 stairs, could it still be serviceable in that situation?  
 23 A. Yes.  
 24 Q. You just need more people?  
 25 A. Just more people, yes.

25

1 Q. We're going to look at two images now. I'll pause for  
 2 a moment so people can make arrangements. I suspect  
 3 this will take no more than a minute.  
 4 The first image is {INQ030851/1}. Is that the Sked  
 5 rolled up?  
 6 A. Yes.  
 7 Q. How many such items does an SRT carry?  
 8 A. Generally, five.  
 9 Q. Had you and your crewmates in the SRT all received  
 10 training in their use?  
 11 A. Yes, we all received training and had done practical  
 12 training with them, yes.  
 13 Q. For the non-SRT trained firefighters, would they have an  
 14 understanding from their training as to how to use these  
 15 items or was that confined to the SRT?  
 16 A. I think it was just confined to the SRT. It wouldn't be  
 17 insurmountable for them to be able to use one. But they  
 18 had no formal training or awareness that I'm aware of.  
 19 Q. Are they in fact quite straightforward to use or is  
 20 there a lot of complexity to them?  
 21 A. I would say they are straightforward to use.  
 22 Q. So they are the sort of thing that somebody under a  
 23 brief instruction at the scene might readily pick up and  
 24 be able to action?  
 25 A. Yes.

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1 Q. Next we're going to see the image of it rolled out.  
 2 {INQ030852/1}.  
 3 So we can see a number of straps on there. Does  
 4 that assist the person who's dragging it?  
 5 A. Yes. There's a strap at the front, which you can see  
 6 under the lady's left foot; that is for dragging. But  
 7 the actual Sked itself would be folded around the person  
 8 and straps would come across their body to hold them in  
 9 place. There's a rear strap to assist with directional  
 10 pulling as well. The bit near my feet would be fastened  
 11 and curled up so you wouldn't slide out.  
 12 Q. I'm now going to turn to 22 May.  
 13 On 22 May, you were on duty; is that right?  
 14 A. Yes.  
 15 Q. And you were on duty in the capacity you had at that  
 16 time, as you've told us, as watch manager of Blue Watch?  
 17 A. Yes.  
 18 Q. We're not going to identify the fire station location.  
 19 But the fire station that you were working out of that  
 20 night had an SRT capability, didn't it?  
 21 A. Yes.  
 22 Q. That meant that at that fire station there was one of  
 23 the SRT vehicles that you have described?  
 24 A. Yes.  
 25 Q. We won't go into the detail of it, but that wasn't the

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1 only place in Manchester that had an SRT capability?  
 2 A. No. There were two other stations attached to the  
 3 capability.  
 4 Q. Speaking about yours, your own station and the  
 5 capability, how many members of staff were on duty with  
 6 you that night?  
 7 A. Five, including myself.  
 8 Q. So a total of five. In your statement you indicate that  
 9 on shift there would be four, five or eight.  
 10 A. Yes.  
 11 Q. What did you understand determined the number of people  
 12 who would be on duty?  
 13 A. There was quite a bit of flexible resourcing going on  
 14 due to lack of numbers reducing some fire cover. So at  
 15 OS at the time there's either -- on that shift  
 16 there was four personnel. Quite often at that time  
 17 there were five personnel, which was the expected level  
 18 of one --  
 19 MR DE LA POER: Would you just pause for a moment? Sir,  
 20 would you forgive me?  
 21 (Pause)  
 22 SIR JOHN SAUNDERS: If you can avoid mentioning the name of  
 23 the station.  
 24 A. Sorry.  
 25 SIR JOHN SAUNDERS: It's very easy to do, don't worry.

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1 MR DE LA POER: We will take steps to fix that. Please  
 2 don't be disconcerted by that.  
 3 I'm sure in the meantime we can carry on and that  
 4 adjustment can be made.  
 5 So there were five of you in total. You've  
 6 described flexible resourcing. Is that a euphemism?  
 7 A. I think at the time it was called flexible resource --  
 8 yeah.  
 9 Q. Sometimes there would be as many as eight?  
 10 A. Yes, if we had two fire engines on, there'd be four on  
 11 each.  
 12 Q. In terms of your SRT capability, did it make any  
 13 substantial difference to the resources that you could  
 14 deploy in terms of vehicles if there were five or eight  
 15 of you?  
 16 A. If there was five we would just take the vehicle itself.  
 17 Extra personnel we could either -- they could take  
 18 a fire engine. But the SRT team as a whole was made up  
 19 of the three different stations that were attached to  
 20 that response.  
 21 SIR JOHN SAUNDERS: There's an SRT vehicle or there's the  
 22 TRU vehicle?  
 23 A. There's two SRT vehicles. One is based at the station  
 24 OS OS  
 25 SIR JOHN SAUNDERS: Did you have a TRU vehicle in yours?

1 A. No.  
 2 SIR JOHN SAUNDERS: Thank you.  
 3 MR DE LA POER: Perhaps we can just deal with that, sir,  
 4 just in terms of the TRU. The TRU stands for technical  
 5 response unit?  
 6 A. Yes.  
 7 Q. That has a different capability to the SRT; is that  
 8 right?  
 9 A. Yes.  
 10 Q. Is it the sort of unit, in your understanding from an  
 11 SRT point of view, that would be useful at an  
 12 Operation Plato incident?  
 13 A. Yes, because they have the same training we have, plus  
 14 they had enhanced training around shoring up buildings,  
 15 rope work, confined space working.  
 16 Q. So when we hear about TRU teams, we should think of them  
 17 as having the same capability that you had?  
 18 A. Yes.  
 19 Q. So they are in addition to the SRT resource -- I'm  
 20 sorry, there are a lot of acronyms there -- the  
 21 specialist response team resource.  
 22 A. Yes.  
 23 Q. So five of you on duty that night. I think that you had  
 24 been deployed to a different incident before you heard  
 25 about the arena attack.

1 A. Yes, that's correct.  
 2 Q. We don't need to know too much about that. Was that  
 3 an SRT-type incident or was it a standard fire appliance  
 4 type incident?  
 5 A. It was standard fire appliance, an RTC-type incident.  
 6 Q. RTC is road traffic collision?  
 7 A. Yes, sorry.  
 8 Q. Does that mean you were away from your station on  
 9 a standard fire appliance?  
 10 A. Yes.  
 11 Q. So at the time that you went to the incident you didn't  
 12 have any of your specialist PPE or first aid equipment?  
 13 A. No. That's all back at the station and on the vehicle.  
 14 Q. On the vehicle which is at the station?  
 15 A. Yes.  
 16 Q. How far from the station approximately were you when you  
 17 first heard about the arena attack?  
 18 A. Approximately a mile.  
 19 Q. And approximately what time was that?  
 20 A. I'd have to refer to my statement.  
 21 (Pause)  
 22 Q. I think you gave a time of 22.44.  
 23 A. Yes.  
 24 Q. I'm looking at page 4, third paragraph.  
 25 A. Yes.

1 Q. Obviously the statement was given closer to the time,  
 2 I think it was given in 2019, so would that be the  
 3 correct time?  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: I think you were able to check  
 6 a document, weren't you, to get such a precise time?  
 7 A. Yes, we found out just probably a little bit before  
 8 because there were some GMP officers at the scene, they  
 9 had to leave the scene because something --  
 10 MR DE LA POER: At your road traffic collision scene?  
 11 A. Yes, so far as I recall. They left the scene saying  
 12 something's happened in Manchester, they've got to go.  
 13 Q. So they, having told you that an incident had occurred  
 14 at an approximate time of 22.44 hours, what did you do  
 15 next?  
 16 A. I think I got my crew manager to contact North West Fire  
 17 Control to speak to the NILO because at that time  
 18 we were aware that something had happened at the arena  
 19 but had limited information. So I got him to contact  
 20 the North West Fire Control, to speak to the NILO, find  
 21 out if they wanted us to go back to the station, and  
 22 deploy as an SRT vehicle.  
 23 Q. Can I just understand what you said there. You said  
 24 contact North West Fire Control to speak to the NILO?  
 25 A. Yes.

1 Q. Was it your expectation that the NILO would be at  
 2 North West Fire Control or was North West Fire Control  
 3 merely a means by which you should find out who the NILO  
 4 was and who you needed to speak to?  
 5 A. The latter.  
 6 Q. So the purpose of your crew manager's call to North West  
 7 Fire Control was effectively to say: who's the NILO,  
 8 what's their telephone number so that I can speak to  
 9 them?  
 10 A. Yes, or they would put us through direct.  
 11 Q. Or they would transfer your call. Did you understand  
 12 that you were able to speak to the NILO or your crew  
 13 manager?  
 14 A. No, he wasn't, they weren't answering. Whether it was  
 15 just ringing -- whether he was on another call or not,  
 16 I don't know.  
 17 SIR JOHN SAUNDERS: In normal circumstances, the nearest  
 18 fire appliance to an incident will go there?  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: Once there, the officer in charge of  
 21 that particular appliance will become the incident  
 22 commander?  
 23 A. Yes, initially, yes.  
 24 SIR JOHN SAUNDERS: It may be taken over by other people  
 25 later on. But it wouldn't be a NILO who would be in

1 charge of the incident or summoning up people, so why  
 2 were you looking for a NILO?  
 3 A. Because we were... The expectation was or is that the  
 4 NILO may or should receive some information from the  
 5 Greater Manchester Police force duty officer.  
 6 SIR JOHN SAUNDERS: Okay. I may have just missed this. You  
 7 were given information that a bomb had gone off in  
 8 Manchester?  
 9 A. By --  
 10 SIR JOHN SAUNDERS: The other fire crew.  
 11 A. By GMP. I don't know whether they were traffic officers  
 12 or what that had attended the incident there.  
 13 SIR JOHN SAUNDERS: Whoever was there.  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: So you knew it was a bomb so therefore  
 16 you were looking for a NILO to contact rather than the  
 17 incident commander?  
 18 A. Yes.  
 19 MR DE LA POER: Knowing it was a bomb you would know that  
 20 your team in particular may be in the minds of the  
 21 commanders to be deployed?  
 22 A. I would have expected it, yes.  
 23 SIR JOHN SAUNDERS: I just missed that bit of evidence, not  
 24 the information.  
 25 MR DE LA POER: I think it was my omission in terms of

1 adducing it, sir. That was my fault, certainly not the  
 2 witness's.  
 3 So your crew manager can't speak to the NILO. What  
 4 do you decide your team needed to do?  
 5 A. At that incident, there was a group manager there, Group  
 6 Manager Pete Buckley, I believe, and I asked him could  
 7 he contact the duty NILO of the night because he would  
 8 have his number stored in his phone, I would presume,  
 9 like most flexi duty officers do. He managed to get  
 10 through and gave us the go-ahead to leave the incident.  
 11 There was already another crew at that incident because  
 12 it was a large diesel spillage, so it's getting  
 13 permission to leave the incident in their hands and go  
 14 back to the station to don our SRT response gear.  
 15 Q. I think within about 15 minutes of you learning that  
 16 a bomb had gone off in Manchester, you were back at your  
 17 station?  
 18 A. I believe it was around that time.  
 19 Q. You say in your statement:  
 20 "As we were kitting up, the station turnout alarm  
 21 went off. This log is timestamped at 23.02."  
 22 A. Yes.  
 23 Q. To the best of your recollection, were you kitted and  
 24 ready to go at the point that that alarm went off or  
 25 were you still in the process of preparing yourself?

1 A. We were still in the process of preparing ourselves,  
 2 very close to leaving, I believe. We were told by  
 3 Pete Buckley to attend Philips Park Fire Station and  
 4 I think the turnout sheet confirmed that as an RVP.  
 5 Q. We know that that's where you went.  
 6 A. Yes.  
 7 Q. And again remembering that we are not adducing the exact  
 8 location of this, but in terms of time under blue lights  
 9 from the station you were at, what would you estimate  
 10 the period of time it would take from leaving the  
 11 fire station you were at to arriving at  
 12 Manchester Victoria had you driven in that direction?  
 13 A. I would say at that time of night, with very little  
 14 traffic on the road, I would say we could be there  
 15 within 12 to 15 minutes, I would say.  
 16 Q. We're working slightly with estimates here, or we are  
 17 very much working with estimates. You said at  
 18 23.02 hours you were nearly ready to leave; that's when  
 19 the station alarm went off. About how much longer would  
 20 you estimate it took you to prepare?  
 21 A. About 1 or 2 minutes after that, I believe.  
 22 Q. So by 23.05 you were ready to leave your station,  
 23 equipped in the SRT vehicle?  
 24 A. Yes.  
 25 Q. And your expectation was that by 11.20 at the latest,

1 taking your 12 to 15—minute estimate, you could have  
 2 been at Manchester Victoria, had that been the direction  
 3 you'd been deployed in?  
 4 A. I'd say it's potentially doable, yes.  
 5 Q. As it was, you went to Philips Park?  
 6 A. That's correct, yes.  
 7 Q. And you went there because you'd been directed to do so?  
 8 A. Yes.  
 9 Q. And from whom had had that direction come?  
 10 A. It had come from Group Manager Pete Buckley and the NILO  
 11 of the night, which I believe was Andy Berry, and also  
 12 the turnout sheet from North West Fire Control.  
 13 Q. That's a document that's generated that you can have on  
 14 screen, is that right?  
 15 A. Yes, it's a printout. It comes through to the station  
 16 printer.  
 17 Q. It's that document that directs where you're going to go  
 18 in writing?  
 19 A. Yes.  
 20 Q. You indicate that you arrived at Philips Park at  
 21 approximately 23.22 hours and say you were ready for  
 22 deployment at 23.25 hours. Just explain to us what that  
 23 3—minute gap means in practical terms.  
 24 A. It would have been finishing off putting all our gear  
 25 on, and basically informing the NILOs that were there

1 that we are ready to commit if needed.  
 2 Q. So had you not put all of that equipment on before you'd  
 3 left because you weren't being deployed to a scene?  
 4 A. Yes, we were going to an RVP.  
 5 Q. So had you been directly deployed to the scene, would  
 6 you have put that PPE on before you left?  
 7 A. Um... There's potential because — the ballistic vests  
 8 are kept in the rear of that van, so it depends if it's  
 9 safe to do so, putting them on en route to the incident.  
 10 Q. I understand. In any event, at 23.25, you're at  
 11 Philips Park Fire Station ready to deploy. Were there  
 12 any NILOs present at the time that you arrived that you  
 13 recall?  
 14 A. Yes, Carlos Meakin and Ben Levy.  
 15 Q. Did you speak to them?  
 16 A. Yes.  
 17 Q. And did you tell them — firstly, were they together?  
 18 A. I think Carlos was there for (inaudible: distorted) time  
 19 after.  
 20 Q. What about Mr Berry?  
 21 A. He arrived some time after. Quite a few minutes after,  
 22 I believe.  
 23 Q. So Mr Meakin first. Did you tell Mr Meakin that you  
 24 were ready to deploy?  
 25 A. Yes, we pulled up on the forecourt of the station at the

1 RVP and started getting dressed, and not long afterwards  
 2 the second SRT vehicle arrived, and I think I informed  
 3 him that we had ten responders ready to go.  
 4 Q. What response did you receive when you told Group  
 5 Manager Meakin that you were ready to go?  
 6 A. Nothing happened, we didn't move. From what I can  
 7 recall, we were waiting for further information to  
 8 proceed close to the incident.  
 9 Q. So whatever was said, it didn't include an instruction  
 10 to go?  
 11 A. No. I think it was at that point that I also  
 12 discovered, to my surprise, that Manchester Central and  
 13 Philips Park Fire Station crews were at that station as  
 14 well. So it dawned on me that there was potentially  
 15 nobody at the incident at that point.  
 16 Q. Did you say anything to anyone in a senior position  
 17 about that or did you keep that observation to yourself  
 18 at that stage?  
 19 A. I can't recall.  
 20 Q. How many conversations were there over the ensuing  
 21 minutes between you and the NILOs?  
 22 A. Once I told them we were ready, I may have approached  
 23 them once or twice just to say, "Are we moving?", just  
 24 so I could brief the crews what we were going to do.  
 25 The expectation was to move forward because I think some

1 people were following it on social media at that point  
 2 and becoming aware that an actual — the incident is as  
 3 bad as it first seemed.  
 4 Q. Approximately how long were you stationed at or  
 5 positioned at Philips Park before you moved?  
 6 A. I don't recall the exact time. I couldn't state ... 5  
 7 to 10 minutes, maybe longer, I don't know.  
 8 Q. And during that period, how were you feeling about the  
 9 situation you were in?  
 10 A. I think at that point we were apprehensive about being  
 11 deployed to the incident because we thought we were  
 12 going to go, but getting frustrated that we weren't  
 13 actually moving. Then the decision came to actually  
 14 move to a closer rendezvous point and I never  
 15 anticipated that we would go there; I anticipated  
 16 we would end up going straight to Victoria Station.  
 17 Q. You thought that instruction would change en route?  
 18 A. Yes.  
 19 Q. And the second rendezvous point that you were deployed  
 20 to was Manchester Central Fire Station; is that right?  
 21 A. Yes.  
 22 Q. Are you able to estimate for us approximately what time  
 23 your SRT vehicle arrived there?  
 24 A. I wouldn't have that down, no, sorry.  
 25 Q. We'll see if we can find another way to gauge that

1 period and it may be that there are other sources of  
 2 evidence that we can call upon.  
 3 Once you were at Manchester Central, did you speak  
 4 to any of the NILOs again?  
 5 A. Yes, I would have spoken to Ben Levy. That's who I had  
 6 my main conversations with.  
 7 Q. What were you saying to Mr Levy?  
 8 A. I was asking, are we going to get deployed, and he was  
 9 trying to get, it felt like, approval to get deployed,  
 10 but my frustration was mounting at that point, as was  
 11 the crews' around us. But I was aware that we had to  
 12 maintain being professional. But yeah, we were  
 13 definitely pushing and I did sense from Ben Levy that  
 14 he was also pushing to get information to go.  
 15 Q. From whom did you understand that Mr Levy was seeking  
 16 approval?  
 17 A. It seemed to me that he was on the phone to the command  
 18 support room at the time and that's who I think a lot of  
 19 his conversations were with. At the front of  
 20 Manchester Central, the three NILOs were having  
 21 a discussion. I think at one point Andy Berry actually  
 22 went forward to the incident itself. I think he left  
 23 the rendezvous point to go towards Victoria Station.  
 24 Q. Do you feel that you conveyed to Mr Levy your  
 25 willingness and readiness to go to the incident in your

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1 conversations?  
 2 A. Yes.  
 3 Q. And did you hear him speaking (inaudible: distorted)  
 4 seeking authorisation from?  
 5 A. Yes. At some point in the evening he was saying that,  
 6 and I think this was when the decision was made to  
 7 deploy the three fire crews, were you aware of their  
 8 enhanced training, and the decision was made to send  
 9 a normal specialist response — sorry, a normal  
 10 response.  
 11 Q. Can I just understand that? The conversation that  
 12 you have just described. There was a reference to SRT's  
 13 enhanced training?  
 14 A. Yes.  
 15 Q. Who mentioned that?  
 16 A. I would have mentioned it to Ben, because I was saying,  
 17 "Are they aware of our extra capability?", because it  
 18 seemed to me that the fact that they weren't deploying  
 19 us and, whether this is an assumption, they seemed  
 20 unaware of our capability and the specialist training  
 21 we'd performed.  
 22 Q. What did Mr Levy say about his own awareness of your  
 23 specialist training?  
 24 A. Group Manager Levy had been on numerous training  
 25 sessions with us, so he would have been well aware of

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1 our specialist capabilities.  
 2 Q. Did he say anything about what he understood others'  
 3 awareness of your specialist capability was?  
 4 A. Say that again, sorry?  
 5 Q. Did he say anything about his understanding of what  
 6 other people thought about your specialist capability?  
 7 A. No.  
 8 Q. He didn't?  
 9 A. No.  
 10 SIR JOHN SAUNDERS: So you're saying other people who  
 11 weren't sending you, you assumed, are they aware of what  
 12 we've got and the answer came back from Levy?  
 13 A. Well, I don't know that. I was just voicing that to  
 14 him — whether it got a response, I don't know. But  
 15 any —  
 16 SIR JOHN SAUNDERS: Or it may have just been a frustrated  
 17 comment by you?  
 18 A. Yes. But any Fire Service response to the incident  
 19 could potentially help. You know, non-specialist crews  
 20 would have assisted as well.  
 21 SIR JOHN SAUNDERS: A rhetorical question by you, perhaps?  
 22 A. Perhaps, yes.  
 23 SIR JOHN SAUNDERS: Just this: when you're going between  
 24 Philips Park and Central, did you go in convoy with the  
 25 other fire engines?

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1 A. Yes, we did.  
 2 SIR JOHN SAUNDERS: And on blue lights?  
 3 A. On blue lights, yes.  
 4 SIR JOHN SAUNDERS: So you'd arrived about the same time as  
 5 everybody else did?  
 6 A. Yes. It should be on the log when the fire appliances  
 7 arrived back at the RVP.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR DE LA POER: You have indicated in a debrief document,  
 10 and we can look at it if you need to, that:  
 11 "The NILOs at the rendezvous point wanted/were  
 12 willing to deploy SRT to the incident."  
 13 Was that your impression based on what they were  
 14 doing and saying?  
 15 A. Very much so, yes.  
 16 Q. So that wherever there was an unwillingness, if that's  
 17 what it was, it wasn't amongst those that were present  
 18 with you at Manchester Central?  
 19 A. No, whether they felt we couldn't deploy without  
 20 speaking to the force duty officer, I don't know, but  
 21 there was definitely some reluctance from somewhere  
 22 else, not from the NILOs. I just think they wanted that  
 23 extra bit of information before they deployed us.  
 24 Q. Were you ever deployed to Manchester Arena?  
 25 A. No.

