

OPUS2

Manchester Arena Inquiry

Day 78

March 19, 2021

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1 Friday, 19 March 2021
 2 (10.00 am)
 3 (Delay in proceedings)
 4 (10.12 am)
 5 MR GREANEY: Sir, good morning. Today we will hear evidence
 6 from Police Sergeant Kam Hare of Greater Manchester
 7 Police. He entered the City Room with members of his
 8 Tactical Aid Unit at 22.55 hours and was present within
 9 that area thereafter for a prolonged period. Although
 10 we will not be dealing with Sergeant Hare's interaction
 11 with any specific person and will seek to deal with his
 12 evidence in a way that is sensitive, I have no doubt
 13 that the evidence we hear today will be distressing and
 14 by that I mean distressing for everyone, but in
 15 particular to the bereaved families.
 16 As a result, we caution everyone, particularly those
 17 directly affected, to think about their own well-being
 18 in deciding whether or not they should watch the
 19 evidence today.
 20 SIR JOHN SAUNDERS: Thank you. It clearly is going to be
 21 very distressing for everyone who is hearing and can
 22 I just urge everybody who's asking questions,
 23 particularly today, to avoid any unnecessary
 24 duplications of questions. I'm not saying it's happened
 25 in the past, but on this particular occasion if everyone

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1 could be particularly careful, I for one would be
 2 extremely grateful.
 3 MR GREANEY: Thank you, sir. I'm going to ask next that we
 4 go to the holding screen for a short time. You do not
 5 need to rise, but Sergeant Hare will be brought into the
 6 courtroom.
 7 SERGEANT KAM HARE (sworn)
 8 Questions from MR GREANEY
 9 MR GREANEY: Would you begin, please, by telling us your
 10 full name?
 11 A. It's Kam Hare.
 12 Q. Are you a police sergeant with Greater Manchester
 13 Police?
 14 A. That's correct, yes.
 15 Q. Did you join Greater Manchester Police in March 2000?
 16 A. Yes, I did.
 17 Q. And gain promotion to the rank of sergeant in 2004?
 18 A. Correct, sir.
 19 Q. In that rank, did you serve first as what is known as
 20 a neighbourhood sergeant?
 21 A. Yes, I did.
 22 Q. And in very simple terms, did that mean that you were
 23 a uniformed sergeant, leading a team with responsibility
 24 for the policing of a particular geographic area?
 25 A. That's correct, sir.

2

1 Q. In July of 2014, by which time you had been a sergeant
 2 for 10 years, were you seconded to a unit called the
 3 Tactical Aid Unit?
 4 A. Yes, I was.
 5 Q. Have you thereafter served in that unit as a substantive
 6 sergeant?
 7 A. That's correct, sir.
 8 Q. In May 2017, in that role, in the Tactical Aid Unit, did
 9 you generally lead a team of seven police constables?
 10 A. Yes, that's correct.
 11 Q. Although I think it would be correct to say that on the
 12 night of the arena attack, you led a larger team of
 13 Tactical Aid Unit constables for reasons to which we'll
 14 come?
 15 A. Yes, sir.
 16 Q. Is the Tactical Aid Unit commonly known as the TAU?
 17 A. Yes.
 18 Q. In a few sentences, could you tell us what the TAU is
 19 and does, please?
 20 A. The Tactical Aid Unit is a specialist unit, working in
 21 teams of one sergeant and seven constables, and we
 22 respond and assist -- we are a force-wide resource to
 23 assist in various different incidents throughout the
 24 Greater Manchester area. We deal with warrants, we are
 25 specialists in many different capabilities of methods of

3

1 entry, doing warrants, public order, dealing with
 2 protests, football and large-scale disturbances and
 3 other everyday incidents as well.
 4 Q. So one of the aspects of the role of the TAU is to deal
 5 with high-profile public gatherings, whether they be at
 6 a football match or a protest or whatever, really?
 7 A. That's correct, sir.
 8 Q. Are you and were you in May 2017, as part of the TAU,
 9 a public order and search specialist officer?
 10 A. Yes, that's correct.
 11 Q. In order to perform that role, did you have particular
 12 qualifications?
 13 A. Yes.
 14 Q. Had you in particular completed training in pre and
 15 post-bomb searching?
 16 A. Yes, that's correct. I was trained.
 17 Q. So does that mean that you are and were in May 2017
 18 trained to search for improvised explosive devices?
 19 A. That's correct, sir, yes.
 20 Q. In May 2017, were you aware that the threat of
 21 a terrorist attack within the UK was severe?
 22 A. Yes, I would have been aware at that time.
 23 Q. And were you aware of the techniques, or some of them,
 24 that terrorists had used in the then recent years around
 25 Europe?

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1 A. Yes, I was aware of that.
 2 Q. Including, no doubt, the Charlie Hebdo attack in Paris
 3 on 7 January 2015?
 4 A. Yes, I was aware of the attack.
 5 Q. And the coordinated Paris attacks on 13 November 2015?
 6 A. Yes, I was aware of that as well.
 7 Q. Were you aware of the possibility that terrorists ,
 8 having mounted a first attack, might deploy secondary
 9 devices?
 10 A. Yes, I was well aware of that.
 11 Q. What did that mean to you in May of 2017?
 12 A. That the UK was possibly at risk of a terrorist act.
 13 Q. And in terms of a secondary device, what was your
 14 knowledge of the risk that that presented?
 15 A. Through my training and experience, I'm aware that if
 16 there is an attack of such, usually the hostile
 17 attacker, there could be a second device to initiate if
 18 the first device does not activate.
 19 MR GREANEY: Sir, I'm going to check through you,
 20 Sergeant Hare is quite softly spoken. I'm going to
 21 check that others in the room are able to hear him. Is
 22 anyone having difficulty?
 23 SIR JOHN SAUNDERS: If you sit further forward, not so that
 24 you're uncomfortable. You need to be comfortable giving
 25 your evidence.

5

1 MR GREANEY: I'm going to be turning, as you'll well
 2 appreciate, to the events of 22 May 2017. First, I want
 3 to ask you a little bit more about your training.
 4 Your training records have been made available by
 5 Greater Manchester Police and I'm going to highlight
 6 a small number of entries, others may highlight others,
 7 and what I'll be principally concerned to understand,
 8 sergeant, is whether the training you received equipped
 9 you adequately to deal with the events that you were
 10 required to confront on the night of the attack. So I'm
 11 not just asking about your training for the sake of it,
 12 I'm asking about it to see whether it actually played
 13 a part in how you responded on the night.
 14 We've received, sir, something called a combined
 15 training index, and I'll give the INQ reference, but
 16 I don't think it's particularly valuable to have it on
 17 the screen. The reference is {INQ040913/1}.
 18 In relation to each piece of training you received,
 19 I'm going to ask you whether you recall it and, if you
 20 do, what it taught you. If you want to see the record
 21 on the screen, I know, sergeant, you'll tell me.
 22 Entry 234 on that index was part of a package of
 23 training that you appear to have received as part of the
 24 policing preparation for the Olympic Games. Do you
 25 remember receiving training during that period of your

6

1 service?
 2 A. Yes, that would have been in 2012, sir, yes.
 3 Q. It was indeed. And entry 234 was entitled "Tri-service
 4 Awareness" and was completed by you on 15 June 2012. Do
 5 you recall that training?
 6 A. I do recall a number of packages of training that we did
 7 on NCALT for the Met Police, for the Olympics. I can't
 8 remember specifically what that training would have
 9 been; it was a few years ago now.
 10 Q. I quite understand that. So you recall that -- were you
 11 deployed together with Metropolitan Police Service
 12 officers during the 2012 London Olympics?
 13 A. Yes, so Greater Manchester Police provided a mutual aid
 14 to supply more officers to assist the Met Police for
 15 that Olympic event.
 16 Q. And I think what you're telling us is, as part of the
 17 preparation for that, you received some additional
 18 training?
 19 A. Yes, that's correct.
 20 Q. You mentioned the term NCALT; what is that?
 21 A. That's an electronic online training, usually a package
 22 that we can use on the system, on the intranet.
 23 Q. Entry 236 which I'll refer to, and then we'll come back
 24 to my question, was part of the same package that you
 25 received on the same date, and that entry was entitled

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1 "Terrorism: a Safe Response".
 2 I'll ask you again: do you specifically remember
 3 that component of the training you received at that
 4 stage?
 5 A. There were a number of packages, I can't remember in
 6 detail now what was in that package, but, yes, there
 7 were a number of packages that we did.
 8 Q. Let me ask you in general terms about the training you
 9 received at that stage. Do you recall whether you
 10 received training in JESIP at that stage?
 11 A. Again, sir, I can't remember if JESIP was in there.
 12 Q. You must understand, I'm not criticising that you can't
 13 recall, everyone will understand, but do you recall
 14 whether as part of your training at that stage you
 15 received any instruction in the response to an MTFA, as
 16 they were then called?
 17 A. Again, sir, I can't recall that.
 18 Q. Entry 339 in your training record brings us a little
 19 closer to now. That was entitled "Firearms and Active
 20 Shooter Incidents: Stay Safe."
 21 And you completed it on 30 July 2014. Could I ask
 22 you again, do you recall that training that you
 23 received?
 24 A. Yes, that will have been an NCALT package as well
 25 in relation to active shooters and the Stay Safe

8

1 principles for officers .

2 Q. In a few sentences, could you explain what that training

3 taught you, please?

4 A. That training would have been officer safety and

5 awareness, how to possibly respond and take cover at

6 such incidents.

7 Q. When you say "such incidents", are you talking

8 specifically about a mass terrorist firearms attack or

9 are you talking about firearms incidents more generally?

10 A. It 'll be for firearms incidents more generally.

11 Q. The final entry that I want to ask you about before

12 asking some general questions is entry 424. It was

13 entitled "Emergency Services Interoperability: All

14 Staff". The start date for that was August 2016.

15 Sergeant, do you recall that training?

16 A. Again, sir, I think it was an NCALT package that I may

17 have started and looked at.

18 Q. So again, this is something that you'll have been doing

19 online?

20 A. Yes, online again.

21 SIR JOHN SAUNDERS: Just tell me the date again, please.

22 MR GREANEY: 8 August 2016, not described as "completed" but

23 described as "in progress".

24 SIR JOHN SAUNDERS: Thank you.

25 MR GREANEY: Having highlighted just those few entries and

1 entirely understanding that you can't bring the details

2 of them immediately to mind, I'm going to ask you a few

3 questions.

4 In May 2017, were you familiar with the joint

5 emergency services interoperability principles, or

6 JESIP?

7 A. Yes, I had an awareness of JESIP, working together with

8 the ambulance, Fire Service and ourselves, the police.

9 Q. Did you understand that those principles involved

10 co-location?

11 A. Yes.

12 Q. Communication?

13 A. Yes.

14 Q. Coordination?

15 A. Yes.

16 Q. The joint understanding of risk?

17 A. Yes.

18 Q. And the final principle, shared situational awareness?

19 A. Yes, I was aware of that.

20 Q. Your involvement on the night of the arena attack

21 principally involved your presence in the City Room, did

22 it not?

23 A. That's correct, sir.

24 Q. In your view, were the principles forming JESIP adhered

25 to within that room?

1 A. Within the room there was a police presence there from

2 BTP, Greater Manchester Police, first-aiders, and then

3 there was the one paramedic who was there in attendance,

4 and then later on, further on in the night, there were

5 another two further paramedics that arrived.

6 Q. So that is, if I may say so, a careful answer, perhaps

7 even a diplomatic answer. When you look back on your

8 involvement in the events in the City Room, and you

9 judge them by reference to the principles involved in

10 JESIP, I am not asking you about the police response

11 more generally or the emergency response more generally,

12 but within that City Room do you think there was good

13 compliance or compliance with JESIP?

14 A. There was compliance and liaison with the ambulance

15 service paramedic who -- I did speak to the paramedic

16 and point out various casualties.

17 Q. Again, you've answered, understandably, carefully.

18 SIR JOHN SAUNDERS: I think what you're saying is those who

19 were there were communicating properly?

20 A. That's correct, sir, yes. Those who were in the room

21 were trying their best and hardest to communicate and do

22 whatever we could there.

23 SIR JOHN SAUNDERS: I think Mr Greaney may be looking for

24 something slightly different but perhaps I'm wrong.

25 MR GREANEY: I'm not looking for anything in particular,

1 I don't suppose. But let me just probe a little deeper.

2 I think the point you're making is it was really just

3 police, ShowSec, first-aiders and one paramedic?

4 A. That's correct, yes.

5 Q. To the extent that there was anyone there from another

6 emergency service to whom the JESIP principles were

7 applicable, well, you spoke to that person?

8 A. Yes.

9 Q. Is that the point you're making?

10 A. That's correct, sir.

11 Q. No member of the Fire and Rescue Service was present

12 whilst you were doing your work in the City Room. Did

13 that strike you at the time?

14 A. No, not at the time. No, not at the time.

15 Q. Had you yourself been involved in any exercises

16 involving joint working with the emergency services?

17 We've heard, for example, about Exercise

18 Winchester Accord.

19 A. No, I haven't been involved in such incidents, only in

20 my role as a public order trained officer. We've done

21 a joint exercise with the Fire Service and the

22 Ambulance Service during what we call a level 1 public

23 order or riot situation training.

24 Q. Do you recall when or whenabouts that took place?

25 A. That would have been -- it's usually every 12 months to

1 keep my accreditation for a public order level 1
 2 officer .
 3 SIR JOHN SAUNDERS: The fact that you were not particularly
 4 aware in your mind or noticed that Greater Manchester
 5 Fire and Rescue Service were not there, is that because
 6 you wouldn't have expected them to be there or just that
 7 you were actually so busy doing what you were doing that
 8 you didn't have time to give that sort of thing
 9 a thought?
 10 A. The latter, sir . Because it was so busy in there and
 11 chaotic in there, I didn't give it a thought at all.
 12 SIR JOHN SAUNDERS: So you would have expected, if you'd
 13 been thinking about it before, that they could have
 14 played a role in it?
 15 A. Yes, afterwards, I did think: where were the Fire
 16 Service?
 17 MR GREANEY: You weren't thinking that at the time, but
 18 let's be clear about this: at the time, as we're going
 19 to see, you most certainly were thinking, "We need more
 20 help in this room", weren't you?
 21 A. Certainly, yes, more help indeed.
 22 Q. We'll get to that in due course.
 23 Still on these general questions about your
 24 training. Had you, before May 2017, received any
 25 training in the response to an MTFA?

13

1 A. No, not that I can recall of any training.
 2 Q. Before May 2017, had you heard the term
 3 "Operation Plato"?
 4 A. I think I've seen it in — perhaps on an operational
 5 order. My only knowledge on that night was that it was
 6 in relation to firearms incidents.
 7 Q. Did you have any more detailed knowledge of what
 8 Operation Plato was beyond the fact that it was a tactic
 9 related to a firearms incident?
 10 A. No, sir, no other knowledge about that.
 11 Q. At any stage on the night of the attack, did you know
 12 that Operation Plato had been declared?
 13 A. No, I wasn't aware on the night, no.
 14 Q. In any event, I think if you had been told, it wouldn't
 15 have meant a very great deal to you?
 16 A. No, not because of the understanding I had of it at that
 17 time, no.
 18 Q. As of May 2017, in the event that there was an MTFA, who
 19 did you think, if you had thought about this at all,
 20 would deploy to the scene?
 21 A. Initially, it would be our firearms officers who would
 22 deploy, possibly the CTSFOs.
 23 Q. Would you have expected the Ambulance Service to deploy?
 24 A. At some stage I would have expected the ambulance and
 25 other police officers to attend.

