

OPUS2

Manchester Arena Inquiry

Day 93

April 26, 2021

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Monday, 26 April 2021

(10.00 am)

SIR JOHN SAUNDERS: There are signs of normality returning. Welcome back.

MR DE LA POER: Sir, the first witness today is Chief Inspector Lodge. I wonder if he may be sworn, please.

CHIEF INSPECTOR TONY LODGE (affirmed) Questions from MR DE LA POER

MR DE LA POER: Please state your full name.

A. It's Tony Lodge.

Q. And your current rank?

A. Chief inspector.

Q. Chief inspector, did you join Hertfordshire Constabulary as a constable in 1992?

A. I did.

Q. Thereafter, were you promoted to sergeant?

A. Yes.

Q. About 7 years after joining Hertfordshire, did you transfer to BTP?

A. Yes.

Q. And that was in the rank of sergeant also?

A. Yes.

Q. In 2001, were you promoted to inspector?

A. Yes.

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Q. Did that work include you working as the duty officer covering London Underground?

A. Yes.

Q. Moving forward a decade or so, between 2013 and 2015 were you the staff officer to the chief constable and deputy chief constable?

A. I was.

Q. In 2015, at the end of that role, were you appointed to the newly created position of senior duty officer?

A. It was in about October -- I think the senior duty officer role was created in 2015. I was put into that role in about October 2016.

Q. Tell us approximately how many senior duty officers are there within BTP?

A. At this time, there are six working on a 24-hour 7-day-a-week roster system.

Q. Was that also the case in May 2017?

A. Yes.

Q. In 2017 were you promoted to the rank of chief inspector?

A. Yes.

Q. I'm going to look in a little more detail, having reviewed in short form your background, at the SDO role. Is there an operating manual for the SDO?

A. There is.

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Q. Mr Lopez, we're going to bring that up on our screens, please. {INQ041112/1}.

We can see that was created on 10 March 2015, no doubt in readiness for that new role. As far as you're aware, is this the version that was in force in May 2017?

A. Yes.

Q. I'm going to go to page {INQ041112/8}. The reason we're able to do that, can you agree, chief inspector, is that this manual applies for business--as--usual policing as well as for significant incidents?

A. Yes, it does.

Q. So when we talk business as usual, we're talking about the everyday policing that British Transport Police does?

A. Yes.

Q. So we're not going to look at that. What we're going to focus upon is the parts of it which deal with, as it's described here, operational incidents.

We can see at 3.1 that in that list of points that we have "terrorism incidents" as one of those that this applies to.

A. Yes.

Q. At 3.2 does this make clear that ordinarily, in relation to any of those incidents listed above, the SDO will not

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take command?

A. Yes.

Q. The word used there is "rare", isn't it, for those circumstances?

A. Yes.

Q. However, it goes on to say:

"... the SDO will provide advice and guidance area where necessary and assist in ensuring that incidents are effectively managed across the force."

In summary, was that the role that you undertook on the night of 22 May 2017?

A. Yes, it was.

Q. If we go over to {INQ041112/9}, please, we see reference to business as usual at 3.5.1, but looking at 3.6:

"The SDO command role will operate under the golden hour principle. The principle supports the notion that effective early action can result in significant gain for the command and control or investigation of an incident."

Just help us, please, to put a little more detail around the phrase "golden hour principle".

A. Absolutely. There's five principles to the golden hour principles and it's the actions that, if a police force takes them in the first hour, can lead to a very effective follow-on investigation. The first one is

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1 preserving life , the second one is preserving scenes,
 2 the third one is securing evidence, the fourth one is
 3 identifying victims, and the fifth one is identifying
 4 suspects.
 5 Q. Those five, are they objectives , is that the right way
 6 to describe them?
 7 A. Objectives, principles . The key themes and key areas
 8 the police should look at in their initial response.
 9 Q. The first of those, as you've identified , is preserve
 10 life . How much training --
 11 SIR JOHN SAUNDERS: Just briefly go through them again, I'm
 12 really sorry . I normally take a note: preserving life ,
 13 preserving the scene?
 14 A. Securing evidence. Identifying victims. Identifying
 15 suspects.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR DE LA POER: What training had you had by May of 2017
 18 in relation to the importance of the golden hour?
 19 A. I'd had some previous experience in CID, so I covered
 20 the golden hour principle as part of the murder
 21 investigation manual several years before, and also
 22 covered it in various inputs around major incident
 23 training that I'd had.
 24 Q. So was it well in your mind on 22 May 2017 that that
 25 first hour, from 22.31 to 23.31, was extremely important

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1 in terms of effective reaction by BTP?
 2 A. It was, yes.
 3 Q. At 3.6.2, it says this specific to the SDO:
 4 "The role of the SDO in that initial golden hour
 5 will be to ensure the appropriate response and resources
 6 are put to the incident. The initial command of the
 7 incident will be determined by the nature of the
 8 incident and how it comes to the attention of the
 9 force."
 10 Perhaps it speaks for itself , chief inspector, but
 11 is there any further detail you want to put around that
 12 in terms of what you understood your specific role was
 13 in that golden hour?
 14 A. Yes, absolutely. My role is a sort of hybrid role, as
 15 you've rightly mentioned, with the oversight of the --
 16 but also I'm informing a number of key internal/external
 17 stakeholders and my phone is ringing with a thirst for
 18 information from that as well. So for example, people
 19 like senior police officers that might be the on-call
 20 superintendent for the area, the on-call chief officer ,
 21 briefing them, providing them with a situation report,
 22 liaising with the railway industry, liaising with the
 23 London Underground control and Network Rail. Various
 24 other parties , our media department, they might have
 25 some queries about the incident.

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1 So I keep oversight of the incident and keep all
 2 these various stakeholders updated at the same time.
 3 Q. A phrase which appears in your witness statement -- we
 4 can look at it but I am sure you can bring it readily to
 5 mind -- is that part of your role was, and here I'm
 6 quoting, to "spot any gaps".
 7 A. Yes.
 8 Q. Is that an appropriate way to frame one of the things
 9 that you were trying to do?
 10 A. Yes, that is the aim, yes.
 11 Q. I'm going to go over the page to {INQ041112/10}, which,
 12 at 3.6.4, is dealing with what has already been
 13 described as the rare scenario of the SDO taking over
 14 command of an incident. I draw this to your attention
 15 particularly because in that context we can see in the
 16 penultimate line of that paragraph the words "JESIP
 17 protocols". Had you received JESIP training as at
 18 22 May 2017?
 19 A. I had. It was some 7 months before and it was
 20 a multi-agency input. It was the first face-to-face
 21 input and the first -- what I would call a good insight
 22 into JESIP.
 23 Q. In May 2017, do you think that you had a good grasp on
 24 the JESIP principles?
 25 A. That's a question I've thought about a lot, particularly