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1 Q. Was the other SRT vehicle ever deployed so far as you're  
 2 aware?  
 3 A. No, it was a specific request that came, I think, from  
 4 the command support room from somewhere else that normal  
 5 fire crews were to attend.  
 6 Q. Your understanding is that you're not quite sure where  
 7 this has come from, but it had come to your command  
 8 room, we only want normal fire appliances, and that's  
 9 why you understand only normal fire appliances were  
 10 sent?  
 11 A. Yes.  
 12 Q. I think you've already conveyed to us a sense of the  
 13 frustration you felt, but is there anything you want to  
 14 add to that about your experience at the time in terms  
 15 of your willingness and frustration?  
 16 A. No, I think it's probably the first time in my career  
 17 where we've not been able to help someone. Normally, we  
 18 get frustrated at incidents when they go wrong, but this  
 19 is the first time we have trained to do something and  
 20 not been allowed to do it through a procedure that's  
 21 failed or felt like it had failed. And that was  
 22 frustration from the crews around me, the normal fire  
 23 crews as well, who are exceptionally capable as well.  
 24 There would be trauma technicians on them vehicles as  
 25 well. And that frustration was the worst I've ever seen

1 at an incident.  
 2 Q. At about 4 o'clock in the morning there was a debrief  
 3 conducted by Mr Harris. Tell us who Mr Harris is,  
 4 please.  
 5 A. He was the assistant county fire officer at the time.  
 6 Q. The chairman has already heard some evidence about that.  
 7 SIR JOHN SAUNDERS: I think you can summarise it.  
 8 MR DE LA POER: Absolutely. All I was going to say is this,  
 9 that that was, on any view, a difficult meeting?  
 10 A. Yes.  
 11 Q. I'd now like just to deal briefly with your reflections  
 12 on the incident to assist the chairman with where you  
 13 perceive things might have gone wrong. Obviously, you  
 14 aren't in a position to have all of the information to  
 15 make your judgements, but you were there as an SRT  
 16 capability. What is it that you think went wrong?  
 17 A. Not being able to get that initial information from the  
 18 NILO for the force duty officer. And again, I think if  
 19 we would have had -- if Manchester Central would have  
 20 turned out, because they're the closest to the  
 21 Manchester Arena, if they would have turned out we would  
 22 have had an incident commander on scene, very quickly,  
 23 and the proper response could have been put in place.  
 24 Whether the -- the SRT would still be minutes behind,  
 25 tens of minutes behind normal fire appliances attending,

1 but at least in that area we could have got six, seven,  
 2 eight fire engines there within 15 minutes. So I think  
 3 not having an incident commander, but not being deployed  
 4 to the scene initially for the reasons I don't know, but  
 5 that definitely hindered our response.  
 6 SIR JOHN SAUNDERS: My understanding is that this is the  
 7 only sort of incident where you wouldn't have an  
 8 incident commander, so it goes to the NILO to decide  
 9 what happens first.  
 10 A. Yes. The NILO would make some initial information but  
 11 generally that is intelligence led from or information  
 12 led from the force duty officer.  
 13 SIR JOHN SAUNDERS: There's normally, isn't there,  
 14 a prearranged --  
 15 A. Attendance.  
 16 SIR JOHN SAUNDERS: Thank you. So on most or probably all  
 17 other incidents, that means that fire engines would go  
 18 to the scene --  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: -- and you'd then have an  
 21 incident commander there to gather the information.  
 22 This is the only sort where you don't. Do you think  
 23 that perhaps the Fire Service isn't very good at dealing  
 24 with that sort of incident in that way because it's not  
 25 the normal procedure?

1 A. I think on the... If we review that night, then yes, it  
 2 didn't go well. I think the NILO is a tactical adviser  
 3 that can make -- is empowered to make some decisions  
 4 with the initial information to get resources to an  
 5 incident, but as far as I'm aware an incident was never  
 6 created for us, maybe not until the crews, the normal  
 7 fire crews, got sent to the incident. So we never had  
 8 an incident commander, as far as I'm aware. I was  
 9 leaning on the NILOs, generally Ben Levy, as the  
 10 incident commander, although he wasn't, but I was  
 11 leaning on him as that.  
 12 MR DE LA POER: Finally, Mr Nolan, I said I would deal with  
 13 this. Exercise Largo. We'll just reset for a moment.  
 14 This is an exercise which took place in 2019.  
 15 A. Yes.  
 16 Q. Your involvement with it was by reason of being involved  
 17 in the Contingency Planning Unit; is that right?  
 18 A. That's correct.  
 19 Q. In your current role as station manager within that  
 20 unit?  
 21 A. Yes.  
 22 Q. What was the objective or Exercise Largo?  
 23 A. It was to test the operational response at quite  
 24 a strategic level. I think it was a British Transport  
 25 Police exercise. It was to test the command response.

1 It was a tabletop exercise in effect .  
 2 Q. To test the command response?  
 3 A. Across multi-agencies.  
 4 Q. I don't propose to bring up the report that you authored  
 5 about this on the screen, although we can if you want me  
 6 to. But just taking what you've said about it from that  
 7 report, you said that the objectives were to clarify the  
 8 MTA JOPs, that's the marauding terrorist attack joint  
 9 operating principles ?  
 10 A. Yes.  
 11 Q. Enhance understanding of Plato?  
 12 A. Yes.  
 13 Q. And examine the formation of a transport cell. That  
 14 I don't think we need to linger on particularly . Those  
 15 were the three objectives of participation in that?  
 16 A. Yes, I believe so.  
 17 Q. It may be that other aspects of your report can be put  
 18 to more senior officers , but firstly , did you know what  
 19 happened to the report that you created as a result of  
 20 that?  
 21 A. No, I submitted it to -- it would have been my group  
 22 manager at the time in contingency planning, which would  
 23 have been Lee Coleman. It would have gone up to the  
 24 area manager of the department and then on to,  
 25 I presume, Dave Keelan, but I never got any response to

1 move on the report or anything from the report. I don't  
 2 even know if it was read at the corporate leadership  
 3 team.  
 4 Q. It sits , does it , in a line of management and  
 5 communication that ends with Dave Keelan?  
 6 A. Yes. He would generally present it , I believe , to the  
 7 senior leaders .  
 8 Q. So he is , potentially at least , someone who we might ask  
 9 about what happened to that report?  
 10 A. Yes.  
 11 Q. But you were never told what happened to it; is that  
 12 right?  
 13 A. No, and some time afterwards Station Manager Mick Lawlor  
 14 asked me about it, so I think it was for him, he was  
 15 looking into it as well -- you would need to clarify it  
 16 with him if you needed to, so I don't even know if it  
 17 was presented.  
 18 Q. He is certainly returning later , we expect.  
 19 There's just one aspect that I want to ask you  
 20 about, perhaps to illustrate your understanding or lack  
 21 of it. One of the entries, and I'll read it to you, was  
 22 you wrote:  
 23 "GMP did not fully understand the importance of an  
 24 early declaration of Op Plato to other category 1  
 25 responders and insisted on using the active shooter.

1 The active shooter declaration has the potential to get  
 2 a mixed delay response from other cat 1 responders and  
 3 their control rooms."  
 4 I just want to ask you what it was that you were  
 5 seeking to communicate when you wrote that.  
 6 A. When I spoke to Area Manager Jim Hutton, who attended  
 7 that tabletop exercise , I think there was a -- speaking  
 8 to him there was a bit of debate about the senior police  
 9 officer who called it an active shooter and we were  
 10 saying, are you declaring Plato because with Plato  
 11 we can put certain things in place and it would enhance  
 12 our response, we would know what we were attending to.  
 13 An active shooter, is it a criminal activity or is it  
 14 a terrorist related -- whereas if we get the clarity of  
 15 an Op Plato declaration, and I think the JOPs say  
 16 declare it quickly, it can also be stood down, the  
 17 response, and... The frustration from the area manager  
 18 was that the senior police officer didn't seem to  
 19 understand the importance of the sharing of that core  
 20 message for us.  
 21 Q. So does this all in fact go back to the idea of  
 22 a predetermined attendance having action cards so that  
 23 you know exactly what sort of incident you're responding  
 24 to and that there is a plan in place?  
 25 A. Yes.

1 Q. Based upon it?  
 2 A. Yes.  
 3 Q. And not using the term Operation Plato risked that you  
 4 wouldn't necessarily respond in the correct way?  
 5 A. Yes.  
 6 Q. But as you've told us, because no one's reported back to  
 7 you, you don't know whether that information has ever  
 8 been fed back to GMP?  
 9 A. No, I don't know if my report was submitted or --  
 10 I don't know.  
 11 SIR JOHN SAUNDERS: Who selects the titles for these  
 12 operations?  
 13 A. I presume it's Greater Manchester Police or the  
 14 Home Office.  
 15 SIR JOHN SAUNDERS: It just seems slightly ironic, the use  
 16 of the term Largo in terms of what happened in May 2017.  
 17 To me, it means very slow, largo.  
 18 MR DE LA POER: Sir, those are all the questions I have for  
 19 this witness.  
 20 I would invite Mr Smith now on behalf of  
 21 North West Fire Control.  
 22 Questions from MR SMITH  
 23 MR SMITH: Mr Nolan, is it correct that the first indication  
 24 you had of the occurrence of this incident was being  
 25 told by a police officer at the road traffic collision

1 that a bomb had exploded or had gone off in Manchester?  
 2 A. Yes.  
 3 Q. When you were told that, was it immediately obvious to  
 4 you that the SRT capability might well be required?  
 5 A. Potentially, yes. I think — I can't remember if he  
 6 used bomb or the word explosion, but with it being  
 7 at the Manchester Arena, it's a likely target. So  
 8 potentially we thought we may be needed.  
 9 Q. Did you also think that it could be a terrorist  
 10 incident?  
 11 A. Yes.  
 12 Q. So you asked, is this correct, Mr Waterhouse, who was  
 13 one of the crew on the appliance, to contact North West  
 14 Fire Control; is that correct?  
 15 A. That's correct, yes.  
 16 Q. The purpose of which was to arrange for the duty NILO to  
 17 be contacted and for the duty NILO to be asked whether  
 18 you had authority to return to home station and get the  
 19 SRT capability ready; is that correct?  
 20 A. That's correct, yes.  
 21 Q. That call was made by Mr Waterhouse to North West Fire  
 22 Control at 22.42.31?  
 23 A. Yes.  
 24 Q. If that's the case, it follows, doesn't it, that you  
 25 must have received the information from the police

1 officer shortly before that time?  
 2 A. That's correct, yes.  
 3 Q. So that allows us to try and put a more accurate timing  
 4 on the point at which you learned of the incident, do  
 5 you agree?  
 6 A. I agree, yes.  
 7 Q. I would like to give you another time. At 23.22.16, the  
 8 SRT capability, which came from your home station, in  
 9 respect of which you were in charge, arrived at  
 10 Philips Park, according to North West Fire Control's  
 11 incident log.  
 12 A. Okay, yes.  
 13 Q. The second SRT capability arrived at 23.31.12. By that  
 14 time, Group Manager Meakin had arrived. He arrived at  
 15 23.25. Mr Levy arrived at 23.34. So was the result  
 16 that, just after 11.30 that night, there were two  
 17 specialist crews therefore available at Philips Park,  
 18 trained in casualty management from ballistic or blast  
 19 injuries?  
 20 A. Yes, it was classed as one crew, but ten responders.  
 21 Q. Did you tell the two NILOs who were there that you now  
 22 had a team of ten ready to deploy to the arena?  
 23 A. Yes, I did.  
 24 Q. And is the position that that is exactly what you  
 25 expected would happen?

1 A. Yes.  
 2 Q. There was then a further delay, wasn't there, until  
 3 shortly before midnight, before you were deployed with  
 4 the rest of the appliances to G16, Manchester Central?  
 5 A. Yes. We waited, I don't know how long, but yes, and  
 6 then we did the 2-mile drive to Manchester Central.  
 7 Q. Do you remember shortly before you left Philips Park  
 8 that Group Manager Ben Levy made a telephone call and  
 9 managed to contact the command support room?  
 10 A. I would have seen Ben Levy on the phone numerous times,  
 11 but sometimes I wouldn't know who he was on the phone  
 12 to, but yes, it's possible.  
 13 Q. But having been on the telephone, were you suddenly  
 14 informed that all of the appliances should now deploy to  
 15 Manchester Central?  
 16 A. Yes. Whether they took that decision to move us forward  
 17 to a closer point... But that's what we were informed,  
 18 yes. I don't know who made that decision, whether it  
 19 came from the command support room or Group Manager Levy  
 20 or one of the other NILOs.  
 21 Q. After you'd arrived at Manchester Central, you began, is  
 22 this correct, to develop a clear sense of frustration  
 23 that the SRT capability was not being deployed when it  
 24 could be? Is that correct?  
 25 A. Yes, I had a frustration that the SRT or any Fire

1 Service resource wasn't being deployed.  
 2 Q. Was it your impression that this was not in any way the  
 3 fault of the NILOs?  
 4 A. I think at the time they were my vent of frustration  
 5 because that's where the link should come from, but they  
 6 were struggling to get information, I believe initially  
 7 from Greater Manchester Police, and then there was  
 8 something potentially holding them back with some of the  
 9 phone calls they were making.  
 10 Q. You did say in your statement that it was predominantly  
 11 Group Manager Levy who was pushing for the SRT crews to  
 12 attend; do you remember that?  
 13 A. Yes. And I think, because I predominantly spoke to  
 14 Group Manager Levy at the time, I think I would have  
 15 heard some of his conversations about deploying, but  
 16 obviously it's only a one-sided conversation. He would  
 17 be able to give you clarity on those full conversations,  
 18 I believe.  
 19 Q. Did you ever receive an explanation at that stage when  
 20 you were at Manchester Central as to why the SRT  
 21 capability was not being deployed to the arena?  
 22 A. No, not specifically. The only time that was clarified  
 23 would have been when the three fire appliances went and  
 24 it was requested that normal fire appliances attend the  
 25 arena and not the SRT.

1 Q. Finally this, please. You mentioned the fact that the  
 2 NILO receives intelligence, is this correct, or  
 3 information in normal circumstances from the force duty  
 4 officer?  
 5 A. Yes, I believe at the time that would have been their  
 6 normal protocol, to contact the force duty officer to  
 7 gain an understanding of where a forward control point  
 8 or RVP would have been as well as some situational  
 9 awareness from Greater Manchester Police.  
 10 Q. Is the position that that would not be shared with you?  
 11 A. I would say that some of it would have been shared. But  
 12 they would have got us to the RVP or the forward control  
 13 point and then we would have had a further briefing as  
 14 to what was required at the incident and where to go to  
 15 the incident.  
 16 Q. You've explained, haven't you, that the fact that you  
 17 were not deployed to the scene, although that was  
 18 a source of frustration, significantly, if standard  
 19 appliances had been deployed to the arena immediately  
 20 upon the control room learning of the incident, that  
 21 would have resulted in situational for the Fire and  
 22 Rescue Service; is that correct?  
 23 A. Yes, that's correct.  
 24 Q. Because there would have been at that stage, at the very  
 25 least, standard fire appliances at or around

1 Victoria Station. And was your thinking that  
 2 information could then have been passed back from those  
 3 appliances to North West Fire Control to the control  
 4 room?  
 5 A. Yes, it would have been beneficial.  
 6 SIR JOHN SAUNDERS: (Overspeaking). Sorry, Mr Smith,  
 7 I talked across you. I was just saying they would have  
 8 had an incident commander. I do apologise.  
 9 MR SMITH: They would have had an incident commander who  
 10 would have been the most senior officer attached to  
 11 those appliances; is that correct?  
 12 A. Yes.  
 13 Q. And that (overspeaking).  
 14 A. Sorry. There's also the deploying crews to an unknown  
 15 scene as well. There's also that as well for their  
 16 safety, some of their safety, but for an explosion  
 17 potentially it would have been --- yeah, I think it would  
 18 have been beneficial on that night, definitely.  
 19 Q. So the important point you're making is simply this,  
 20 isn't it: if there had been an immediate deployment to  
 21 the arena, the control room could have had situational  
 22 awareness?  
 23 A. Yes.  
 24 Q. And as far as the incident commander on the ground is  
 25 concerned, who was the incident commander on the night?

1 A. I don't know. There were three NILOs there and my  
 2 learning is the NILOs are tactical advisers --- normally  
 3 we have a white tabard which indicates the  
 4 incident commander, and I honestly am not aware of  
 5 anybody saying they are the incident commander.  
 6 Q. On the night?  
 7 A. On the night, sorry, yes.  
 8 MR SMITH: Thank you very much.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR DE LA POER: Next, I'm going to turn to Mr Cooper ---  
 11 we're 1 hour and 20 minutes in.  
 12 SIR JOHN SAUNDERS: Should we have a break?  
 13 MR DE LA POER: I was going to propose, unless Mr Cooper  
 14 wishes to make a start. It occurs to me it might be  
 15 easier for him to do his questioning as a piece, but I'm  
 16 sure he can speak for himself.  
 17 MR COOPER: Not at all. I agree with that assessment, sir.  
 18 With your leave, I think that would be the good time for  
 19 the break.  
 20 SIR JOHN SAUNDERS: Just one thing, and in a way it's  
 21 a comment by you on the obvious, but that does happen.  
 22 You were talking about the fact that if you got a fire  
 23 engine there immediately then you could have had  
 24 incident awareness and all the rest of it. That didn't  
 25 happen and obviously we're going to find out why that

1 didn't happen and we are discovering that. But equally,  
 2 we do know, and you presumably knew, that ambulances  
 3 were going back and forth to the scene.  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: So they had a presence there and they  
 6 could have given you incident awareness ---  
 7 A. Yes.  
 8 SIR JOHN SAUNDERS: --- if the actual feedback was coming.  
 9 A. I think that's why Station Manager Berry went forward to  
 10 try and find someone, either North West Ambulance  
 11 Service or GMP. So... But...  
 12 SIR JOHN SAUNDERS: Okay. We are maybe going to hear that  
 13 the reason why you were not sent forward was (a) because  
 14 someone within the Ambulance Service said, "We didn't  
 15 need your specialist equipment", and, secondly, because  
 16 it was decided to keep you in reserve if anything else  
 17 were to happen. Did you ever get either of those  
 18 explanations at the time?  
 19 A. Not at the time, no. I knew there was something around  
 20 us potentially --- another incident happening in Oldham,  
 21 I believe, but that turned out to be nothing. But the  
 22 thought of holding someone back just in case --- you  
 23 know, that's what we have other resources for, mutual  
 24 aid for, to get those resources moving. If we hold  
 25 back, I think it's probably a wrong decision if that was



1 the case.  
 2 SIR JOHN SAUNDERS: Thank you.  
 3 If we have a quarter of an hour, so back at 25 to.  
 4 Thank you.  
 5 (11.21 am)  
 6 (A short break)  
 7 (11.35 am)  
 8 SIR JOHN SAUNDERS: Mr Cooper, thank you.  
 9 Questions from MR COOPER  
 10 MR COOPER: Mr Nolan, as you probably realise, I ask  
 11 questions on behalf of the bereaved families in this  
 12 matter.  
 13 I want to take you straight back, please to,  
 14 a document we've already seen, which includes details of  
 15 your training. Can we go back to {INQ039928/1}.  
 16 I want to dig a little deeper, if I may, into the  
 17 training you received, particularly prior to this  
 18 atrocity. We see on that document you were trained in  
 19 issues relating to stretchers and Sked deployment. We  
 20 see for instance, two dates there: 26 April 2017 and  
 21 18 April 2017.  
 22 To put the question shortly, were those two aspects  
 23 of training particularly in relation to the quick  
 24 deployment of Skeds and how to extricate people from  
 25 dangerous circumstances quickly?

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1 A. Yes, the function of the Sked in those training  
 2 scenarios is to — one is to allow the minimum personnel  
 3 to remove a casualty, and also it is a reasonably rapid  
 4 way, depending on the floor surface, to be able to slide  
 5 them away, yes. So yes, to answer your question.  
 6 Q. So it'd be right to say that, tragically but  
 7 coincidentally, your training on Skeds and stretchers  
 8 in April, just before this atrocity, was at its best,  
 9 effectively, and ready for deployment?  
 10 A. Yes. We were fully capable of using the Skeds at the  
 11 time.  
 12 Q. Thank you.  
 13 Keeping that document on the screen, please, on  
 14 18 April 2017, we see one reference to MTFA training.  
 15 I just want to examine the terminology used. It's about  
 16 three-quarters of the way down and it says this:  
 17 "Explain limit of exploitation in relation to  
 18 an MTFA incident."  
 19 What does that mean?  
 20 A. So for us, it would be the furthest point within a zone  
 21 which we would deploy to. So it may be, as things stood  
 22 then, in the warm zone — the warm zone may consist of  
 23 an area, but our limit of exploitation may only be to  
 24 a point within that area. And that would generally be  
 25 decided with the joint understanding of risk between the

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1 three emergency services present.  
 2 Q. So limit of exploitation of fire service personnel; is  
 3 that what it means?  
 4 A. Yes, it would be the furthest point into the incident  
 5 which we would go.  
 6 SIR JOHN SAUNDERS: All personnel, not just fire personnel?  
 7 A. It's fire and generally HART, we work to the same limit  
 8 of exploitation.  
 9 MR COOPER: Thank you, sir, I meant to say in relation to  
 10 fire, HART, but not dealing with ambulance and police,  
 11 but dealing with your profession; correct?  
 12 A. Correct, yes.  
 13 Q. So the only reference we seem to have there on that  
 14 document to training in relation to MTFA is training  
 15 in relation to how far the Fire Service are prepared to  
 16 go; is that right?  
 17 A. It would appear that way in the titles, but some of the  
 18 other training on there regarding the zoning is  
 19 applicable to an MTFA incident. There's certain  
 20 different zones used for other types of incident.  
 21 Q. Yes, well, maybe, but I'm asking you questions at the  
 22 moment specifically about MTFA training and what the  
 23 priority was. The priority seems to be safety of  
 24 firefighters; is that right?  
 25 A. It's one of the elements, yes. Yes.

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1 Q. Well, it's the prime element, isn't it?  
 2 A. Yes, the safety of firefighters is — yes, making us  
 3 safe within that warm zone, yes, as safe as possible.  
 4 Q. In fact, in relation to such deployment, have you had an  
 5 opportunity of reading the expert's report on the  
 6 attitude of the Fire Service to exploitation and risk  
 7 taking in these situations?  
 8 A. I haven't read that document, no.  
 9 Q. Just to paraphrase it, it's very short, and for those —  
 10 I'm not asking for it to be called up, it's  
 11 {INQ032363/1}. Do you agree that GMP, British Transport  
 12 Police and NWS risk assessments in relation to putting  
 13 personnel safety secondary to the immediate risk to  
 14 protect life — that was their priority? GMP, BTP and  
 15 NWS risk assessments put personal safety secondary to  
 16 the immediate need to protect life. Do you accept that?  
 17 A. Yes, if it's in the document, yes.  
 18 Q. And do you accept that the next paragraph in the  
 19 experts' report, it's the only reference I'm making to  
 20 you, says this:  
 21 "GMFRS risk assessment was different and concerned  
 22 personal safety of firefighters alone and there was no  
 23 risk assessment including casualties."  
 24 Do you accept that?  
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Mr Cooper, do you mind if I put it  
 2 a slightly different way?  
 3 I don't know whether you heard the evidence of some  
 4 of the other Fire Service officers that I've heard about  
 5 who were there on the night. We heard from them that  
 6 they did consider that the Fire Service reaction to  
 7 these sort of events was unduly risk averse. Do you  
 8 agree with that?  
 9 A. In part, yes. I think round some of the training that  
 10 we did, it was -- you know, we would be deploying into  
 11 a warm zone where there is potential for it to -- for  
 12 risk -- for attackers to come back. So I wouldn't say  
 13 it's overtly risk averse, but there were elements of  
 14 keep the staff, Fire Service and HART team, as safe as  
 15 possible while still performing a function. But I think  
 16 at the time it would probably on the night seem, yeah,  
 17 risk averse because we didn't get the information to  
 18 proceed. We were still following that policy of still  
 19 trying to get the information to get that joint  
 20 understanding of risk rather than deploying as a sole  
 21 entity.  
 22 SIR JOHN SAUNDERS: Is that something that occurred to you  
 23 on the night, this is part of our being too risk averse,  
 24 or not really?  
 25 A. I think the people that wanted to deploy is the NILO

1 officers who I wouldn't count as risk averse at all.  
 2 I think they were searching for that knowledge that they  
 3 were deploying to a correct area. I don't know if GMP  
 4 had considered, because they were there, considered  
 5 contacting us either. I don't know the answer to that  
 6 question. But they were trying to follow a prescribed  
 7 procedure of getting to the incident, which didn't  
 8 occur.  
 9 SIR JOHN SAUNDERS: Okay.  
 10 A. But could we have been more dynamic and looked at it?  
 11 Potentially, yes, but it's easy... Me not being the  
 12 incident commander, being in their shoes is different.  
 13 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 14 MR COOPER: I am putting it a little more systemically to  
 15 you, if I may put it that way, officer, that the  
 16 attitude of the Fire Service, certainly at the time of  
 17 this atrocity, compared to the other emergency services  
 18 perhaps, was far too risk averse. Not just on the night  
 19 but systemically that was the attitude within the Fire  
 20 Service, wasn't it?  
 21 A. Um... On the night, I would say it has potential --  
 22 yes. But I would say that firefighters, fire officers,  
 23 put themselves in a lot of dangerous situations on  
 24 a daily basis, so I don't think you could say that  
 25 blanketly that the Fire Service is a risk averse

1 situation. There may be some areas where we manage the  
 2 risk and taking a step back from that risk is good, and  
 3 there's areas where we take a step back from that risk  
 4 and obviously fall back on policy and procedures and it  
 5 doesn't work as well as it should have done, which again  
 6 is the night in question.  
 7 Q. Let me be clear about this to you and any of your  
 8 colleagues that are listening: I make no disparaging  
 9 observations about individual firefighters, who we all  
 10 accept do a tremendous job and are brave and courageous  
 11 people. I have said that to all your colleagues and I'm  
 12 sure everyone understands that. The questions I'm  
 13 putting to you are on the basis of management, culture,  
 14 command and control, if you will, that the attitude  
 15 systemically within the Fire Service, within those  
 16 echelons, is risk averse, isn't it?  
 17 A. I think when you are training to deploys crews into  
 18 a warm zone, then I wouldn't say it's overly risk  
 19 averse, no, it's a managed risk. I think there's some  
 20 elements of -- because obviously there was a political  
 21 element to this where people thought should we not be  
 22 doing that role. But from my point of view, I think  
 23 I wouldn't deem it as overly risk averse in what I've  
 24 witnessed, but I do understand that it could be viewed  
 25 that way.