14

1 Q. Would you expect or have expected the Fire and Rescue
 2 Service to deploy to the scene of an MTFA?
 3 A. Yes, all services would have been there to assist.
 4 Q. In May 2017, did you have any awareness of the
 5 specialist resources that might be deployed by the Fire
 6 and Rescue Service or the Ambulance Service?
 7 A. I am aware that there are officers in the
 8 Ambulance Service, NNAS, which is a HART team, so I'm
 9 aware of HART officers.
 10 Q. Yes.
 11 A. And they were the equivalent to SRTs in the Fire Service
 12 as well.
 13 Q. At the time of the attack, did you have any knowledge or
 14 any detailed knowledge of the way in which NNAS might
 15 work at the scene of such an event? And by that, I mean
 16 were you familiar with the concepts of casualty
 17 collection points and casualty clearing stations?
 18 A. I was aware of the role perhaps during a football match
 19 at a stadium, that they would work in sort of similar
 20 circumstances as in casualty clearing areas.
 21 Q. Just moving on slightly —
 22 SIR JOHN SAUNDERS: I just need to know a bit more about
 23 that. Does that mean you've actually been on duty at
 24 a football match where a casualty clearing station has
 25 had to be set up, or is it just something you know from

15

1 the routine and what would happen at a football match if
 2 something did happen?
 3 A. I've never experienced anything like that or come across
 4 that, sir, where it's been instigated, but I'm aware of
 5 it because in an operational order it will say the role,
 6 so there's usually a police liaison officer and the role
 7 of ambulance liaison. I'm aware in principle it's an
 8 operation order should something happen and it can be
 9 activated.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR GREANEY: So what was your understanding of where
 12 a casualty clearing station would come into that? Did
 13 you have an understanding that if there was an incident,
 14 there would be an attempt to move casualties from where
 15 it had happened to some other place where they might be
 16 treated, or did you not have that knowledge?
 17 A. On the night I didn't have a knowledge of there being
 18 a separate casualty clearing station. It wasn't until
 19 after that night I realised it was happening.
 20 Q. We're going to see that when we get to the chronology of
 21 events.
 22 Before 22 May, had you received training in
 23 first aid?
 24 A. Yes. So my first aid training would be then every
 25 3 years.

16

1 Q. Would you describe that as basic first aid training or
2 something more advanced than that?
3 A. No, I'd class that as basic first aid training.
4 Q. Had the training that you had received by that date
5 equipped you to understand the principles involved,
6 for example, in the application of a tourniquet?
7 A. No, my training was basic first aid, not at an advanced
8 level.
9 Q. Had you had any training in the triaging of patients?
10 A. No, again that would be another level of advanced
11 training, first aid training.
12 Q. That night, as you and your team of TAU officers entered
13 the City Room, what first aid equipment did you and/or
14 your team have with you?
15 A. In our vehicle, in our TAU van, we had just a basic
16 small green first aid box, which is routine for every
17 police vehicle, you would have a small green first aid
18 box.
19 Q. And no doubt the precise contents of such a box can be
20 ascertained if important. Did that box contain
21 tourniquets?
22 A. No, sir, the box would have contained a few bandages,
23 some plasters, again very minimal, small bandages.
24 Q. So we can be clear that when you and your team ran, as
25 we're going to see you did, into Victoria Railway

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1 Station that night, that's the level of equipment and
2 first aid training that you had?
3 A. That's correct, yes.
4 Q. Against that background, I'm going to turn to the events
5 of 22 May, and please do bear in mind, as the chairman
6 has said, if at any stage you need a break for any
7 reason, you need only let us know.
8 A. Thank you.
9 Q. On that afternoon, did you parade on duty at
10 Clayton Brook Police Station for a shift between 3 pm
11 and 11 pm?
12 A. Yes, that's correct.
13 Q. Is Clayton Brook Police Station to the east of the
14 centre of Manchester?
15 A. Yes, sir. It's more of a unit, not a police station.
16 It's for our team, not for members of the public. It's
17 a non-operational police building.
18 Q. Nonetheless, it was in Clayton Brook?
19 A. That's correct, yes.
20 Q. And I think I'm right, using what Ms Roberts would
21 describe as a little local knowledge, that it's about
22 4.5 miles to the east of the city centre?
23 A. Yes, that'd be about right, sir.
24 Q. Did you parade on duty with the seven constables for
25 whom you were responsible?

18

1 A. Yes, that's correct, sir.
2 Q. Did you receive a briefing and then go on general patrol
3 in the city centre and Salford?
4 A. Yes, that's correct.
5 Q. That day, were you commanding PC Michael Ball?
6 A. Yes, I was.
7 Q. PC Paul Carmody?
8 A. Yes, sir.
9 Q. PC Ian Tonge?
10 A. Yes, sir.
11 Q. PC David Shott?
12 A. Yes, sir.
13 Q. PC Tony Sivori?
14 A. Yes, sir.
15 Q. PC Chris Dawson?
16 A. Yes, sir.
17 Q. And PC Matthew Hill?
18 A. Yes, sir.
19 Q. During the course of patrolling the city centre, did you
20 become aware that there was a concert on at the arena?
21 A. Yes, just whilst on patrol and driving past. There were
22 lots of members of the public heading towards Victoria
23 and the MEN Arena, so to me there must be something on
24 at the arena, a concert of some description.
25 Q. Would this be at about 9 o'clock that you saw this

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1 happening?
2 A. Yes, around that time, just before we were heading back
3 in.
4 Q. So it would seem that you hadn't been informed in any
5 kind of formal way that the concert was taking place,
6 you simply inferred that from the fact that you saw
7 people moving in the direction of the arena?
8 A. Yes, that's correct. It wasn't on my briefing, I didn't
9 have any prior knowledge there was a concert on there.
10 It was just while we were on patrol, we noticed quite
11 a lot of people heading towards the arena.
12 Q. Were you familiar with the area around the arena and
13 around the railway station?
14 A. Yes, I'm familiar with the area. We've often deployed
15 to assist BTP officers during crowd control and football
16 supporters heading into Manchester and crossovers.
17 Q. So people who have travelled from outside of Manchester
18 to go to Old Trafford or the Etihad, you might deploy to
19 support BTP in dealing with the crowd there?
20 A. Yes, dealing with football supporters, perhaps.
21 Q. And so it would seem to follow that you would be
22 familiar with the railway station itself?
23 A. Yes, I've used the railway station myself, so I'm
24 familiar with the entries and exits.
25 Q. So you've policed it and also you've used it as

20

1 a passenger?
 2 A. That's correct, sir, yes.
 3 Q. Were you familiar with the arena itself?
 4 A. Yes. Again, I've attended to other concerts and events
 5 at the arena.
 6 Q. Do you mean in a policing capacity or a personal
 7 capacity?
 8 A. In a personal capacity.
 9 Q. On the occasions that you had been there, had you been
 10 into the City Room?
 11 A. Yes, that's my normal route in: up the stairs and into
 12 the City Room.
 13 Q. That's just helpful in terms of the level of
 14 understanding that you had when you were forced into
 15 there on 22 May.
 16 Can you give us an idea of about how many times you
 17 had been into the City Room before 22 May?
 18 A. Perhaps over the last 10 years, a couple of times a year
 19 perhaps, or once a year, to various concerts and events.
 20 Q. So on 22 May, you would therefore have been most
 21 familiar with where the City Room was and how to get
 22 there from the station concourse?
 23 A. Yes, that's correct, sir. I did refer to it as the
 24 foyer, I've always called it the foyer, but I do know
 25 it's known as the City Room. At that time and prior to

21

1 that, I always called it the foyer.
 2 Q. We know that at about 9 o'clock you and your team were
 3 patrolling the city centre. Did you return to
 4 Clayton Brook at round about 10 pm?
 5 A. Yes, around about that time.
 6 Q. You'll appreciate I'm taking these times from a witness
 7 statement that you made nearer the time. Up until that
 8 point of time, had it been a perfectly normal shift?
 9 A. Yes, it had. A normal shift. And then getting towards
 10 the end of the shift.
 11 SIR JOHN SAUNDERS: Was Monday night normally quiet?
 12 A. It is, Monday night is one of our quieter days.
 13 Obviously towards weekends, it's more busier for us at
 14 weekends and during the day with various things going
 15 on.
 16 MR GREANEY: The picture I think we're getting is sometimes
 17 of course you'd be deployed to pre-planned events,
 18 whether it was the execution of a warrant or a football
 19 match, but if there was no such event would you just
 20 generally patrol the city centre or Salford in support
 21 of your other policing colleagues?
 22 A. Yes, that's correct. Just general patrol, mobile
 23 patrol.
 24 Q. You returned to Clayton Brook, and once there, did you
 25 go into your sergeant's office at about 10.15 or 10.20?

22

1 A. Yes, about then.
 2 Q. Did you have your police radio on at that time?
 3 A. Yes, it was on at the time.
 4 Q. And did you phone the force duty officer?
 5 A. I would have phoned the force duty officer just after --
 6 between 10.30 and 10.45.
 7 Q. Not to put words in your mouth, I think you must have
 8 done it a little earlier on this particular night
 9 because we know that very shortly after 10.30, you
 10 started to make your way to the arena, didn't you?
 11 A. Yes.
 12 Q. I'll just remind you of what you said in your witness
 13 statement, which is dated 24 July 2018, so things would
 14 have been fresher in your mind:
 15 "My radio was on and I was on the phone to the force
 16 duty officer, checking if there was anything we were
 17 required to do before we finished our tour of duty."
 18 A. Yes. When I say that, sir, obviously we were aware of
 19 the incident at the arena prior to quarter to, so when
 20 I realised there was an incident going on there, I tried
 21 to call the FDO, but the line was engaged. I think that
 22 was corrected in my second statement, sir.
 23 Q. You're quite right. So let's deal then with the first
 24 time that you were aware that something was happening
 25 at the arena and how you became aware of that.

23

1 A. I was aware one of my officers, PC Chris Dawson, had
 2 come in and said, "There's an incident happening at the
 3 arena, in the city centre". I had a look on the police
 4 systems, the command and control system, which we call
 5 GMPIX and I could see various different (inaudible:
 6 distorted) coming in: explosion, bomb had gone off,
 7 there was a possible shooting. So lots of incidents
 8 were coming in into the call-takers, into the control
 9 room.
 10 Q. Certainly when you made your witness statement, a clear
 11 recollection that you had was that it had been mentioned
 12 that there was a casualty who had been shot in the leg
 13 outside Marks & Spencer.
 14 A. Yes, I remember that.
 15 Q. As many will know, there is a Marks & Spencer at the
 16 railway station, which is, as one looks at the station,
 17 on Station Approach at the far right-hand side of the
 18 station?
 19 A. Yes, there is.
 20 SIR JOHN SAUNDERS: It doesn't matter a huge amount, but
 21 just so I have got it a bit clearer in my mind, did this
 22 happen after you'd been in contact with the FDO that you
 23 got this message or did you not get in contact with him
 24 at all?
 25 A. Just to clarify, sir, I usually phone as a matter of

24

1 routine just before — 15 minutes before the end of the
 2 shift I will make contact with the FDO to make sure
 3 there's no other incidents that require the Tactical Aid
 4 Unit. So it's normal practice for me to phone quarter
 5 of an hour before I finish. However, the incident
 6 happened before then and I tried to phone the FDO and
 7 I couldn't get through on numerous occasions.
 8 SIR JOHN SAUNDERS: I'm grateful, thank you.
 9 MR GREANEY: The FDO was, of course, Inspector Sexton;
 10 is that right?
 11 A. Yes, that's right.
 12 Q. Inspector Dale Sexton. Did you, on discovering all
 13 this, realise that something very significant was
 14 happening at the arena?
 15 A. Yes, I knew there was something happening, yes, at that
 16 point. I was thinking that a terrorist attack has just
 17 occurred.
 18 Q. As you said in your statement, that was the thought you
 19 had from the very outset, that potentially what you were
 20 dealing with here was a terrorist incident?
 21 A. Yes.
 22 Q. Did you immediately decide that there was only one place
 23 you and your team needed to go, namely to the arena?
 24 A. Yes, that's correct. I couldn't get through to the FDO.
 25 Usually I would ask the FDO, "Are we okay to deploy, are

1 we likely to deploy?" I couldn't get through, so
 2 I decided to start to make our way there as quickly as
 3 possible to the Victoria Station.
 4 SIR JOHN SAUNDERS: You did it on your radio, trying to get
 5 hold of the FDO?
 6 A. No, I would have tried on the mobile phone. I tried in
 7 the office and then, whilst we were our van, with the
 8 blue lights, sirens going, what we call on a grade 1
 9 incident, so to get there as quickly as possible, I do
 10 believe I tried on my mobile a few times and again it
 11 was engaged.
 12 SIR JOHN SAUNDERS: You were just getting the engaged tone?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: In normal circumstances how often would
 15 that occur that you'd ring the FDO and get the engaged
 16 tone and not get through?
 17 A. Usually, very often we can get through to the FDO quite
 18 quickly and usually within a few rings. Unless there's
 19 another incident ongoing that we're aware of and we
 20 realise the FDO may be busy on the phone and then
 21 there's another number I could ring, which is the force
 22 duty supervisor, the FDS.
 23 MR GREANEY: We have understood your shift was coming to an
 24 end or it would naturally have been coming to an end at
 25 11 o'clock and therefore you'd ordinarily have called

1 the FDO at about quarter to. But here, very shortly
 2 after 22.30, you were getting reports of what was
 3 happening at the arena, you tried to speak to the FDO on
 4 the phone, but the number was just engaged?
 5 A. That's correct, sir, yes.
 6 Q. So what you did do, I think, is you got on your radio
 7 and tried to find out what was happening; is that
 8 correct?
 9 A. Yes. We monitor a number of channels. PC Dawson was
 10 monitoring one channel that covered the city centre and
 11 I was on the specialist channel radio. So I do recall
 12 radioing up, to shout up to say, "Are you aware of this
 13 incident in the city?"
 14 Q. What we're going to do is to work through certain
 15 entries in a schedule that's been put together, which is
 16 based on a number of sources, both radio messages, but
 17 also, as we're going to hear, from the recording that
 18 was made on your body-worn camera. I hope that you have
 19 a copy of that document in front of you.
 20 A. I have, yes.
 21 Q. We are not going to play any footage from your camera,
 22 nor am I going to play any of the audio recordings.
 23 We'll deal with it, the two of us, as a narrative.
 24 The first entry on the first page is timed at
 25 22.35.18.