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1 in light of other issues that have come up within this
 2 inquiry. That input would have lasted a few hours. It
 3 was very useful, I met with London Ambulance Service,
 4 with the Fire Service. We did a tabletop exercise.
 5 Like so many things in the police you need to practice
 6 these things, they need to become second nature so that
 7 when you're in the heat of an incident it is raised
 8 right at the forefront of your mind. It's a bit like
 9 when we do the officer safety training , it can take
 10 years to get some good at so that you can -- almost
 11 second nature. So I felt -- at the time I felt trained
 12 in it , but looking back, I think with just one input
 13 I think some of those principles should have been
 14 further inset in my mind and maybe they weren't.
 15 Q. Because in fact, in fairness to you, and I'll be told if
 16 I'm wrong about that, that is the only mention of JESIP
 17 in this document. Does that accord with your
 18 expectation? I appreciate you don't have a line-by-line
 19 understanding, but would that reflect --
 20 A. Yes.
 21 Q. -- where JESIP sat in terms of being ingrained into your
 22 role?
 23 A. Yes, yes.
 24 SIR JOHN SAUNDERS: Just help me, you said the need to
 25 exercise: do tabletop exercises fulfil that need in your

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1 view?
 2 A. I think they do, but I think you can also be
 3 complemented by — and I have done one of these
 4 exercises since, I think it was about a year after the
 5 Manchester incident, where you are in the SDO, it's
 6 better than a tabletop, you are running a mock exercise,
 7 you're sitting at your desk, there's a mock incident
 8 coming at the screen, so you really feel like you're
 9 living, eating and breathing and I had never done one of
 10 those exercises before the Manchester incident.
 11 SIR JOHN SAUNDERS: And that would have helped?
 12 A. Yes, that would have helped.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR DE LA POER: We can take that down. I'm going to ask, we
 15 may come back to it, but I suspect probably not, but I'm
 16 only asking for that to happen because it affects the
 17 image of you for people watching, so I want to make sure
 18 it's now in the background.
 19 What training, chief inspector, had you received by
 20 May 2017 in order for you to be able to discharge your
 21 duties as an SDO?
 22 A. I'd received training, major incident training. I'd
 23 also been training in the public order Silver commander
 24 course by the College of Policing, although that does
 25 major on major pre-planned events rather than

1 spontaneous events. I did a number of e-learning
 2 courses on major incident principles. I'm trying to
 3 think whether I had done an e-learning on JESIP at that
 4 time. I possibly had.
 5 Q. All of those, no doubt, can apply to a number of roles
 6 within BTP. Specific to acting as an SDO, had you
 7 received any formal training?
 8 A. No, I hadn't.
 9 Q. So what training had you received in order to be able to
 10 act as the SDO?
 11 A. I think it's taken — and the role is selected by —
 12 people who are deemed to be operationally and recently
 13 operationally competent, people who are able to deal
 14 with stakeholders in a confident way of a variety of
 15 different levels, because it isn't just the oversight
 16 role, it's the interface with stakeholders as well, and
 17 they take into the round when you are selected your
 18 background on your operational competencies and your
 19 stakeholder ability.
 20 Q. Obviously, that will identify officers with skills that
 21 are required for the job. But in terms of discharging
 22 the responsibilities, for example, in a major incident,
 23 that requires all of those skills to be aligned in
 24 a particular way and in a particular order, do you
 25 agree?

1 A. I do.
 2 Q. Did you receive any training in how to do that?
 3 A. No.
 4 Q. So in other words, training specific to what the SDO
 5 does in a major incident?
 6 A. No. But since then, my line manager asked me to put
 7 together — it's more of an induction package. It gets
 8 you to have a — draws your attention to key policies
 9 and procedures, for example, refreshing on JESIP,
 10 looking at the national decision-making model —
 11 SIR JOHN SAUNDERS: Sorry, the prelude to that: you were
 12 saying your senior officer asked you to? And we didn't
 13 actually get to what he asked you to do.
 14 A. Apologies, to develop an induction package for new SDOs
 15 coming into that role.
 16 SIR JOHN SAUNDERS: So you did that, did you?
 17 A. I did that and that is —
 18 SIR JOHN SAUNDERS: Just describe to us what you have put
 19 in that.
 20 A. Right. That contains a requirement to look at key
 21 policies, such as JESIP, such as the national
 22 decision-making model, how to manage a critical
 23 incident, a range of — the key policies and procedures
 24 that an SDO would need to know. It also has
 25 a requirement to make contact with some key stakeholders

1 in the role that you would need to have contact with, so
 2 you build a relationship from the early stages. And it
 3 also has a requirement to fulfil a minimum number of
 4 shadowing shifts where you're shadowing an experienced
 5 SDO and a major incident probably won't come up in that
 6 time, but there might be a chance of a serious incident
 7 coming up, but there might not be.
 8 So when that's completed, the person sort of is
 9 signed off as such. But I wouldn't say it's a formal
 10 training because it's more of an induction process, sir.
 11 SIR JOHN SAUNDERS: Which you didn't have?
 12 A. We didn't have that at the time I was put into the role.
 13 SIR JOHN SAUNDERS: Did you shadow before you —
 14 A. I think I did the odd shift, maybe two shifts, something
 15 like that, not very much.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR DE LA POER: A key person for the SDO, do you agree,
 18 in the course of any major incident is the force
 19 incident manager?
 20 A. Yes.
 21 Q. Had you ever undertaken the role of force incident
 22 manager?
 23 A. No.
 24 Q. Do you think that you had in May of 2017 a clear
 25 understanding of the particular pressures that a force

1 incident manager would be under during a major incident?
 2 A. No.
 3 Q. Do you think acting as a force incident manager, at
 4 least for a short period, might be useful training for
 5 an SDO?
 6 A. Yes, on that exact note we've got an SDO at the moment
 7 who is standing in, who normally is a force incident
 8 manager, and I happened to ask her the other day, "Do
 9 you think it's been useful to be a force incident
 10 manager before being an SDO", and she said, "Yes
 11 absolutely", so that helped me reflect on thinking,
 12 yeah, that does sound a sensible precaution or stepping
 13 stone for the organisation.
 14 Q. Finally, before we turn to 22 May, had you by May of
 15 2017 received any training in the use of an SDO action
 16 card?
 17 A. I was aware there was action cards, they would appear on
 18 the desk, so they weren't there all the time and I can't
 19 remember at what stage they were introduced, but I'm
 20 aware of the action cards.
 21 Q. Did you work to an action card on 22 May 2017?
 22 A. No.
 23 Q. Again, reflecting as you clearly have done, do you think
 24 that your performance might have been improved in any
 25 way had you had an action card summarising the important