1 SIR JOHN SAUNDERS: Let me try and narrow this down and then  
 2 we'll move on because I think Mr Cooper's got what he  
 3 can from this part. If the decision not to deploy to  
 4 the scene at all but to be where you were in  
 5 Philips Park to start with was as a result of  
 6 a perceived risk, does that now appear to you, or would  
 7 have at the time, as being risk averse, that there was  
 8 no reason to be that far back?  
 9 A. Yes, I think I did question that, why choose  
 10 Philips Park. I've got a good knowledge of the city  
 11 centre, so I put Manchester Central, although it's  
 12 close, it's not directly in line of sight.  
 13 SIR JOHN SAUNDERS: So if that decision was taken as  
 14 a result of considering the risks which might be  
 15 involved, you would regard that as being unduly risk  
 16 averse?  
 17 A. In my opinion, yes.  
 18 SIR JOHN SAUNDERS: But where, once you've got to the scene,  
 19 where it is safe for firefighters to actually go in and  
 20 work and not run undue risk of losing their lives in the  
 21 process, as I understand it, you don't think that the  
 22 attitude generally to that was unduly risk averse?  
 23 A. No, I don't think so, no.  
 24 SIR JOHN SAUNDERS: Don't just say so because I say. We  
 25 want your view of it.

1 A. I think, yeah, in hindsight, it's -- you know... It  
 2 does look like we didn't deploy to the scene through  
 3 trying to get that core bit of information. Did we seek  
 4 that information as well as we could have done?  
 5 Potentially not. But again that is my opinion.  
 6 Conversely, if you deploy to a scene without stepping  
 7 outside and someone gets hurt, it's a different context.  
 8 But I definitely think that with a bit more information,  
 9 we could have done a lot more a lot quicker.  
 10 SIR JOHN SAUNDERS: Okay.  
 11 MR COOPER: Thank you, sir, I will move on.  
 12 Just on the back of that, I'll put this to you, if  
 13 I may. It's not just simply a matter, is it, officer,  
 14 that with a bit more information you might have done  
 15 better, the whole policy, so far as the Fire Service was  
 16 concerned at the time, was designed to keep the Fire  
 17 Service in the background, safely and securely, and  
 18 perhaps other services in the foreground?  
 19 A. No, I disagree with that. I think the policy around  
 20 a marauding terrorist firearms attack was to get the  
 21 Fire Service and the Ambulance Service towards and  
 22 getting into the warm zone with the specialist  
 23 responders of the police in the hot zone actively -- and  
 24 basically this was designed around a firearms attack and  
 25 to me that was the role of the specialist response, was

1 to get to that warm zone, which is not an area with no  
 2 risk.  
 3 Q. And you never actually got there, did you?  
 4 A. No.  
 5 Q. You referenced, in answer to the chair, that there was  
 6 a political situation relating to this matter. I want  
 7 to ask you just briefly about that, if I can, because  
 8 there was some dispute, wasn't there, as far as MTFA  
 9 matters are concerned, between the Fire Brigades Union  
 10 and certain firefighters, the Government, and indeed  
 11 senior ranks within the Fire Service as to whether fire  
 12 people should be even performing MTFA? Is that right,  
 13 is that the political situation you just referred to?  
 14 A. That's correct, yes.  
 15 Q. We're going to hear from Mr Dark, and I'm not going to  
 16 trammel that route to any great degree today, but the  
 17 fact was, at the time of the Manchester Arena atrocity,  
 18 that political dispute was still at its highest, wasn't  
 19 it?  
 20 A. Yes, it had been going on for some time, but yes,  
 21 I would say --  
 22 SIR JOHN SAUNDERS: Did it affect your actions on the night  
 23 at all?  
 24 A. No, I don't think so.  
 25 MR COOPER: Do you know one way or the other whether it

1 might have affected command and control's actions at the  
 2 time?  
 3 A. I wouldn't have thought so, no.  
 4 SIR JOHN SAUNDERS: Hang on. I think whichever answer you  
 5 give to that, I think has a degree of speculation about  
 6 it, trying to look into other people's minds, so we'll  
 7 avoid that, I think.  
 8 MR COOPER: So be it, sir.  
 9 The issue, and again I'll explore this, with the  
 10 chair's leave, with Mr Dark tomorrow, but in short with  
 11 you, GMFRS were involved also with suspending using  
 12 MTFA, weren't they?  
 13 A. Correct, yes, we suspended our specialist response due  
 14 to, I presume, that dispute and continuity training.  
 15 Q. When was it suspended?  
 16 A. I don't have the date to mind, but I think it was some  
 17 time -- was it October 2018? I think.  
 18 Q. So just dealing with this, and I reassure the chair I'm  
 19 not going with you into any great depth about it, but  
 20 after MTFA was considered to be so important as far as  
 21 the response to the Manchester Arena atrocity in 2017  
 22 was concerned, nonetheless GMFRS suspended it shortly  
 23 afterwards?  
 24 A. Yes, they suspended it and we relied on mutual aid from  
 25 Merseyside.

1 Q. I will speak to Mr Dark about that in due course. I'll  
 2 move on, save this, something you said today, training  
 3 about an MTFA incident, which has now been stabilised.  
 4 What did you mean by stabilised, a word you used today?  
 5 I will help you with context because it's difficult when  
 6 you're in the witness box. You said:  
 7 "The training you received about an MTFA incident  
 8 was about responding to an MTFA incident when the scene  
 9 had been stabilised."  
 10 What did you mean by stabilised?  
 11 A. So basically, all the three emergency services are in  
 12 a position to get the three commanders together, so the  
 13 NILO, the Ambulance Intervention Team leader and  
 14 a tactical firearms officer. They could then get the  
 15 joint understanding of risk and make a deployment plan  
 16 accordingly. So it was, as opposed to having, say, one  
 17 of the services there, two of the services there, it was  
 18 always -- the training always seemed to be based around  
 19 having those three services present to get that full  
 20 understanding and a full deployment plan. So it seemed  
 21 to me that it felt like we were in a set place, ie  
 22 stabilised.  
 23 Q. Did it perhaps mean that the training that fire  
 24 personnel received in relation to MTFA incidents was  
 25 after the scene had been made safer?

1 A. It was... Well, it would give us that situational  
 2 awareness and to make it safer for us to go and respond  
 3 and retrieve casualties. But if it was still an active  
 4 firearms incident in there then the only people that  
 5 respond to that is the specialist firearms officers  
 6 at the time.

7 Q. Again, as far as any training you received for MTFA  
 8 incidents, the training was always predicated, was  
 9 always linked to the scene being made safer or even safe  
 10 for fire officers to attend (overspeaking)?

11 A. Yes, definitely safer because it's always based around  
 12 a firearms attack. So obviously apart from a small  
 13 ballistic plate, we have no protection and  
 14 (overspeaking).

15 SIR JOHN SAUNDERS: We're talking across each other a bit.  
 16 Could you finish your response?

17 A. So with regard the safety, apart from our ballistic  
 18 protection, to get into that warm zone it would be  
 19 safer, but we wouldn't necessarily have the opportunity  
 20 of having armed police officers with us at the time.  
 21 They may have gone forward and then that risk assessment  
 22 takes place, that joint understanding of risk takes  
 23 place behind that for us to save as many casualties as  
 24 we can.

25 SIR JOHN SAUNDERS: Okay.

1 MR COOPER: Thank you. And if making the scene safer,  
 2 stabilised, for fire personnel to attend meant the  
 3 police and the ambulance services going in first, that  
 4 was something that was planned and accepted for, was it,  
 5 by the Fire Service?

6 A. Sorry, did you say police and Ambulance Service going in  
 7 first?

8 Q. Yes, I did.

9 A. No, it was generally the police went in first.

10 SIR JOHN SAUNDERS: Okay, just stop. As I understand your  
 11 first answer, you're talking about armed police going in  
 12 first.

13 A. Sorry, yes.

14 SIR JOHN SAUNDERS: So armed police going in first. Then  
 15 when they say it's safe for other people to go in, the  
 16 ambulance and fire go in. I think Mr Cooper is  
 17 suggesting that somehow ambulance and ordinary police go  
 18 in and only then, if it's safe for them, do the Fire  
 19 Service go in. Is that right, Mr Cooper?

20 MR COOPER: Sir, yes, I was exploring that.

21 SIR JOHN SAUNDERS: So now you understand what the question  
 22 is all about?

23 A. Thank you. I would say the armed police go in and then  
 24 the fire and HART team, the specialist response team and  
 25 HART them go in behind them together as a joint team.

1 MR COOPER: Thank you.

2 I want to go on to JESIP now. You were never  
 3 formally trained in JESIP, you say, ahead of  
 4 22 May 2017; is that right?

5 A. Yes. In my statement I said that, but we would have  
 6 covered JESIP principles in other training areas. But  
 7 I think that was a bespoke training day.

8 Q. I just want to examine first what you said in your  
 9 statement. So in your statement, you said that you'd  
 10 not received any formal training in JESIP before the  
 11 arena atrocity; is that right?

12 A. That's correct, in my statement, yes.

13 Q. Yes. That's what your statement says. You signed that  
 14 and we're originally going on your statement. You tell  
 15 us today that in fact your statement is not quite right  
 16 or you want to add to it; is that right?

17 A. Yes, I'd like to add to it. Reading my statement now,  
 18 I would say that my statement isn't — could have  
 19 greater clarity to it that I had done some previous  
 20 JESIP training, yes (overspeaking) included in my  
 21 training — sorry?

22 Q. My fault. It's difficult on this system. Your  
 23 statement is very, very clear indeed about your JESIP  
 24 training. You did read that statement after you signed  
 25 it, didn't you?

1 A. Yes.

2 Q. And you'd have seen what you said about your JESIP  
 3 training. It's on page 3 of your statement. It's very  
 4 clear what you say, isn't it, that you had not done any  
 5 before the arena?

6 A. Yes.

7 Q. That's what you say, isn't it? There's no clarification  
 8 or addition to it, it's simply you had not done any  
 9 JESIP training before the arena atrocity. I'll read it.  
 10 You say:  
 11 "In relation to multi-agency training, I have  
 12 completed the joint emergency services interoperability  
 13 principles, JESIP, training. I did this on  
 14 4 October 2018 and had not done this training prior to  
 15 the attack on 22 May 2017. I would do at least one or  
 16 two training sessions a year. These would be with the  
 17 Ambulance Service and the police, but sometimes it would  
 18 be just us and the Ambulance Service."  
 19 I'll read the whole paragraph in fairness to you:  
 20 "These exercises consisted of training in relation  
 21 to zones, cover from ballistics, enhanced first aid,  
 22 which included dealing with ballistic injuries.  
 23 Following this, there would be a scenario. I would  
 24 explain zones as basically how far we can go is  
 25 controlled."

1 So your statement is pretty clear, isn't it, that  
 2 you had not done any JESIP training before the arena  
 3 attack; correct?  
 4 A. It says that, yes, but I would say that is incorrectly  
 5 put now.  
 6 Q. When did you --  
 7 A. In relation to multi-agency training, whether that was  
 8 the first time I did it with a group of multi-agency  
 9 partners in the room, but I've definitely done  
 10 multi-agency training as part of incident command and  
 11 regarding some of the MTFA training. So I would say  
 12 that my statement isn't clear.  
 13 Q. Have you told anyone before this morning that your  
 14 statement isn't clear?  
 15 A. Yes.  
 16 Q. Yes, you did? Who was that?  
 17 A. When I spoke to the solicitors this morning about when  
 18 I read it again and I thought the clarity wasn't there.  
 19 Q. Is that the first time you've told anyone that your  
 20 statement wasn't entirely clear on this --  
 21 A. I think so, yes.  
 22 Q. So let's examine then what training you say you have  
 23 had. So you'd had no formal JESIP training, can we at  
 24 least agree on that, before the Manchester atrocity?  
 25 Can we at least agree on that?

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1 A. I had some JESIP training but that was the only first  
 2 formal session that was given by another trainer.  
 3 Q. So for instance you'd have been aware, would you, at the  
 4 time of the Manchester atrocity of the guidelines, the  
 5 JOPs JESIP principles of January 2016 edition 3?  
 6 A. Yes.  
 7 Q. You were? Help us with them. I know it's not supposed  
 8 to be a test, but I want to examine your sudden change  
 9 of evidence. So you're aware of that document, it's  
 10 INQ0087372 (sic). And so therefore you can help me with  
 11 some of the principles of it, can you?  
 12 A. Yes: co-locate, communicate, joint understanding of  
 13 risk.  
 14 Q. Help us with treat and leave and treat and extricate;  
 15 what does it say about that?  
 16 A. So that's a decision made generally by the HART team  
 17 leader, the NWS paramedics, regarding the amount of  
 18 casualties, whether to treat them and, after triage,  
 19 treat them and leave with them, or treat and leave, so  
 20 do some very basic training -- sorry, some very basic  
 21 first aid to stem catastrophic bleeding and then move on  
 22 to the next casualty and so forth.  
 23 Q. And what is advised?  
 24 A. Yes, generally under advice from an NWS HART  
 25 practitioner, yes.

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1 Q. What do they say is the preferred option?  
 2 A. It depends on the amount of casualties.  
 3 Q. Does it?  
 4 A. Pardon?  
 5 Q. Does it say that?  
 6 SIR JOHN SAUNDERS: Sorry, Mr Cooper, just let him answer  
 7 the question and then do the follow-up if you don't  
 8 mind.  
 9 A. It's two options, two tactical options that they would  
 10 use. If there's a vast amount of -- sorry, you're  
 11 shaking your head.  
 12 SIR JOHN SAUNDERS: Look away then and look at me instead.  
 13 A. Okay.  
 14 SIR JOHN SAUNDERS: If we were in a Criminal Court,  
 15 Mr Cooper, that would be called a comment, shaking your  
 16 head.  
 17 MR COOPER: That's naughty of me, I accept that. I'm sorry.  
 18 SIR JOHN SAUNDERS: You carry on. He won't shake his head  
 19 any more.  
 20 A. There's two options that are generally applied in the  
 21 training around do we treat them, leave them, ie do some  
 22 very basic treatment, or do we treat them and take them,  
 23 so put them on a Sked or walk out with them? That's  
 24 a tactical decision, taking -- HART are taking and would  
 25 be given to you at the briefing.

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1 MR COOPER: Were you aware of this guidance at the time of  
 2 the Manchester Arena?  
 3 A. Yes.  
 4 Q. Bear with me, I'm just calling it up. My computer is  
 5 very slow.  
 6 (Pause)  
 7 Was this part of the training that you received  
 8 before the arena or were you expected to read this  
 9 document?  
 10 A. It's training that we would have had on some of the  
 11 scenarios and some of the training days we would have  
 12 had, yes.  
 13 Q. I'm just calling it up.  
 14 (Pause)  
 15 As far as the tactic known as treat and leave, did  
 16 you receive training in that?  
 17 A. Yes, we would have had that training along with HART,  
 18 they would basically -- it's basically just some very  
 19 simple techniques to, like I say, generally stem  
 20 catastrophic bleeding, place a casualty in the recovery  
 21 position and then move on to the next casualty in  
 22 a triage way.  
 23 Q. Is that advised in cases of heavy casualties?  
 24 A. That's one of the options, yes, that the HART or medical  
 25 team there would potentially use, yes.

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1 Q. It's a preferred option, isn't it?

2 A. I would say so, yes. Otherwise you could get

3 overwhelmed and potentially some saveable lives would

4 not be saved.

5 SIR JOHN SAUNDERS: Mr Cooper, I just want --- forgive me for

6 this, but I would like quite to know where we're going.

7 As I understand it, and perfectly understandably, the

8 concerns of the families have been that had this

9 particular team from the Fire Service got there quicker

10 they had both the equipment and the expertise in order

11 to help with the removal and treatment of casualties,

12 which may, in a number of cases, have led to a more

13 beneficial result. We're not just talking about those

14 who unhappily died, but we're also talking about those

15 who were injured. Do you not accept or is it not

16 generally accepted that had they been there on the

17 scene, it actually would have been a beneficial result

18 for those who were injured? Mr Cooper, I'm sorry, I'm

19 asking you, really.

20 MR COOPER: I am sorry, sir, I thought you were asking

21 Mr Nolan. I'm so sorry, sir.

22 SIR JOHN SAUNDERS: I was asking you, the advocate, a

23 question. I know it's an unusual experience for people,

24 but nevertheless occasionally it's of some help. I just

25 wondered. You're perfectly entitled to dig deep into

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1 the training and things like that, and there may have

2 been deficiencies in it, but the reality is, isn't it,

3 that in general what the families are saying and what

4 they want to know is had this team got there with their

5 extra training and their extra equipment that actually

6 that would have been a better outcome all around?

7 MR COOPER: Of course, sir, that's absolutely correct. The

8 only reason I have slightly diverted for a moment is the

9 evidence we heard for the first time this morning about

10 how there was a level of JESIP training. I was simply

11 trying to probe a little as to how effective that was.

12 But I can move on now. It's just simply ---

13 SIR JOHN SAUNDERS: Can I just ask a general question?

14 I was shown over the weekend, and I think in due course

15 the CPs will see this, a document from someone who was

16 on the Kerslake Inquiry, and part of the information

17 in that is that in 2016 there was a tri-service review

18 of how JESIP had got --- was understood by the services

19 and how it was being taken up. The review found, taking

20 a scale of 1 to 4, of how much JESIP was being

21 understood and practised, so 1 was the lowest, where

22 it would be said to be chaotic, and 4 was if it was

23 being done at the best level and was best practice. The

24 conclusion that review came to was level 2, that meant

25 that the joint doctrine, JESIP, existed but it was not

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1 widely accepted or understood. Is that your view, would

2 you think that was right as far as the Fire Service was

3 concerned or do you think your acceptance of it was

4 greater than that?

5 A. I would say that the acceptance of it was greater.

6 I think the Fire Service was very open to the joint

7 working and I think it's --- at the time, as a watch

8 manager, the JESIP working happened at virtually every

9 incident, like I said earlier.

10 SIR JOHN SAUNDERS: But when you got there, automatically,

11 you said, the three different services were there ---

12 A. Yes.

13 SIR JOHN SAUNDERS: --- and you knew what your individual

14 roles were?

15 A. Yes and we would discuss what we were going to do and

16 what we might need from each other's service. I think

17 probably the further up you go in rank, it gets more

18 complicated because you are doing that remotely. It's

19 very --- in its pure and simplest form it works very well

20 at most incidents.

21 SIR JOHN SAUNDERS: Sorry, Mr Cooper, that was a long

22 intervention on my part.

23 MR COOPER: In fact, the document you put is very helpful

24 and rather deals with the issue I was trying to explore

25 myself. Let me move on.

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1 Indeed, as the chair summed up with you, Mr Nolan,

2 the SRT had equipment and indeed training of people like

3 yourselves to offer casualties and those stricken down

4 in the City Room; that's correct, isn't it?

5 A. Yes.

6 Q. Mr Smith touched upon this, but let's be clear about it:

7 you were never officially or formally notified at all

8 during 22 May of the arena bomb, were you?

9 A. Not initially, no, because we made that call ourselves,

10 or that call was made by my team. But once we got to

11 the --- I suppose the official notification going to the

12 RVP at Philips Park was the normal turnout method.

13 Q. When you arrived at the scene would you agree that

14 a good description of it was utter confusion?

15 SIR JOHN SAUNDERS: Are you talking about (overspeaking)?

16 MR COOPER: At the fire station, I should say. The scene

17 can be best described as utter confusion?

18 A. Do you mean Philips Park or Manchester Central, sorry?

19 Q. Philips Park.

20 A. Philips Park... I wouldn't say utter confusion, I would

21 just ... We got there, got our gear on, got dressed,

22 informed that we were ready to go. You know, I was

23 surprised that Manchester Central and Philips Park

24 Fire Stations were there and awaiting further

25 information, really. So... I wouldn't say chaos.