1 A. Yes.
 2 Q. This, I think, but tell me if I'm wrong, is you making
 3 a call on your radio, trying to find out what is
 4 happening?
 5 A. That's correct, yes.
 6 Q. I should say, we can't put this on the screen because it
 7 does contain highly sensitive information. So people
 8 will just need to bear with me, I'm afraid.
 9 You're recorded as saying:
 10 "XZ9339."
 11 What does that mean?
 12 A. XZ is the call sign for the Tactical Aid Unit, and then
 13 9339 is my collar number.
 14 Q. Who were you calling on the radio at that stage?
 15 A. At that stage, it would have been the radio
 16 communications on the specialist operational channel.
 17 Q. The operator, I don't believe we need to name that
 18 person, replies :
 19 "Go ahead."
 20 And you then say:
 21 "Yes, just been made aware of this incident. Let me
 22 know who's running it, please, and the RVP."
 23 And the operator replies:
 24 "Yes, will do."
 25 Let's just remind ourselves. This is 4 minutes

1 after the explosion has occurred concerned and you are
 2 asking who is running it. What did you mean by that?
 3 A. Who's running it, as in which supervisor or inspector or
 4 supervisor is running it, possibly at the scene or who's
 5 actually in charge at the time.
 6 Q. You wanted to know the RVP. What did you mean by that?
 7 A. I wanted to know the RVP — so when we deploy to
 8 incidents, usually in my daily sort of police work,
 9 I will ask for an RVP for that particular incident,
 10 which is a location, you know, which location would you
 11 like myself and my team to deploy to.
 12 Q. By the time you made that call on the radio, 4 minutes
 13 after the explosion, can you recall whether you were
 14 still at Clayton Brook or whether you had started your
 15 journey to the arena?
 16 A. I think at that time, sir, as soon as that was coming in
 17 and I couldn't get through, myself and my team deployed
 18 straightaway.
 19 Q. So you're probably actually in the van at this stage?
 20 A. Yes.
 21 Q. Had you, just before this call, shouted to your team to
 22 get into the van?
 23 A. Yes.
 24 Q. Your statement tells us that you'd also told the team to
 25 get spare radio batteries.

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1 A. Yes, because it was coming towards the end of the shift
 2 and obviously if we're going to stay on, we needed to
 3 make sure we had radio comms.
 4 Q. Was there another Tactical Aid Unit on duty that night?
 5 A. Yes, there was another team on duty that night.
 6 Q. Did they have a sergeant who was in command of them?
 7 A. No, their sergeants were off that night.
 8 Q. In that result, did you inform them, that second team,
 9 that you and your team were making your way to the arena
 10 immediately?
 11 A. Yes, sir.
 12 Q. Did you give any instruction to the second team?
 13 A. I do recall asking them to go on RV on Oldham Road,
 14 which is just near the city centre.
 15 Q. And to remain there on standby?
 16 A. Yes, that's correct.
 17 Q. But I think, and indeed we're going to see, that in due
 18 course did that second team also come to the arena?
 19 A. Yes, they did.
 20 Q. Is that how you came to be in command not of a team of
 21 seven PCs that night, but in fact in command of a team
 22 of 12?
 23 A. That's correct.
 24 Q. Was the van driven with the emergency equipment
 25 activated?

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1 A. Yes, that's correct.
 2 Q. And did you and your team travel there really as quickly
 3 as was possible?
 4 A. As quickly as possible, yes.
 5 Q. Were you given an RVP?
 6 A. I don't recall being given an RVP. They're very busy on
 7 the radios, they may have been an RVP, the radio
 8 transmissions was busy, the sirens as well. I may not
 9 have got that RVP but I instructed my driver to drive as
 10 near to Victoria Station as we could.
 11 Q. In the result, were you able to get to the station
 12 itself?
 13 A. Yes, we fell short of perhaps 200 yards on
 14 Corporation Street. A couple of minutes away from it,
 15 where we sort of abandoned the van and jumped out and
 16 ran towards the Victoria Station.
 17 Q. You say ran. I think you mean that literally you and
 18 your team ran to the station?
 19 A. That's correct, yes.
 20 Q. Through which entrance did you then enter the station?
 21 A. It would have been the far entrance towards the hotel,
 22 where the Co-Op is.
 23 Q. So I think I know where you mean. Let me make sure
 24 everyone else does. Again, I'm outside the station,
 25 looking towards the station, by which I mean the war

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1 memorial entrance. If I look to my right, down Station
 2 Approach, I can see where the Marks & Spencer is. I can
 3 see where Station Approach becomes Todd Street. I think
 4 you're talking about the entrance which is just near
 5 Marks & Spencer on the right?
 6 A. Yes, that's correct.
 7 Q. So that is the entrance through which you and your team
 8 went?
 9 A. Yes.
 10 Q. At about the time that you entered the railway station,
 11 did you activate your body-worn camera?
 12 A. Yes, I do believe I activated it at that stage.
 13 Q. For what purpose did you operate your camera?
 14 A. Again it was to record the incident and record what
 15 we were doing. Usually, the body-worn video is on
 16 standby and when we approach a particular incident and
 17 when we deal with something, we activate the body camera
 18 and start recording, sometimes for evidence or just to
 19 record that incident.
 20 Q. Am I right that you knew you were going to something
 21 which was really very important, significant, and you
 22 thought it was important to keep a record of what you
 23 saw and what you did?
 24 A. That's correct, yes.
 25 Q. Indeed, I have no doubt everyone will agree that was the

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1 right thing to have done. We're going to come to what
 2 happened within the station in a moment, but I know that
 3 certainly some of the core participants are interested
 4 in this question. Would it be right to regard you as
 5 having self-deployed to the scene?
 6 A. Yes. I did contact the FDO initially to see if we could
 7 deploy. When I couldn't get through, I knew then it was
 8 my decision to self-deploy.
 9 SIR JOHN SAUNDERS: In a situation where you can't get hold
 10 of the FDO or the FDO is busy, who would deploy you or
 11 where would you get any instruction to deploy to the
 12 scene from if it had come through?
 13 A. On some other occasions, sir, it could be the local
 14 radio channel, their operator there on behalf of the
 15 inspector or another supervisor, and again because
 16 we are a force-wide resource, we do and still do
 17 self-deploy to incidents.
 18 SIR JOHN SAUNDERS: Absolutely, it's the mechanics of it.
 19 So the FDO could deploy people?
 20 A. Yes, the FDO.
 21 SIR JOHN SAUNDERS: Normally, if it was a large incident,
 22 he'd be doing the deployment; is that right or not?
 23 A. Yes, initially they would make contact with us, sir, and
 24 say: this is the incident log, this is the location, can
 25 you meet there and liaise with a local divisional

1 supervisor or the local channel, the radio channel for
 2 more updates?
 3 SIR JOHN SAUNDERS: The local channel can also send people
 4 in various directions?
 5 A. Yes, that's correct.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR GREANEY: So was it your expectation that if you had been
 8 able to speak to the FDO, he would have deployed you to
 9 the scene?
 10 A. Yes, I'm sure the FDO would have deployed us
 11 straightaway.
 12 Q. In the result, you couldn't speak to him, so you made
 13 a decision, which was within your area of
 14 decision-making, that you would self-deploy there?
 15 A. That's correct, yes.
 16 Q. What skills or capabilities did you consider that you
 17 and the TAU had that would be of assistance at such
 18 a scene?
 19 A. Initially, I was aware that people were injured.
 20 We were there to help people who had been injured.
 21 We were there to support local officers and BTP officers
 22 there at the scene. It was to deploy with crowd
 23 management, helping people, casualties, and possibly
 24 assisting our firearms team, should they require us for
 25 any cordons or any other assistance in relation to any

1 incidents or suspects.
 2 Q. I had left you at the point at which you were entering
 3 the station. We'll return to that moment, but let's be
 4 clear about this, first of all. From the point that you
 5 arrive at the railway station, as you will know,
 6 sergeant, we are able to track your movements and
 7 actions in a number of ways.
 8 You are captured on CCTV within the station and
 9 within the City Room. The footage from your body-worn
 10 camera is available. You're captured on the footage of
 11 the body-worn cameras of others and we also have radio
 12 transmissions. So as you'll appreciate, we know
 13 everything you did and we know almost everything that
 14 you said, and we're going to piece it together,
 15 together.
 16 So that people aren't unnecessarily distressed,
 17 I make it clear, we will not see any image during your
 18 evidence of a person who was dead, dying or injured.
 19 We will not name any such person. And necessarily,
 20 therefore, parts of your actions we will need to deal
 21 with in summary. Does that make sense to you, sergeant?
 22 A. It does, sir, yes.
 23 Q. Let's start with your arrival within the railway
 24 station, which was captured on the CCTV system.
 25 Mr Lopez, could we have on the screen, please,

1 {INQ035612/1} -- and don't put it on the screen until
 2 you have found this page, please -- {INQ035612/123}.
 3 We now have the time at which you arrived. It's
 4 18 minutes after the bomb has exploded:
 5 "A group of seven GMP police officers [there were
 6 eight in total] from the Tactical Aid Unit enter
 7 Victoria Train Station from the Todd Street entrance.
 8 All of the officers run through the station heading
 9 towards the bottom of the stairs that lead up to the
 10 Manchester Arena and the City Room. This group is made
 11 up of the following ..."
 12 And then they are listed:
 13 "The last officer appears to have a first aid box in
 14 their hand."
 15 Is that the first aid box that you told us about
 16 earlier in your evidence?
 17 A. That's correct.
 18 SIR JOHN SAUNDERS: I'm sure it's quite irrelevant, but as
 19 it happens, eight are named.
 20 MR GREANEY: Yes. Quite right, sir, there are eight. Good
 21 spot.
 22 You and the seven constables that you were in charge
 23 of?
 24 A. Yes, that makes eight, yes.
 25 Q. So you have run through the Todd Street entrance. Just

1 to orientate ourselves, as you run in that direction, on
 2 the left would be the entrances to the station,
 3 including the war memorial entrance, including the
 4 ticket office. And you're running down towards the
 5 barriers that lead to the platforms, so that the
 6 staircase and the lift that lead up to the walkway,
 7 giving access to the City Room, would be on your right?
 8 A. That's correct, yes.
 9 Q. The first footage we have from your body-worn camera is
 10 timed very shortly afterwards at 22.49.51. So this is
 11 entry 2,381 on our schedule. 22.49.51.
 12 We have a conversation described:
 13 "PC McLaughlin asked a colleague, PC Ball from the
 14 TAU, 'Where is that, the box office?'"
 15 He then adds:
 16 "They said ten fatalities, the box office."
 17 Referring to a radio transmission. And PC Dawson
 18 then says to you:
 19 "Most of the casualties are up here near the
 20 Trinity Way car park."
 21 And points towards the bridge, leading into the
 22 City Room.
 23 So does it follow from that that, from really almost
 24 the very first moment that you entered the railway
 25 station, you knew that whatever had happened had

1 occurred in the City Room?
 2 A. Yes, that's correct, sir.
 3 Q. PC Dawson then adds:
 4 "We need a sweep here."
 5 What did you understand him to mean by that, if you
 6 understood anything?
 7 A. A sweep would have been to check the area, so I think
 8 that's what he meant by that, to check the area for
 9 possible casualties or suspects or just to see if it's
 10 clear and safe.
 11 Q. And there was then a discussion about the availability
 12 of explosives dogs and you said:
 13 "Going to have to call it in as there'd been an
 14 explosion and guns."
 15 Is that correct?
 16 A. Yes, that's correct.
 17 Q. We see that you did then, very quickly afterwards, make
 18 a call on the radio. That call was made at 22.50.34.
 19 It's the bottom entry on that page. Do you see?
 20 A. Yes, I do see that.
 21 Q. You gave your call sign again and said:
 22 "Show us Victoria. We're liaising now with BTP.
 23 Any further?"
 24 You emphasised, line 2,589, that you were at the
 25 scene, and you asked:

1 "Can you tell me who's SIO-ing at the scene, please,
 2 so we can liaise with?"
 3 What did you mean by that, please?
 4 A. So by SIO-ing, SIO stands for senior investigating
 5 officer, so like I'm asking there who were the
 6 supervisors, who's the officer in charge at the scene
 7 that I could liaise with, and I'm asking the radio
 8 operator that question.
 9 Q. We can see in fact, from the entry at 22.51.57, that
 10 Inspector Mike Smith comes on the radio then; is that
 11 correct?
 12 A. Yes. He comes on the radio, he gives his collar number
 13 and says, "Go ahead".
 14 Q. "If they come in the main entrance, up these stairs and
 15 along the overhead to me here, overheads in here."
 16 And you ask that to be relayed again and the
 17 operator says:
 18 "Up the stairs and along the corridor there, you'll
 19 see him up there."
 20 And you added:
 21 "Yeah, roger, we'll come and liaise now. It will be
 22 my one and seven going in together."
 23 So by that stage, a couple of minutes after you'd
 24 arrived at the station, you'd ascertained that the
 25 events had occurred in the City Room and you'd

1 ascertained that Inspector Smith was in charge and that
 2 he was within the City Room; is that correct?
 3 A. That's correct, sir.
 4 SIR JOHN SAUNDERS: So you're no longer trying to contact
 5 the FDO. You're communicating with people on the radio
 6 and phoning in your information and making your request.
 7 Is that normal procedure or have you given up the FDO?
 8 A. Yes, at that point I knew the FDO would be inundated
 9 with calls and be very busy, so my main objective was to
 10 get to the scene and see who was in charge at the scene
 11 at ground level.
 12 SIR JOHN SAUNDERS: Thank you, I understand.
 13 MR GREANEY: We are not going to look at any footage, but
 14 at the time you make this radio call, I can say, because
 15 I have seen it, you are at the bottom of the stairs that
 16 lead to the walkway.
 17 A. Yes, sir.
 18 Q. So you haven't yet walked up the stairs. You were
 19 asking about the person in charge. At that stage were
 20 you giving any thought to a command structure of Gold,
 21 Bronze and Silver or strategic, tactical and operational
 22 or giving no such thought?
 23 A. No, not at that time, sir, because I was responding to
 24 this incident. I was aware there was an inspector
 25 there, so there would have been a commander there, and

1 I believe that that would have already been done by the
 2 FDO or the comms supervisor to put a Gold/Silver/Bronze
 3 structure in place.
 4 Q. Your expectation was that someone senior would have put
 5 the command structure in place and you were there as
 6 part of the operational response to deal with whatever
 7 was going to be put in front of you; is that correct?
 8 A. That is correct, sir.
 9 Q. At that time, still at the bottom of the stairs, you had
 10 a conversation with a firearms officer and this is the
 11 entry which is the penultimate entry on that page.
 12 22.54.04:
 13 "Sergeant Hare speaks with firearms officer PC Troy
 14 Tyldesley and states:
 15 "'We're just having a look, mate. Inspector's up
 16 there. We are going to see what's happening up there.
 17 Unconfirmed, possibly 12 dead already.'"
 18 So at that stage, you were starting to understand,
 19 am I right, the enormity of what you were going to be
 20 confronted with?
 21 A. Yes, sir.
 22 Q. PC Tyldesley replied and he made plain that his
 23 understanding was that there had been a suicide bombing;
 24 is that correct?
 25 A. That's correct, sir.