1 tasks that you needed to undertake as SDO in that golden
 2 hour?
 3 A. Yes, I do, because although you have these things in
 4 your mind, if it's there written out, it's a ready
 5 reckoner, a check list to go through. For example, the
 6 JESIP principles would be there, you can see them, you
 7 think: right, that'll help me look for the gaps around
 8 JESIP principles, for example.
 9 SIR JOHN SAUNDERS: I just want to know a bit more about
 10 your preparedness for what happened in May. Had you
 11 ever been the SDO for a major incident before?
 12 A. No.
 13 SIR JOHN SAUNDERS: How would you know who to contact if
 14 you've had no induction and you've had no — it's never
 15 happened to you before, how would you know who you would
 16 need to contact?
 17 A. Because I'm drawing on my experience of knowing in
 18 a major incident because I've dealt with serious
 19 incidents before but not a major incident, so I was
 20 using that as a sort of structure to work on. So the
 21 superintendent for the division responsible for that
 22 geographic area needs to know because they'll probably
 23 be taking command. The senior officer for the force,
 24 the chief officer, needs to know for situational — for
 25 media, for resourcing levels for the force, so I can

1 envisage the people that needed to be told. I knew
 2 I needed to get a crime scene examiner to get there to
 3 preserve evidence because I had good knowledge of the
 4 five golden hour principles.
 5 SIR JOHN SAUNDERS: Did you have any — you said you'd done
 6 serious incidents before. Had you had any training to
 7 do that or had you learned on the job, as it were?
 8 A. Really learned on the job, to be honest.
 9 MR DE LA POER: We've heard from Inspector Dawson, turning
 10 now to 22 May, something of the force control room in
 11 London where he was based. Were you also based there on
 12 22 May?
 13 A. I'm in an office that's exactly next door to the control
 14 room.
 15 Q. Does your role involve you and the force incident
 16 manager moving between those two rooms to speak to each
 17 other as required?
 18 A. Yes.
 19 Q. Inspector Dawson told us that before the first notice of
 20 the arena attack, it had been, so far as he was
 21 concerned, an ordinary evening. Was that your
 22 experience also?
 23 A. Yes.
 24 Q. How did you first become aware of the arena attack?
 25 A. Because Mr Dawson came through, put his head through the

1 door and said, "Boss, there's been a report of a bomb
 2 going off in Manchester".
 3 Q. About how long after the first notification do you think
 4 that was, bearing in mind that I know that you then
 5 immediately looked at the log? Was it within the first
 6 10 minutes or longer than that?
 7 A. Yes, I looked at the log immediately and of course I was
 8 desperately hoping that — because you have reports like
 9 this and sometimes it can be a car backfiring or
 10 something else and, of course, I was desperately hoping
 11 it would be something of that nature. Quite soon into
 12 the log I saw descriptions of injuries, et cetera, that
 13 made it absolutely apparent to me that this was
 14 a serious incident.
 15 Q. We're not going to go through nearly as many items
 16 in the log as we did with Inspector Dawson, but I'm just
 17 going to remind you of some the things, the log entries
 18 he spoke about. You have the log in front of you if you
 19 need to turn it up and I can give you references, but it
 20 may be, as I know you watched his evidence since he gave
 21 it, that you'll be able to take the timings from me.
 22 Do you think that by 22.44 you were aware of the
 23 incident?
 24 A. Yes.
 25 Q. At 22.44.25, the log records the rendezvous point as

1 being the Fishdock car park. Were you aware of that
 2 at the time, in other words was that an entry that you
 3 saw and mentally noted?
 4 A. Yes.
 5 Q. We'll come back to that, but what we're going to do now
 6 is just put up a schedule of calls and use that as
 7 a framework for a number of the actions you took that
 8 night.
 9 Is it fair to say that the majority of the things
 10 that you did in response were over the telephone or in
 11 person with the force incident manager?
 12 A. Yes.
 13 Q. In other words, between what you said to him and your
 14 phone records, that's a good capture of your actions on
 15 the night?
 16 A. Yes.
 17 Q. Let's turn that log up, please. Mr Lopez,
 18 {INQ032073/1}.
 19 This doesn't just include your calls, chief
 20 inspector, it shows your calls in the context of
 21 behaviour that others were undertaking and many of those
 22 involving Inspector Dawson we have covered already. But
 23 we can see your first call recorded on this is at
 24 line 5., 22.47, just after that rendezvous point entry,
 25 although I'm not suggesting the two are connected.

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1 Do you recall making a 3—minute 32—second call at that
 2 time?
 3 A. I have to say on that particular call, I don't recall
 4 making that one.
 5 Q. Can you help us with who the person you were calling
 6 was, do you know?
 7 A. Yes, CSE stands for crime scene examiner. Because it's
 8 in the forefront of my mind to make sure we're getting
 9 crime scene examiners to the scene to secure and
 10 preserve evidence. It would be a call, something of
 11 that nature, to check that person was aware of the
 12 incident and was en route or marshalling resources.
 13 Q. At this point, was it clear to you that the incident was
 14 a terrorist attack?
 15 A. Yes, given from the injuries I saw, I couldn't see how
 16 it could be an accident or anything of any other nature.
 17 Q. Given that it was a terrorist attack so far as you --
 18 SIR JOHN SAUNDERS: Okay, sorry, you've indicated it's an
 19 attack. Did you realise -- did you believe and realise
 20 it was a terrorist attack at that stage?
 21 A. To be fair, no, I realised that there was a criminal
 22 element.
 23 SIR JOHN SAUNDERS: Someone had deliberately placed a bomb
 24 (overspeaking)?
 25 A. Yes, yes.

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1 MR DE LA POER: That is a very important clarification. I'd
 2 misunderstood the answer. Thank you, sir.
 3 We'll come back to that as a theme, but certainly at
 4 that time you knew that it was a -- a crime had been
 5 committed or at least that was your strong belief. So
 6 it seems that the first phone call you made was to
 7 somebody who would be able to ensure that the evidence
 8 was preserved for any subsequent investigation?
 9 A. Yes.
 10 Q. And of course, did you also have in your mind that the
 11 incident itself was being managed by Inspector Dawson so
 12 far as BTP were concerned?
 13 A. Yes, yes.
 14 Q. So is this an example of you perhaps filling in those
 15 gaps and ensuring that things that Inspector Dawson
 16 wouldn't be able to make his first priority are being
 17 done in a timely fashion?
 18 A. Trying to do that as well as updating various other
 19 stakeholders as well.
 20 SIR JOHN SAUNDERS: I will stop interrupting in a minute and
 21 it may be that you were about to be asked this, but the
 22 person you were contacting, where is she based?
 23 A. They were probably -- at that time of night they might
 24 even have been on call at home possibly because --
 25 SIR JOHN SAUNDERS: The area of the country she lives in?