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1 SIR JOHN SAUNDERS: Lack of leadership at the scene for  
 2 whatever reason?  
 3 A. Potentially, yes. Yes.  
 4 MR COOPER: All right. You've given evidence that there was  
 5 no incident commander at the scene when you arrived. In  
 6 fact there was no NILO -- when I say the scene, at  
 7 Philips Park. There was no NILO there, either, was  
 8 there, when you arrived?  
 9 A. My memory might stand to be corrected. I thought  
 10 Carlos Meakin was there at the time. I think there's  
 11 maybe a minute's difference --  
 12 SIR JOHN SAUNDERS: I think, from the times Mr Smith said,  
 13 he arrived just a minute after you.  
 14 A. It was within a minute or two I would have thought.  
 15 MR COOPER: Do you know what had delayed Mr Berry?  
 16 A. At the time I didn't know; I do now.  
 17 Q. What have you been told?  
 18 A. That he lived some distance away anyway and there was  
 19 issues around his route around road closures.  
 20 Q. Who told you that?  
 21 A. I don't know if it is one of the elements that was  
 22 brought up in the sort of debrief we had -- I can't  
 23 think which building that was in. We sort of had  
 24 a debrief. I don't know if it was a debrief or not.  
 25 SIR JOHN SAUNDERS: There was a debrief in July when lots of

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1 people were there; were you there?  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 MR COOPER: Did Mr Berry formally tell you that, that there  
 5 were road closures?  
 6 A. I would have thought he would have brought it up, yes.  
 7 I can't remember specifically, sorry.  
 8 Q. You tell us, before we move on further into the  
 9 incident, that the SRT was suspended in October 2018;  
 10 is that right?  
 11 A. I can't remember the exact date. I think it was 2018.  
 12 Q. Why was the SRT suspended in October 2018?  
 13 A. Assistant Chief Officer Dave Keelan wrote to the  
 14 Home Office and stated that our specialist response has  
 15 been withdrawn and from my understanding, it was around  
 16 that we -- the crews were not doing any further training  
 17 around it, so they were out of competency.  
 18 Q. So why weren't the crews doing any training and became  
 19 out of competency?  
 20 A. My understanding again -- it was under guidance from the  
 21 Fire Brigades Union regarding non-contractual work and  
 22 regarding the pay dispute.  
 23 Q. So do I understand this then, again it is for Mr Dark  
 24 more than you, but as a result of this pay dispute, as  
 25 a result of the political issue, as you describe it, not

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1 only were MTFAs affected, so much so outside resources  
 2 had to be obtained, but SRTs were suspended?  
 3 A. Yes, the team was withdrawn by the Fire Service due to  
 4 the lack of -- I presume due to lack of training at the  
 5 time.  
 6 Q. Well, when did this lack of training stop? Was there  
 7 a problem over lack of training before the  
 8 Manchester Arena bomb?  
 9 A. No.  
 10 Q. So the SRTs are on tip-top form on 22 May 2017 but are  
 11 suspended just over a year later because they're not  
 12 trained up? When did this deterioration begin?  
 13 A. The ongoing discussion around whether it's -- if it's  
 14 contractual, part of a firefighter's role, had been  
 15 going on for some years. It must have come to a head --  
 16 I don't know what discussions took place and why the  
 17 decision was made, but the decision was then made by  
 18 ACFO Keelan, I presume, all the way up to the chief  
 19 at the time to withdraw the response.  
 20 Q. But Merseyside gave back-up on the MTFAs withdrawal. Was  
 21 anyone backing up the lack of SRT facility for  
 22 Manchester?  
 23 A. Sorry, I missed the first bit of the question.  
 24 Q. Merseyside, I understand, gave back-up when the MTFAs  
 25 withdrawal occurred in Manchester and I'm asking if

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1 similar back-up was given when SRT was withdrawn.  
 2 A. Merseyside would have come under mutual aid to  
 3 Manchester.  
 4 SIR JOHN SAUNDERS: So they would be covering both?  
 5 A. They'd be covering both, yes.  
 6 MR COOPER: Have SRTs been restored?  
 7 A. There's current training ongoing at the moment and  
 8 I think there's a likely go-live date of 1 April this  
 9 year.  
 10 Q. SRTs could have made a significant difference on  
 11 22 May 2017, couldn't they?  
 12 A. I believe some difference could have been made, yes.  
 13 I think --  
 14 Q. What sort of difference?  
 15 A. Just with some of, like, the training with the ballistic  
 16 bandages, you know. I think normal fire crews could  
 17 have made a difference as well. I don't want to get  
 18 away from that. But with the SRT, some of the enhanced  
 19 training and what they used to...  
 20 SIR JOHN SAUNDERS: Sorry to cut you short, but if you had  
 21 been there quickly, as might have happened, you'd have  
 22 been there in helping the medics and your particular  
 23 skills in that area would have been an enormous help,  
 24 wouldn't they?  
 25 A. Yes.

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1 MR COOPER: Could have saved lives?  
 2 A. Yes.  
 3 Q. So do I understand this: that that ability , should an  
 4 atrocity happen now, heaven forbid, would not be  
 5 available as far as Manchester is concerned, provided by  
 6 Manchester firefighters?  
 7 SIR JOHN SAUNDERS: I think the answer has to be yes because  
 8 you don't have any SRTs.  
 9 A. Yes.  
 10 MR COOPER: All right.  
 11 Back to Philips Park. You asked, didn't you, and  
 12 I don't need to take you to where it appears unless  
 13 required, but you asked Mr Berry at one stage, didn't  
 14 you, at Philips Park, "Why are we meeting here? Why did  
 15 you nominate here, Mr Berry, for the RVP?" Do you  
 16 remember having that conversation with him?  
 17 A. I remember discussing it, yes.  
 18 SIR JOHN SAUNDERS: Do you want to look at your statement,  
 19 the part of it?  
 20 A. Yes, please.  
 21 MR COOPER: Sir, it's not in his statement, but it might be,  
 22 but the reference I'm referring to is in the debrief.  
 23 A. Oh yes. Sorry, yes.  
 24 Q. It's simply this: when you asked Mr Berry that question,  
 25 you say he said, "It's one of the places I know". That

1 was his reply to you, wasn't it, "It's one of the places  
 2 I know"?  
 3 A. Yes. It was around --- yeah, why choose somewhere that  
 4 distance away from the actual scene of the attack. We  
 5 do use other fire stations as RVPs and stand-by places,  
 6 and I think that was a decision he made at the time.  
 7 That was his decision at the time, yes.  
 8 Q. Indeed it was, but the reason he gave to you, and it is  
 9 in the debrief, was, "It's one of the places I know."  
 10 That's what you said in the debrief and that's what he  
 11 said to you, isn't it?  
 12 A. I believe so, yes, yes.  
 13 Q. Thank you. So you arrive at Philips Park, and I'm not  
 14 going to go into matters that have already been dealt  
 15 with, but Mr Levy tells you he didn't have permission to  
 16 attend at the scene, didn't he, in short?  
 17 A. Yes, we had no information to proceed to the scene, yes.  
 18 Q. And there was general frustration, which has been dealt  
 19 with.  
 20 I want to ask you particularly about the way you  
 21 term your evidence in your statement. It appears at  
 22 page 5 of your statement and this concerns the issue of  
 23 who was aware of your capabilities and who wasn't.  
 24 That's the issue I'm asking you about very briefly now.  
 25 In your statement at page 5, you say:

1 "The NILOs were fully aware of our capabilities and  
 2 this was conveyed to the command support room."  
 3 So you specifically say in your statement two  
 4 things: one, that the NILOs were aware of your  
 5 capabilities , and that this was conveyed to the command  
 6 support room; do you see that?  
 7 A. Yes, I do, yes.  
 8 Q. The point I want to ask you about is the "This was  
 9 conveyed to the command support room". So you heard  
 10 a NILO tell the command support room of your  
 11 capabilities and of your team's capabilities?  
 12 A. Yes.  
 13 Q. Because you said it was conveyed, you heard it conveyed  
 14 to the command support room; is that right?  
 15 A. Yes.  
 16 Q. And yet despite it being conveyed to the command support  
 17 room, so far as you recollect by the NILOs, you were not  
 18 deployed?  
 19 A. That's correct, yes.  
 20 Q. Did that surprise you, to say the least?  
 21 A. Yes. Surprised and frustrated, yes.  
 22 Q. Because despite them being made aware, despite the  
 23 command support room being made aware in your presence  
 24 by the NILOs of your expertise, they still sent in  
 25 non-specialist crews; is that right?

1 A. Yes.  
 2 Q. In short, as you put at the top of page 6 of your  
 3 statement, bluntly:  
 4 "The command support room prevented our deployment"?  
 5 A. It certainly felt ---  
 6 SIR JOHN SAUNDERS: Just stop for a moment. I think we need  
 7 the whole sentence, if you don't mind. It reads:  
 8 "I got the feeling the NILOs wanted to deploy us but  
 9 were prevented from doing so by the command support  
 10 room, who they were in contact with."  
 11 A. That's the way it felt at the time, yes.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR COOPER: I want to ask you about the chief fire officer.  
 14 This is not in your statement, but it's in another  
 15 document and I can take you to it if needs be. Who was  
 16 the chief fire officer at the time?  
 17 A. Peter O'Reilly.  
 18 Q. You were told at the debrief that the CFO was at G16,  
 19 Manchester fire station , but you were told to keep this  
 20 to yourselves. You are saying that on the 12 July  
 21 debrief?  
 22 A. I don't know...  
 23 SIR JOHN SAUNDERS: Let's have the document, please.  
 24 MR COOPER: Sir, yes, of course. It's {INQ030902/23}.  
 25 SIR JOHN SAUNDERS: Thank you. This will enable you to get



1 the context if you want to and see what was said.  
 2 A. Thank you.  
 3 MR COOPER: It's a reference to -- I see it now:  
 4 "It kind of irked me that the CFO was at G16 and  
 5 we were told to keep to ourselves."  
 6 What did you mean by that?  
 7 A. That was around debriefing and talking about it. So  
 8 this was after the incident.  
 9 Q. I see, yes.  
 10 A. So it was -- basically we were told to make notes and  
 11 statements and stuff like that, but we were told,  
 12 I don't know who by, but groups was not to get together  
 13 and discuss what happened on the night. Then some time  
 14 later I found out that Peter O'Reilly, the chief at the  
 15 time, had gone to see some Manchester stations and had  
 16 talked about it and it kind of like -- we were doing, as  
 17 we were told by -- basically keeping our counsel to  
 18 ourselves because we... You know, for... I presume to  
 19 keep our view as our view, not letting it be changed by  
 20 anyone. And then we find out that that the chief seemed  
 21 to have gone against his instructions for the groups not  
 22 to meet up and he's gone and met up. So that was the  
 23 feeling of frustration there. It was not to do with the  
 24 night itself, it was some time afterwards, just to be  
 25 clear.

1 Q. I see. So it's effectively dealing with the debrief  
 2 aspect of it?  
 3 A. Yes.  
 4 Q. Thank you. I just want to finish off by asking you  
 5 a few more questions, please, about Exercise Largo.  
 6 Exercise Largo took place on 18 April 2019, didn't it?  
 7 A. Yes, I believe so, yes.  
 8 Q. And that was to learn from the Manchester Arena  
 9 response. That's what its specific purpose was, wasn't  
 10 it?  
 11 A. Yes.  
 12 Q. So here's an operation in April 2019 to learn from the  
 13 arena response. Is there any reason why that particular  
 14 operation took so long to get up and going?  
 15 A. I don't know. I don't know who organised it. It may  
 16 have... I honestly don't know.  
 17 Q. Because it's nearly 2 years since the atrocity, isn't  
 18 it?  
 19 A. Yes, but there's ongoing training and tabletop exercises  
 20 happening all the time and I presume happened previous  
 21 as well. I don't know if this was one of the ones that  
 22 came out of Kerslake to get some of the findings,  
 23 I don't know.  
 24 Q. Let's park that then as to taking place nearly 2 years  
 25 later. No doubt some important lessons were learned

1 from it?  
 2 A. Yes. I believe so, yes. I didn't do the debrief.  
 3 I don't know if -- British Transport Police, I think,  
 4 ran the exercise and they provided a debrief to the  
 5 Local Resilience Forum to be disseminated and learned  
 6 from. I just had a very small scope to look into some  
 7 of the findings around Jim Hutton and Ray Carolyn at the  
 8 time.  
 9 Q. Let me just follow on from that: you mentioned British  
 10 Transport Police. This was arranged by British  
 11 Transport Police, was it?  
 12 A. I believe so, yes.  
 13 Q. So they had a crucial part in it?  
 14 A. I believe so, yes. At the time of writing the report,  
 15 I left -- I contacted them a couple of times but got no  
 16 response. I think the person that was doing the  
 17 write-up of it, the formal debrief, that was taking  
 18 place some time later.  
 19 Q. I'm coming on to this. I'm dealing with the delays, I'm  
 20 dealing with the progress of this report. British  
 21 Transport Police are central to the organisation of this  
 22 lessons learnt document in relation to the arena  
 23 response. Your observation of British Transport Police  
 24 is this, isn't it: British Transport Police did not  
 25 reply in time to requests for the official briefing

1 findings? That's what you say --  
 2 A. Yes.  
 3 Q. -- in your report? What do you mean? That British  
 4 Transport Police, who have actually arranged Largo, who  
 5 are central to Largo, did not reply in time to requests  
 6 for the official debrief findings? What do you mean?  
 7 A. That I requested them as part of my brief just to write  
 8 a short report to inform our senior leaders, because  
 9 this was an internal report, of the outcomes -- not the  
 10 outcomes, some of the findings from that exercise.  
 11 I think in the time scales I didn't get a response back  
 12 from British Transport Police before I submitted that  
 13 report.  
 14 Q. Have you had a response back from them?  
 15 A. No, and when I say I submitted the report through my  
 16 line managers, I received no further communication  
 17 regarding that report (overspeaking) further  
 18 information.  
 19 Q. Let me understand this then: British Transport Police  
 20 set up an operation, Exercise Largo, which took place on  
 21 18 April 2019 to learn lessons from the arena response,  
 22 possibly as a result of Kerslake. British Transport  
 23 Police, who are central to this operation, did not reply  
 24 in time to requests for the official debrief findings  
 25 and still to this day, 2021, they still haven't? Is

1 that right?  
 2 A. Not to me, no. They may have replied elsewhere, but  
 3 I have no knowledge.  
 4 SIR JOHN SAUNDERS: How much time were you giving them? How  
 5 much time are we talking about that they hadn't done  
 6 a response to you by?  
 7 A. It was only a matter of a few weeks because I think they  
 8 wanted the report passing up, so...  
 9 SIR JOHN SAUNDERS: Do you have any idea? Can you do better  
 10 than a few weeks?  
 11 A. I honestly couldn't say with any clarity, sorry --  
 12 certainty, rather.  
 13 MR COOPER: Did anyone else -- was anyone else late in  
 14 providing that information?  
 15 A. With regards to what I wrote?  
 16 Q. With regards to what British Transport Police didn't do.  
 17 SIR JOHN SAUNDERS: Were you seeking information from anyone  
 18 else and was there a delay there?  
 19 A. I sought information from Area Manager Hutton who  
 20 attended the exercise on behalf of the Fire Service and  
 21 Ray Carolyn, who at the time was working for the Local  
 22 Resilience Forum, who was on a secondment.  
 23 SIR JOHN SAUNDERS: Did you get responses from them in time?  
 24 A. Yes.  
 25 MR COOPER: You understand the families are listening keenly

1 as to lessons learned and whether organisations have  
 2 learned lessons or are acting with more expedition and  
 3 that's why I'm asking you to BTP. To this day, they  
 4 still haven't responded to their own operation?  
 5 SIR JOHN SAUNDERS: He hasn't had a response; whether they  
 6 have responded elsewhere and whether they have produced  
 7 a report, we will have to ask them about. But we will  
 8 enquire from BTP.  
 9 MR COOPER: Thank you, sir. My last question on Largo is  
 10 this, and it really just top and tails the evidence  
 11 you've given already: you simply don't know what has  
 12 happened to it, nothing's been done, you've not been  
 13 spoken to about it, it's just effectively in someone's  
 14 drawer? Is that effectively where we are with Largo  
 15 now?  
 16 A. As far as my report to Largo -- but there was a request,  
 17 a colleague asked me about Largo, I think it was  
 18 either March last year -- so at a Local Resilience Forum  
 19 level, I don't know if it's been talked about since,  
 20 I honestly don't know. I don't know who would be the  
 21 best person -- perhaps ACFO Keelan would be the best  
 22 person to give you more information on Largo.  
 23 SIR JOHN SAUNDERS: We're going to try and get more  
 24 information from people who know, Mr Cooper.  
 25 MR COOPER: I have one last question and it's really a short

1 exploration of the final comments in the evidence you  
 2 gave to CTI. You said:  
 3 "We have not been allowed to do our job through  
 4 a procedure that failed."  
 5 That's what you said today:  
 6 "We have not been allowed to do our job through  
 7 a procedure which failed."  
 8 In short, what procedures failed?  
 9 A. Yes. The procedure I was referring to would be the  
 10 reliance on information from the force duty officer from  
 11 Greater Manchester Police.  
 12 Q. Would you accept it failed for more reasons than that,  
 13 didn't it?  
 14 A. I thought if we would have got that information  
 15 straightaway, then things could have happened and the  
 16 incident -- we could have attended the incident. But at  
 17 that time, I thought that was the crux of us not  
 18 attending, would have been that --  
 19 SIR JOHN SAUNDERS: Okay, but the fact they couldn't get the  
 20 information or Mr Berry couldn't get the information  
 21 from the FDO, should that have just let the whole  
 22 procedure grind to a halt or should there be some -- the  
 23 Ambulance Service are there.  
 24 A. I don't know whether they tried to contact the ambulance  
 25 NILO or sending someone forward.

1 SIR JOHN SAUNDERS: So the whole process of getting  
 2 information from the scene is what failed?  
 3 A. Yes, I have to agree, yes.  
 4 MR COOPER: Can I just finally suggest to you that whether  
 5 or not that information had got to the responsible  
 6 people, the whole culture of the Fire Service at the  
 7 time would have been to stay at Philips Park, wouldn't  
 8 it?  
 9 A. I disagree. I think the culture would have been --  
 10 judging by the frustration that people wanted to attend  
 11 that incident ...  
 12 MR COOPER: Thank you.  
 13 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 14 MR DE LA POER: Sir, I think it is Ms Johnson on behalf of  
 15 GMCA.

Questions from MS JOHNSON

16 MS JOHNSON: Thank you. Just one issue. Could I ask to  
 17 have up, please, {INQ004275/1}.  
 18 Mr Nolan, this is a debrief document that you  
 19 prepared on 12 July 2017. It's already been referred  
 20 to. Could I ask that we move to {INQ004275/5}, please.  
 21 On this page, you write in your recommendations for  
 22 future similar events and I just wanted to look at two  
 23 of them in relation to the RVPs. If you look three up  
 24 from the bottom, you have written one recommendation be:  
 25

1 "Protect the RVP, close surrounding roads."  
 2 And below that:  
 3 "Sweep of RVP."  
 4 Do you see that?  
 5 A. Yes, I do, yes.  
 6 Q. The first question that I had was: which of the RVPs are  
 7 you referring to in this?  
 8 A. I would say it would have been the multi-agency one that  
 9 was at Manchester Central -- Manchester Central  
 10 Fire Station, sorry.  
 11 Q. In terms of your recommendations about closing  
 12 surrounding roads and sweeping the RVP, what was the  
 13 threat that you were concerned about when you wrote  
 14 this?  
 15 A. I think it was just when I was there and you saw the  
 16 amount of emergency responders at that site, because  
 17 ambulances had started to come to the scene from far  
 18 afield, it just seemed a potential risk and I think  
 19 initially Thompson Street wasn't closed at either end.  
 20 It did get closed later on, but I think initially there  
 21 would have been -- it was quite open because cars were  
 22 still coming down and it was quite a big area to sweep  
 23 and I... Whether I asked the question, I'm not too  
 24 sure, and it got answered, had a sweep been done of the  
 25 RVP to ensure it was safe, because there were obviously

1 no police there at the time, what had we done to make it  
 2 safer for ourselves? And I think that's one of the  
 3 things... It may have been done by the NILOs, but  
 4 I wasn't too sure.  
 5 Q. What I just wanted to understand was in terms of making  
 6 it safe, from what was it that you were concerned it  
 7 needed to be made safe? What was the risk?  
 8 A. Just the potential for secondary devices or a secondary  
 9 attack. Because at that point we -- we still had no  
 10 knowledge of was it just the one incident area. Could  
 11 we have been -- could the emergency services have been  
 12 a further target?  
 13 Q. Was there anything about the location of that RVP and  
 14 its proximity to the arena that gave you any cause for  
 15 particular concern?  
 16 A. It's a reasonable distance from the arena to be quite  
 17 a good one. Its size is good. But for someone perhaps  
 18 pre-planning an attack, it's probably quite a likely  
 19 location to do a secondary attack, in my opinion.  
 20 MS JOHNSON: Thank you. Those are my questions.  
 21 SIR JOHN SAUNDERS: Could we have that document back again?  
 22 Sorry, I didn't quite stop you in time.  
 23 These are your considered conclusions about your  
 24 recommendations and you had until July to think about  
 25 it. So I think it's worth going through them all, if

1 you don't mind:  
 2 "A Fire Service response utilising regular and  
 3 specialist crews, trusting their judgement."  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: So you trust the people who are closest  
 6 to it on their judgement of whether it's safe to go in?  
 7 A. Yes, like we do with every --  
 8 SIR JOHN SAUNDERS: "Allow forward commanders/NILOs to make  
 9 decisions."  
 10 So again people on the scene don't have to get the  
 11 commanders, who are rather remote, to decide that?  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: "Better liaison with other agencies."  
 14 So again you're talking, presumably, because you say  
 15 once you get to the scene it's fine, you're talking  
 16 about you remotely liaising with ambulance and police?  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: "Better/full mobilisation of appropriate  
 19 resource to incident as well as command support at RVP."  
 20 So what do you mean by command support being at the  
 21 rendezvous point?  
 22 A. We also have a command support vehicle --  
 23 SIR JOHN SAUNDERS: You're talking about the vehicle?  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: Which never turned up on the night

1 I think.  
 2 A. I don't think so, no.  
 3 SIR JOHN SAUNDERS: Thank you:  
 4 "Protect the RVP. Close surrounding roads."  
 5 Then:  
 6 "A sweep of the RVP."  
 7 Now, we know that the particular station you were  
 8 sent to was manned at the time, so there were people  
 9 there?  
 10 A. Yes.  
 11 SIR JOHN SAUNDERS: But you thought there should have been  
 12 a sweep of it before you were actually sent there?  
 13 A. No. I think once we got there, we could have performed  
 14 that or someone could have performed that, just at any  
 15 RVP to do with a terrorist-type incident, an RVP should  
 16 have been swept.  
 17 SIR JOHN SAUNDERS: Right. So you would do it?  
 18 A. In the absence of police, I think yes. Any crew --  
 19 someone should be tasked with looking for anything  
 20 suspicious and untoward.  
 21 SIR JOHN SAUNDERS: You have just said about Philips Park,  
 22 that it's a reasonable distance away from the arena  
 23 because of the risk of a secondary device. Most firemen  
 24 who have come to give evidence about this have said, "We  
 25 shouldn't have gone this far away, we should have been

1 at Central."  
 2 A. Sorry, I meant Manchester Central is the correct  
 3 distance; Philips Park is too far away. Sorry,  
 4 I correct myself.  
 5 SIR JOHN SAUNDERS: I don't think that's actually clear from  
 6 there.  
 7 A. Just to clarify on the better and full mobilisation of  
 8 appropriate resources, the specialist response team  
 9 consisted of members from three stations, so the team  
 10 should have consisted of 12 personnel and there was only  
 11 10 there. One team wasn't tasked with coming, the team  
 12 from one of the TRU stations wasn't tasked.  
 13 SIR JOHN SAUNDERS: The original RVP as set down by the  
 14 force duty officer was the Cathedral Car Park.  
 15 A. Yes. I believe so, yes.  
 16 SIR JOHN SAUNDERS: Which is, I think, closer than Central?  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: In your view too close or would it have  
 19 been all right?  
 20 A. In hindsight ...  
 21 SIR JOHN SAUNDERS: Well, at the time.  
 22 A. At the time potentially a little bit close. At the time  
 23 there was a discussion around whether there was an  
 24 active shooter -- well, a marauding terrorist firearms  
 25 attack. So that potentially would have been too close

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1 whereas Manchester Central, I think, was less than half  
 2 a mile.  
 3 SIR JOHN SAUNDERS: We have the scenario that the Cathedral  
 4 Car Park is the rendezvous point set down by the police.  
 5 I think it's right to say that nobody actually turns up  
 6 there at all, but you're all selecting your own, which  
 7 doesn't help to co-locate very much.  
 8 A. No.  
 9 SIR JOHN SAUNDERS: And finally:  
 10 "Backfill with neighbouring brigades to allow  
 11 complete SRT team to be stood up."  
 12 So the idea of keeping you in reserve because of  
 13 a further incident which has been said to be one of the  
 14 reasons why you weren't used, if you actually use your  
 15 agreements with neighbouring forces --  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: -- then you don't need to do that?  
 18 A. Yes, we should deploy resources to the incident and then  
 19 if it's deemed that potentially there's further risk  
 20 then use the mutual aid.  
 21 SIR JOHN SAUNDERS: Okay. Thank you very much. That's  
 22 helpful to have gone through that.  
 23 Anything else?  
 24 MR DE LA POER: Not from me, thank you very much.  
 25 SIR JOHN SAUNDERS: We're really grateful for your help. If

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1 it seemed to you that perhaps you were being somehow got  
 2 at today, it wasn't an intention by anyone to do that,  
 3 just a desire to get the information.  
 4 MR DE LA POER: Thank you, sir.  
 5 Our next witness -- and we're only minutes ahead of  
 6 where we expected to be -- is, as far as I am aware,  
 7 available, but I wonder whether now would be  
 8 a convenient moment to take an early lunch.  
 9 SIR JOHN SAUNDERS: Why not? We'll come back at 1.45.  
 10 Thank you very much for your evidence.  
 11 (12.45 pm)  
 12 (The lunch adjournment)  
 13 (1.43 pm)  
 14 MS CARTWRIGHT: Good afternoon, sir. The witness in the  
 15 witness box is Watch Manager Turner.  
 16 MS MACCYLA TURNER (affirmed)  
 17 Questions from MS CARTWRIGHT  
 18 MS CARTWRIGHT: Could you please tell the inquiry your full  
 19 name?  
 20 A. Maccyla Turner.  
 21 Q. And in May 2017 were you crew manager at Blue Watch at  
 22 station G16, Manchester Central Fire Station?  
 23 A. That's correct.  
 24 Q. At that time how long had you been a firefighter for,  
 25 please?