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1 Q. And he added that there was possibly a second device.
 2 A. Yes, that's correct.
 3 SIR JOHN SAUNDERS: He's someone who's already at the scene
 4 who you're meeting on your way and you're getting
 5 information from him, is that right, or is it the other
 6 way round?
 7 A. That's correct, PC Tyldesley was the firearms officer
 8 at the bottom of the stairs there.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR GREANEY: We see on the footage you're still at the
 11 bottom of the stairs, you have made your radio call and
 12 you engage him in discussion about what information he
 13 has. Is the picture that you were trying to get as much
 14 information as you could, as quickly as you could, about
 15 what happened in the City Room before deploying into
 16 that area?
 17 A. That's correct, sir, yes. It's what I'd call getting
 18 a sitrep, situation report.
 19 Q. By this stage, you knew that there had been an
 20 explosion, that many were dead, and from the very first
 21 you'd thought that this was a terrorist incident. Was
 22 everything that you were seeing and being told
 23 confirming you in that view that you'd held?
 24 A. Yes, sir.
 25 Q. By this stage, at 22.54, as you're at the bottom of the

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1 stairs leading to the overbridge, had anyone said
 2 anything to you about what I'm going to term "zoning"?
 3 A. No. I don't recall that.
 4 Q. You looked slightly quizzical, which I understand, when
 5 I used that term. What I mean is: had anyone said,
 6 "This is a hot zone, this is a warm zone, this is a cold
 7 zone"?
 8 A. No, no reference to that.
 9 Q. Do you think you'd have known what that person was
 10 talking about if they'd said those things?
 11 A. Not at that time, no, sir.
 12 Q. So does it follow, and this is most certainly no
 13 criticism of you, that you didn't yourself give any
 14 thought to zoning?
 15 A. No.
 16 Q. You had been told at 22.54 that there was a possibility
 17 of a secondary device. As we're going to see, what you
 18 do straightaway afterwards is to lead your team up the
 19 staircase, along the walkway and into the City Room.
 20 Did you give any thought to whether it was safe for you
 21 and your team to do that?
 22 A. Yes. So for me, I carried out a dynamic risk assessment
 23 for myself and my colleagues, and I was aware that there
 24 were police officers up there, there was people that
 25 were injured and hurt, and my thought process at the

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1 time was to get up there as quickly as possible and help
 2 out and see what we could do to help people.
 3 SIR JOHN SAUNDERS: Presumably what PC Tyldesley had told
 4 you was of some assistance, anyway, in getting some sort
 5 of risk assessment in your own mind?
 6 A. Yes, sir, because he mentioned casualties up there. He
 7 obviously was aware there could be a second device up
 8 there. But my main thing was there were casualties up
 9 there. I knew Inspector Smith was up there, my
 10 colleagues were up there, members of the public, we
 11 needed to get up there to see what was happening and how
 12 we could help people.
 13 MR GREANEY: So what I've understood from what you've said
 14 is that you recognised that there was a risk to you and
 15 your team by going in there, but that was outweighed by
 16 the need to find out what was happening and help?
 17 A. Yes, that's correct, sir.
 18 Q. By this stage, you're still, and by saying that I don't
 19 mean that you didn't act quickly, at the bottom of the
 20 stairs. I'm going to ask you to turn over the page to
 21 the second entry on that page. It's numbered 2,849.
 22 The time is 22.54.29.
 23 Do you have that, sir, and do you have that,
 24 sergeant?
 25 A. I do, yes.

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1 Q. This is where we get the first reference of what we're
 2 going to see are many references to ambulances. There
 3 is a discussion in your presence with an officer called
 4 Sergeant James McGowan, and he's given a description of
 5 what the situation is in the City Room that I won't
 6 repeat. He then says:
 7 "I've been up there, mate, I've come back down.
 8 I've tried to clear all that to get the ambulances
 9 through. They're not here."
 10 And you began to lead your officers on to the
 11 footbridge, did you not?
 12 A. Yes, sir.
 13 Q. At that stage, you'd obviously seen a number of police
 14 colleagues. Had you seen any paramedics by that stage?
 15 A. No, not at that stage, no.
 16 Q. Had that thought struck you, namely where are the
 17 paramedics, or were you so bound up in what you were
 18 doing and being told that that thought did not occur to
 19 you?
 20 A. Initially, that thought didn't occur to me until I got
 21 into the City Room.
 22 Q. As I just indicated, you then led your officers on to
 23 the footbridge and towards the City Room, did you not?
 24 A. Yes, that's correct.
 25 Q. We're going to see a redacted image of that happening:

1 {INQ035612/151}.
 2 SIR JOHN SAUNDERS: Just so I'm getting the sequence of
 3 events, when you had first gone in and there had been
 4 a conversation with Mr Smith or through a third party,
 5 the inspector, he was saying, "Get them up here to where
 6 I am"?
 7 A. Sorry, who, sorry?
 8 SIR JOHN SAUNDERS: When you first arrived, there is
 9 a conversation between you, the radio operator, and also
 10 Inspector Smith?
 11 A. Yes, that's correct.
 12 SIR JOHN SAUNDERS: And he's telling you where he is.
 13 A. Yes. I have asked where is the inspector, and then the
 14 comms operator said that Inspector Smith is upstairs and
 15 he's given his collar number. Then Mr Smith has told us
 16 where he is and says, "Deploy here".
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR GREANEY: So we can see, 22.55.18:
 19 "PS Hare and his TAU officers walk along the
 20 footbridge heading towards the City Room."
 21 I don't want you to think for one second that in the
 22 question I next ask you I'm being remotely critical, but
 23 is it a fact that as you walked along the overbridge,
 24 you did see a number of people who were injured?
 25 A. I did, yes.

1 Q. As the footage reveals, and you will agree, you didn't
 2 stop to treat those people or to direct your officers to
 3 do so, did you?
 4 A. No, not at that time.
 5 Q. Could you explain to us what your decision—making was in
 6 not stopping, but instead proceeding to and into the
 7 City Room?
 8 A. I was directed by the inspector to come and liaise with
 9 him in the City Room, so that's where I needed to be.
 10 Casualties, people who were there, were talking, they
 11 were shouting, so I knew they were possibly injured but
 12 okay, but I had to get to the objective, which was to
 13 get into the City Room, liaise with the inspector, see
 14 what needed to be done from there.
 15 Q. The footage from your body—worn camera reveals that you
 16 say to your officers essentially, "Keep together, follow
 17 me in a line". Do you recall saying that to them?
 18 A. I do recall that, yes, sir.
 19 Q. Why were you saying that?
 20 A. A few things there. I was thinking of, obviously, to
 21 see — it's an area and I need to stick to one certain
 22 route in to the left—hand side. That was the sort of
 23 clear area to walk straight up. There was nothing in
 24 the way obstructing us. And it was to stick together as
 25 a team because we were going to deploy together.

1 I didn't want to lose any members of the team, I wanted
 2 to stick together to enter the City Room together.
 3 Q. You say to them, clearly and loudly, "Stay calm, guys,
 4 stay calm". Why did you say that to your team?
 5 A. I am trying to think now if I was saying it to the
 6 casualties, sir, rather than the officers.
 7 Q. It's your recollection that's important. I have seen
 8 some of this footage and it's not my interpretation
 9 that's significant. What do you recall?
 10 A. I do recall turning round and saying, "Stay calm and
 11 stay together". It could possibly have been to the
 12 officers, but I do recall reassuring some of the people
 13 who were on the walkway, who were injured, to reassure
 14 them to stay calm as well. So it could have been to
 15 them and the officers. That's all I can remember, sir.
 16 Q. It's what you remember that's important.
 17 I'm going to give in a moment the time at which you
 18 enter the City Room, and sir, I do understand that in
 19 terms of developing a clear understanding of this
 20 chronology, showing footage will be the best way of
 21 doing it. I do hope you understand and others
 22 understand why we're not doing it that way and I hope
 23 that the chronology is nonetheless emerging with
 24 clarity.
 25 SIR JOHN SAUNDERS: It is.

1 MR GREANEY: The footage from the City Room CCTV shows that
 2 you and your team enter the City Room at 22.55.24.
 3 Sergeant, the scene that confronted you is not one that
 4 I want you to describe in any detail. But am I correct
 5 that it was obvious to you that there were people who
 6 were dead, dying and injured?
 7 A. Yes, sir.
 8 Q. You could see that there were first —aiders who were
 9 providing assistance?
 10 A. Yes, that's correct.
 11 Q. And do you recall also seeing members of the ShowSec
 12 security staff in the City Room and also rendering
 13 assistance?
 14 A. Yes, I did.
 15 Q. We know, because we've heard some evidence from him,
 16 that at that time there was a single paramedic present
 17 within the City Room, Patrick Ennis. In fact, he'd
 18 entered just 1 minute before you, I think. Do you
 19 recall seeing him there at that stage?
 20 A. I don't recall seeing him straightaway, no.
 21 Q. Did you, however, see Inspector Mike Smith?
 22 A. Yes.
 23 Q. And did you speak to him?
 24 A. I did, yes.
 25 Q. This we see, entry 2,994, occurred at 22.55.46. Again,

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1 I'm not going to read out exactly what he said, that's
 2 not important, but in simple terms did he encourage you
 3 and your team to focus on the living?
 4 A. Yes, he did.
 5 Q. And you then literally shouted to your team, "Guys,
 6 first aid, first aid, first aid"?
 7 A. Yes, that's correct.
 8 Q. And in turn encouraged your team to focus on the living,
 9 did you not?
 10 A. I did, sir, yes.
 11 SIR JOHN SAUNDERS: Before we go on, it is just a sort of
 12 general impression for me. When you walked into the
 13 room, it was clearly a terrible scene and we all well
 14 understand that. Was your impression there seemed to be
 15 a lot of people there helping the injured or there
 16 really aren't many there helping? Because you have told
 17 us there were ShowSec people there, first—aiders there,
 18 we know there were some police officers there. Was your
 19 impression lots of people or really relatively few?
 20 A. I wouldn't say there were lots of people there, sir.
 21 The people who were there, everyone was doing something.
 22 Everyone was attending to someone and there was people
 23 there, injured people, who didn't have anyone with them.
 24 SIR JOHN SAUNDERS: Right.
 25 A. So I wouldn't say there was many people there at the

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1 time, but whoever was there were doing...
 2 SIR JOHN SAUNDERS: What they could?
 3 A. Indeed, yes.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR GREANEY: We'll just deal with one final entry and then
 6 we've gone on a little longer than I said, sir, and then
 7 we'll take a break.
 8 You'll probably need to turn over the page to an
 9 entry that is numbered 3,076. It's timed at 22.56.15.
 10 Do you have that one, sergeant?
 11 A. Yes, I do.
 12 Q. We're not going to name individuals. We can see that
 13 Patrick Ennis is involved at that stage and that also an
 14 advertising board is being used to move a patient. Did
 15 you notice that an advertising board was being used for
 16 that purpose?
 17 A. I can't recall if I could remember that. I know we did
 18 use advertising boards and whatever we could whilst
 19 we were in the City Room to help people.
 20 Q. At that early stage when you just entered, did you give
 21 any thought to the availability of equipment such as
 22 stretchers?
 23 A. Not at that stage, no, sir.
 24 MR GREANEY: We're going to come on, after a break, to how
 25 your thinking and indeed concerns developed over the

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1 next period of time.
 2 Sir, that would be a convenient moment for a break.
 3 SIR JOHN SAUNDERS: You suggest how long.
 4 MR GREANEY: I think 20 minutes would be fine, sir.
 5 SIR JOHN SAUNDERS: Is that all right for you or would you
 6 like longer?
 7 A. That's fine, sir.
 8 SIR JOHN SAUNDERS: Twenty minutes from now, just after
 9 quarter to.
 10 (11.28 am)
 11 (A short break)
 12 (11.48 am)
 13 MR GREANEY: We were at 10.56, sergeant, and you and your
 14 team had entered the City Room. I'm going to draw your
 15 attention next, please, to the final two entries on the
 16 page that you should be on, entries 3,107 and 3,117.
 17 At 22.56.24, you can be seen putting on gloves and
 18 you state to your team:
 19 "Casualties in twos. Casualties in twos. Stick in
 20 twos together. Casualties."
 21 And members of your team then walk away from you and
 22 towards people who are injured. What did you mean by
 23 saying, "Casualties in twos", sergeant?
 24 A. I was probably relating to the officers to work as
 25 a pair together to give first aid to anyone who required

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1 it , working in twos.
 2 Q. As we've heard, you've been given the instruction by
 3 Inspector Smith to focus on the living . You shouted out
 4 to the team, "First aid, first aid", and you're telling
 5 them now to work in pairs in relation to casualties?
 6 A. Yes, that's correct.
 7 Q. Seconds later, the final entry on that page, 22.56.27,
 8 PC Shott, one of your team, asks you:
 9 "Where are the ambulances coming into?"
 10 And you replied:
 11 "They're coming, mate, they're coordinating."
 12 So should we understand from that that it was your
 13 expectation that ambulances would be arriving?
 14 A. Yes, that's correct.
 15 Q. Was it your expectation that paramedics and/or ambulance
 16 technicians would be coming into the City Room?
 17 A. Yes.
 18 Q. What was that expectation based upon?
 19 A. Because there was a number of injured people there,
 20 casualties , that needed medical treatment. I was hoping
 21 it was a matter of time before the paramedics would be
 22 there to assist .
 23 Q. Is the point as simple as this : that you had some basic
 24 first aid training but not more than that, you had some
 25 basic first aid equipment, but what the people in there

1 needed was treatment by people who were better trained
 2 and with more equipment?
 3 A. Yes, sir , it was more trauma training and better
 4 equipment and better training to be in there to help
 5 them people.
 6 Q. Did you become increasingly concerned as the seconds
 7 turned into minutes, and the minutes into a number of
 8 minutes, that paramedics were not entering the City Room
 9 over and above the one who was there?
 10 A. Yes, sir , I was.
 11 Q. The answer may be obvious, but why was it that you
 12 became increasingly concerned by that state of affairs ?
 13 A. Because, as you said, sir , minutes were going by, there
 14 were people there with lots of injuries and we needed
 15 paramedics with the expertise, better equipment there,
 16 as quickly as possible .
 17 Q. In the period that followed, I can deal with this by way
 18 of summary but I want to assure everyone that I'm not
 19 missing out anything that is relevant. You repeatedly
 20 encouraged your officers to help those who needed help,
 21 did you not?
 22 A. Yes, I did.
 23 Q. You encouraged them to support each other in what was
 24 obviously a situation of horror?
 25 A. Yes, I did.