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1 A. I can't remember for that member of staff.
 2 SIR JOHN SAUNDERS: Do you have any crime scene examiners in
 3 Manchester?
 4 A. We will have in BTP, we will have.
 5 MR DE LA POER: The next entry that we can -- forgive me,
 6 we've moved across one and I just need to deal with it,
 7 although it's not terribly easy to do so. I think for
 8 this we'll need to have a look at the log so we can help
 9 explain it. I know others don't have the log, so we're
 10 going to make this entry absolutely clear. Can I please
 11 invite you to go to page 40 {INQ002000/41} of the log.
 12 SIR JOHN SAUNDERS: And the numbering we're using is
 13 different?
 14 MR DE LA POER: The internal page numbering, sir, page 40.
 15 SIR JOHN SAUNDERS: Top left—hand corner?
 16 MR DE LA POER: Indeed, thank you very much.
 17 A. Yes, I'm on page 40.
 18 Q. So we've just dealt with the telephone call that you
 19 made which took us to about 22.50, given its length,
 20 with the crime scene examiner. What is recorded here at
 21 22.53.43 -- I'll read it out and I'll read it slowly:
 22 "SDO has informed Chief Superintendent Gregory,
 23 on—call CDiv senior. He is currently in a hotel
 24 10 minutes away from force control room Birmingham and
 25 will make his way there. He has asked me to inform

20

1 on-call COG and I will action that now. I will speak to
 2 Mr Gregory in 10 minutes' time."
 3 SIR JOHN SAUNDERS: COG?
 4 A. Chief Officer Group, sir.
 5 MR DE LA POER: And I think we'll see about this time, or
 6 shortly thereafter, you do contact ACC Smith; is that
 7 right?
 8 A. Yes.
 9 Q. So we'll come back to the last part there. The first
 10 part of this, let's just unpack it a little bit:
 11 "Chief Superintendent Gregory, on-call CDiv senior."
 12 Just explain that jargon for us.
 13 A. In British Transport Police there are three main
 14 geographical divisions, there's D, Delta, Division,
 15 which is Scotland; there is C Division, which is the
 16 whole of the Pennines, the Midlands, a whole swathe of
 17 England going down to the south-west coast, and includes
 18 Wales as well; and B Division is London, the south-east
 19 and up to about Dorset way. So C Division — so
 20 Manchester sits within the geographical footprint of C
 21 Division.
 22 Q. And you have identified him as "CDiv senior"?
 23 A. Yes.
 24 Q. Was he the divisional commander?
 25 A. Yes, he happened to be the divisional commander but

21

1 he was also on that night — they share out — they take
 2 a role on the on-call rota, so who will be the senior
 3 officer for C Division, and they share it about, so one
 4 will do it for one week, and will do it the next week,
 5 and even though he was the divisional commander, he was
 6 also the on-call person for taking anything that might
 7 occur out of hours that needed a senior oversight.
 8 Q. The entry indicates that you have informed
 9 Chief Superintendent Gregory; in what way did you inform
 10 him, please?
 11 A. By mobile telephone.
 12 Q. What sort of duration was that call, please?
 13 A. From memory, something like 3 or 4 minutes, maybe not
 14 even as long as that.
 15 Q. What did you tell Chief Superintendent Gregory, please?
 16 A. Well, I'd waited to a point where I had enough
 17 information to talk about the incident, the type of
 18 incident we were dealing with, what initial BTP response
 19 we had in place, and that does take a bit of time to
 20 make sure you've got that. So I would tell him about
 21 the location of the incident, the number of casualties
 22 that we knew about at that time, the type of officers,
 23 the officers we had going, the type of resources, any
 24 specialist officers we would have going, that the FIM
 25 was in command, but the natural purpose of that phone

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1 call is to start a process of handing over command to
 2 a dedicated team effectively that's set up under a Gold,
 3 Silver and Bronze structure and I can explain that if
 4 you want me to.
 5 Q. I think we have quite a clear understanding of the
 6 strategic, tactical and operational roles that each of
 7 those fulfil.
 8 Perhaps just this question to make sure we don't
 9 miss anything: is there anything unique to British
 10 Transport Police about that structure?
 11 A. No, all forces use that.
 12 Q. Yes.
 13 SIR JOHN SAUNDERS: You rang Mr Gregory's mobile phone?
 14 A. Mm.
 15 SIR JOHN SAUNDERS: Perfectly understandable. That's the
 16 contact number you had for him. Did you ring him on
 17 your mobile phone or did you do it on a phone within
 18 your office?
 19 A. I believe I rang from the SDO mobile phone.
 20 SIR JOHN SAUNDERS: Okay. Clearly if you're phoning from
 21 the office, it would appear to automatically go on the
 22 log; is that right?
 23 A. I don't think that's the case, but what it does offer,
 24 if you ring from the office or via a system called IX,
 25 which is a (inaudible: distorted), it will record the

23

1 phone call, so it will record the nature of exactly what
 2 you are discussing.
 3 SIR JOHN SAUNDERS: So because you were doing it on your
 4 mobile phone, as I understand the log system, and I have
 5 almost certainly go it wrong, because it says "RMK",
 6 remark, you had to physically enter this yourself?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: You're taking time to type in what
 9 you've told him?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Do you do that contemporaneously?
 12 A. As soon as you possibly can, but sometimes something
 13 else urgent might come in where you have to look at
 14 something or are asked something or make a decision. So
 15 you aim to get that, as you say, done as soon as you
 16 can, but sometimes it can be a minute to a couple of
 17 minutes, worst case, later.
 18 SIR JOHN SAUNDERS: So here the timing of this is the timing
 19 you enter your record of the call?
 20 A. Correct.
 21 SIR JOHN SAUNDERS: Not necessarily when the call is made?
 22 A. Correct.
 23 MR DE LA POER: That is in fact what I was just hoping to
 24 get to. It's exactly the precursor I was hoping for.
 25 We can see on the telephone log that we have that