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1 A. I was a firefighter up until I went to Golf 16,  
 2 Manchester Central, and then I became a crew manager  
 3 there, so at that time I had done 10 years' service.  
 4 SIR JOHN SAUNDERS: Ms Turner, if you will forgive  
 5 a personal question, I don't think I've ever come across  
 6 your Christian name before.  
 7 A. Maccyla, yes, it's Gaelic.  
 8 MS CARTWRIGHT: I think, subsequent to 2017, you have been  
 9 promoted now to watch manager; is that correct?  
 10 A. That's correct.  
 11 Q. And that's at Oldham, is that right?  
 12 A. Yes, ma'am.  
 13 Q. Thank you.  
 14 You have provided two witness statements for the  
 15 purposes of the inquiry. The first is dated  
 16 5 December 2017 and do you have a copy of that statement  
 17 there?  
 18 A. I have, yes.  
 19 Q. Are the contents of that statement true to the best of  
 20 your knowledge and belief?  
 21 A. They are.  
 22 Q. And then you have provided a second statement dated  
 23 1 December last year. Do you have a copy of that  
 24 statement?  
 25 A. Yes, I do.

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1 Q. Are the contents of that second statement true to the  
 2 best of your knowledge and belief?  
 3 A. Yes.  
 4 Q. We've already dealt with how long you've been  
 5 a firefighter at the time, but could you just assist us  
 6 with a little more detail about training, please? Could  
 7 you assist us with whether you'd had any JESIP training,  
 8 please, as of May 2017?  
 9 A. The only training that I can recall having was an  
 10 e-learning package that we do online and it's just  
 11 familiarisation on JESIP protocols.  
 12 Q. Those records have been provided. Sir, I don't intend  
 13 to take the witness into the records unless it would  
 14 assist you.  
 15 We've also been provided with the wider records  
 16 relating to medical training you had. Is it right that  
 17 in May of 2017 you were a qualified trauma technician?  
 18 A. That's correct.  
 19 Q. Can you give us some idea as to how long you've been  
 20 a trauma technician, please?  
 21 A. I can't recall off the top of my head when I did my  
 22 initial course. It was quite early on in my career,  
 23 possibly around 2010/2011.  
 24 Q. We have your wider records in respect of the medical  
 25 training you had. Would it be right to summarise it in

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1 this way, that you had received medical training in  
 2 respect of responding to cardiac arrest?  
 3 A. That's correct.  
 4 Q. In respect of pulse oximeter?  
 5 A. Yes.  
 6 Q. Could you explain what that training was and what the  
 7 training pulse oximeter covers, please?  
 8 A. The watch-based training is an e-learning package that  
 9 the trauma technician will take the watch through:  
 10 various aspects of the basic life support, the AED, as  
 11 well as the pulse oximeter, just how to read the numbers  
 12 on the actual equipment itself, just so the crews know  
 13 and what the numbers actually mean: one is obviously the  
 14 pulse rate and the amount of oxygen they have in the  
 15 blood.  
 16 Q. So were you confident in measuring oxygen saturations?  
 17 A. Yes, we do have a laminate sheet in the trauma bags that  
 18 will give you an idea -- if someone has COPD, then  
 19 different levels of O2 are required.  
 20 Q. Thank you. We also see on the medical training that you  
 21 had received training for the mechanics of injury and  
 22 casualty assessment?  
 23 A. Yes.  
 24 Q. So to that extent were you confident in terms of  
 25 provision of the ABC, airways, breathing, circulation?

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1 A. Yes, ma'am.  
 2 Q. We can see also that there was training in respect of  
 3 C-spine immobilisation.  
 4 A. Yes.  
 5 Q. Can you give us an idea of what that training covered  
 6 please?  
 7 A. The training covered various different scenarios where  
 8 we'd immobilise a casualty and extricate them in  
 9 different ways, whether it be from laying on the side,  
 10 if they're stood up and you'd have to do a snatch  
 11 extrication on to the long board. It was just training  
 12 in different techniques in how to get that casualty  
 13 safely on a board as quickly as possible.  
 14 Q. We can also see that as well as the trauma technician  
 15 training you'd had, you'd also received training in  
 16 basic life support, including the use of  
 17 a defibrillator?  
 18 A. That's correct.  
 19 Q. Is there any other aspect that you think would assist  
 20 the chairman to hear about your medical training, about  
 21 your confidence in delivering medical care to patients?  
 22 A. Not that I can think of, no.  
 23 Q. Thank you.  
 24 Before I deal with your involvement on the night,  
 25 I'm going to briefly deal with your involvement in

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1 attendance at Granby Row on 20 May 2017. That's broadly  
 2 covered by the second witness statement of Mrs Turner,  
 3 sir.  
 4 Is it right, Mrs Turner, that on 19 May 2017 you  
 5 were not on duty but some of the pumps from your station  
 6 at Manchester Central had attended at Granby Row in  
 7 response to the activation of a fire alarm?  
 8 A. That's correct.  
 9 Q. I think the following day you'd been tasked to go and  
 10 pay a visit to Granby Row.  
 11 A. That's correct, yes.  
 12 Q. So could you just describe to the chairman what the  
 13 purpose of your visit to Granby Row was on 20 May 2017?  
 14 A. Yes. Every time there's an incident involving a fire in  
 15 a dwelling or a house, we'd have an initiative  
 16 afterwards, what we call a Target 25 or Target 50, and  
 17 that basically is going to that premise and knocking on  
 18 all the doors and checking with the occupiers for any  
 19 fire safety advice that they require. And there's a bit  
 20 of... Sorry, I forgot the word.  
 21 SIR JOHN SAUNDERS: It happens to us all!  
 22 A. Reassurance.  
 23 MS CARTWRIGHT: Thank you.  
 24 Just dealing with the circumstances that you're  
 25 aware of as to the attendance on 19 May 2017, had that

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1 related to a ground floor flat where a pan of food had  
 2 been left on the hob?  
 3 A. I believe so.  
 4 Q. Were you able to conduct your safe—and—well visit on  
 5 20 May at Granby Row?  
 6 A. Not to my recollection, no.  
 7 Q. Could you assist us as to the interrogation of the data  
 8 that you've had as to the length of time you were at  
 9 Granby Row, please?  
 10 A. Can you repeat the question, please?  
 11 Q. Perhaps if I frame it in a different way. Is it fair to  
 12 say that you have checked the system as to how long your  
 13 pump was present at Granby Row on 20 May 2017?  
 14 A. I haven't physically checked, no, but I believe it's  
 15 been checked on my behalf.  
 16 Q. Is it right that those checks have recorded that it was  
 17 the G16P2 pump that attended at 15.29 and was present  
 18 for less than 12 minutes?  
 19 A. I believe so, yes.  
 20 Q. What does that support (sic) to you in terms of  
 21 a 12-minute visit to Granby Row?  
 22 A. To knock on all the flats and offer fire safety advice,  
 23 it suggests to me that it wasn't done. I've got no  
 24 recollection of actually getting into the building.  
 25 I don't think we actually did get in the building, if

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1 I'm perfectly honest. It's quite an old, wooden door,  
 2 hasn't got a keypad to ring doorbells that I can recall,  
 3 so I'm pretty sure we didn't gain access to the building  
 4 that day.  
 5 Q. Thank you.  
 6 Can we then move into your original witness  
 7 statement, please, of 5 December 2017. Is it correct to  
 8 identify that the basis of the statement was an earlier  
 9 prepared self-administered interview that you'd  
 10 completed?  
 11 A. That's correct, yes.  
 12 Q. Thank you. You tell us in the witness statement that on  
 13 22 May 2017 you were the crew manager of Blue Watch and  
 14 that you commenced your night shift at 7 o'clock in the  
 15 evening.  
 16 A. That's correct, yes.  
 17 Q. You tell us who was also working with you on that shift.  
 18 The inquiry has already heard evidence from Watch  
 19 Manager Simister, but is it right to identify that  
 20 you were the officer in charge for the G16P2 pump at  
 21 Manchester Central station that night?  
 22 A. That's correct, yes.  
 23 Q. And that the other firefighters that were on that or  
 24 allocated to that pump under your management were  
 25 Firefighter Redfern?

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1 A. Yes.  
 2 Q. Firefighter Ludley?  
 3 A. Yes.  
 4 Q. And Firefighter Bird?  
 5 A. That's correct.  
 6 Q. Would it be right that whilst you were the officer in  
 7 charge for the second pump, the overall watch manager  
 8 was Mr Simister that night?  
 9 A. Correct, yes.  
 10 Q. Thank you. I'm now on page 2 of your witness statement  
 11 and I'm going to take you through the account you  
 12 provided.  
 13 You describe in your witness statement that at 22.38  
 14 the watch received a pre-alert for the Manchester Arena.  
 15 Can you describe what a pre-alert is, please?  
 16 A. Yes. It was a trial that we used where the alarm would  
 17 sound for a pre-alert, and sometimes it gave an address,  
 18 sometimes it just gave coordinates, to the closest point  
 19 where the control thought it was, and the pre-alert went  
 20 out to the nearest stations in a small radius and it was  
 21 just to get you to stand by while they collected  
 22 information from the caller and whether we mobilised or  
 23 not, and after 3 minutes, if the second bell didn't go,  
 24 then you were no longer mobilised and you stood down.  
 25 Q. In terms of then when the pre-alert goes off and you're

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1 on standby, what are the firefighters physically doing  
 2 at that time?  
 3 A. We generally went and put our boots and wet legs on,  
 4 which is the overtrousers, and we just waited for that  
 5 second bell, then all we had to do then was put a jacket  
 6 on and get ready to go. So we would all be round the  
 7 console in the engine house area while we put our wet  
 8 legs on.  
 9 Q. When the pre-alert went off, did you have any  
 10 information at that stage as to what the incident  
 11 related to that had caused a pre-alert to sound?  
 12 A. No. No, I mean, I think I assumed it may be a lift  
 13 rescue, which was quite common. I remember we discussed  
 14 it at the time around the console, it might be a lift  
 15 rescue.  
 16 Q. Could you just assist us, in terms of your evidence as  
 17 to how long it would takes you, had your pump travelled  
 18 on blue lights from Thompson Street to the arena, how  
 19 long would that take?  
 20 A. As we were already dressed, probably about 3 or  
 21 4 minutes.  
 22 Q. You say in your witness statement that after the  
 23 3 minutes, if no further instruction is received, the  
 24 crews stand down.  
 25 A. Yes.

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1 Q. And you also say that, just prior to the pre-alert  
 2 sounding, you had been doing some work in the office on  
 3 the computer and that Firefighter Bradbury had spoken to  
 4 you about something he'd heard. Can you deal with that,  
 5 please?  
 6 A. Yes. So we were in the main watch office,  
 7 Firefighter Bradbury was at one desk, I was at the  
 8 other. There was a bang, he said to me, "Did you hear  
 9 that?" At the time I said no, but at the time it was  
 10 one of those subconscious things and I don't know  
 11 whether I heard it or not. My statement said I didn't  
 12 hear it so I'll go with that. Then I just carried on  
 13 with my work at that point, but he had recognised that  
 14 he'd heard something.  
 15 Q. You then say:  
 16 "The 3 minutes had elapsed, we had received no  
 17 further instruction, so we stood down and continued with  
 18 what we had been doing."  
 19 A. Yes.  
 20 Q. Then we're now at the next sounding of the pre-alert.  
 21 You say this:  
 22 "At 22.45 hours a second pre-alert sounded. This  
 23 time it was for the Manchester Arena car park."  
 24 Can you tell us about that, please?  
 25 A. Yes. So again, the pre-alert sounded, we got up, went

1 to the console, read the address. It was the same or  
 2 similar address to the first pre-alert. So we were kind  
 3 of expecting that we might be going at that point. And  
 4 then I think that's when the phone went.  
 5 Q. So I think you tell us in the witness statement that  
 6 a call had come in from G19, Gorton Fire Station, and  
 7 some information from Crew Manager Mottram. Can you  
 8 tell us about the information that he provided, please?  
 9 A. Yes. The information that was relayed back was Crew  
 10 Manager Mottram had -- his wife was on duty as  
 11 a paramedic that night and she had phoned him or  
 12 communicated to him that there'd been an explosion at  
 13 the Manchester Arena. So he had phoned up to say, "Why  
 14 are you still on station?" I don't know it was him that  
 15 phoned up, somebody at Gorton had phoned up to ask why  
 16 we were still on station as there had been an explosion  
 17 at Manchester Arena.  
 18 Q. It may seem an obvious question, but why were Gorton  
 19 ringing Manchester Central to say, "Why are you still at  
 20 the station?"  
 21 A. I'm not sure if they were just checking to see if  
 22 we were on station or had been mobilised.  
 23 SIR JOHN SAUNDERS: I think that's because you're the  
 24 closest place to the arena.  
 25 A. Yes.

1 MS CARTWRIGHT: And other than the call that had come from  
 2 Gorton, had you got any other information from anywhere  
 3 else at that point in time about what was happening  
 4 at the arena?  
 5 A. No, not really. I think maybe with the hearing of the  
 6 bang and then that phone call, there might have been  
 7 some assumption that maybe something actually has  
 8 happened.  
 9 Q. You then go on to tell us that having heard that second  
 10 pre-alert and the call from Gorton, you all rushed to  
 11 the pumps, got dressed in your full personal protective  
 12 equipment, opened the engine house doors, and mounted  
 13 your pumps ready to be mobilised.  
 14 A. Yes, ma'am.  
 15 Q. Is that both pump 1 and pump 2?  
 16 A. I can only talk for pump 1. I'm not 100% sure about  
 17 pump 2 -- sorry, pump 2, not 100% with pump 1.  
 18 Q. You then go on to say that the 3 minutes again passed  
 19 and no further information had been sent to you.  
 20 A. Yes.  
 21 Q. You say this:  
 22 "I felt confused and frustrated and couldn't  
 23 understand why we had not been deployed."  
 24 A. That's correct.  
 25 Q. Is there anything further you want to expand upon in

1 respect of that statement?  
 2 A. No. No, ma'am.  
 3 Q. You tell us that:  
 4 "We got off the pump and started to walk to the back  
 5 of the appliance."  
 6 And then you describe that the bells dropped and the  
 7 alarm sounded for mobilisation. So can you just explain  
 8 what the bells dropping or the alarm sounding indicates,  
 9 please?  
 10 A. Yes. It's a mobilisation that we have on station, where  
 11 the bells will sound, all the lights on the station will  
 12 come on, and then the printer will print out the job.  
 13 It'll also be on mobile data terminal on the appliances  
 14 as well. It'll flash up red, saying you're being  
 15 mobilised.  
 16 Q. Does that printout tell you where you have to mobilise  
 17 to?  
 18 A. That's correct, yes.  
 19 Q. You say that you checked the mobile data terminal in the  
 20 appliance and the turnout at 22.49 hours showed that  
 21 both of the pumps from Manchester Central and G18 pump 1  
 22 were to go to a rendezvous point at G18 Philips Park.  
 23 A. That is correct.  
 24 Q. You say this:  
 25 "This felt wrong to me as G18 is about 2 miles

1 further away from the arena than G16."  
 2 A. That's correct, ma'am, yes.  
 3 Q. Again, is there any other expansion you want to make to  
 4 that statement?  
 5 A. There was a lot of confusion. There was a lot of  
 6 confusion and I remember as we pulled out slightly of  
 7 the engine house, I recall the appliances stopping as  
 8 we were talking, the crews were asking what was going  
 9 on. I -- it was a really short space of time and I just  
 10 said to my crew at the time, "There must be something  
 11 else that we don't know about. There's got to be  
 12 something else". So there was just a lot of confusion  
 13 at the time.  
 14 Q. In giving that answer, would it be fair to say that the  
 15 only information you could give as officer in charge of  
 16 pump 2 was, "There must be a reason"?  
 17 A. That's correct.  
 18 Q. But at that stage you didn't know what that reason was?  
 19 A. Correct.  
 20 Q. You then tell us that:  
 21 "I booked us as mobile incident en route to the  
 22 rendezvous point at 22.50 hours."  
 23 And:  
 24 "As [you] were leaving the engine house, [you] saw  
 25 ambulances pulling up on to [your] yard."

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1 A. That's correct, yes.  
 2 Q. Can you give us some idea as to how many ambulances you  
 3 saw?  
 4 A. I can't recall.  
 5 Q. You repeat again in your statement:  
 6 "I knew there must be a reason, but I couldn't help  
 7 but think going to G18 was wrong."  
 8 A. Correct.  
 9 Q. You go on to tell us that you arrived at G18 at  
 10 22.54 hours and parked your pump and you say this:  
 11 "It was clear that nobody was expecting us so I went  
 12 upstairs to find Watch Manager Helmrich, the officer in  
 13 charge at G18P1."  
 14 A. That's correct.  
 15 Q. So on arrival at Philips Park Fire Station, can you just  
 16 give us some idea as to how many appliances were there  
 17 and what the mood was like at the station, please?  
 18 A. When we arrived, there was only one appliance there and  
 19 that was G18P1, which was parked up inside the engine  
 20 house. When we got in, went upstairs to the mess area  
 21 and recreation area, and the watch were just in there  
 22 relaxing, it was late in the evening. We walked in with  
 23 full PPE and they were quite relaxed and chilled when we  
 24 arrived.  
 25 Q. En route from Thompson Street to Philips Park, had you

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1 received any further information or instructions during  
 2 that journey?  
 3 A. Not to my recollection, no.  
 4 Q. Do you recall whether the journey from  
 5 Manchester Central, Thompson Street, to Philips Park was  
 6 on blue lights?  
 7 A. It was, yes.  
 8 Q. Roughly how long did that journey take?  
 9 A. I think it was about 4 minutes.  
 10 Q. You say this about getting into the mess room at  
 11 Philips Park:  
 12 "They were all in the mess room and unaware of what  
 13 had happened. We changed the television over to a news  
 14 channel and started to look at social media sites on our  
 15 phones to find out what was going on. As we watched  
 16 things unfold, G19P2 from Gorton Fire Station arrived."  
 17 A. That's correct, yes.  
 18 Q. Just pausing there for a moment, when you were on social  
 19 media sites and watching the news, were you able to get  
 20 any other information or glean what was happening at the  
 21 arena?  
 22 A. What I recall, it was -- they were reporting it was an  
 23 explosion that had been detonated. There was a lot of  
 24 casualties. That's all I can recall, really. Watching  
 25 some of the -- there were some videos on social media

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1 that people had filmed on their phones. It was quite  
 2 chaotic. So at that point I was kind of expecting for  
 3 us to be mobilised.  
 4 Q. You say that Crew Manager Mottram was one of those  
 5 officers that arrived from Gorton Fire Station. Can you  
 6 recall what he told you at that time, please?  
 7 A. Not word for word. He just was repeating what the phone  
 8 call was, that his wife's there, there's several  
 9 casualties, why weren't we there. He kept asking why  
 10 we weren't going.  
 11 Q. Did you or any other of the fire officers get an answer  
 12 as to why you weren't being deployed at that time?  
 13 A. No, ma'am.  
 14 Q. You tell us that:  
 15 "Watch Manager Simister called control as nobody had  
 16 contacted us since the incident had happened. He told  
 17 us that there were at least 18 confirmed fatalities. We  
 18 felt irate and frustrated that we weren't there and  
 19 helping."  
 20 A. Correct.  
 21 Q. Again, is there anything you'd like to expand upon that  
 22 statement of feeling frustrated and irate?  
 23 SIR JOHN SAUNDERS: You don't need to unless you think there  
 24 is something. You'll be aware, I expect, we've heard  
 25 quite a lot of evidence already about how you were all

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1 feeling and you felt much the same as everyone else, no  
 2 doubt?  
 3 A. Absolutely, sir, yes.  
 4 MS CARTWRIGHT: You then tell us that a little time later  
 5 you went down to the engine house, that some of the  
 6 crews had congregated there, and it's at that time you  
 7 saw two of the senior officers had arrived. You  
 8 describe them as NILO 2, Mr Meakin, and NILO 3, Mr Levy.  
 9 A. That's correct.  
 10 Q. And the chairman's received the various timings as to  
 11 their arrival. It is 23.25 for Mr Meakin and 23.34 for  
 12 Mr Levy.  
 13 You say this:  
 14 "We were still very much in the dark and the pumps  
 15 were now trapped in the yard. Philips Park is a small  
 16 station and there was a bottleneck of resources blocking  
 17 the exit. The marauding terrorist firearms attack crew  
 18 had also arrived."  
 19 A. That's correct, yes.  
 20 Q. Thank you. At this stage now that there are two NILOs  
 21 present, was any information being provided from the  
 22 NILOs to you at that time?  
 23 A. No information that I can recall, no.  
 24 Q. You then take us to the time of midnight on 23 May, and  
 25 you say:

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1 "We'd still not been given any official information.  
 2 Everything we knew was from the news, social media and  
 3 second-hand from Crew Manager Mottram"; is that correct?  
 4 A. That's correct.  
 5 Q. One of your colleagues asked the NILOs for information  
 6 of what was going on and the answer was given:  
 7 "He was told this was not the time for questions."  
 8 A. That's correct, yes.  
 9 Q. Do you know which of the NILOs gave the answer, "This  
 10 was not the time for questions"?  
 11 A. Yes, it was, I believe, Group Manager Meakin.  
 12 Q. You then tell us that around midnight, Group  
 13 Manager Levy told you to return to G16, so back to  
 14 Thompson Street Fire Station, and that all crews were to  
 15 muster there?  
 16 A. That's correct, yes.  
 17 Q. You then describe that that journey then from G18 to G16  
 18 was using blue lights and sirens.  
 19 A. That's correct.  
 20 Q. And again, can you give us an idea as to how long that  
 21 journey back took?  
 22 A. It probably would have been 3 or 4 minutes.  
 23 SIR JOHN SAUNDERS: Much the same as on the way there,  
 24 really. Sorry.  
 25 MS CARTWRIGHT: Well, you never know, sir.