1 Q. You spoke to the injured, seeking to reassure them, did
 2 you not?
 3 A. I did, sir , yes.
 4 Q. And indeed, if we turn over the page, to the penultimate
 5 entry on that page, 3,432, timed at 22.58.52, you are
 6 recorded on your camera saying to a person injured
 7 at the scene:
 8 "We're getting ambulance and medics to you. Just
 9 hang in there."
 10 Do you not?
 11 A. Yes, that's right , sir .
 12 Q. Again, therefore, does this reflect your expectation
 13 that paramedics would be turning up to that scene to
 14 help those who were so severely injured?
 15 A. Yes, correct.
 16 Q. At around the time we were just dealing with, 22.58.52,
 17 the other TAU team was arriving.
 18 So Mr Lopez, could we have on the screen, please,
 19 {INQ035612/160}.
 20 22.58.19. A second group of six GMP Tactical Aid
 21 Unit officers enter Victoria Station via the same
 22 entrance. One of those also has the bag containing the
 23 basic first aid equipment.
 24 Just minutes later, you returned again to the topic
 25 of ambulances. Would you go over the page, please? The

1 line entry is 3,661. The time by now is 23.00.41.
 2 It 's recorded that you meet another officer,
 3 he isn't named in the schedule, but from the sensitive
 4 sequence of events we can confirm his name is
 5 PC John Goodwin.
 6 He had entered the City Room to assist and you said
 7 to him:
 8 "We need the fucking medics, John."
 9 Adding:
 10 "Try and grab a casualty. Make sure they're okay."
 11 The sense that perhaps many will have about you,
 12 sergeant, is that you are not a person who readily
 13 resorts to the use of words such as fucking. Is this an
 14 indication of your increasing frustration with what was
 15 happening, or rather what was not happening?
 16 A. Yes, that would be correct.
 17 Q. When you refer to the "fucking medics", who are the
 18 medics? Are you talking about doctors or some other
 19 group of people?
 20 A. No, I'm referring to paramedics, sir , ambulance
 21 paramedics.
 22 Q. And how were you feeling, sergeant, at that stage, at
 23 just gone 11 o'clock?
 24 A. I was frustrated, sir , I was thinking, "Where are they,
 25 where are the paramedics? There's one here, we need

1 more".
 2 Q. Again by way of summary, did you continue in the minutes
 3 that followed to speak to and comfort casualties and to
 4 support your staff and others who were seeking to
 5 assist?
 6 A. Yes, I did.
 7 Q. Shortly afterwards, over the page, please, line 3,855,
 8 at 23.02.15, you instructed other members of your staff
 9 to turn their body-worn cameras on. Why did you do
 10 that?
 11 A. That was, sir, to ensure we were evidence gathering at
 12 the same time as well.
 13 Q. As we look through further entries, we can see that your
 14 concerns continue to grow and grow. Over the page,
 15 please, to line 4,185, we can see that you state at
 16 23.04.43:
 17 "Come on, paramedics."
 18 Do you not?
 19 A. Yes, that's correct.
 20 Q. Just a minute later, you're recorded on the CCTV
 21 speaking to Advanced Paramedic Paddy Ennis.
 22 A. Yes.
 23 Q. We'll show that on the screen, sergeant.
 24 {INQ035612/206}, 23.05.57. This is a shot from
 25 within the City Room, very heavily redacted for obvious

1 reasons:
 2 "Sergeant Kam Hare approaches Paramedic
 3 Patrick Ennis and they appear to be leading him and
 4 pointing him towards an area of the City Room where
 5 a large number of injured casualties are located. They
 6 both walk out of camera view."
 7 Are you able to recall what you said, at least in
 8 summary, to Advanced Paramedic Ennis at that stage?
 9 A. I do believe that I was directing the paramedic,
 10 Mr Ennis, towards certain casualties.
 11 Q. Was Advanced Paramedic Ennis someone you knew?
 12 A. No, I didn't know Mr Ennis until that night.
 13 Q. You'd never seen him before?
 14 A. No.
 15 Q. If you turn over, I think, a couple of pages, please, to
 16 an entry which is 4,746.
 17 SIR JOHN SAUNDERS: Just before we do, Mr Greaney, obviously
 18 it's important, and you're doing it in a way to make
 19 sure we get the sequence.
 20 MR GREANEY: Yes.
 21 SIR JOHN SAUNDERS: And obviously, for the witness it's
 22 quite difficult getting the sequence, so just for my
 23 benefit, by this stage have any of the casualties been
 24 moved out in whatever way?
 25 MR GREANEY: Yes, they have.

1 SIR JOHN SAUNDERS: That is a process which is ongoing at
 2 this stage?
 3 MR GREANEY: It is.
 4 SIR JOHN SAUNDERS: Thank you. I'm just not asking you
 5 because you're trying to remember things and I have no
 6 doubt it's extremely difficult to get everything in
 7 sequence, if not impossible.
 8 A. Thank you, sir.
 9 MR GREANEY: This is obviously a difficult experience for
 10 everyone.
 11 SIR JOHN SAUNDERS: Yes.
 12 MR GREANEY: There undoubtedly are some who would wish that
 13 we went into more detail and complete detail in relation
 14 to these events, others who will be finding even this
 15 amount of detail extremely distressing. I have had to
 16 decide where to draw the line. I hope that people can
 17 understand why I have drawn that line where I have and
 18 that the horror of what occurred is being communicated
 19 adequately.
 20 Just before we get to the entry that I was talking
 21 about, throughout the course of these events, and again
 22 without referring to any particular patient, there is
 23 reference to the use of a defibrillator; do you recall
 24 that?
 25 A. I do, yes.

1 Q. The sense, when one looks at the material overall,
 2 is that you would rather there had been -- was there
 3 just one defibrillator there?
 4 A. Yes, one that we used.
 5 Q. Put in very simple terms, was it your belief that one
 6 was just not enough?
 7 A. Yes, it wasn't enough, no.
 8 Q. Because there was more than one patient who needed it?
 9 A. Yes, sir.
 10 Q. We were at line 4,746. It's now 23.08.39. PC Dawson
 11 speaks to you and refers to the fact that a particular
 12 injured person is going to be removed on a table and
 13 that the table therefore is to be used as a stretcher.
 14 "Casualty clearing", PC Dawson says, "is out the
 15 front. Anyone that can be moved, they want moving."
 16 Now, 23.08, it's 37 minutes after the explosion, and
 17 this I think is the first reference to casualty
 18 clearing. We'll get to that in a moment.
 19 First of all, obviously by this stage you knew that
 20 something that was not a stretcher, at least not
 21 technically a stretcher, was going to be used to
 22 transport a patient. But by this stage, did you have
 23 any concerns about that state of affairs?
 24 A. Yes, because we were using tables and other items as
 25 stretchers, to help people to get them downstairs.

1 Q. As we look down this page, we can see you developing a
 2 particular concern about a particular person, and at
 3 line 4,948, you walk over to PC Gareth Wray and you ask
 4 him where the paramedic is, and in context this must be
 5 a question about Advanced Paramedic Ennis. PC Wray
 6 states:
 7 "Get that paramedic over here and ask him."
 8 And then the rest of the sentence can't be read.
 9 Am I right in understanding that what is happening here
 10 is not that frustration is developing about Mr Ennis as
 11 a person, but instead frustration is developing about
 12 the fact that this area is not one into which paramedics
 13 are coming in numbers?
 14 A. That would be correct, sir.
 15 SIR JOHN SAUNDERS: Are we going to tell at what stage that
 16 the other two paramedics do come?
 17 MR GREANEY: We are. I've got the time in my head, but I'm
 18 going to ask Mr Suter if he could ask Mr de la Poer to
 19 give us the precise time.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: They are referred to in the schedule that
 22 we are looking at, but I'm not sure it identifies the
 23 exact time -- in fact, I know it doesn't -- that they
 24 arrive. Mr de la Poer is watching these proceedings and
 25 I'm sure he'll help us.

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1 If we turn over the page, 23.13.32, line 5,255, we
 2 get a yet further reference to paramedics. PC Hill
 3 shouts across the City Room to Sergeant Hare as he walks
 4 across to him and he shouts at you:
 5 "Kam, are the paramedics coming?"
 6 And you replied:
 7 "Paramedics, mate, they need to be coming in in
 8 droves."
 9 Was that your feeling at that time? That paramedics
 10 were needed in that room in considerable numbers?
 11 A. Yes, sir, that's correct.
 12 Q. And that just was not happening?
 13 A. That's correct as well.
 14 Q. The next minute, over the page, please, 23.14.23. Just
 15 before we read that out, which is very much on the same
 16 theme, we need to be clear about what is happening,
 17 because throughout this whole period of time, just so
 18 we can get a sense of it, you are speaking to people who
 19 are injured?
 20 A. Yes, sir.
 21 Q. You're speaking to your staff?
 22 A. Yes, that's correct.
 23 Q. Encouraging them to help to the extent that they can?
 24 A. Yes.
 25 Q. Encouraging them to support each other?

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1 A. Yes, sir.
 2 Q. And in short, were you doing your best, with the limited
 3 training that you had in first aid, to coordinate
 4 a response?
 5 A. Yes, sir, I did my best.
 6 Q. As I said, we're in the top entry on that page. I hope
 7 you have it. 5,343. It's now 23.14.23. You spoke to
 8 PC Carmody and PC Sivori, saying:
 9 "We need paramedics in here."
 10 To which Constable Sivori replied:
 11 "I know we do. They're trying to get them here as
 12 quick as they can."
 13 And PC Carmody stated:
 14 "They've just turned up but they're dealing with the
 15 ones outside."
 16 SIR JOHN SAUNDERS: Mr Carmody was one of your team who'd
 17 come into the City Room?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Do I read into that that he had by that
 20 time taken someone away downstairs, so had gone
 21 downstairs and was able to see what was going on?
 22 A. Yes, sir, I believe so. He must have been downstairs
 23 and seen the paramedics downstairs on the concourse.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR GREANEY: It's now very nearly 23.15 and you have been

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1 routinely and effectively complaining about the fact
 2 that there was only one paramedic in that room, had you
 3 not?
 4 A. Yes, sir.
 5 Q. This is about 20 minutes after you had entered the
 6 City Room?
 7 A. Yes.
 8 Q. Twenty minutes during which you'd been doing, as you
 9 say, your best to help?
 10 A. Yes, sir.
 11 Q. The conversation about the need for paramedics continued
 12 and you'd been told by PC Carmody that there were
 13 paramedics but they were outside. And you then said,
 14 line 5,360:
 15 "They need to come in. That girl's still okay.
 16 She'll get through."
 17 A. Yes, sir.
 18 Q. And in saying, "They need to come in", were you
 19 referring to the paramedics that you'd been told were
 20 outside the room?
 21 A. Yes.
 22 Q. And making the point that it seemed to you that there
 23 was someone here that, with that assistance, might be
 24 okay?
 25 A. Yes, sir.

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1 Q. The next entry that I want to draw your attention to is
 2 line 5,567. It's timed at 23.16.50.
 3 But just before that, sir, to answer your question,
 4 at 23.15.00, so between the discussion about the girl
 5 and what we're next going to, Paramedics Hargreaves and
 6 Vaughan arrived in the City Room.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: At 23.16.50, Sergeant Hare speaks to
 9 Sergeant Anwyl, and you stated:
 10 "Everyone's triaged now, mate. We're trying to get
 11 some stretchers, make some stretchers. Lads have gone
 12 to get some more tables from in there."
 13 Sergeant Anwyl asked you:
 14 "Do we need a stretcher team then?"
 15 And you reply:
 16 "We're okay, going round, just reassuring now, and
 17 let's start stretchering casualties out."
 18 So by that stage, did it remain the position that to
 19 get people out who were unable to walk was requiring the
 20 use of makeshift stretchers?
 21 A. Yes, sir.
 22 Q. Forty-two seconds later, and this is the final entry on
 23 the page, line 5,641, timed at 23.17.32, you spoke again
 24 to PC Hill, who asked you where the paramedics were, and
 25 you replied:

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1 "We're trying to get them in."
 2 Throughout this whole period of time, now 22 minutes
 3 since you had entered the City Room, were you wanting
 4 paramedics in there to provide treatment?
 5 A. Yes, sir, that would be right.
 6 Q. Over the page, the second entry down, 5,656, 23.17.41,
 7 you spoke to someone described as an arena medic named
 8 Sarah Broadbent. On this same topic, you asked her if
 9 there were any other tables that can be used as
 10 stretchers. Did she reply:
 11 "Fucking hell, no. Apart from if you pull the
 12 boards apart."
 13 But did you say that you and your team were doing
 14 that already?
 15 A. Yes, that's correct.
 16 Q. Twelve seconds later, line 5,673, at 23.17.53, did you
 17 speak to Inspector Smith?
 18 A. Yes, I did.
 19 Q. And you stated:
 20 "Boss, we're happy now, which is any injured
 21 parties, we can take out and get first aid."
 22 What did you mean by that, do you recall?
 23 A. I think I meant that we tried to get as many of the
 24 injured people and casualties downstairs to get further
 25 first aid.

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1 Q. There's a discussion about a particular person or
 2 particular persons, and you then stated, as you had
 3 stated by now many times:
 4 "We need more paramedics. We need them in here
 5 now."
 6 So that continued, it would seem, to be your view,
 7 did it not?
 8 A. Yes, that's right, sir.
 9 SIR JOHN SAUNDERS: You had radios with you. Was anyone
 10 trying to communicate with anyone downstairs to say,
 11 "Can you get paramedics up here?" or were you waiting
 12 for Inspector Smith? We'll hear from him about that.
 13 A. It was that busy, the radio, the message and the
 14 audibility ...
 15 SIR JOHN SAUNDERS: It sounds that people were going
 16 downstairs, so the message could be being got through
 17 that way?
 18 A. Yes, I'm sure. Everyone would have asked paramedics to
 19 come upstairs, I'm sure of that.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: A little bit further down that page, the bottom
 22 entry, by now it's 23.19.11, line 5,803. PC Dawson, one
 23 of your team, approached you and you say to him:
 24 "We need some stretcher teams now, taking them out,
 25 mate."