24

1 doesn't include that reference that you made the
 2 telephone call to the crime scene investigating on—call
 3 at 22.47. Do you think that you called
 4 Chief Superintendent Gregory before that?
 5 A. It would have been before that, yes.
 6 Q. So that we get the sequence correct, in fact the first
 7 phone call you made that night was to the on—call
 8 divisional commander who happened to be the C Divisional
 9 commander?
 10 A. Mm.
 11 Q. The entry is, as you've accepted, some minutes later, no
 12 criticism there, but that's how we understand that
 13 timing.
 14 Continuing with our chronology, the log, as we saw
 15 with Inspector Dawson, records at 22.55.28
 16 {INQ002000/42} that NWS was indicating a rendezvous
 17 point of Hunts Bank. I'm summarising there, but were
 18 you aware that NWS had indicated a rendezvous point
 19 different to the Fishdock car park that BTP had
 20 identified some 10 minutes earlier?
 21 A. No, I wasn't.
 22 Q. What do you think the reason for you being unaware of
 23 that is?
 24 A. The log does move at quite a speed and I know Mr Dawson
 25 referred to that. There's a lot of entries going on

1 there and if I'm ringing up somebody, updating them on
 2 something, the log could have moved on by a number of
 3 entries very fast. I try my best, once I've come off
 4 a phone call, to try to remember where I was in that log
 5 and go back, but the risk of that is you're going back
 6 and you're missing new entries going on there, so —
 7 it's moving so fast, every few seconds there's new
 8 entries going on there, I don't what the way round that
 9 is, but sometimes you can miss information.
 10 Q. One way round it might be, if the technology or the
 11 training allows, is that key JESIP information, such as
 12 a rendezvous point, is extracted into a separate area so
 13 that it can all be seen side by side.
 14 A. Yes.
 15 Q. Do you think a system which allowed for that key JESIP
 16 information to be readily accessible would be something
 17 that might have helped you on the night?
 18 A. Yes, absolutely, and I've also reflected on this myself
 19 and this has been a learning for me, that I will devise
 20 for myself some sort of pro forma around those command
 21 principles, those principles of JESIP, so it's at the
 22 forefront of my mind as well and it is something I'll
 23 recommend to my colleagues in addition to that so it's
 24 right at the forefront of your thinking.
 25 Q. Just leading on from that answer, another safeguard so

1 that that information isn't missed is exactly what
 2 you've been describing, that some sort of prompt that
 3 makes you think consciously, "I need to look for this
 4 particular piece of information because it is so
 5 important"?
 6 A. Mm.
 7 Q. At about the time of that NWS entry, we can see an
 8 entry which relates to you, again we'll read it out so
 9 everyone can see it. It's on the following page to the
 10 one that you've just been looking at.
 11 SIR JOHN SAUNDERS: So page?
 12 MR DE LA POER: It's page 41 {INQ002000/42} in the top
 13 left—hand corner.
 14 Do you see, about a quarter of the way down that
 15 page, there is the remark in relation to the Hunts Bank
 16 rendezvous point in relation to the ambulance?
 17 A. Yes. Where it says, "We have been asked to RVP at
 18 Hunts Bank by the booking office"?
 19 Q. That's the one you weren't aware of at the time?
 20 A. No.
 21 Q. We can see four lines further down at 22.55.50 there's
 22 a remark:
 23 "From SDO — please can it be established whether
 24 this is BTP or GMP jurisdiction where the bomb has gone
 25 off?"

1 I've been asked to ask you a question in particular
 2 by a core participant, and I'm very grateful for the
 3 prompt. It may be that this entry will answer that
 4 question. Does it follow from the entry which is
 5 ascribed to your name there that you were aware at this
 6 time that it was a bomb attack?
 7 A. Yes. I must have been, yes.
 8 Q. About how soon into the incident do you think you became
 9 aware that it was an attack of that particular nature?
 10 A. I don't want to describe the injuries that —
 11 Q. Please don't.
 12 A. No. This is from memory, probably something like 10,
 13 12 minutes into the incident, something of that nature.
 14 Q. So relatively shortly after you'd been notified of it,
 15 that was your working assumption?
 16 A. Yes.
 17 Q. I hope that that deals with the question that I've been
 18 asked to ask.
 19 Going back to this particular entry:
 20 "From SDO — please can it be established whether
 21 this is BTP or GMP jurisdiction where the bomb has gone
 22 off?"
 23 Will this be an entry that you have manually entered
 24 in yourself?
 25 A. Yes. I know that because "from SDO", that would be the

1 wording I would use, and also on the log there would be
 2 an entry with my police number on there as well, I think
 3 3978, if you wanted to check, but yes, I believe that is
 4 my entry, my request.
 5 Q. Just help us: bearing in mind the proximity of those two
 6 entries, help us understand how it appears on your
 7 screen that at the time or seconds before you are making
 8 that entry there is that highly relevant entry that you
 9 weren't aware of as it passed on the screen?
 10 A. I don't know that, I'm afraid.
 11 Q. At this point we are 20 minutes into the incident and we
 12 see that you are seeking to have established whether
 13 this is BTP or GMP jurisdiction and you will have heard
 14 the very many questions that Inspector Dawson was asked
 15 about this, so I'm not anxious to protract this as
 16 a topic area. But bearing in mind that that is your
 17 entry, can you help us to understand why it was
 18 important that one of the first things that you were
 19 doing in response to this incident was tasking people to
 20 find out whether it was GMP's or BTP's jurisdiction?
 21 A. I was aware obviously we had a lot of officers going
 22 down there and it was exactly the right thing to do: in
 23 any major incident, all police forces need to get as
 24 many officers in as possible. It's what the public
 25 would expect from us. But where it's important -- BTP,

1 we have jurisdiction at railway stations, which means
 2 our police powers occur at or near railway stations for
 3 railway business. Where that becomes important is --
 4 and I did in my own mind believe that, strangely, the
 5 arena falls on our patch, which it seems a strange
 6 (inaudible: distorted) that a very large concert venue
 7 would sit on a British Transport Police patch, but I do
 8 remember boxing events, et cetera, that we'd policed in
 9 that location, but I wanted to be sure -- I wasn't 100%
 10 sure and I wanted to be sure of that in my own mind
 11 because it is such a strange thing to have a concert
 12 event, the arena, on our patch.
 13 Q. Why was it so important to establish that only
 14 20 minutes after, in your own words?
 15 A. Yes, because it affects -- all police forces are going
 16 to go to the scene to preserve life, but it starts to
 17 affect if, for example, that incident had been on
 18 Greater Manchester Police's jurisdiction, once we'd had
 19 the ability to get to the scene and everybody had done
 20 as much as we can, we would start to look at who was
 21 going to take primacy, who was going to take control of
 22 moving this incident forward, because if it had been on
 23 Greater Manchester Police's patch, albeit we would have
 24 helped with the first response, absolutely they would
 25 take the lead on commanding that scene, commanding that

1 investigation moving forward.
 2 As it happens, it was on our patch and I know that
 3 we did later hand that over to them.
 4 SIR JOHN SAUNDERS: From a practical point of view you're
 5 contacting senior officers, you know one is going to go
 6 from a hotel nearby in Birmingham. If it turned out,
 7 say for example, that it had occurred on the street
 8 outside the station, so clearly GMP jurisdiction, not
 9 yours, no doubt your officers, your police officers,
 10 would have gone there, but would you actually have
 11 sent -- trying to get superintendents to come from round
 12 the country or to go to scene because their job, if they
 13 went there, would be to command the scene and if someone
 14 else is commanding it, would you actually want them to
 15 go?
 16 A. Yes -- no, it's a fair point.
 17 SIR JOHN SAUNDERS: I hope it's a fair point. The question
 18 is: is that the way you would have reacted to it if it
 19 had been, "Oh no, it's on the pavement", would you have
 20 just said, "No need for you to go, our officers will go,
 21 but other senior officers will command the scene"?
 22 A. Yes, absolutely. There's no point getting
 23 a Gold/Silver/Bronze structure in place if you don't
 24 envisage that it's going to be your incident and you'll
 25 take primacy on your jurisdiction.