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1 SIR JOHN SAUNDERS: No, you never know.  
 2 MS CARTWRIGHT: You describe that the scene when you  
 3 returned back to your home station was that the front  
 4 and back yards were both full of police and ambulance  
 5 vehicles and personnel?  
 6 A. That's correct.  
 7 Q. Again, you say this:  
 8 "No further information had been passed to [you] at  
 9 that time, so [you] got off the pump and spoke with some  
 10 of the other crews that were at the station."  
 11 A. Yes, that's correct.  
 12 Q. You describe that on returning to your home station you  
 13 saw the Gorton crew, Papa 1, and the Broughton crew,  
 14 papa 1?  
 15 A. Yes.  
 16 Q. Can I then move you forward in time to 00.23. You tell  
 17 us that you were told by Group Manager Levy that the two  
 18 pumps from your station and the pump from Philips Park,  
 19 pump 1, were going to the incident?  
 20 A. That's correct, yes.  
 21 Q. Could you deal with what you were told at that time and  
 22 what you were instructed to do, please?  
 23 A. I can't really recollect the exact words. We were just  
 24 being told that we were going down to Victoria Station  
 25 to assist NWAS, North West Ambulance Service, with some

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1 of the casualties.  
 2 Q. You describe the location that you were to make your way  
 3 down to was Long Millgate.  
 4 A. Yes.  
 5 Q. Was that the address that was given to you?  
 6 A. Verbally. It was just information that was passed on.  
 7 It was quite chaotic and a lot of confusion, so that's  
 8 my recollection of what I was told at the time.  
 9 Q. Thank you. Just to confirm, can you tell us where the  
 10 Long Millgate address is?  
 11 A. It's basically as you turn into the Station Approach,  
 12 I think it bears off — it's to the left of that.  
 13 Q. Thank you. You describe that you made your way there in  
 14 convoy with NILO 1 Station Manager Berry leading the way  
 15 in his car.  
 16 A. Yes.  
 17 Q. He was followed by G16P1 and your vehicle, G16P2, and  
 18 then G18P1 followed on behind?  
 19 A. Yes.  
 20 Q. You tell us at that 00.25 the convoy stopped on  
 21 Corporation Street just after the junction with the ring  
 22 road?  
 23 A. Yes.  
 24 Q. Were you aware as to why the convoy stopped at that  
 25 location?

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1 A. No.  
 2 Q. So what happened then, please?  
 3 A. Watch Manager Simister, he had left the appliance and  
 4 he was walking over to the Station Manager Berry's car.  
 5 Because I didn't know what was going on, I jumped off as  
 6 well, went over to Andy Simister, "What's going on?" He  
 7 replied back, saying that he's trying to find out where  
 8 Long Millgate is. I'm not sure if that was a jest or  
 9 meant, but Station Manager Berry was on his phone in the  
 10 car at the time with his window up.  
 11 Q. You indicate in your witness statement that the convoy  
 12 was stopped for about 11 minutes before you moved off  
 13 again.  
 14 A. Yes, ma'am.  
 15 Q. Can you give us some idea what you were doing during  
 16 that 11-minute period of time?  
 17 A. Just pacing, really. Getting frustrated. I went back  
 18 on — because Andy had made a comment about  
 19 Long Millgate and you start questioning things in your  
 20 head so I thought I would just check on the mobile data  
 21 terminal, because we have like a satnav on it and  
 22 Google Maps just to make sure that in my head it's right  
 23 where it is, so I did that while we were waiting around.  
 24 Q. What did the checking of that mobile data terminal tell  
 25 you?

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1 A. Where I thought it was.  
 2 Q. Okay.  
 3 SIR JOHN SAUNDERS: Which was?  
 4 A. Just round the corner from where we were.  
 5 SIR JOHN SAUNDERS: Right.  
 6 MS CARTWRIGHT: You then describe that following the convoy  
 7 moving off again after 11 minutes, you drove into  
 8 Victoria Station Approach and you saw a lot of  
 9 ambulances filling the road and hustle next to the main  
 10 entrance of the train station.  
 11 A. Yes.  
 12 Q. Up until this point there has been some evidence that  
 13 the chairman has heard about information about an  
 14 Operation Plato or whether Operation Plato had been  
 15 declared. Up until the point of you arriving at  
 16 Victoria Station, had you been given any information  
 17 about Operation Plato?  
 18 A. No, I was informed once we arrived at the station,  
 19 I think.  
 20 SIR JOHN SAUNDERS: When you arrived at Victoria Station?  
 21 A. Yes. I think it was Watch Manager Simister that told  
 22 me. He said, "Operation Plato's been declared", but  
 23 at the time I didn't really know much about  
 24 Operation Plato.  
 25 MS CARTWRIGHT: So did that statement from Mr Simister mean

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1 anything to you?  
 2 A. I knew vaguely that it was to do with firearms, but  
 3 I wasn't 100%, so not really.  
 4 Q. Alongside Mr Simister indicating that Plato, did that  
 5 affect anything about the instructions that were being  
 6 given to the firefighters that were now at  
 7 Victoria Station?  
 8 A. No, not from me.  
 9 Q. You tell us that you parked on the left-hand side of the  
 10 road and then you got off the pump, you told your crew  
 11 to stay put until you found out what was going on. You  
 12 went to speak to Watch Manager Simister, who said to  
 13 wait until he'd spoken with someone in charge, but  
 14 I think Firefighter Collins on Mr Simister's pump  
 15 couldn't wait and walked off, saying he was going to see  
 16 if there was anything he could do in the interim.  
 17 A. Yes.  
 18 Q. He came back, after 2 minutes, indicating that you were  
 19 to collect all of the blankets off the ambulances with  
 20 your staff?  
 21 A. Yes, it was all of us, the three pumps.  
 22 SIR JOHN SAUNDERS: I'm going back slightly. Had you had no  
 23 training as to what Operation Plato meant?  
 24 A. The only training we had done was the JESIP e-learning  
 25 package. I can't even recall if it goes that deeply

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1 into Operation Plato. I knew vaguely what it was, but  
 2 not a great deal.  
 3 SIR JOHN SAUNDERS: Okay, thank you.  
 4 MS CARTWRIGHT: Can I ask then as a follow-on question from  
 5 the chairman's question, had you ever done any  
 6 exercising with other blue light services in respect of  
 7 a training exercise involving an Operation Plato?  
 8 A. No.  
 9 Q. You tell us then that two senior paramedics, one of them  
 10 including Dan Smith, then a little later, told you to  
 11 work in pairs. You paired up with Firefighter Redfern  
 12 and proceeded to provide assistance to a number of  
 13 casualties?  
 14 A. That's correct.  
 15 Q. I'm not going to ask you to tell the inquiry about the  
 16 assistance you provided to a number of individuals.  
 17 Again, I mean no disrespect to you in not dealing with  
 18 the efforts that you took at the railway station.  
 19 Could I then take you, please, to the end of the  
 20 evening. You tell us that there came a time when you  
 21 left the station and returned back to your station.  
 22 A. Yes.  
 23 Q. I want you to assist us, please, with what's been  
 24 described as a potential hot debrief that took place at  
 25 that time. Can you tell us about that, please? I'm on

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1 page 7 of your witness statement now.  
 2 A. Yes. The assistant chief fire officer , Harris, had came  
 3 down to the station to what I believe was a hot debrief,  
 4 which is what we'll do after any incident, we'll have  
 5 a hot debrief to talk about what went well, what went  
 6 wrong, what failures of equipment, et cetera. So that  
 7 was the purpose of a hot debrief. And to give some  
 8 answers to crews.  
 9 Q. What then took place at that time? I think you tell us  
 10 it was about 04.11 hours. Did such a hot debrief take  
 11 place?  
 12 A. No, it did not.  
 13 Q. Was any information shared about the incident with  
 14 crews?  
 15 A. No.  
 16 Q. Were any answers given to the questions that the  
 17 firefighters had at that time?  
 18 A. No, there were not.  
 19 Q. You say this:  
 20 "People were very frustrated and wanted to know what  
 21 had gone wrong."  
 22 A. That's correct.  
 23 Q. And that:  
 24 "After that debrief finished , crews left to go back  
 25 to their home stations"?

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1 A. Yes, that's correct.  
 2 Q. Is there any other information you wish to provide to  
 3 the chairman about that hot debrief in the early hours  
 4 of 23 May?  
 5 A. You've possibly heard it already, sir , but the hot  
 6 debrief itself was Assistant Chief Fire Officer Harris  
 7 coming down supposedly to brief us up. He was getting  
 8 fired a lot of questions, which he couldn't answer. He  
 9 stated that he was unable to answer because he was not  
 10 involved and he hadn't been in the command support room.  
 11 Obviously at that point everyone was getting very angry.  
 12 The circle that was around him was getting smaller and  
 13 smaller. I personally didn't see anything. I had  
 14 nothing to say at that point; I was too upset and angry.  
 15 SIR JOHN SAUNDERS: A debrief normally, a hot debrief, is to  
 16 get people's immediate impressions of what happened,  
 17 what went wrong, things like that, or what went right?  
 18 A. That's correct, sir .  
 19 SIR JOHN SAUNDERS: And presumably Mr Harris had come down  
 20 in order to find that out from you all?  
 21 A. He'd normally be the one doing the debrief, so he'd be  
 22 informing us of things that happened or didn't happen on  
 23 the incident.  
 24 SIR JOHN SAUNDERS: Okay. So you'd expect the person  
 25 conducting the debrief to first of all say this, that,

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1 and the other happened from the command point of view?  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: How did it seem to you, as it were?  
 4 A. Yes, and it's a two-way thing, so we both say what went  
 5 well and what didn't go well.  
 6 SIR JOHN SAUNDERS: So you would have expected to get that  
 7 from him in the first place?  
 8 A. That's correct, sir , yes.  
 9 SIR JOHN SAUNDERS: Thank you. I just want to say, I want  
 10 to make clear that I have read the statement of what you  
 11 did there. You obviously made every effort to do what  
 12 you and the other firefighters could do to help in what  
 13 must have been a very difficult situation . How long  
 14 were you actually there helping remove casualties?  
 15 A. I 'll be honest, sir , time just went from me. I've no  
 16 idea how long I was there for.  
 17 SIR JOHN SAUNDERS: Okay, thank you.  
 18 MS CARTWRIGHT: Just one final topic of questions from me,  
 19 please. We can see that you were involved in the  
 20 debrief that then took place on 12 July 2017.  
 21 A. That's correct.  
 22 Q. Again, I'm not going to ask for it to be displayed on  
 23 the screen, but the chairman has been provided with  
 24 a copy of the structured debrief report and we know from  
 25 the attendees that you were identified as contributor

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1 number 7. But on the structured debrief report  
 2 itself — and, sir, for your reference it 's  
 3 {INQ004498/1} — we don't actually see that any of the  
 4 comments were attributable to attendee number 7. So  
 5 could you give us your approach to that debrief, please?  
 6 A. To the whole debrief?  
 7 Q. I'm going to come on to one comment that's attributed to  
 8 you, but in the structured debrief report we don't see  
 9 you as one of the participants that identified any  
 10 issues as part of the structured debrief report.  
 11 I wondered if you could assist us then with that.  
 12 A. From my perspective, I felt as though there was some  
 13 individuals maybe keeping their cards close to their  
 14 chest, not being fully open and transparent in the  
 15 debrief. I didn't feel that I had anything else to add  
 16 on that particular debrief so I decided not to bring  
 17 anything up at the end.  
 18 SIR JOHN SAUNDERS: Someone's bound to ask you the question,  
 19 so I will. It's perfectly apparent having read the  
 20 debrief that went on that people who were there in your  
 21 sort of position, ie on the pumps or whatever, were not  
 22 backwards in coming forwards with their observations and  
 23 saying what they thought.  
 24 A. Yes, I think they were, yes.  
 25 SIR JOHN SAUNDERS: They were backwards in —

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1 A. They were forward, yes.  
 2 SIR JOHN SAUNDERS: Sorry, that was my impression from  
 3 reading it .  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: So presumably, the people who you say  
 6 were not being completely open as far as you were  
 7 concerned, and your impression, it can only be your  
 8 impression, are the people rather higher up the chain?  
 9 A. Yes, more senior.  
 10 SIR JOHN SAUNDERS: Who weren't actually on the scene but  
 11 perhaps were somewhere apart from it?  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: Okay, thank you.  
 14 MS CARTWRIGHT: Can I take you to one comment that we do see  
 15 attributed to you in the notes that were taken from the  
 16 meeting at The Hive on Lever Street.  
 17 Mr Lopez, please could we display {INQ030902/22}.  
 18 SIR JOHN SAUNDERS: Would you describe this as a fairly  
 19 lively meeting too?  
 20 A. Yes, it was.  
 21 MS CARTWRIGHT: {INQ030902/22}, please.  
 22 Could you expand the bottom half of the page,  
 23 please?  
 24 Mrs Turner, we can see that in answer to a topic  
 25 that's being dealt with by Pete — and is that

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1 Mr O'Reilly?  
 2 A. I assume so, yes, ma'am.  
 3 Q. We see an answer that's attributed to you. The  
 4 transcript suggests that you said this:  
 5 "What we were saying was that given our view of the  
 6 timeline but the feelings from the crews was that we  
 7 blamed the NILOs. That's what it felt like and that was  
 8 felt from all the crews."  
 9 Can you assist us as to that comment, please, and  
 10 what your view was about the NILOs that you were  
 11 expressing in the meeting?  
 12 A. The transcript of this is not 100% accurate. I remember  
 13 that particular comment that I made and it was an answer  
 14 to Mr O'Reilly, who'd asked me a direct question, where  
 15 Mr Levy had brought up regarding the NILOs and the visit  
 16 to G16 Manchester Central, I'm not 100% sure of what  
 17 Mr Levy had said, but Mr O'Reilly then responded and  
 18 then he looked at me and asked me directly. His words  
 19 were:  
 20 "You were there, Miccy, you'll back me up, won't  
 21 you?"  
 22 And my response then was, the feeling — I said, now  
 23 you've got me to interject, but the feeling that was  
 24 felt by the crews when you left was you blamed the  
 25 NILOs.

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1 SIR JOHN SAUNDERS: So this is all about an occasion after  
 2 this had happened when Mr O'Reilly came to G16; is it  
 3 that right?  
 4 A. That's correct.  
 5 SIR JOHN SAUNDERS: How close to the incident was it, how  
 6 long after the incident?  
 7 A. I'm not 100% sure, sir.  
 8 SIR JOHN SAUNDERS: A day or two or —  
 9 A. Maybe a couple of weeks possibly.  
 10 SIR JOHN SAUNDERS: In the context we've heard, and tell me  
 11 whether this is right about it, all of you were told to  
 12 keep quiet about it at the moment and wait until you've  
 13 had a proper debrief with everybody? Is that right?  
 14 A. Yes. So my view of it — my understanding was that  
 15 Mr O'Reilly had agreed to meet up with a pump or two  
 16 pumps to go through his version of accounts. Word got  
 17 out and then I think a few pumps turned up at Manchester  
 18 Central on that particular shift and then Mr O'Reilly  
 19 came in and then spoke to all the crews together to go  
 20 through his version of events of that night.  
 21 SIR JOHN SAUNDERS: And you weren't happy about it or people  
 22 weren't happy about it generally? I'm just trying to  
 23 get the context of the remark.  
 24 A. I haven't got much recollection of that evening. I just  
 25 remember when he'd left, I remember we had

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1 a conversation with a few of the crews afterwards and  
 2 everyone was saying the same thing, as in blame the  
 3 NILOs, as in he's dropped the NILOs in it. That's the  
 4 feeling that was left after Mr O'Reilly left.  
 5 SIR JOHN SAUNDERS: The feelings from the crews that "we  
 6 blamed NILOs" is Mr O'Reilly really was blaming the  
 7 NILOs?  
 8 A. Yes, sir.  
 9 MS CARTWRIGHT: Perhaps to follow on from there, was there  
 10 any sense from you that there had been an issue with the  
 11 NILOs on the night?  
 12 A. On the night?  
 13 Q. Yes.  
 14 SIR JOHN SAUNDERS: Okay, can I just stop that for a moment?  
 15 Sorry, just to understand that. Clearly, you were all  
 16 very frustrated with the NILOs that you weren't getting  
 17 on with it and going to help and I understand that. Did  
 18 you know at the time who was responsible for the  
 19 direction that you shouldn't go in? Did you know if it  
 20 was the NILOs themselves or whether they were getting  
 21 instructions from on high?  
 22 A. At the time I knew that they were taking phone calls,  
 23 I knew the command support room was getting set up. So  
 24 I knew that there would obviously be conversations  
 25 between them and the support room, but I didn't know who

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1 was in the command support room at that time. So I just  
 2 assumed that they were getting some form of direction at  
 3 some point.  
 4 SIR JOHN SAUNDERS: Okay, so you personally were not blaming  
 5 the NILOs? Or you didn't know who to blame?  
 6 A. I didn't know who to blame. I was confused. It was  
 7 a mess.  
 8 SIR JOHN SAUNDERS: Thank you. Just taking that bit out of  
 9 context is quite difficult to understand.  
 10 MS CARTWRIGHT: That in fact concludes the questions that  
 11 I have for Mrs Turner, unless there's anything further  
 12 you want to pursue at this stage.  
 13 SIR JOHN SAUNDERS: No, thank you.  
 14 MS CARTWRIGHT: The core participants who have indicated  
 15 they have questions are, perhaps if we start with  
 16 Mr Smith, please, on behalf of North West Fire Control.  
 17 Questions from MR SMITH  
 18 MR SMITH: Could I take you to page 3 of your statement,  
 19 please, to the first paragraph. There's something there  
 20 I want to ask you about. It begins with the words:  
 21 "We arrived at G18..."  
 22 Is that correct?  
 23 A. That's correct.  
 24 Q. So we have the right place. A few lines down from  
 25 there, you describe how you went to the mess room;

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1 is that correct?  
 2 A. That's correct, yes.  
 3 Q. And then there are these words:  
 4 "We changed the television over to a news channel  
 5 and started to look at social media sites on our phones  
 6 to find out what was going on. As we watched things  
 7 unfold..."  
 8 And then you describe the arrival of Mr Mottram with  
 9 the Gorton pump.  
 10 A. That's correct.  
 11 Q. Taking you, if I may, to these words:  
 12 "As we watched things unfold..."  
 13 Were you able to see, first of all on television,  
 14 whether the Ambulance Service was at the scene at the  
 15 arena?  
 16 A. I recall not so much on the television, but I do recall  
 17 some sort of pictures or a video on social media of  
 18 ambulances on scene or an ambulance on scene, possibly.  
 19 Q. I was going to ask you about the social media next. As  
 20 things did unfold, were you able to see the arrival of  
 21 further ambulances at the arena before you left  
 22 Philips Park?  
 23 A. I can't recall, sir.  
 24 MR SMITH: Thank you for your help. That's all I wanted to  
 25 ask you.

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1 SIR JOHN SAUNDERS: Let me say this: it's quite difficult  
 2 when people are asking you questions over the video.  
 3 They don't deliberately talk over you, it just happens  
 4 that way because of the delay. If someone does talk  
 5 over you, if you want to carry on with the answer, just  
 6 tell me because it's your answers that are the most  
 7 important thing.  
 8 A. Okay, sir, thank you.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MS CARTWRIGHT: Could I ask next Mr Jamieson on behalf of  
 11 the families to ask his questions, please?  
 12 Questions from MR JAMIESON  
 13 MR JAMIESON: Good afternoon, sir. Can you see and hear me?  
 14 SIR JOHN SAUNDERS: Yes, we can, thank you.  
 15 Q. Mrs Turner, can I reiterate exactly what the chair has  
 16 said to you: I'm on a slight delay and if I at any stage  
 17 talk over you, please keep going because it's what  
 18 you have to say that's more important.  
 19 A. Thank you.  
 20 Q. What I would like to do, please, is just follow through  
 21 the chronology of the evening, and there are just some  
 22 extra points that I'd like your assistance with.  
 23 May I start with this, though: your primary  
 24 statement, the one that I'm concerned with, is dated  
 25 5 December 2017.

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1 A. Yes.  
 2 Q. It's got a number of accurate timings in it.  
 3 A. Yes.  
 4 Q. Am I right in inferring that you would have had the  
 5 incident log or some other contemporaneous document in  
 6 front of you to come up with those timings?  
 7 A. Yes. I'd gone into the incident log to get the timings.  
 8 Q. Thank you. I just wanted that clarification. I've done  
 9 the same exercise, I've checked the accuracy, but it  
 10 just makes the exercise quicker if we don't have to keep  
 11 looking at it.  
 12 So we start with the explosion, which I'm afraid  
 13 we are now certain happened at 22.31, which, as you've  
 14 told us, was heard by one of your colleagues.  
 15 A. That's correct.  
 16 Q. The first pre-alert that came through to your station,  
 17 the closest station to the arena and the closest  
 18 resources, was 7 minutes later, 22.38?  
 19 A. That's correct.  
 20 Q. You have told us that if you had been mobilised at that  
 21 time to the arena, you could have been there within 2 or  
 22 3 minutes. So perhaps 11 or 12 minutes — sorry,  
 23 perhaps 22.41 or 22.42, something like that?  
 24 A. Yes, sir.  
 25 Q. Which would have put your response — and by you, I mean

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1 Greater Manchester Fire and Rescue Service — somewhere  
 2 in the order of at the scene 10 minutes after the  
 3 explosion?  
 4 A. Yes.  
 5 Q. As we understand it, I'd be grateful for your  
 6 experience, that would be an average, a usual, standard  
 7 response time for your service, something of that order?  
 8 A. Yes, I think the average response time may be about  
 9 7 minutes.  
 10 SIR JOHN SAUNDERS: I think six is what I've read  
 11 everywhere.  
 12 MR JAMIESON: It's within a few minutes of the average  
 13 response time?  
 14 A. Yes.  
 15 Q. So nothing happens then. You get the second pre-alert  
 16 at 22.45. We're about 15 minutes after the explosion at  
 17 this point.  
 18 A. Yes.  
 19 Q. And it's around this time that you learn through  
 20 Mr Mottram the information that there has in fact been  
 21 an explosion?  
 22 A. That's correct.  
 23 Q. And it's 4 minutes after that that you are mobilised to  
 24 Philips Park, 22.49?  
 25 A. Yes.