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1 In reference to the wounded casualties in the
 2 City Room, did you not?
 3 A. Yes, I did.
 4 Q. And PC Dawson told you:
 5 "The problem we've got is we're leaving -- they're
 6 down there on the stretchers. That's the problem."
 7 And what did you understand him to mean when he said
 8 that to you?
 9 A. By that conversation, sir, to me we're using the
 10 makeshift stretchers, we're taking injured people
 11 downstairs, and then we're leaving them on the
 12 stretchers there, thus we're going to run out of
 13 stretchers.
 14 Q. You then said to PC Dawson:
 15 "Casualty is out there."
 16 Pointing in the direction of Victoria Station:
 17 "They're not fucking -- they need to start coming
 18 in, mate."
 19 Over the page, line 6,003 -- and sergeant, I do
 20 appreciate that we're looking at a lot of entries that
 21 seem rather repetitive, but it's important that we
 22 should have a sense of your frustration and what you
 23 were saying to express it.
 24 6,003, 23.20.48. You are shown on your body-worn
 25 camera footage approaching four officers of BTP and

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1 stating:
 2 "Guys, BTP, anyone that can walk out, let's take
 3 them out, please, we need casualty clearing teams. Take
 4 them out, please."
 5 It's now 25 minutes after you have entered and
 6 almost 50 minutes to the second after the explosion.
 7 What did you mean in what you're recorded as having said
 8 to BTP?
 9 A. I'm asking BTP officers, anyone that can walk out, they
 10 need to be downstairs in the clearing area and then we
 11 need to start to make up stretcher clearing teams to
 12 take them out.
 13 Q. In the period that then followed, you yourself were
 14 involved in removing a particular person from the
 15 City Room, were you not?
 16 A. Yes, that's correct.
 17 Q. And how was that done?
 18 A. I remember asking BTP officers to form a stretcher team
 19 with myself for that particular patient. I do recall
 20 the gentleman was of large build and it would take a few
 21 of us to use the makeshift stretcher, the railings,
 22 really, to hold on to it and to have enough officers
 23 round there to lift the patient up and take him
 24 downstairs.
 25 Q. Did you take the patient downstairs on that makeshift

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1 stretcher?
 2 A. Yes, along with BTP officers.
 3 Q. And can you give us an idea, was that a straightforward
 4 thing to achieve or was it difficult?
 5 A. No, sir, it was difficult. The barriers were metal
 6 barriers, they were heavy, they weren't ideal, but it's
 7 what we had at the time, it's what we made use of. And
 8 then it was difficult, and it became slower as I got to
 9 the steps, and as I got to the steps I remember using
 10 the terminology of counting steps, 1, 2, 1, 2, and that
 11 naturally slowed people down on the steps, so by
 12 shouting that out, other officers were relaying that as
 13 well, and by synchronising, 1, 2, we were slowly, slowly
 14 going down each step to make sure that the patient
 15 didn't slide off or fall off because it was difficult,
 16 they weren't strapped on. So it was a slow process, it
 17 was heavy. I remember there where legs on the metal
 18 barrier and I remember saying to help us to take the
 19 weight off and for ease, put the leg on to the metal
 20 railing to use as a lever, just slow us down and slowly
 21 slide us down slowly by using that method of 1, 2, 1, 2,
 22 1, 2. So we had to be careful we didn't — the injured
 23 person didn't fall off the railings and to slow it all
 24 down and everyone needed to do that at the same time.
 25 Q. You were doing this with BTP officers. How many BTP

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1 officers?
 2 A. For that gentleman, I remember there must have been
 3 perhaps eight, nine, maybe more officers. There was
 4 quite a few officers and I do recall on one side some of
 5 the officers were female officers as well and I was
 6 trying to balance out, so we had enough weight and
 7 strength all the way round the stretcher, especially
 8 towards the bottom end because the gravity as we were
 9 walking down the stairs, spread the officers out to make
 10 sure that they had a grip of the railing and there was
 11 more strength on that particular side, on the left-hand
 12 side, to strengthen that up to keep hold of the railing,
 13 the makeshift stretcher.
 14 Q. It sounds from what you're saying as if that was a very
 15 unsatisfactory way of moving the patient.
 16 A. It was, but that's the only thing we had to move the
 17 casualties out, so we had to make do. It was the only
 18 thing that we had to take the injured people down with
 19 at the time.
 20 Q. And by unsatisfactory, what I mean, and tell me if you
 21 agree, is not just moving a person in that way and with
 22 the risk that they might fall off the makeshift
 23 stretcher, but also taking that number of officers away
 24 from the City Room where they might have been used to
 25 provide help?

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1 A. Yes, it took eight or nine, maybe more, officers to do
 2 that for that one casualty, but it was the only way to
 3 use the officers because the next objective was to get
 4 the casualties down to the clearing station to get them
 5 more first aid. It was done as quickly as possible, but
 6 then it also had to be a slow process to make sure we
 7 had hold of the railing and the stretcher and the
 8 casualty didn't fall off. So it did take a number of
 9 officers to do that. Yes, I was taking officers away
 10 from the City Room, but that had to be done as well.
 11 Q. Certainly I wasn't criticising the decision that you
 12 were compelled to make. So we are clear, the reason why
 13 you were having to move people and move them in that way
 14 was because the area you were taking this patient to was
 15 where that person could receive treatment?
 16 A. That's correct, yes.
 17 Q. I'm not very far from the end of my questions, although
 18 as you'll appreciate, others will have questions for
 19 you. I'm going to take you next, it's over at least one
 20 page, it might be more than one page, to line 7,904.
 21 We've moved ahead in time. So we have the context,
 22 you've dealt with the patient that you've told us about
 23 and you then returned to the City Room, did you not?
 24 A. Yes, I did return.
 25 Q. You were then involved in making the arrangements to

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1 move other people who required treatment from the
 2 City Room down the stairs; is that correct?
 3 A. Yes, that's correct.
 4 Q. Line 7,904. It's now 23.40.48. Those who needed to be
 5 removed for treatment had left the City Room. It's now
 6 1 hour and 9 minutes since the explosion. You had
 7 a conversation, do you see, with Patrick Ennis? He said
 8 to you that his name was Paddy and he was to shake your
 9 hand. Do you remember that?
 10 A. Yes, I remember that.
 11 Q. You said to him:
 12 "Good job, mate. Fucking hell."
 13 And he replied, Advanced Paramedic Ennis:
 14 "I don't know what we'd do without you guys here."
 15 And you replied:
 16 "Teamwork, like this, mate."
 17 I'm going to try to unpick that a little and see if
 18 you can help us with what you meant in what you said.
 19 By this stage, how were you feeling?
 20 A. At this stage I was thinking we'd got as many people
 21 downstairs, the majority of the casualties downstairs
 22 for treatment.
 23 Q. And when you said to Mr Ennis, "Good job, mate, fucking
 24 hell", what did you mean?
 25 A. He'd shaken my hand and said, "Couldn't have done it

1 without you", so like, yeah, we've tried to do our best,
 2 we've done a good job, the best we can, and then
 3 emphasised that by... "What have we just dealt with?"
 4 Q. Did you say, "What have we just dealt with?"
 5 A. The words were, "Good job, mate. Fucking hell".
 6 I think those were expressions of: my God, what have we
 7 just dealt with? That kind of expression there.
 8 Q. Have I understood correctly that what you were
 9 communicating to him is: we've done our best in terrible
 10 circumstances? And would it be fair to say that you
 11 were also thinking, without the degree of help that we
 12 needed?
 13 A. Possibly, yes. That's probably what I meant.
 14 Q. And Mr Ennis was to say to you, "I don't know what we'd
 15 do without you guys here".
 16 Now, thereafter, and in summary, but again without
 17 failing to deal with all relevant matters, there was
 18 a period when you were concerned to consider and ensure
 19 the welfare of your team; is that correct?
 20 A. Yes, sir.
 21 Q. Who, like you, had been through that terrible
 22 experience?
 23 A. Yes, that's correct.
 24 Q. Throughout the whole of that period that we've been
 25 dealing with, from 22.55 when you go out, to 23.40 when

1 you're speaking to Patrick Ennis, did you give any
 2 thought to the possibility that there was a gunman
 3 in the City Room?
 4 A. At that time, sir, when I approached the stairs, there
 5 was a firearms officer there, so again I knew we had,
 6 I would say, a containment on the stairs, that access
 7 there. When I was in the City Room, I was aware, again,
 8 there were further firearms officers just outside of the
 9 City Room doors, leading to the bowl area, the
 10 concourse, before going into the... So I knew it was
 11 secure, I had colleagues there, firearms specialist
 12 officers there. The only other people in that room were
 13 the injured patients, casualties, police officers, so
 14 I felt safe in there.
 15 Q. Am I correct in saying that really, bearing in mind all
 16 of those circumstances, it didn't really cross your mind
 17 that there was a terrorist gunman within the City Room?
 18 A. Not at that time. Initially when I went in there,
 19 I didn't know what to expect. Having established
 20 obviously there was no threat to me at that time or my
 21 officers, I was happy to carry out first aid and I knew
 22 that there were firearms officers at the doors. For me,
 23 that area was secure for me to do what I needed to do to
 24 the people.
 25 Q. Did you give during that whole period we're discussing

1 thought to the possibility that there might be
 2 a secondary device within the City Room?
 3 A. Yes, sir. So after the sitrep at the bottom of the
 4 stairs and going up, that was at the back of my mind,
 5 that there could be a secondary device. We needed to
 6 get in there quickly to help people. We got in there,
 7 treated casualties, we removed casualties downstairs,
 8 and then, once that was done, it was a case of there
 9 were a lot of police officers there and other members of
 10 the public, we needed to get them out. Inspector Smith
 11 and myself had that conversation about getting people
 12 out of the room, so that's when I knew, towards the end
 13 when all the casualties had been removed, we could
 14 safely -- the next thing was a lot of police officers
 15 there. We needed to get them out of view, out of sight,
 16 away from that area and for their welfare as well and
 17 get support for them afterwards.
 18 Q. The position is that your shift didn't end, did it, at
 19 that point, 11.40?
 20 A. No, sir.
 21 Q. And indeed, you were deployed back into the City Room.
 22 I'll choose my words carefully. You went back in there
 23 for the purpose of making an assessment of the extent of
 24 this terrible outrage, did you not?
 25 A. Yes, sir.

1 Q. Then, and you told us that you were a trained search
 2 officer with experience in the identification of
 3 improvised explosive devices, you were deployed as part
 4 of a team to carry out a search of the entire arena,
 5 were you not?
 6 A. Yes, sir.
 7 Q. I am uncertain of precisely where it fits into those
 8 events, and it's probably in between them, but do you
 9 remember that at 00.27 hours you switched off your body
 10 cam?
 11 A. Yes, I'd have done that just prior to carrying out that
 12 extra search.
 13 Q. The last thing, the very final page of the schedule, and
 14 the final entry indeed, the last thing that the body cam
 15 captured was you walking down the staircase, away from
 16 the City Room, and on to the station platform. You said
 17 to one of your colleagues, as you walked down the
 18 stairs, away from that scene, these words:
 19 "Fucking hell. We weren't ready for this, were we?"
 20 What did you mean by that?
 21 A. I must have meant that what we'd just dealt with, it was
 22 overwhelming, it was... I think I was just expressing
 23 that we weren't ready for this, what we've just dealt
 24 with, what we've come across, for that night, that
 25 incident. We weren't expecting to do this tonight.

1 SIR JOHN SAUNDERS: You never could be ready for it, though,
 2 could you?
 3 A. No, sir, no training could have prepared you for that.
 4 MR GREANEY: Sir, I can see the time. We can either take an
 5 early lunch and deal with the questioning of other core
 6 participants at 1.30, it's probably better, or we can
 7 make a start on that now.
 8 SIR JOHN SAUNDERS: I'm going to leave it entirely to you.
 9 I don't know how long the questioning is estimated to
 10 last. I'm certainly not suggesting we finish it. But
 11 would you like to carry you for a bit and have lunch
 12 later?
 13 A. I'm happy to carry on. As you wish, sir.
 14 SIR JOHN SAUNDERS: It's really your choice.
 15 A. I'm happy to continue if it helps everyone.
 16 MR GREANEY: I'm not entirely certain who has questions.
 17 I know who has made, if I can put it this way, a bid to
 18 question. I will ask, first of all, whether Mr Smith on
 19 behalf of North West Fire Control has any questions that
 20 he wishes to ask.
 21 MR SMITH: Thank you. We have no questions.
 22 MR GREANEY: Thank you very much, Mr Smith.
 23 I'm going to ask whether Ms Roberts on behalf of
 24 North West Ambulance Service has any questions.
 25 MS ROBERTS: No, thank you, sir.

1 MR GREANEY: Thank you very much. That just leaves, subject
 2 to Mr Horwell, of course, Mr Weatherby, who will lead on
 3 behalf of the bereaved families.
 4 Questions from MR WEATHERBY
 5 MR WEATHERBY: Can you see and hear me?
 6 A. Yes, sir.
 7 Q. Thank you. Can I, first of all, sir, indicate that, as
 8 you'd expect, there have been discussions with
 9 Mr Greaney and he mentioned the difficulty of detail on
 10 this evidence. Can I just say from the perspective of
 11 those that I represent, the degree of detail has been
 12 entirely appropriate.
 13 Mr Hare, can I preface what I'm going to ask you by
 14 indicating that I am not in any way going to imply any
 15 criticism of you personally or of what you did. I'm
 16 just going to ask you for a few follow—on details from
 17 the evidence that you've already given. Is that okay?
 18 A. Yes, sir.
 19 Q. I want to start at the beginning with the way that you
 20 mobilised to the scene. Mr Greaney has suggested you
 21 self—mobilised and I'm not going to quibble at all with
 22 the words. But I just want to, with your assistance,
 23 drill down into that. Again for your reassurance, I'm
 24 going to be suggesting to you that what you did was
 25 broadly in accordance with the relevant Greater

1 Manchester Police policy. Okay?
 2 A. Yes, sir.
 3 Q. So you've told us that on hearing from PC Dawson of the
 4 multiple reports of what was going on at the arena that
 5 you tried to get hold of the force duty officer on your
 6 mobile.
 7 A. I was trying to get hold on the landline phone, sir,
 8 in the office.
 9 Q. Sorry, on the landline. It may not matter, but can you
 10 just help us? Why by phone and not by radio initially?
 11 A. Because the FDO, sir, operates mainly using the phone
 12 and not monitoring the radios.
 13 Q. I see.
 14 A. The FDO, sir, would operate by communication by the
 15 phone for the majority of the time, unless for other
 16 operational reasons or other operational incidents the
 17 FDO would contact that particular specialism via
 18 a dedicated radio channel for that incident and for that
 19 specialism.
 20 Q. Thank you, that's very helpful. So you would, during
 21 the course of your general duties, not this particular
 22 night, you would often be in contact with the FDO and
 23 you would generally, if you were at the police station,
 24 do so by the phone?
 25 A. Yes, sir, the FDO would contact us direct on the mobile

1 phone or from the landline or from the mobile phone.
 2 Q. You've mentioned the FDS, the force duty supervisor,
 3 who, as I understand it, is effectively an assistant to
 4 the FDO.
 5 A. Yes, I believe they are an assistant to the FDO.
 6 Q. And in mentioning the FDS, did I understand that if you
 7 can't get through to the FDO, you would try the FDS, the
 8 force duty supervisor?
 9 A. Yes, sir.
 10 Q. And do you recall on that evening, at about 22.35, did
 11 you in fact try this force duty supervisor as well as
 12 the FDO or not?
 13 A. I do recall trying the FDO a number of occasions and the
 14 FDS lines as well. I have a couple of numbers for them
 15 as well.
 16 Q. So you did your best to get through in the normal way
 17 and you just simply, through no fault of yours, weren't
 18 able to do so. So we then have the radio calls that
 19 you've already been taken to. In terms of what
 20 happened, you radioed in to control, as you've been
 21 taken to, and you ask who is running the incident, and
 22 you ask about the rendezvous point; yes?
 23 A. Yes, sir.
 24 Q. Just so it may be easier, I'll give you the line
 25 references. We've been to them already but I'm not

1 going to refer to them but just in case you need to do
 2 so. The line reference is 1,453 on the log that you
 3 have already been referred to.
 4 So as part of your general duties as the Tactical
 5 Aid Unit, one of those would be patrolling the city
 6 centre; is that right?
 7 A. Yes. So we can patrol -- sometimes we're directed to
 8 patrol to a particular division or area to support the
 9 local officers or, by default, I would patrol the city
 10 centre, on the outskirts or wherever we're requested or
 11 tasked to patrol.
 12 Q. So if some incident occurs in the city centre, you're
 13 radioed or called and you deploy and sort it out?
 14 A. Yes. Either that -- we can hear of an incident and
 15 I can shout up and say, "I can attend that", so I do
 16 deploy myself to incidents as well.
 17 Q. And the arena would therefore be on your patch if you
 18 were patrolling in the city centre?
 19 A. Yes, it'd be -- it's the city centre, I class it as part
 20 of the city centre, so it's an area where I patrol.
 21 Q. So reacting to an incident at the arena would not be
 22 particularly unusual to you?
 23 A. It wouldn't be unusual, no.
 24 Q. So back to what you tried to do immediately. Within
 25 4 minutes of the bomb going off, you've learnt of the

1 incident and you try to ascertain who you are to report
 2 to and to seek some kind of command order from; would
 3 that be a fair way of putting it?
 4 A. Yes, sir, it would.
 5 Q. So you are there on your tour of duty, supervising your
 6 team, and in fact you end up, as we've heard,
 7 supervising another team as well. You're calling the
 8 FDO, the FDS, and then radioing, trying to establish and
 9 maintain a line of command above you?
 10 A. Yes, sir, and that's a normal routine of me attending
 11 any incident, to find out who is the officer on the
 12 scene or who is in charge.
 13 Q. Absolutely. That's what I'm trying to establish with
 14 you, that you're doing what you should do. So at that
 15 point you're listening to the incident, you're assuming
 16 that you're going to be deployed because of the duties
 17 that you do and your general duties that night. And
 18 you're trying to fit in with the line of command and
 19 you're trying to gain knowledge as to exactly where to
 20 deploy to?
 21 A. Yes, sir.
 22 Q. At that time, when these reports came through, it's
 23 right, isn't it, that you recognised it as a potential
 24 major incident at that point?
 25 A. Yes, sir.