1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: At the time that you were seeking to
 3 establish whether BTP had jurisdiction where the device
 4 had been detonated, were you aware of any national or
 5 local agreement which governed the issue of primacy
 6 in relation to a terrorist attack?
 7 A. It wasn't going through my mind at that time but
 8 subsequently, looking back with hindsight, and I think
 9 as the incident evolved, I started to appreciate it rang
 10 bells in my mind that the North-west Terror Command
 11 would eventually take on this incident but at the time
 12 of taking these calls I don't think that was featuring
 13 in my mind.
 14 Q. We'll touch on this again but I'll move on to the next
 15 entry. Mr Lopez, can we go back to the call schedule.
 16 {INQ032073/1}.
 17 We can see at line 7 that, shortly after that entry
 18 that you made on the system, you telephoned ACC Smith.
 19 You've already mentioned the COG. Given that that was
 20 in your entry and given what you did immediately after
 21 you made that entry, just help us to understand what
 22 that was as you understood it and why it was important
 23 and why it was necessary to call ACC Smith?
 24 A. Yes, well, ACC Smith was the on-call COG, Chief Officer
 25 Group, the chief officer from the group on duty at that

1 time, so the most senior level of command within British
 2 Transport Police. So as I was -- I was working on the
 3 working assumption this was a BTP incident on our
 4 jurisdiction, and we would take initial primacy, it was
 5 a need to bring in the Gold/Silver/Bronze structure and
 6 I naturally thought (a) he needed to be made aware as
 7 a senior officer for situational awareness but also
 8 I was envisaging that he would take the role of
 9 Gold/strategic commander in this incident.

10 Q. We can see two actions then that you have taken in quick
 11 succession which are based upon the assumption that BTP
 12 has primacy.

13 A. Yes.

14 Q. We've had your contact of ACC Smith and obviously we've
 15 got your request seeking to put that issue clearly to
 16 bed. Do you think that if you had been working with
 17 a clear understanding at the time that in a terrorist
 18 incident the Home Office force who had resources that
 19 you just wouldn't be able to get to the scene would have
 20 primacy, you would have focused your energies more
 21 towards cooperating with that force as opposed to
 22 setting up this command structure?

23 A. Quite possibly.

24 Q. What did you speak to ACC Smith about in your telephone
 25 call?

1 A. Again, on very similar lines to my briefing conversation
 2 with Mr Gregory in the situation -- like, update, the
 3 resources we had going to the scene, the type of
 4 resources, what initial actions we'd put in place. And
 5 very, very early on -- and Mr Smith was new to the force
 6 at that time -- he questioned whether it was on our
 7 jurisdiction and I can only surmise, but he again was,
 8 maybe being new to it, surprised that a large concert
 9 venue should be on railway jurisdiction.

10 I think he prompted that issue in my mind and said,
 11 "Are we sure it's on our jurisdiction?" I think
 12 I responded back saying, "I recall a number of events
 13 there", but it maybe introduced an element of doubt in
 14 my mind, but I treated it as being on our jurisdiction,
 15 as having primacy. It was clearly a matter that was
 16 engaging his mind.

17 Q. Would it be fair to say that quite a lot of energy is
 18 being expended by you to try and resolve this issue in
 19 circumstances where it could readily have been resolved,
 20 in principle, long before this event took place?

21 A. Yes, but also I can see the activity and energy that
 22 BTP's putting into this. We're getting lots and lots of
 23 officers to the scene, we're helping rescue casualties,
 24 so I'm content that action is happening to help people,
 25 but maybe my energies are maybe slightly diverted by

1 this issue.

2 Q. Because, as we have just established, your energy could
 3 have been directed towards the JESIP principles of
 4 cooperation with the local force, communication with
 5 them?

6 A. Yes.

7 Q. Is that fair?

8 A. Yes, it is fair.

9 SIR JOHN SAUNDERS: Does there seem to be some confusion
 10 between jurisdiction and primacy? Jurisdiction is your
 11 force can't act as police officers except on your land,
 12 on railway property, so that gives you the jurisdiction
 13 to act as a constable, although it wouldn't have stopped
 14 people going and doing a rescue operation like this.
 15 Primacy is who is actually going to run the show. Is
 16 there a confusion?

17 A. Not in my mind. The important aspect is primacy
 18 determines which police force is going to take command
 19 so you get the most effective response and both sides
 20 understand which part they play in the overall response.

21 SIR JOHN SAUNDERS: Right, okay.

22 MR DE LA POER: Can I just explore that briefly with you in
 23 terms of the confusion? When you have spoken about this
 24 in your evidence, you have talked about whether it's
 25 your BTP's jurisdiction or GMP's. In fact, GMP has

1 jurisdiction there as well, doesn't it?

2 A. They do, yes.

3 Q. In speaking about it in that way, do you think perhaps
 4 there had crept into your mind a distinction which
 5 doesn't exist, in other words that it's as binary as
 6 either it's BTP or it's GMP?

7 A. Yes, quite possibly, because it tends to be when
 8 something occurs on a railway station, even though they
 9 have jurisdiction as well, because you're responsible
 10 for the stakeholders and for the performance and for
 11 serving victims of crime, you take primacy, you take
 12 ownership of it, so you view it as yours. Just
 13 occasionally you will adopt an incident in BTP that is
 14 maybe just off your jurisdiction or the other way around
 15 and another police force will say, for example, the
 16 majority occurred on their jurisdiction, one part tipped
 17 over on to yours, so it isn't always that simply because
 18 it's your jurisdiction you will take -- other than
 19 terrorism, it can occasionally be other more routine
 20 incidents -- it's key you agree between the parties
 21 who's taking control and who's doing what and both sides
 22 understand that.