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1 Q. I just wanted to explore in a little more detail  
 2 something you mentioned before. You said that at the  
 3 time that you went, the time that you left, it seemed  
 4 wrong that rather than going to the arena you were going  
 5 to a different fire station.  
 6 A. That's correct.  
 7 Q. I just wanted to clarify that that feeling that you had  
 8 that something was wrong, is that something you felt  
 9 at the time or is it something you have come to reflect  
 10 on later?  
 11 A. It was felt at the time.  
 12 Q. Your junior firefighter obviously had a similar thought  
 13 because they raised it with you as their senior and you  
 14 dealt with it, "There must be a reason", something of  
 15 that sort.  
 16 A. Yes. We had a brief conversation on the fire appliance.  
 17 They were asking why we're going to Philips Park.  
 18 Q. But you in fact had had the same fear, and my question  
 19 is this: was there somebody that you could raise that  
 20 concern with?  
 21 A. I think I actually had a brief conversation with Watch  
 22 Manager Simister prior to leaving and we both said the  
 23 same thing, that there must be another reason. So  
 24 at the time I didn't have anyone directly who I could  
 25 ask at that point. That would be a conversation that

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1 I could have or Watch Manager Simister or Watch Manager  
 2 Helmrich could have had once we got to Philips Park.  
 3 Q. Thank you.  
 4 SIR JOHN SAUNDERS: Can I just interrupt for a moment? This  
 5 may be where we're going.  
 6 Could you not get on to North West Fire Control and  
 7 say, "Look, this looks entirely wrong, we're going off  
 8 in the wrong direction"? It's not intended as  
 9 a criticism, believe me.  
 10 MR JAMIESON: May I say, sir, neither from me.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 A. I think at the time it might have been frowned upon to  
 13 question being mobilised and like I say, when the  
 14 explosion happened, we didn't know it was an explosion,  
 15 we'd only heard through a telephone call that it might  
 16 have been an explosion. We didn't know anything else  
 17 other than that. Like I said, there could have been  
 18 something else that we didn't know about. And then  
 19 possibly by me questioning North West Fire Control, it  
 20 could have been frowned upon possibly.  
 21 SIR JOHN SAUNDERS: By whom?  
 22 A. Um... Senior management. There's things happened  
 23 historically where crews have questioned North West Fire  
 24 Control on other issues and it's been frowned upon. Not  
 25 to suggest that I'd be frowned upon if I had questioned

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1 going to a rendezvous point, but I figured if something  
 2 big is going on, I know they're understaffed at North  
 3 West Fire Control and it would be absolutely chaotic and  
 4 the last thing possibly that I should be doing is maybe  
 5 mithering them slightly.  
 6 SIR JOHN SAUNDERS: So you've got a direct order and, so far  
 7 as you're concerned, you're just going to cause problems  
 8 if you start challenging it with people who are under  
 9 pressure at the moment?  
 10 A. Possibly, possibly. I didn't know — like I say, there  
 11 was a lot of confusion at the time and I genuinely  
 12 thought there was something else going on apart from an  
 13 explosion.  
 14 SIR JOHN SAUNDERS: Okay, thank you.  
 15 MR JAMIESON: There's just one more question I would like to  
 16 ask on that topic, Mrs Turner, because you described  
 17 yourself in some self-deprecating way as mithering on,  
 18 but you were a senior firefighter, the concern in your  
 19 mind — I'm not even applying the benefit of  
 20 hindsight — you know that there is an incident  
 21 happening in one direction, you know you are the closest  
 22 resource, and you know that you're being sent in the  
 23 opposite direction. It's not an unreasonable question,  
 24 I might suggest, to ask, "Is this right?", but your  
 25 concern at the time, is this right, was that such

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1 enquiries would, at the very least, not be welcome?  
 2 A. I couldn't give you an honest answer to that. I just  
 3 give you my view, my opinion of what's happened or what  
 4 I've heard has happened in the past. To question where  
 5 we go for a rendezvous point or to an incident  
 6 address -- at that time we had the smallest of windows  
 7 to make that decision, and as far as I was concerned,  
 8 I was a junior officer, I was the second pump of  
 9 Manchester Central, and I just had been told to do --  
 10 and I followed my order. I questioned it in my head and  
 11 I questioned it with my crews and I questioned it with  
 12 my watch manager, but ultimately I followed my order.  
 13 SIR JOHN SAUNDERS: So it would have been Mr Simister's  
 14 responsibility to challenge it if anybody was going to  
 15 do it and you spoke to him about it?  
 16 A. I spoke to Mr Simister about it and, to be honest, it's  
 17 not just him, any officer or watch officer can challenge  
 18 anything. Like I say, I was just following my order  
 19 in the really small window I had of making a decision.  
 20 SIR JOHN SAUNDERS: I'm not suggesting Mr Simister would  
 21 have been backwards in coming forwards either. He seems  
 22 to make his views very well felt.  
 23 MR JAMIESON: You mentioned in your answer a moment ago that  
 24 you would have known that NWFC was understaffed. Was  
 25 that a general concern that was operative or something

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1 particular to this incident or what did you mean,  
 2 please?  
 3 A. I think since we moved our Fire Control to  
 4 North West Fire Control, we knew that the staffing that  
 5 we had was reduced down to cover the whole of the  
 6 north-west. So we knew that -- or I knew that the  
 7 staffing there with the whole area to cover will be  
 8 stretched when it comes to a major incident.  
 9 Q. So a lesser level of support compared to when there used  
 10 to be single control rooms?  
 11 A. Yes.  
 12 Q. I'm going to move the clock on, thank you. You tell us  
 13 in your statement, and you're right, that you arrived at  
 14 Philips Park at 22.54. So we are now at something over  
 15 20 minutes after the explosion has happened and you  
 16 arrive. Just help us with this, please. It's a theme  
 17 the chair picked up with an earlier witness, but it's  
 18 something I'd be interested in your assistance with.  
 19 How we understand that the GMFRS responses normally work  
 20 is that when there is an incident, the nearest available  
 21 suitable crew goes, and the most senior person on that  
 22 deployment becomes the incident commander.  
 23 A. Yes, sir.  
 24 Q. They are in charge on the ground at the front where the  
 25 information is most readily available and they make

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1 decisions about the response.  
 2 A. That's correct.  
 3 Q. On this occasion, the location of your deployment was  
 4 Philips Park.  
 5 A. Yes.  
 6 Q. You arrived there at 22.54. To your mind, who was the  
 7 incident commander?  
 8 A. To my mind, I thought whoever made the decision to  
 9 a rendezvous point, to Philips Park, would have been  
 10 overall incident commander. So whoever the NILO was was  
 11 who I thought was then being in charge.  
 12 Q. So somebody who was not there?  
 13 A. Yes.  
 14 Q. And somebody in fact whose identity you didn't know at  
 15 that time?  
 16 A. That's correct.  
 17 Q. May I just ask you, just for a moment, to digress into  
 18 training? I wonder if we could, please, have on the  
 19 screen -- it's only a short document -- {INQ040452/1}.  
 20 It's very difficult to see but the columns that we  
 21 need to see are the two to the right, so if we could  
 22 crop in to those columns on the right-hand side.  
 23 Can you read that, Mrs Turner?  
 24 A. I can, yes.  
 25 Q. This is your training records under the theme "Firearms

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1 and active shooter". As I look down the two columns on  
 2 the right-hand side, there are competencies and there  
 3 are dates. If we just look at the dates for the moment,  
 4 can you see that there are three entries for  
 5 16 November 2015? And three entries for  
 6 11 November 2016?  
 7 A. Yes.  
 8 Q. So it looks like training one year and then a refresher  
 9 a year later?  
 10 A. That's correct.  
 11 Q. If we look at the three topics that are covered:  
 12 "Incident dangers; operational procedures and ILO  
 13 role; [and thirdly] incident criteria and categories."  
 14 A. Yes.  
 15 Q. When you were talking about online JESIP training  
 16 before, is this what you were talking about or is this  
 17 something else?  
 18 A. Something else. I think they both integrate into each  
 19 other, the JESIP and the firearms active shooter  
 20 training, I think it's integrated into each other. I'm  
 21 not 100%.  
 22 Q. Okay. I hope this is a fair and helpful question. If  
 23 not, say so. Operational procedures and ILO role.  
 24 That's what I'm interested in. ILO is the old term, as  
 25 we understand it, for NILO. So if that's right, it

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1 looks like you received some training about the role of  
 2 the NILO or ILO in firearms and active shooter  
 3 incidents. The question is this: what did that training  
 4 teach you about what a NILO was going to do or perhaps,  
 5 with more precision, did it tell you that they were  
 6 going to be the incident commander?  
 7 A. I can honestly say, sir, it was a while ago and I cannot  
 8 recall the details of the training.  
 9 Q. All right. I'll press you one more and then I'll move  
 10 on. On any view, turning up at a rendezvous point  
 11 without an incident commander there would presumably  
 12 have been pretty unusual?  
 13 A. Yes.  
 14 Q. Are you able to help with whether that's what you were  
 15 expecting, that there would be a remote incident  
 16 commander or whether it was just frankly confused?  
 17 A. I think when... If you get an incident, we'd go to the  
 18 address. We wouldn't go to a rendezvous point because  
 19 the incident commander would dictate where the  
 20 rendezvous point was. That's the information that would  
 21 be passed on via the incident commander, who's already  
 22 on scene. I had no idea if the incident commander was  
 23 en route, on scene, where he was, because I hadn't been  
 24 told any information at this point. So as far as I was  
 25 concerned, we were told a rendezvous point, therefore

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1 I knew I wasn't, because I was a crew manager, but  
 2 I knew that neither Mr Simister or Mr Helmrich would be  
 3 incident commander because these decisions have already  
 4 been made.  
 5 Q. So the fact that a decision has been made tells you that  
 6 somebody's making those decisions, but you don't have  
 7 any information to tell you the identity of that person?  
 8 A. No.  
 9 SIR JOHN SAUNDERS: So presumably an incident commander who  
 10 goes to the scene may well say, "I want another five  
 11 fire engines to go to a rendezvous point" --  
 12 A. That's correct.  
 13 SIR JOHN SAUNDERS: -- "and wait to be called forward?"  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: So at the stage you're told to go to  
 16 Philips Park, would you have believed instinctively that  
 17 there was someone at the incident who was saying that  
 18 you should go to Philips Park as a rendezvous point?  
 19 A. We didn't know. We had no information and, like I say,  
 20 there was a lot of confusion because we were querying  
 21 the fact why we weren't going to the scene, why  
 22 we weren't going to the arena.  
 23 SIR JOHN SAUNDERS: Of course, you're the closest  
 24 fire station, aren't you, so you might have expected  
 25 that if one was going to be on the scene, it would have

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1 come from you?  
 2 A. Yes. That's why we thought something else must be going  
 3 on. That's what I thought, that something else must be  
 4 going on, hence they're sending us to Philips Park.  
 5 SIR JOHN SAUNDERS: But you wouldn't necessarily know that  
 6 it was someone who was remote from the scene who was  
 7 actually sending you there?  
 8 A. Not at that time, no.  
 9 SIR JOHN SAUNDERS: You wouldn't have any idea.  
 10 Thank you, Mr Jamieson.  
 11 MR JAMIESON: No, sir, thank you.  
 12 Just one more point on this and then I'll move the  
 13 clock along. I'm not asking for this to go on the  
 14 screen and I'm not asking for the witness to see it, but  
 15 I'm going to provide a reference for you, sir, and  
 16 indeed for anybody else that wants to pick this up with  
 17 subsequent witnesses. It is the statement of  
 18 Andy Berry, {INQ026733/20}, paragraph 72.  
 19 What that is, Mrs Turner, is this: the NILO who it  
 20 transpires -- I'm going to call him the duty NILO and  
 21 nothing else at this moment -- but he has written in his  
 22 statement something to the effect that -- in fact, I'll  
 23 read the line so I do not misquote it:  
 24 "In terms of incident command, initially, because  
 25 four appliances had been mobilised to Philips Park, the

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1 watch manager in charge of those pumps would be the  
 2 officer in charge."  
 3 I'm not for a moment suggesting that that is right,  
 4 but the suggestion seems to be being made there, and  
 5 we'll hear from Mr Berry when he comes, that his  
 6 expectation was that the incident command or the  
 7 incident commander would be the watch manager from one  
 8 of the pumps who was sent to Philips Park. The question  
 9 is this: that expectation, that thought, that view, was  
 10 that made clear to you or to anybody on your crew as far  
 11 as you could tell?  
 12 A. No. No, sir, it wasn't.  
 13 Q. We'll roll the clock on then, please. What I'm going to  
 14 do is take you to the same paragraph of your statement,  
 15 in fact, that Mr Smith was taking you to, page 3, the  
 16 first paragraph, with a slightly different aspect. This  
 17 is when you've arrived at Philips Park. What you tell  
 18 us about in the third line is Mr Simister phoning  
 19 control, NWFC, and then you mention a second telephone  
 20 call in the last couple of lines of that paragraph as  
 21 well. The detail isn't in your statement, but in fact  
 22 we heard those calls and read the transcripts of them,  
 23 so I'm going to give times now for clarity.  
 24 23.06 is the first call. The transcript, if we need  
 25 it, is {INQ001176/1}. The second call was at 23.25,

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1 {INQ040474/1}.

2 I just want to ask you a couple of questions about

3 this, please. The first one, 23.06, you've been at

4 Philips Park for about 12 minutes at that point, you

5 told us about your expectation that there was some sort

6 of remote incident commander, but you still don't know

7 who it is. And so Mr Simister phones up NWFC seeking

8 information. The reason I mention it to you is one of

9 the things he says in that call is the fact that you've

10 told us now that as you were leaving Central,

11 ambulances, plural, were arriving, which was a fact that

12 you'd known and that you'd recognised the significance

13 of because you've recorded it in your statement.

14 May I just check that I've understood the

15 significance of the fact that ambulances were there. Is

16 it this? Two things. One, those ambulances were, and

17 these are normal ambulances, not specialists, but they

18 are very much closer to the incident than where you were

19 being held.

20 A. Sorry, what was the question?

21 Q. The fact that ambulances were present at Central, was

22 that important?

23 A. As in?

24 SIR JOHN SAUNDERS: So you're leaving to go to the other

25 station --

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1 A. Yes.

2 SIR JOHN SAUNDERS: -- Philips Park. And as you're leaving,

3 you see ambulances actually arriving at your station.

4 A. Yes.

5 SIR JOHN SAUNDERS: Why was that important to you? What was

6 the significance of it to you?

7 A. It looked to me that the ambulances were starting to

8 rendezvous, I assume for the incident. I didn't know

9 they were definitely for the incident, but that was my

10 assumption at the time.

11 SIR JOHN SAUNDERS: And if they were going to rendezvous

12 there, why shouldn't you; is that the thinking?

13 A. Yes.

14 SIR JOHN SAUNDERS: Okay, thank you.

15 MR JAMIESON: And if you're short of information because

16 you're at a rendezvous point on your own, that's where

17 one of the other blue lights services is?

18 A. That's correct.

19 Q. Presumably the purpose of telling NWFC that was so they

20 could tell the incident commander, whoever it was?

21 A. Yes, it was to pass that information across.

22 Q. So your expectation would have been that that

23 information would have been passed to the NILOs?

24 A. Correct.

25 Q. The second call, 23.25, by that time -- again, we've

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1 looked at the transcript, so I'll just tell you. By

2 that time, Mr Mottram has got the information that his

3 wife, the paramedic, is actually at the arena, and that

4 information, so not at Central any more but actually

5 forward and providing care at the arena, and that

6 information is provided by Mr Simister to NWFC. Again,

7 would your expectation be that that information is

8 provided to the NILOs?

9 A. Correct, yes.

10 Q. Again, as we look at the time, 23.25, we're coming up to

11 an hour after the explosion. That's the situational

12 awareness that you at Philips Park have been able to

13 gather and that's what the expectation is as to what

14 happened with it.

15 Again you don't give us a time but let me help you

16 and I can deal with this quite shortly. We know from an

17 official log of Mr Meakin's movements, for the

18 transcript {INQ001143/1}, he was the first NILO to

19 arrive and he arrived at Philips Park at 23.28, so again

20 round about half past 11.

21 It wasn't until midnight or thereabouts, I think the

22 log says 00.02, but your midnight is close enough,

23 I might say, that there was a movement to Central. Can

24 I just ask about your impression in that half hour?

25 You have told us that you had expected the NILOs are

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1 incident commanders, they had not arrived at the RVP

2 until nearly 23.30. In that half an hour before you

3 moved, was there any change in dynamic or atmosphere?

4 A. The half an hour from what time to what time, sir?

5 Q. 11.30 to midnight.

6 A. No, there was no change.

7 Q. From the NILOs turning up to you leaving -- no.

8 Also this, please. You say in your statement and

9 you have told us today -- and I don't want to know the

10 particular details of this Philips Park Fire Station --

11 but it so happened that there were that many fire

12 engines there or vehicles of one sort or another that

13 vehicles were being blocked in and would be otherwise

14 unable to move.

15 A. Yes.

16 Q. In your view, was Philips Park a suitable location for

17 a rendezvous point for a major incident, wherever it

18 might have been located?

19 A. No, sir, it was not. It's a very small yard. You drive

20 in the gates and once you're in the yard, the only way

21 to get back out is to do a three point turn to get round

22 to come back in, back out the way you came in or go

23 through the engine house.

24 Q. So it was never a suitable location?

25 A. No.

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1 SIR JOHN SAUNDERS: And if there wasn't enough room for a  
 2 fire engine then there certainly wouldn't have been  
 3 enough room to have ambulances there as well.  
 4 A. No.  
 5 MR JAMIESON: Thank you. I just want to ask you a little  
 6 bit about the travel to the arena and what happened  
 7 there. So it's 00.23, coming up to 2 hours — sorry,  
 8 let me put it in context.  
 9 You've moved to Central, you're at Central for about  
 10 20 minutes, and then the time comes to go forward to the  
 11 arena.  
 12 A. Yes.  
 13 Q. During that 20 minutes or so that you're at Central, and  
 14 you can see it's very busy with ambulances, as we  
 15 understand it, another witness has said as many as  
 16 40 ambulances there at the time. Was that your  
 17 impression?  
 18 A. I don't know the numbers, but there was quite a lot,  
 19 yes, sir.  
 20 Q. Was it obvious that they were shuttling back and forth  
 21 to the arena and presumably to hospitals as well?  
 22 A. Yes.  
 23 Q. Did you see the NILOs go and talk to the paramedics and  
 24 try and get some information?  
 25 A. I have no recollection of that, sir.

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1 Q. After about 20 minutes you were mobilised forward with  
 2 others and you have told us that there was this break  
 3 in the journey of 11 minutes, and 11 minutes, if I say  
 4 so, is a pretty precise period of time. Can we take it  
 5 you got that from the log?  
 6 A. I got that from the log, yes.  
 7 Q. Where you were stationary and really a very short  
 8 distance from where you needed to go, whilst Mr Berry  
 9 did something in his car to ascertain where he was  
 10 supposed to go?  
 11 A. Yes, he was on the phone to — I don't know who he was  
 12 on the phone to or what the conversation was. We were  
 13 just waiting to move —  
 14 Q. I'm not going to — I'm not going to ask you to  
 15 speculate. But at this point, 00.23, coming up to  
 16 2 hours after the explosion, there's a further 11-minute  
 17 delay whilst Mr Berry resolves whatever that is. And  
 18 finally this, I am just going to give a warning before  
 19 I ask this so that everybody who's listening is aware.  
 20 I am just going to talk very generally about what you  
 21 did at the arena. I am not going to mention  
 22 individuals. I am not going to mention injuries or  
 23 conditions or anything of that sort. But I do consider  
 24 it's important that you help the chairman with just one  
 25 or two facts.

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1 At the time that you arrived with your fellow  
 2 firefighters, there were still important jobs that  
 3 needed doing?  
 4 A. Yes, there were still casualties to be triaged and moved  
 5 out.  
 6 Q. Just to deal with it in very general terms, you were  
 7 involved in utilising some of the equipment that was  
 8 already present at the arena, by which I mean stretchers  
 9 and blankets from ambulances. You nodded, but there's  
 10 an oral transcript. So is that yes?  
 11 A. Sorry, yes.  
 12 Q. So yes, you were involved in — and one of the things  
 13 that you did was assist in the evacuation of what are  
 14 called P1 casualties?  
 15 A. Yes.  
 16 Q. Which means people who are very injured. So lest it be  
 17 thought that there was nothing for the firefighters to  
 18 do by the time they turned up, there were still very  
 19 injured casualties that needed evacuation at the time  
 20 that you arrived?  
 21 A. That's correct.  
 22 Q. And I think you were also able to note that at the time  
 23 that you arrived, there were still improvised stretchers  
 24 that were in use?  
 25 A. That's correct.