1 Q. And in fact, we don't need to refer to it, but I'll just
 2 give it for reference, the line in the log that you have
 3 is 1,736. At 22.40.32, you actually refer to this being
 4 a possible major incident. On what you knew, that was
 5 an entirely reasonable assumption to make, wasn't it?
 6 A. Yes, sir.
 7 Q. Are you familiar with the Greater Manchester Police
 8 major incident plan?
 9 A. I wouldn't say I'm familiar with it, sir. I'm aware
 10 there is a major incident plan, a document.
 11 Q. Okay. I've referred to this with another officer, so
 12 I can put it up on screen. For brevity, I'm just going
 13 to quote some parts of it at you and ask you to agree
 14 that what you did was in line with those. Is that okay
 15 or would you like me to put it up on screen?
 16 A. No, that's fine, sir, thank you.
 17 Q. Again, I'm just giving this for reference, it doesn't
 18 need to go up, Mr Lopez, unless anyone wants me to.
 19 {INQ007275/35}. We have paragraph 3.3.2 of the major
 20 incident plan and that refers to the RVP location:
 21 "Where all police and emergency service personnel
 22 attending an incident should be directed."
 23 That was your thinking at the time, wasn't it, to
 24 identify not simply the arena but the place to which you
 25 should be deployed?

1 A. Yes, sir. RVPs are a terminology that I'm familiar
 2 with. When I attend most incidents, I'll always ask and
 3 shout up for an RVP.
 4 Q. Yes. Then again, only for reference, page 46 of that
 5 document, paragraph 4.3 {INQ007275/46}. The major
 6 incident plan refers to the cornerstone of health and
 7 safety legislation, which applies both to officers and
 8 to the general public:
 9 "Before officers are deployed, they must be fully
 10 briefed and all staff involved in responding to a major
 11 incident must understand their role and there must be no
 12 ambiguity."
 13 I understand I'm doing this very swiftly, but what
 14 you were doing in radioing in and trying to get hold of
 15 commanders was to try to get instructions about just
 16 those things. You were trying to be properly briefed
 17 and you were trying to understand what role you should
 18 be doing unambiguously. That was the purpose of what
 19 you were doing; is that right?
 20 A. Yes, sir.
 21 Q. Would you agree that in deploying to a scene like this,
 22 the policy generally is that it's important to know
 23 exactly what's expected of you?
 24 A. Yes, sir. It would be important. More information
 25 would be helpful when attending any incident.

1 Q. And it would be important for commanders in charge of
 2 the incident to know what resources were available and
 3 when and approximately where they were going to attend;
 4 yes?
 5 A. Yes, sir, that'd be fair to say.
 6 Q. So whether we say you were deployed or self-deploying,
 7 that's what you were trying to achieve?
 8 A. Yes, sir, it was.
 9 Q. At line 1,736, so 5 minutes after you had first made the
 10 calls, you still hadn't heard back about who was in
 11 charge, and you had, as you've told us, already started
 12 to mobilise to the scene. So very quickly, you had got
 13 your team together and you had mobilised; yes?
 14 A. Yes, sir.
 15 Q. Although you hadn't received a reply to your
 16 communications about who was running the incident or the
 17 RVP, am I right that you would be expecting, on your
 18 journey to the arena, that that information would, if
 19 possible, be provided to you?
 20 A. Yes, sir. It could have been provided, but with the
 21 sirens going off, the radios being busy, I may have
 22 missed that RVP, but I wasn't sure of where the RVP was
 23 on that night.
 24 Q. I think it doesn't really matter, I'll be corrected if
 25 I'm wrong, but I don't think it was provided to you. So

1 what you did is the next best thing, you deployed very
 2 quickly and then once you'd got to the complex itself,
 3 you tried to gain some understanding of what was going
 4 on, both for your purposes in deploying your team but
 5 also so you could send it back to control; is that
 6 right?
 7 A. Yes, sir.
 8 Q. In so doing, you would add to the command of the
 9 incident and you would also be making it clear, so far
 10 as you were able to, to those who were or should have
 11 been in command, where you and your team were and were
 12 available?
 13 A. Yes, sir. I did radio up to let them know that my team,
 14 1 and 7, which refers to a sergeant and seven PCs, would
 15 be going up to the City Room and liaising with the
 16 inspector who was there.
 17 Q. Okay. We've gone through a lot of this already and
 18 we'll move quite quickly now. At line 2,246, at
 19 22.50.34, we have you calling in to control, and that
 20 was for the dual purpose, wasn't it, of making quite
 21 clear to control where exactly you were and making them
 22 aware of what you had ascertained by that point?
 23 A. Yes, sir, that's correct.
 24 Q. Then Mr Greaney has taken you through various entries,
 25 so I won't take you to them in any detail whatsoever.

1 But you ascertained that Inspector Smith was in fact the
 2 on-scene commander; yes?
 3 A. Yes, sir.
 4 Q. And although you were unable to speak to him directly
 5 initially, you managed through the radio to obtain an
 6 instruction from him to take your team upstairs to the
 7 City Room?
 8 A. Yes, that's correct.
 9 Q. From your perspective, you at that point had a commander
 10 and, within reason, you were to deploy further in
 11 accordance with his instructions; is that right?
 12 A. Yes, that's right, sir.
 13 Q. So at that point you're beginning to assume that it's
 14 safe enough for you to take your team up to the
 15 City Room because that's where Inspector Smith is;
 16 is that a fair way of putting it?
 17 A. Yes, it is, sir.
 18 Q. On the way, you encounter the firearms officer that
 19 you've been asked about and again you take the
 20 opportunity to obtain further information. Would it be
 21 right from that discussion that there's no mention of
 22 any active shooter or any marauding terrorist, but there
 23 was mention of the possibility of a secondary device?
 24 A. Yes, that's correct.
 25 Q. Therefore that was your state of knowledge with respect

1 to risk , both to yourself and your officers and more
 2 generally?
 3 A. Yes, sir .
 4 Q. You had done everything you could to get in touch in
 5 command and you eventually managed to set that in motion
 6 and you got as much information about the risks as
 7 possible?
 8 A. Yes, sir .
 9 Q. Can I move to line 3,117 and by this time it's 22.56.27.
 10 Mr Greaney has asked you about this, but I want to probe
 11 a little bit further. This is when one of your
 12 officers , PC Shott, has asked you about ambulances and
 13 whether they're coming. I think this may be the first
 14 recorded reference to ambulances. Yes?
 15 SIR JOHN SAUNDERS: Could you repeat the number for me,
 16 please? Sorry.
 17 MR WEATHERBY: 3,117.
 18 SIR JOHN SAUNDERS: Thank you very much, yes, I've got it.
 19 MR WEATHERBY: It's the top of the fifth page on my copy.
 20 It may not matter.
 21 SIR JOHN SAUNDERS: I think you may have a different copy
 22 then.
 23 A. I've found it in any case.
 24 MR WEATHERBY: I think that may be the first, at 22.56,
 25 reference to ambulances and it's coming from one of your

1 officers . By this point, relatively early in your time
 2 at the scene, had you thought about ambulances already
 3 or was this something that had prompted you?
 4 A. I think initially it was to get into the City Room, sir,
 5 and see who we can help, and then knowing that was
 6 happening and knowing that obviously ambulances -- other
 7 services would be coming to help us, the ambulances must
 8 be coming, sir, at that point, they must be coordinated,
 9 they must be coming, obviously they're aware.
 10 Q. Obviously that's something that would be dealt with
 11 above your level. It wasn't part of your role, was
 12 it --
 13 A. No. My role was to go in the City Room, sir, and help
 14 as many people as I could.
 15 Q. And to do what you were instructed to do by
 16 Inspector Smith. Did you in fact, when you spoke to
 17 Inspector Smith initially, have a discussion about
 18 ambulances with him?
 19 A. Not initially, sir, no. Not initially. The objective
 20 was to quickly see to people and help people. That
 21 didn't come at that time.
 22 Q. Then you became aware of Mr Ennis, the one paramedic who
 23 was there until about 23.15. When you saw him, did you
 24 have any conversation about ambulances? I'm not
 25 suggesting you should have done, I'm just asking whether

1 you did.
 2 A. I can't recall, sir. There was a lot going on in the
 3 room at that time. I don't recall every conversation.
 4 I can't recall it.
 5 Q. I'm not going to take you through the various references
 6 and the increasing concern about the lack of paramedics
 7 in the City Room that Mr Greaney has already taken us
 8 through. But that's the right way of looking at what
 9 happened so far as you're concerned, isn't it, that
 10 there was an increasing concern, the longer time went
 11 on, at the lack of paramedics in the City Room from your
 12 perspective?
 13 A. Yes, sir. There was a lot of concern, a lot of
 14 frustration during that time.
 15 Q. And increasingly so because, obviously, you and your
 16 officers were triaging and trying to give first aid to
 17 some very badly injured casualties?
 18 A. Yes, sir.
 19 Q. In that context, did there come a time when you did
 20 speak to Inspector Smith and ask him how long it's going
 21 to be before paramedics arrive or are paramedics
 22 arriving? Did you have that conversation at any time?
 23 A. I do recall having conversations with Mr Smith about
 24 ambulances, you know.
 25 Q. You recall that, but do you recall what the response

1 was?
 2 A. I don't recall the response, sir, no.
 3 Q. Okay. Again, I'm not in way being critical of you
 4 because it wasn't -- I'm not suggesting it was your
 5 role, but you've been asked by the chair about the use
 6 of the radio. Were you using the radio to communicate
 7 for more help whilst you were in the City Room at all?
 8 A. I may have done, sir, but it was busy, the radio was
 9 going off, there were lots of things coming over the
 10 radio. The other incidents were coming over the
 11 radio --
 12 Q. Yes.
 13 A. -- which could have been happening. And the noise and
 14 everything going on... So I could have -- other things
 15 could have been relayed on the radio, I'm not aware.
 16 Q. I'm not being critical at all. Would it have been part
 17 of your thought process that in fact that would be being
 18 dealt with higher up the command chain?
 19 A. Yes. Obviously the controllers knew what was happening,
 20 other officers and commanders, perhaps Silvers, Bronzes,
 21 would have known what was happening.
 22 Q. Line 4,007. 23.03.29. This is a reference to
 23 PC Prince. In your statement, I think you refer to
 24 PC Prince handing out cloths at some point. Do you
 25 recall that?

1 A. I do, sir. That was Sergeant Prince. He was
 2 --I remember him having packs of, like, cloths or
 3 sponges or something similar -- like cleaners use,
 4 perhaps, in packs. I remember him coming round with
 5 them and then myself going out, asking people, does he
 6 need any pads, do you need any pads, to use as bandages.
 7 Q. I missed a little bit of what you said then. You were
 8 describing what these cloths or pads were. You describe
 9 them as cleaning cloths in your statement, but can you
 10 help us again? I missed a word.
 11 A. They'd have been like a cleaning cloth or a cleaning
 12 sponge or pad to be used for cleaning surfaces which
 13 we were using to improvise as bandages or padding, and
 14 I remember him giving me some, as I was going round
 15 asking anyone, do you need any pads for bandages or
 16 something similar.
 17 SIR JOHN SAUNDERS: Perhaps you can help me. There has been
 18 reference from another witness of coming with some
 19 towels and saying, "That's the best we can do". And
 20 Sergeant Prince has certainly been mentioned before.
 21 I don't know whether you can recall if it was him who
 22 was the person with the towels.
 23 MR WEATHERBY: I'm afraid I can't recall. I think it was me
 24 who put that in evidence, which I assume is why you
 25 asked me, but I will try and...

1 SIR JOHN SAUNDERS: It's because you're asking questions at
 2 the moment, Mr Weatherby.
 3 MR WEATHERBY: I should know. I will know after lunch, so
 4 I'll revisit that.
 5 SIR JOHN SAUNDERS: Thank you very much. It is actually
 6 1 o'clock now. Would it be inconvenient, Mr Weatherby,
 7 for you to finish there and break for an hour?
 8 MR WEATHERBY: It wouldn't. Can I indicate, I'm not going
 9 to be very much longer, but I'm guessing I will be 10 to
 10 15 minutes. Again, I'm in your hands.
 11 SIR JOHN SAUNDERS: I think we will break for lunch. Do you
 12 mind?
 13 A. I don't mind at all, sir.
 14 SIR JOHN SAUNDERS: We'll break for an hour and then it
 15 won't be that much longer before you finish, but it is
 16 a bit and I don't want you to keep going unnecessarily
 17 long and the rest of us need to be concentrating as
 18 well. Thank you.
 19 (1.02 pm)
 20 (The lunch adjournment)
 21 (2.00 pm)
 22 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.
 23 MR WEATHERBY: Before I carry on, can I just answer your
 24 question, sir. The reference to towels was on Tuesday,
 25 which was Day 75, page 97, line 9 {Day75/97:9}, and

1 I was asking Sergeant Beasley about some body-worn video
 2 at 23.11 in the City Room, which showed PC Williams, and
 3 he was referring to some towels and he said:
 4 "It's as good as it gets."
 5 And that was with respect to stemming bleeding.
 6 SIR JOHN SAUNDERS: I'm very grateful. Obviously
 7 I misremembered, so thank you for that research.
 8 MR WEATHERBY: I'm sorry I didn't have it before.
 9 Just picking up on improvisation, officer, and again
 10 I underline, I'm not being critical at all, I'm just
 11 trying to drill down so we all understand exactly what
 12 the position was. In respect of Mr Williams, the point
 13 I've just referred to, I don't know whether you saw
 14 Mr Williams with towels.
 15 A. No, I just recall Sergeant Prince with the packs of
 16 towels.
 17 Q. Okay. So Sergeant Prince was handing out cleaning
 18 cloths, as you describe it in your statement, and
 19 I think you suggested before lunch there might have been
 20 sponges. They were cleaning cloths that you might have
 21 to clean tables or chairs or something; would that be
 22 the right description?
 23 A. Yes, sir, it would.
 24 Q. Would I be right that therefore the officers with you,
 25 under your supervision or not, were doing their best,

1 improvising, finding materials which they could use
 2 because they didn't have tourniquets or sufficient
 3 bandages to deal with the injuries before them?
 4 A. Yes, sir, that would be correct.
 5 Q. That deals with that point.
 6 Can I just briefly touch on defibrillators. I think
 7 that you used a defibrillator; is that right?
 8 A. Yes, sir, I assisted, I think twice, with
 9 a defibrillator for different patients.
 10 Q. Were you happy to do so or were you only doing so
 11 because there weren't available paramedics who could use
 12 the defibrillator?
 13 A. I think it was a case of -- I knew we had sight of one
 14 defibrillator, so it was to use that and try and use
 15 that again and find another one to assist anyone else
 16 because there was no one else, really. I was making
 17 sure that the defibs were being used and, if anyone
 18 required one, I could quickly get that to them.
 19 Q. Yes. Were you actually trained in the use of
 20 defibrillators?
 21 A. I believe the first aid training would have trained us
 22 during the first aid training, basic first aid, for how
 23 to use the defibs, which are quite self-operated, and
 24 they give you guidance as to how to use them with
 25 instructions and audio.