23 SIR JOHN SAUNDERS: In terms of jurisdiction you knew the
 24 arena was on railway ground, didn't you?

25 A. Yes (overspeaking).

1 SIR JOHN SAUNDERS: So you were had no doubt, and nor would
2 ACC Smith have any doubt, that you had jurisdiction.
3 The actual issue you were concerned about was who has
4 primacy, who's going to run the show?
5 A. Mm, mm.
6 SIR JOHN SAUNDERS: Okay.
7 MR DE LA POER: Moving forward, please, we're going to have
8 a look at another log entry which I think will probably
9 be the last that we look at on this topic. If you can
10 move forward, please, to page 44 {INQ002000/44}, top
11 left-hand corner. Again, to help everybody who doesn't
12 have it in front of them, which will be many people,
13 we can see at the bottom a new log entry from you at
14 23.01.03. The action is cleared. So you recall that we
15 just looked at -- I'm so sorry, do you have it?
16 A. Is it 21.01.3?
17 Q. 23.01.03. Page 43 in the top left-hand corner
18 {INQ002000/44}.
19 (Pause)
20 We can see, just over the page, seconds later, the
21 record of you having spoken to ACC Smith:
22 "SDO has spoken to on call COG ACC Smith and, given
23 the early facts, I am trying to establish which police
24 force has jurisdiction."
25 A. Mm-hm.

1 Q. So it seems that following, as you've told us, your
2 conversation with ACC Smith, who cast that doubt into
3 your mind, as you've described it, despite your
4 confidence before the call, that was still a topic that
5 you were focusing your energy on?
6 A. Yes.
7 SIR JOHN SAUNDERS: Just tell me this: should it accurately
8 read, "which police force has a primacy", or is it
9 correct that it says, "which police force has
10 jurisdiction"? Which were you meaning there?
11 A. I was meaning jurisdiction but the natural conclusion
12 is that -- and therefore because of that we would take
13 primacy. So, to give a more accurate entry there --
14 SIR JOHN SAUNDERS: Sorry, you've already agreed with me you
15 knew that the arena was on your land, so you knew you
16 had jurisdiction by virtue of that. So why were you
17 still trying to establish it?
18 A. No, I think it's the fact of establishing the primacy.
19 SIR JOHN SAUNDERS: Thank you.
20 MR DE LA POER: Because in fact, as you've agreed, stating
21 it as which police force has jurisdiction isn't
22 a correct framing of the issue of jurisdiction?
23 A. Yes.
24 Q. It's a correct framing of the issue of primacy, isn't
25 it?

1 A. Yes.
2 Q. Because that can only vest in one or the other, but in
3 fact jurisdiction, GMP had it already?
4 A. Yes.
5 Q. That was never in doubt because they can operate as
6 a constable within an area that BTP covers, can't they?
7 A. Absolutely. In the heat of the moment, making these
8 entries, you're under a lot of pressure --
9 Q. Absolutely, there is no criticism. It's trying to get
10 to the bottom of what you are in fact meaning and
11 whether or not the language is getting a little confused
12 in the heat of that moment. I think we've probably got
13 there --
14 SIR JOHN SAUNDERS: And we're asking a lot of leading
15 questions, so please don't be pushed into giving an
16 answer because it is asked. I'm sure you wouldn't, but
17 don't be bullied into an answer.
18 MR DE LA POER: We're going to return to a question of JESIP
19 and another entry which is on that same page which we
20 looked at with Inspector Dawson. 23.03.22, so 3 minutes
21 past 11, {INQ002000/45}:
22 "Ambo commander on scene."
23 Is that an important piece of information so far as
24 JESIP is concerned?
25 A. Yes.

1 Q. Was that a piece of information that you were aware of
2 at the time?
3 A. Yes, because I was looking to see because it's
4 a different thing to have called a particular service or
5 first of all the request to do it, then has it been
6 done, and then have they arrived are the sort of three
7 elements to that. So that's the final reassurance and
8 you feel we've got people there who are skilled and
9 qualified to help to manage that scene and to help
10 people who need medical assistance.
11 Q. So reassurance that the ambulance commander has arrived?
12 A. Mm. Mm.
13 Q. What about whether that should prompt any JESIP-based
14 action?
15 A. Yes.
16 Q. Was that in your mind?
17 A. No, it wasn't, no.
18 Q. Might -- well, sitting here now, with the benefit of the
19 reflection that you've undertaken, what do you think
20 information like that might have prompted you to do so
21 far as JESIP was concerned?
22 A. I'd be immediately saying to our ground commander or
23 prompting the FIM to say -- it doesn't matter as long as
24 one of us does it and we're both clear someone has done
25 it -- prompting him to say: the ambulance commander's on

1 scene, find him or her, and start engaging, start
 2 communicating, start your tactical meetings. You can
 3 then start understanding the joint risks you're facing,
 4 the situation you're facing, and each side can work what
 5 they're doing -- starting to coordinate the approach.
 6 Q. Is that the sort of activity that might happen at
 7 a forward command point?
 8 A. Yes.
 9 Q. At any point in your involvement in the incident,
 10 including throughout the period where you believed that
 11 BTP had primacy, did you take any action to seek to
 12 ensure that a forward command point was established?
 13 A. No.
 14 Q. Do you think that that might be one of the gaps that
 15 an SDO ought to be looking to ensure is filled?
 16 A. Yes, I do.
 17 Q. To the extent that you haven't covered it already, why
 18 do you think it was that that didn't occur to you on the
 19 night?
 20 A. I was speaking to over 15 different stakeholders,
 21 internal, external, often many of them multiple times,
 22 the log's moving very fast, and also, to be truthful,
 23 the JESIP principles at that time weren't sufficiently
 24 ingrained in my muscle memory, my reflex memory, to
 25 trigger that and I think that's a really, really

1 important point: the stakeholders can wait or someone
 2 else can do that, I need to make sure this action gets
 3 done.
 4 SIR JOHN SAUNDERS: Would you do that by prompting the FIM?
 5 A. Quite possibly because the FIM is in charge, so I'd look
 6 to see that it had been done, and it's very important as
 7 an SDO that you don't tread on someone's toes and too
 8 many cooks can spoil the broth, but I would certainly be
 9 looking for that entry to be on there and if I didn't
 10 see it quickly, then I would be through next door and
 11 giving a prompt.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR DE LA POER: Returning, please, to our call schedule,
 14 {INQ032073/1}. We can see that about the time of that
 15 "Ambo commander on scene" entry, line 9, that at 23.04
 16 one of the -- well, the thing that you were attending to
 17 was a 1-minute 36-second call with a BTP press officer,
 18 as there identified; is that right?
 19 A. Yes.
 20 Q. At line 11, we see, at 23.06, you are back in touch with
 21 the Gold commander for 54 seconds. Was that to provide
 22 an update or for some other reason?
 23 A. Yes, I think probably to provide an update.
 24 Q. 23.10, line 12. We can see you have a 2-minute
 25 40-second call with a person identified as a SOCO,