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1 Q. So there was still a shortage in effective equipment  
 2 being used? Whether or not it was available, there was  
 3 still a shortage.  
 4 A. Yes. So when we arrived, the casualties had to be put  
 5 on to a stretcher, so whatever was used to bring them  
 6 out to the Station Approach area, they were still on  
 7 that improvised stretcher as such.  
 8 SIR JOHN SAUNDERS: What I understand is when you arrive,  
 9 you're told to go and get stretchers from ambulances  
 10 with blankets.  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: You go back to the scene to where people  
 13 are being tended in the casualty area.  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: And you transfer them from whatever  
 16 they've been transported on before onto proper  
 17 stretchers you and then you took them to the ambulance  
 18 and then they went to hospital?  
 19 A. That's correct.  
 20 SIR JOHN SAUNDERS: And you did that on a number of  
 21 occasions, just you yourself?  
 22 A. We all did it, yes.  
 23 SIR JOHN SAUNDERS: I wasn't thinking you did it all on your  
 24 own.  
 25 MR JAMIESON: Thank you, sir. You have encapsulated

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1 everything I wanted to get there.  
 2 The final topic, please, is just this, and I'm going  
 3 to deal with it very shortly because the chair in fact  
 4 got the salient details.  
 5 The debrief process afterwards, there are the two  
 6 elements you have told us about, the structured debrief  
 7 and the meeting in July, which I think has been  
 8 characterised as a frank exchange of views, certainly  
 9 from the junior officers anyway.  
 10 In relation to the formal debrief, you said that you  
 11 felt that the senior ranks were holding their cards  
 12 close to their chest one way or another, and I'm not  
 13 asking for more detail, you've explained what that  
 14 means. But what I am interested in is what you said in  
 15 response to that. Have I got this right, the reason you  
 16 gave for why you did not contribute beyond the comment  
 17 that we were taken to was because that was the attitude  
 18 of the senior ranks?  
 19 A. A lot of things that were brought up had already been  
 20 brought up by my peers, so Watch Manager Helmrich, Watch  
 21 Manager Simister, I think Crew Manager Mottram said  
 22 something that I was in agreement with. So a lot of  
 23 things were already brought up. There was no point in  
 24 me repeating if it's already been mentioned and  
 25 obviously put on the record. I just felt so frustrated

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1 and angry. I mean, I had a lot of anger at the time,  
 2 I just couldn't find it in myself to even put anything  
 3 forward that made any sense to myself, never mind anyone  
 4 else.  
 5 Q. Well, may I say this: it is imperative to the families  
 6 that you be put in a position whereby those feelings  
 7 don't apply and you can give us, you can give the chair,  
 8 any points of improvement you can give. That's really  
 9 the final thing I want to do. You're out of that  
 10 atmosphere, we are here to seek to learn everything that  
 11 we can from this terrible tragedy, so if there are any  
 12 shortcomings or points for learning that you have  
 13 identified, please either tell us now if there's  
 14 anything you would like to say or indeed come back to us  
 15 in writing. Because it sounded --  
 16 SIR JOHN SAUNDERS: Sorry, while you're thinking about that,  
 17 can I just say -- I expect you've followed the evidence  
 18 from your fellow firefighters to some extent when you've  
 19 been able to.  
 20 A. I have, yes.  
 21 SIR JOHN SAUNDERS: Bearing that in mind, is there anything  
 22 you want to bring to my attention that you don't think  
 23 has been already brought to my attention?  
 24 A. I'm not aware of all the evidence, so I'm not aware if  
 25 more... more involvement of all of the crews on to

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1 scenario-based training where it comes to terrorism or  
 2 a marauding terrorist act. We don't get involved in any  
 3 of that and it tends to stay with the SRT/TRU, but  
 4 I think it's beneficial because any incident that  
 5 involves the SRT or TRU, we'd always go and help out and  
 6 back them up.  
 7 SIR JOHN SAUNDERS: So you think you should get more  
 8 training for a potential terrorism event?  
 9 A. Absolutely, yes, sir.  
 10 SIR JOHN SAUNDERS: Do you get it now? Has it improved  
 11 since 2017 or not really?  
 12 A. Not that I'm aware of.  
 13 SIR JOHN SAUNDERS: You would be aware of it, wouldn't you?  
 14 A. I have not had any training and I have not been informed  
 15 of any training.  
 16 SIR JOHN SAUNDERS: And you would know, wouldn't you, if  
 17 there was training, I hope it's not disrespectful, for  
 18 ordinary crews, ie not SRT?  
 19 A. Yes, we are not aware of all the training that goes on  
 20 for the specialist roles.  
 21 SIR JOHN SAUNDERS: No, no, but you're aware of what goes on  
 22 for people in your position?  
 23 A. Correct.  
 24 SIR JOHN SAUNDERS: Okay, so you would recommend that there  
 25 should be more training for you? It's indicative to me

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1 that you didn't even really know what Operation Plato  
 2 meant.  
 3 A. Yes, that's correct, yes.  
 4 SIR JOHN SAUNDERS: At the debrief when you kept quiet and  
 5 lots of others spoke, were there any specific matters  
 6 that you would have wanted to raise at that debrief  
 7 which weren't raised by somebody else? You understand  
 8 I've got a copy of the whole debrief so I know what was  
 9 said.  
 10 A. I've also got a copy of the transcript of the debrief  
 11 and it's quite hard to follow, I find, because it's not  
 12 wholly accurate.  
 13 SIR JOHN SAUNDERS: Right.  
 14 A. I think the whole incident command structure that we  
 15 normally adhere to failed catastrophically in that  
 16 incident and it's certainly an area that we all have to  
 17 learn from, specialist roles, including the NILOs, a bit  
 18 more clarity for all.  
 19 SIR JOHN SAUNDERS: I think, as we've already heard, the  
 20 normal procedure, first crew, incident commander on the  
 21 scene, knows what's wanted, asks for what's wanted,  
 22 works well?  
 23 A. Yes.  
 24 SIR JOHN SAUNDERS: This sort of scenario, which hopefully  
 25 is rare, but no one goes to the scene immediately,

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1 a NILO is involved to see where everyone should go next,  
 2 that seems to be a procedure with which the Fire Service  
 3 is not very familiar and it certainly didn't work very  
 4 well on 22 May.  
 5 A. It did not, sir, no.  
 6 SIR JOHN SAUNDERS: For you, would you feel any more  
 7 confident in dealing with that sort of incident now if  
 8 it happened? Have things moved on to say I think I now  
 9 know what would happen and it would be fine?  
 10 A. I feel a lot more confident now not only on what should  
 11 happen and what you'd expect, but I definitely challenge  
 12 and query any decisions that's made that I'm not wholly  
 13 happy with.  
 14 SIR JOHN SAUNDERS: Okay. Thank you.  
 15 MR JAMIESON: Thank you.  
 16 MS CARTWRIGHT: Finally there's questioning, please, on  
 17 behalf of GMCA. Could I ask Ms Johnson, please, to ask  
 18 her questions now?  
 19 MS JOHNSON: There's nothing from us, thank you very much.  
 20 MS CARTWRIGHT: Sir, that does conclude the questioning of  
 21 this witness. Thank you.  
 22 SIR JOHN SAUNDERS: I'm really grateful. Thank you very  
 23 much. I know it's not very easy coming in front of lots  
 24 of people with lots of other people watching and trying  
 25 to give your account, so I'm grateful for the

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1 information you've given to me.  
 2 A. Thank you, sir.  
 3 MS CARTWRIGHT: The next witness is Mr Gray. I have not met  
 4 with him yet. Could I ask for a 15-minute break,  
 5 please?  
 6 SIR JOHN SAUNDERS: We'll start again at 3.30.  
 7 (3.11 pm)  
 8 (A short break)  
 9 (3.30 pm)  
 10 (The inquiry sat in a restricted session)  
 11 (3.35 pm)  
 12 (A short break)  
 13 (3.45 pm)  
 14 SIR JOHN SAUNDERS: Mr Gray, you will understand I've  
 15 received a great deal of evidence already from  
 16 firefighters who were in your position on the night.  
 17 I understand, and I well understand the reasons for it,  
 18 that you would like to help me by telling me things that  
 19 happened on the night. Having got here and prepared  
 20 yourself, it's quite important perhaps to go through  
 21 with it and I well understand that.  
 22 You will forgive me, however, if Ms Cartwright, on  
 23 my behalf, goes through things very quickly because  
 24 I have a very clear picture in my mind and I well  
 25 understand things, so we'll deal with your evidence

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1 pretty briefly if that's okay by you.  
 2 THE WITNESS: Yes.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 MR KYLE GRAY (sworn)  
 5 Questions from MS CARTWRIGHT  
 6 MS CARTWRIGHT: Good afternoon. Could you please tell the  
 7 court your full name?  
 8 A. Kyle Thomas Gray.  
 9 Q. You provided a witness statement to the inquiry dated  
 10 22 February of this year?  
 11 A. Yes.  
 12 Q. Are the contents of that statement true to the best of  
 13 your knowledge and belief?  
 14 A. Yes, they are, yes.  
 15 Q. It's right, isn't it, that the contents of that  
 16 statement were based on a much earlier in time  
 17 self-administered interview that you had prepared?  
 18 A. Yes.  
 19 Q. You tell us in your witness statement that you've been  
 20 a firefighter since September 2008?  
 21 A. Yes.  
 22 Q. And ordinarily, you'd be based — your home station is  
 23 in Stockport?  
 24 A. That's correct.  
 25 Q. But on the night of 22 May you were working a shift at

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1 Gorton Fire Station?  
 2 A. Yes.  
 3 Q. And I want to take you now, please, just through the  
 4 events of that night, please, Mr Gray.  
 5 You tell us that at approximately 10.30, whilst you  
 6 were at G19 Gorton, Mr Mottram informed you he'd been  
 7 speaking to his wife who was working as a paramedic for  
 8 NWAS and that she was proceeding to the arena to reports  
 9 of a bomb that had detonated.  
 10 A. Yes, that's correct.  
 11 Q. And that at about 22.50, your appliance, G19P2 was  
 12 mobilised to G18 Philips Park Fire Station due to that  
 13 explosion?  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: Were you expecting to be mobilised once  
 16 you had heard?  
 17 A. I was, yes, because Gorton is one of the city centre  
 18 stations, really, and I did believe that on the  
 19 predetermined attendance for something like that,  
 20 we would be one of the closest stations to get  
 21 mobilised, yes.  
 22 MS CARTWRIGHT: You tell us in your witness statement that  
 23 you got those times from the turnout sheet.  
 24 A. Yes.  
 25 Q. And that you could also see from the turnout sheet that

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1 other appliances were proceeding with you, as in, from  
 2 Gorton, were G18P1, G16P1 and G16P2.  
 3 A. Yes.  
 4 Q. You tell us in your witness statement your understanding  
 5 from the turnout sheet was your appliance was going to  
 6 G18 Philips Park on a blue light response to stand by  
 7 there and await further instruction?  
 8 A. Yes.  
 9 Q. Can you give us an idea, how long does it take to get  
 10 from Gorton to Philips Park on --  
 11 A. On the blue light response, 3 minutes, 3 to 4 minutes.  
 12 Q. You tell us in the witness statement that you were  
 13 confused why you were being sent to G18 to stand by --  
 14 A. Yes.  
 15 Q. -- and not to G16 Manchester Central Thompson Street?  
 16 A. Yes, that's correct.  
 17 SIR JOHN SAUNDERS: Is that something you'd have all talked  
 18 about as you were going along?  
 19 A. Yes. Because we initially thought that  
 20 Manchester Central would have gone on a turnout to the  
 21 arena, but obviously on that night, that wasn't the  
 22 case. And to go on a blue light response to stand by at  
 23 another fire station is not heard of, really. Because  
 24 when we go stand by, we normally go at normal road speed  
 25 because it's not an emergency, we're just going to cover

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1 another fire station.  
 2 SIR JOHN SAUNDERS: Yes.  
 3 The decision to go on blue lights, that would be one  
 4 taken locally rather than --  
 5 A. No, it would have come higher up. That would have  
 6 mainly come from control who make that decision.  
 7 MS CARTWRIGHT: You tell us in the witness statement you did  
 8 deploy on blue lights to Gorton and that in fact you  
 9 arrived at Philips Park at the same time as G16P1 and  
 10 G16P2 and at that time you all gathered in the TV room  
 11 when news was just being leaked regarding the incident  
 12 on Sky News.  
 13 A. Yes.  
 14 Q. You say:  
 15 "When we were watching this, we decided to go to the  
 16 appliance bay to wait for the arrival of senior  
 17 officers."  
 18 A. Yes, that's correct.  
 19 Q. And you tell us:  
 20 "This meant we had our fire gear on with blue trauma  
 21 gloves."  
 22 A. Yes.  
 23 Q. You had the trauma bags ready with the defibrillators so  
 24 you could use them immediately when deployed?  
 25 A. Yes, we did, yes.

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1 Q. You then tell us whilst stood in the appliance bay you  
 2 were informed by Mr Mottram that he'd heard from his  
 3 wife and she was going to the scene.  
 4 A. Yes.  
 5 Q. And in fact they gave details about the nature of the  
 6 attack that had occurred at the arena.  
 7 A. Yes.  
 8 Q. Including the number of casualties?  
 9 A. Mm--hm, that's correct.  
 10 Q. You then tell us that the senior officers and the SRT  
 11 team then arrived at G18 Philips Park.  
 12 A. Yes.  
 13 Q. And you recall that those senior officers were General  
 14 Managers Mr Meakin and Mr Levy?  
 15 A. Yes, that's correct.  
 16 Q. And you describe them as NILO 1 and 2. Was that your  
 17 understanding?  
 18 A. It was, yes.  
 19 Q. You estimate in your witness statement that it was about  
 20 11.30 that those individual officers arrived.  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: Mr Gray, you look to me to be a bit  
 23 younger than most of the other firefighters we have  
 24 actually heard from. Had you had to attend any other  
 25 major incidents in your time as a firefighter prior to

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1 this?  
 2 A. Not that I am aware of, not major incidents -- I have  
 3 been in the Fire Service since 2008 but nothing like  
 4 this. I don't think any firefighter has been called out  
 5 to any incident such as this before.  
 6 SIR JOHN SAUNDERS: No. Okay. Thank you.  
 7 MS CARTWRIGHT: Mr Gray, can I ask you this though: I have  
 8 not taken you through your training records but we can  
 9 see that you've had medical training in particularly  
 10 cardiac arrest and the enquiry's heard some evidence  
 11 about the initiative with NWSA for the Fire and Rescue  
 12 Service to respond to cardiac arrest calls.  
 13 A. Yes.  
 14 Q. Having given the answer you've just given to the  
 15 chairman, to what extent had you had to respond to  
 16 cardiac arrests? I think they're called Red 1s.  
 17 A. Yes, Red 1s. They were called Red 1s at the time. I've  
 18 been to over 60 cardiac arrests and we were doing it as  
 19 a Fire Service on the whole, so it was quite common to  
 20 get one or two every day and we were very good at CPR at  
 21 that time. We were more advanced than what  
 22 I believe we are now because we were doing them --  
 23 SIR JOHN SAUNDERS: I think someone's described you were at  
 24 the peak of your powers of dealing with them, for  
 25 instance.

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1 A. Yes, it was. They described it as a pit stop team, like  
 2 a Formula 1 team. That's how we worked in collaboration  
 3 with NAWAS at the time because nine times out of ten  
 4 we would get there first before NAWAS because they're  
 5 that busy anyway that the fire engine would get there  
 6 quicker and we would just go into people's houses, they  
 7 wouldn't even ask why we were there, they'd just seen  
 8 a group of firefighters come in with a defibrillator ,  
 9 trauma bag, and we're a help, and that's what they  
 10 were... You know, people -- not once did anyone ask  
 11 what we're here for. They just let us in and we did  
 12 what we were trained to do.

13 MS CARTWRIGHT: Thank you. Can I take you back now to  
 14 Philips Park. We'd got to around 11.30 when you have  
 15 told us about the arrival of Mr Meakin and Mr Levy. You  
 16 then say this:

17 "After a long period of time, I can't recall how  
 18 long, we were given the go-ahead by General Manager  
 19 Meakin to proceed to a forward command and control point  
 20 which had been decided to be G16 Manchester Central."

21 A. Yes.

22 Q. You say this:

23 "My understanding was this was because the  
 24 rendezvous point had been changed and my perception  
 25 is that the actual decision may have been made by a more

1 senior officer than General Manager Meakin."

2 A. Yes.

3 Q. Can you assist us as to why you had that perception?

4 A. Because with Group Manager Meakin being at Philips Park,  
 5 I thought that someone else higher up in the control  
 6 room maybe or higher ranking would be making that  
 7 decision because Group Manager Meakin was at the  
 8 fire station with us and it doesn't seem right that he  
 9 would be making that call.

10 SIR JOHN SAUNDERS: Well, he had been there for some time,  
 11 so you would have thought he would have made the  
 12 decision earlier if he was going to make it.

13 A. Yes.

14 MS CARTWRIGHT: I want to move you forward now to when you  
 15 arrived with the G19 crew at G16. You say this:

16 "We were met with at least 40 different types of  
 17 paramedic vehicles. We parked on the front apron of the  
 18 station with other appliances and we were met by General  
 19 Managers Levy and Meakin, NILO 1 and 2."

20 A. Yes, that's correct.

21 Q. You then say this:

22 "I recall General Manager Levy said Operation Plato  
 23 had been declared and the Prime Minister had called for  
 24 a COBR meeting. I had heard of the term Operation Plato  
 25 before that date but cannot recall in what context or

1 when. I did not have any knowledge or understanding of  
 2 what it referred to or meant."

3 A. Yes, that's correct.

4 Q. "General Manager Meakin and General Manager Levy [you  
 5 say] seemed to be making lots of phone calls but no  
 6 information was being passed to the crews."

7 A. Yes, that's correct.

8 Q. You say that you and other firefighters asked  
 9 General Manager Levy and Station Manager Topping for an  
 10 update on numerous occasions but this was ignored.

11 A. Yes, that's correct.

12 Q. And when you say ignored, can you --

13 A. They had no answer. I mean, Group Manager Levy was on  
 14 his phone quite a lot. So to get his attention was  
 15 quite hard, really. And Al Topping, he didn't know  
 16 much, and anything he did know he relayed back to us  
 17 anyway.

18 Q. I think the way that you have expressed it in your  
 19 witness statement is that:

20 "At one point, [you] can't recall the time,  
 21 Mr Topping came over to speak to us but he knew as  
 22 little as we did regarding the incident."

23 A. Yes.

24 Q. You then tell us that you talked to a number of  
 25 firefighters, one of which was Tom Wheeler from Salford

1 who was in charge of the air unit that night.

2 A. Yes, that's correct.

3 Q. And I'm going to deal with this in vaguer terms than  
 4 you've expressed in your witness statement but the  
 5 chairman has that detail. But in particular, at the  
 6 request of some of the families, we've been asked to deal  
 7 with this in general terms.

8 You tell us that at that time when you were with  
 9 Mr Wheeler you were approached by a female paramedic.

10 A. That's correct.

11 Q. And if I summarise it in this way, she was very upset?

12 A. Yes.

13 Q. She was crying?

14 A. Yes.

15 Q. And she really wanted the assistance of the Fire and  
 16 Rescue Service to attend at the arena?

17 A. That's correct.

18 Q. And she referenced some of the treatment she'd been  
 19 providing that night to a patient?

20 A. Correct.

21 Q. And because of what she told you in that manner, would  
 22 it be fair to say you took her to Mr Topping so she  
 23 could tell him what she told you?

24 A. Yes.

25 Q. You then say that time passed again and you can't recall

1 the time before you were eventually told to mount the  
 2 appliance as you were going to be deployed to the  
 3 incident.  
 4 A. Yes.  
 5 Q. And you believe that the instruction would likely have  
 6 come from Mr Mottram?  
 7 A. Yes, he would have got that from higher up, yes.  
 8 Q. And that you did mount the appliance with the  
 9 equipment --  
 10 A. Yes.  
 11 Q. -- that you had available to you?  
 12 A. Yes.  
 13 Q. However, the decision was cancelled approximately  
 14 2 minutes later.  
 15 A. Yes.  
 16 Q. Were you told why it was cancelled?  
 17 A. No.  
 18 Q. And again you indicate it was Mr Mottram who would have  
 19 communicated, essentially, the stand-down?  
 20 A. Yes.  
 21 Q. And you say that that process of getting on and off your  
 22 appliance happened about four times?  
 23 A. Yes, it did.  
 24 SIR JOHN SAUNDERS: This is the time when other appliances  
 25 went to the scene and you didn't?

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1 A. Yes. Well, we mounted once or twice at Philips Park and  
 2 then we did it a couple more times at Manchester Central  
 3 again.  
 4 MS CARTWRIGHT: You say that after approximately 1 hour of  
 5 first being sent to G16, a number of other fire  
 6 appliances arrived at G16 Manchester Central, and you  
 7 say that the decision was made, you can't recall by who,  
 8 to deploy a number of fire engines to the scene to at  
 9 last the paramedics and the engines at the station.  
 10 A. Yes.  
 11 Q. And the chairman has heard evidence of those three  
 12 appliances that were called forward. Finally, you say  
 13 that there was a debrief at approximately 3 o'clock in  
 14 the morning on 23 May which was held by Assistant Chief  
 15 Officer Geoff Harris in the station yard at G16  
 16 Manchester Central?  
 17 A. Yes, that's correct.  
 18 Q. You say this in your statement, having used the debrief  
 19 form as the basis for this account:  
 20 "In my debrief form I have written this was a waste  
 21 of time because nobody was given answers. Geoff Harris'  
 22 demeanour was appalling. He walked through the front of  
 23 the appliance bay in a mood, with his hands in his  
 24 pockets, and the first words out of his mouth were,  
 25 'What do you need to know?'"

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1 A. That's correct.  
 2 Q. "The general feeling amongst the crews was that we  
 3 wanted answers as to why we weren't deployed. There was  
 4 a feeling of hurt, upset and confusion."  
 5 A. Yes, that's correct.  
 6 Q. "At that point everyone became very angry with the  
 7 attitude and lack of understanding the ACFO had."  
 8 A. Yes.  
 9 Q. "He stated he was there to answer our questions but  
 10 every answer he gave was 'I don't know'.  
 11 A. Yes, that's correct.  
 12 Q. "We asked that the chief officer attend..."  
 13 Pausing there, is that Mr O'Reilly?  
 14 A. Yes, it is.  
 15 Q. "... as he would know the answers because he seemed to  
 16 be the one giving orders over the phone."  
 17 A. Yes.  
 18 Q. "One of the firefighters" --  
 19 SIR JOHN SAUNDERS: Okay, I'm just slightly concerned.  
 20 You're now about to say what a firefighter said, or you  
 21 do in your statement, but you don't actually know who.  
 22 A. No, because there was that many.  
 23 SIR JOHN SAUNDERS: Yes. Sort of second-hand hearsay.  
 24 There is nothing wrong with hearsay in inquiries, but  
 25 it's a couple down the line made an allegation against

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1 the chief fire officer, essentially.  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: Right. I don't think I need to hear it  
 4 from you, Ms Cartwright. If any other CP thinks it  
 5 ought to be adduced, of course I'll listen to what they  
 6 have to say. It's not the fault of you, but it doesn't  
 7 necessarily look the most reliable. Is it confirmed by  
 8 anybody else?  
 9 MS CARTWRIGHT: I don't have the identity. In fact, I had  
 10 the question, "Who?"  
 11 SIR JOHN SAUNDERS: I don't think we're going to find that  
 12 out.  
 13 MS CARTWRIGHT: Finally this, Mr Gray. In terms of that  
 14 debrief on 23 May in the early hours, you say this:  
 15 "Everyone was very honest with the assistant chief,  
 16 telling him how we felt, that we were very angry, upset,  
 17 let down and ashamed, that we had the equipment and  
 18 training to help the public but we weren't utilised."  
 19 A. Correct.  
 20 SIR JOHN SAUNDERS: And you're obviously still very upset by  
 21 the whole incident, even after this length of time.  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: But I think I can tell you safely that  
 24 no one at this inquiry is blaming you or the other  
 25 firefighters for the fact that they weren't deployed.

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1 MS CARTWRIGHT: Sir, there are a number of core participants  
2 who indicated they may have questions. Could I briefly  
3 turn to see if any of them still have questions for  
4 Mr Gray?  
5 Could I ask Mr Smith on behalf of North West Fire  
6 Control if he has any questions, please.  
7 MR SMITH: No, I don't, sir, thank you.  
8 SIR JOHN SAUNDERS: Thank you very much, Mr Smith.  
9 MS CARTWRIGHT: Could I ask Mr Jamieson on behalf of the  
10 families if he has any questions for Mr Gray?  
11 MR JAMIESON: No, sir, it's not necessary to ask any  
12 questions, thank you.  
13 MS CARTWRIGHT: Finally, could I turn to Ms Johnson on  
14 behalf of GMCA to see if she has any questions?  
15 MS JOHNSON: I don't, thank you very much.  
16 MS CARTWRIGHT: Thank you, sir.  
17 SIR JOHN SAUNDERS: Thank you very much for coming and  
18 thank you for giving your evidence.  
19 MS CARTWRIGHT: Thank you, sir.  
20 SIR JOHN SAUNDERS: Is that it for today?  
21 MS CARTWRIGHT: That concludes the evidence for today. We  
22 start tomorrow at 10 o'clock with the evidence of  
23 Mr Dark.  
24 SIR JOHN SAUNDERS: Right. I hope everyone fully  
25 understands why we have dealt with that evidence fairly

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1 briefly. I hope and see that people here do understand.  
2 We will now proceed with the next witness tomorrow  
3 morning.  
4 Thank you.  
5 (4.03 pm)  
6 (The inquiry adjourned until 10.00 am  
7 on Tuesday, 9 March 2021)  
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