1 Q. Can I put it this way: had there been available
 2 paramedics, you would have wanted the paramedics to deal
 3 with the defibrillator rather than you?
 4 A. Yes, sir, I would. They're the experts, they're the
 5 ones with the knowledge and experience and training,
 6 yes.
 7 Q. So doing your best, and again absolutely no criticism,
 8 doing your best, you were filling in where you would
 9 have hoped that there would be medically trained
 10 paramedics available?
 11 A. Yes, sir, that'd be correct.
 12 Q. Can I briefly touch on tables. You've been asked a bit
 13 about the use of tables as stretchers, and back to the
 14 log, just really for reference purposes. 5,567. We're
 15 at 23.16.50 and you have a conversation with
 16 Sergeant Anwyl. You're talking about the use of tables
 17 and that's obviously because you have no stretchers
 18 available to you; is that right?
 19 A. Yes, sir, that's correct.
 20 Q. Can you just help us? I asked you about Inspector Smith
 21 before lunch. Were you getting any updates from
 22 Inspector Smith about further resources coming to the
 23 City Room or further equipment, for example stretchers?
 24 Had you had any information from him about that?
 25 A. No, sir, I can't recall.

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1 Q. You and your officers were again improvising and doing
 2 the best you could, so you were using tables.
 3 Line 5,648, about a minute later, 23.17.37, you were
 4 asked about another similar entry to this, where one of
 5 the first aid people that were there — you were asking
 6 for more tables. So you had been trying to use tables
 7 as stretchers and you were asking someone with knowledge
 8 of the scene where there might be some more tables;
 9 is that right?
 10 A. Yes, sir, I do recall trying to ask either the medics or
 11 the ShowSec staff there if there were any tables there
 12 stored or anywhere else that we could use as stretchers.
 13 Q. The answer was negative, there weren't, and the
 14 suggestion to you was that you use noticeboards?
 15 A. Yes, that's correct.
 16 Q. And in fact, I think this is the point that wasn't quite
 17 clear before, the suggestion was that you took
 18 noticeboards down from the walls and used those as
 19 stretchers; is that right?
 20 A. Yes, sir. There were notice and display boards up, like
 21 merchandise displays, so we utilised them, we used them.
 22 Q. Yes. Again, no criticism, you've thought out of the box
 23 and used tables. You've then moved on to noticeboards
 24 and then eventually you move on to using metal barriers;
 25 is that right?

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1 A. Yes, sir, that's right.
 2 Q. You're not simply having to improvise, but you're having
 3 to think — as resources run out, you're having to think
 4 of other things to use as well?
 5 A. Yes, I think we went through anything that could be used
 6 as a stretcher that we could see or we could find, so we
 7 made do, we had to improvise.
 8 Q. Yes. And for the whole period you were in the
 9 City Room, did you see any actual stretchers used?
 10 A. No, sir, I didn't see any made-for-purpose stretchers.
 11 Q. Back to Mr Smith and line 5,673. We're still at 23.17,
 12 a little bit further on. 23.17.53. You have
 13 a conversation recorded on the body-worn video with
 14 Inspector Smith regarding asking for more paramedics,
 15 and at that point Inspector Smith is saying that he's
 16 asked a BTP officer to go and get some, particularly
 17 in relation to casualties, two particular casualties.
 18 Do you recall that?
 19 A. Yes, I do recall that.
 20 Q. So in the absence of sufficient paramedics, and I think
 21 by this time the other two had arrived, so there'd be
 22 three there, your commander, Inspector Smith, was
 23 sending officers off to ask for more paramedics to come
 24 up?
 25 A. Yes, sir, I believe so.

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1 Q. Finally this, in respect of the log and the casualties.
 2 Line 6,682. Again, this refers to body-worn footage.
 3 By this time, it's 23.28.22. You and your officers are
 4 still engaged with moving casualties at this point,
 5 aren't you?
 6 A. Yes, I believe so, yes.
 7 Q. This is almost an hour after the explosion, so this is
 8 57 minutes afterwards. This entry relates to
 9 a particular casualty, who is at that point moved on
 10 a metal barrier, because there are still no stretchers.
 11 The significance of this casualty is that he had been
 12 seen by a paramedic and was expressly referred to as
 13 a P1 casualty; is that right?
 14 A. Yes.
 15 Q. A P1 casualty, I think, is somebody who requires
 16 immediate life-saving interventions; is that right?
 17 A. That's my understanding of a P1, priority 1, sir, yes.
 18 Q. Finally, this, and it's a small point, but I need to ask
 19 it. After you had finished what you could do in the
 20 City Room, as you made your way downstairs, I think, and
 21 this is line 8,129, and this is 23.43, you were asked by
 22 officers where Mr Dexter was in context of him being in
 23 command. Do you recall that?
 24 A. I do recall someone asking if I knew where Mr Dexter
 25 was.

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1 Q. And you indicated that you thought that Inspector Smith
 2 was in command and you didn't know where Mr Dexter was?
 3 A. Yes. I believe that was the detective inspector who was
 4 asking and I was assisting her in letting her know who
 5 was in command to update her.
 6 Q. Yes.
 7 SIR JOHN SAUNDERS: Is that a BTP officer?
 8 A. No, sir, it was a GMP Detective Inspector Natalie Dalby.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR WEATHERBY: So at that point you didn't know that
 11 Mr Dexter had a command position at the scene?
 12 A. To my knowledge, it was Mr Smith who had command of the
 13 City Room, sir. I did see Mr Dexter at one stage, but
 14 I believe -- sorry.
 15 Q. No, no, my fault. Please finish.
 16 A. I saw Mr Dexter, Chief Inspector Dexter at that time,
 17 and I think he was dealing with and assisting with
 18 commanding the firearms officers.
 19 Q. Right. Did you know whether there had been a forward
 20 command post established by this time?
 21 A. No, I didn't know if there was one established or where
 22 it was.
 23 MR WEATHERBY: Okay. Those are all my questions. Thank you
 24 very much.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR GREANEY: Sir, in a moment I'm going to ask Mr Horwell
 2 whether he has any questions, although he was good
 3 enough to inform me at lunchtime that at that stage he
 4 did not. For a reason I'll explain in a moment, I'm
 5 going to -- there is Mr Horwell.
 6 MR HORWELL: Sir, I have no questions, thank you.
 7 SIR JOHN SAUNDERS: Thank you, Mr Horwell.
 8 Further questions from MR GREANEY
 9 MR GREANEY: There is one matter that I did want to deal
 10 with, but for a reason I'll explain, I am going to ask
 11 that we go to the holding screen just for one moment,
 12 please.
 13 Mr Dunlay, I would just like to check that it is not
 14 possible to see in the screen behind me a reflection of
 15 the screen of my computer.
 16 (Pause)
 17 Sir, it will be obvious to you that I have in front
 18 of me an image from the sensitive SoE and I would not
 19 want even a blurred image of it to be apparent.
 20 Sergeant Hare, I just wanted to clear up an issue
 21 that understandably the chairman was interested in,
 22 although there's only a certain extent to which you can
 23 assist by confirming.
 24 Mr Lopez, could we have on screen, please, the
 25 sequence of events, so this is {INQ035612/157}.

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1 Sir, this is the paper towel issue.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR GREANEY: The time is 22.57.53:
 4 "GMP officers Sergeant Darren Prince and Michael
 5 Williams force their way into the Beer House bar,
 6 located on Victoria Train Station concourse, to gather
 7 items from these premises to use as first aid
 8 equipment."
 9 SIR JOHN SAUNDERS: That's helpful, thank you.
 10 MR GREANEY: Next, {INQ035612/168}, please. 22.59.23.
 11 "PC Williams leaves the Beer House, carrying a large
 12 quantity of paper towels, cloths and bottled water."
 13 Then the final image from this sequence of events,
 14 {INQ035612/177}, please.
 15 "Mr Prince is seen on the footbridge, carrying items
 16 that he had obtained from the Beer House, along with
 17 PC Williams."
 18 Obviously, none of that, Sergeant Hare, would
 19 you have been aware of.
 20 Just to complete the picture, Sergeant Prince does
 21 then enter the City Room and is captured on the
 22 body-worn camera of Sergeant Hare. At 23.02.38,
 23 Sergeant Prince hands paper towels over to
 24 Sergeant Hare, and then over the course of the next 5 or
 25 6 minutes, Sergeant Hare distributes those paper towels

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1 to people who are in need of them.
 2 I don't know, but does that accord with your
 3 recollection?
 4 A. Yes, sir, it does.
 5 SIR JOHN SAUNDERS: I just have a couple of questions. Just
 6 help me about the triage process. We've heard from
 7 a paramedic that triage involves giving whatever
 8 immediate life-saving treatment is required, like
 9 stopping overwhelming bleeding, and then, once that's
 10 happened, categorising the individual person as P1, P2,
 11 P3, depending on the urgency of the treatment required
 12 by them. Was that only done by paramedics or were
 13 police having to do it as well?
 14 A. I think initially, sir, it was police officers and
 15 others were helping in moving whoever we could, really,
 16 and then it come to a point where the paramedic,
 17 Mr Ennis had then started issuing P1s, P2s, to
 18 categorise, prioritise, perhaps, at a later stage. So
 19 I think at one stage we were trying to take as many
 20 casualties downstairs for treatment and then at some
 21 stage, sir --
 22 SIR JOHN SAUNDERS: On the basis of how injured they
 23 appeared to be?
 24 A. I think it was a case of, yes, how injured and who was
 25 dealing with that particular injured casualty, sir.

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1 SIR JOHN SAUNDERS: Right. But the only person who actually
 2 categorised as P1, P2 or P3 would have been Mr Ennis
 3 in the first instance until the other two came?
 4 A. Yes, sir, that would be correct.
 5 SIR JOHN SAUNDERS: Thank you. Secondly, this, and entirely
 6 different. I have heard that some police officers after
 7 these events regretted the fact that they hadn't had
 8 more medical training so they could have done more to
 9 help on the night in the absence of the paramedics.
 10 You've told me, and obviously quite rightly, that
 11 actually nothing could train you for the events you
 12 found that night. Do you think, looking to the future,
 13 that it would be a help if police officers generally had
 14 more medical training?
 15 A. Yes, sir, it would. In particular, my unit, the
 16 Tactical Aid Unit, we have recently been trained up now
 17 as more trauma care medics.
 18 SIR JOHN SAUNDERS: So you have had more training?
 19 A. We have recently, sir, yes.
 20 SIR JOHN SAUNDERS: Is that as a result of these events?
 21 A. It was, yes. I think it was requested afterwards that
 22 we should be trained up.
 23 SIR JOHN SAUNDERS: So you asked for it, as it were, or your
 24 team?
 25 A. Yes, sir, my team and other officers, and the other team

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1 did say that we should be trained to a higher level of
 2 trauma training, more advanced trauma training, and have
 3 more equipment with us on our vans. That's been done
 4 recently: six officers on each van, so each team are
 5 trained up now to a higher level of trauma care and
 6 we have a high level and more equipment, tourniquets,
 7 extra things and bandages and other things that can
 8 assist in first aid, in stemming blood, et cetera. So
 9 that training has been given to officers, an extra 3 or
 10 4 days of training, I think it was, to category of a D13
 11 trauma trained officers, similar to what my colleagues,
 12 the firearms officers, are trained to now.
 13 SIR JOHN SAUNDERS: We all hope that nothing like this will
 14 ever happen again, but if it did, with this extra
 15 training, would you be better able to cope with what
 16 happened?
 17 A. Certainly, sir, we'd be better equipped and trained to
 18 offer more assistance with better training and with
 19 better equipment. Yes, we'd be able to assist and
 20 perhaps save people or at least make them stable until
 21 our colleagues from the Ambulance Service arrive.
 22 SIR JOHN SAUNDERS: I'm grateful. Those are all the
 23 questions I want to ask.
 24 Let me say something about your evidence, if I may.
 25 I have found your evidence both shocking and

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1 inspirational. It's shocking because of the awful scene
 2 that faced you as you entered the City Room and the
 3 awful situation that you had to cope with. It's
 4 inspirational because, on what I have heard and read,
 5 you and your team under your leadership did everything
 6 you possibly could to help the injured people you found
 7 in there.
 8 I have no doubt that what happened that night has
 9 and continues to affect you deeply, and I'm sure that
 10 reliving these events to assist me has caused you
 11 considerable anxiety. I'm very grateful to you for
 12 coming to do that. You have brought credit on your
 13 office, so thank you.
 14 A. Thank you, sir.
 15 SIR JOHN SAUNDERS: Turning to something less serious for
 16 a moment, and just before we end for the week,
 17 Mr Greaney, you will know that there are a number of
 18 dedicated and hard-working people who help to ensure
 19 that the inquiry runs smoothly. One of them you know is
 20 leaving us today to move to a different permanent job
 21 with HMCTS. He is Andrew Sherwood, who has worked as an
 22 usher with the inquiry since it started. He has had
 23 a particularly difficult job in that he has had to,
 24 amongst his other duties, look after me. He has had to
 25 calm me down when I am outside the room, keen to get on

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1 with the hearing and waiting for the advocates who are
 2 still preparing themselves. He has also had to go back
 3 and forth to my room during the hearings to bring things
 4 that I have forgotten and he's also kept me supplied
 5 with coffee to keep me going. So I think from the whole
 6 of the team, thank you, Andrew: you've done a great job,
 7 and the best of luck in the future.
 8 MR GREANEY: Thank you very much indeed, sir.
 9 SIR JOHN SAUNDERS: And we will return without him,
 10 unhappily, at 10 o'clock on Monday morning.
 11 (2.24 pm)
 12 (The inquiry adjourned until 10.00 am
 13 on Monday, 22 March 2021)

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