1 scenes of crime officer; is that right?
 2 A. In fact a manager of the scenes of crime officers,
 3 a senior member of that department.
 4 Q. That is -- we are still well within that golden hour,
 5 aren't we? That is a call that is useful if BTP have
 6 primacy; is that right?
 7 A. Yes.
 8 Q. But if the investigation is going to be run by the local
 9 force, would that be as important a call for you to deal
 10 with?
 11 A. No, it wouldn't be.
 12 Q. So is that an example of another action that you are
 13 occupying your time with on the assumption that BTP has
 14 primacy?
 15 A. Yes.
 16 Q. 23.14. We see a substantial call, 3 minutes, 2 seconds,
 17 at line 18, again with the Gold commander. This time
 18 he's called you. Do you see that?
 19 A. Yes.
 20 Q. Was that you further updating him or for some other
 21 purpose?
 22 A. It could be or he could be starting to explain his plans
 23 about maybe where he was travelling to or anyone else he
 24 wanted me to notify. His thinking obviously would have
 25 matured by that stage.

1 SIR JOHN SAUNDERS: These calls, are they coming through to
 2 a call operator and then being put through to you?
 3 A. I think they'd be coming through to the SDO mobile
 4 phone.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR DE LA POER: We're just going to return to the log that
 7 we have. It's page 50 {INQ002000/51}. The top
 8 left-hand corner. Right at the very bottom, 23.18.12.
 9 Do you have that?
 10 A. Yes.
 11 Q. Let me just read it out. It's a remark, so an entry by
 12 a control room operator, it would appear:
 13 "Fire [arrow] our RVP is at Philips Park
 14 Fire Station. Four pumps are there now. No requests of
 15 BTP."
 16 And you will recall that I asked Inspector Dawson
 17 about this entry. Was that an entry that you were aware
 18 of at the time?
 19 A. I think I'd been pleased that the Fire Brigade had
 20 turned up. I have to say, I didn't pick up on why it
 21 was a different RVP point to the -- they'd arrived at
 22 a different location to the set RVP of Fishdock car
 23 park.
 24 Q. We're still within the golden hour. At this point is it
 25 your view that BTP still has primacy of this incident?

1 A. Yes.
 2 Q. So the RVP that other emergency services should be going
 3 to should be the one nominated by BTP; is that right?
 4 A. That'd be sensible.
 5 Q. Is it a bit more than sensible, is it essential under
 6 the JESIP principles?
 7 A. Yes.
 8 Q. Do you think the importance of a joint rendezvous point
 9 was clearly in your mind on the night?
 10 A. It wasn't clear enough or it wasn't sure enough in my
 11 mind, no.
 12 Q. Had it been, do you think you might have noticed that
 13 fire was going to a different rendezvous point to the
 14 one that BTP had declared?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Were you aware that you were running
 17 this incident without being able to contact GMP, the
 18 Fire Service or the Ambulance Service?
 19 A. I wasn't aware of those difficulties. That has really
 20 only been made aware to me from following this inquiry.
 21 SIR JOHN SAUNDERS: Were you aware in advance that if
 22 something like this happened you'd be in the queue for
 23 999 calls along with every member of the public?
 24 A. No.
 25 MR DE LA POER: Back to the call schedule. We can deal with

1 most of these shortly just to acknowledge them so
 2 they're on the record as actions you took that night.
 3 Line 22. 23.27. Another call from you to the
 4 Gold commander, ACC Smith. What would be the purpose of
 5 that call?
 6 A. Again, some sort of update, maybe an update on
 7 casualties. I think he asked me to ring a few people,
 8 he might have wanted an update that I had rung certain
 9 people, got certain actions that he had tasked me with
 10 in place or I hadn't progressed on those.
 11 Q. This period of time is quite an important time in the
 12 chronology, do you agree, because
 13 Chief Superintendent Gregory is imminently to take over
 14 as Silver commander; is that right?
 15 A. Yes.
 16 Q. We can remind ourselves that from about 25 past 11
 17 through to 11.37, there was a period of handover taking
 18 place as Inspector Dawson told us. We can see another
 19 two phone calls at lines 23 and 24, both of them quite
 20 short, involving ACC Smith; is that right?
 21 A. Yes.
 22 Q. We don't need to turn it up, but I'm sure that you will
 23 take it from me that the log shows at 23.30 the
 24 Gold/Silver/Bronze structure in an entry made by you.
 25 Lines 26 and 27. In fairly quick succession, two

1 calls involving DCC Hanstock, both to you from that
 2 person. What was the purpose of those calls?
 3 A. Again, although Mr Hanstock wasn't part of the on-call
 4 structure for that night, understandably, naturally, as
 5 a very senior officer of the force, he wants an
 6 awareness of what's going on. He's looking at the
 7 overall picture for BTP and needs to be aware of that
 8 information.
 9 SIR JOHN SAUNDERS: You have an on-call system and you have
 10 a chief officer on-call system. This is not criticising
 11 Mr Hanstock, but actually, isn't it better if all chief
 12 officers except the on-call one keep off the line
 13 because they're actually taking you off other calls,
 14 aren't they?
 15 A. Yes. It's -- yes.
 16 SIR JOHN SAUNDERS: Obviously they're interested and they're
 17 concerned, I understand that, but as far as you can
 18 remember, was his call doing anything except getting an
 19 update from you? Was it with a view to doing anything
 20 in particular or do you not remember?
 21 A. I can't recall.
 22 SIR JOHN SAUNDERS: Fair enough. Thank you.
 23 MR DE LA POER: At about this time, there's a log entry
 24 timed at 23.40, involving Chief
 25 Superintendent Connaghan, if I've pronounced that

1 correctly. Can you tell us who that person is and why
 2 you would need to have contact with him?
 3 A. Chief Superintendent Connaghan is the head of our
 4 specialist operations department that have resources
 5 that can go to -- or incidents connected with terrorism,
 6 can make assessments of specialist equipment, et cetera,
 7 and from what I recall, ACC Smith had asked me to make
 8 sure that Chief Superintendent Connaghan was aware --
 9 I think he even said for him to come to Palestra --
 10 that's the name of the building the control room's
 11 located in, I'm located in, possibly to meet Mr Smith
 12 and I think they were going to travel up there together,
 13 but I had a tasking to contact Mr Connaghan.
 14 Q. We are now out of that golden hour, we must recognise.
 15 We can see at 23.53 on the log that you notified the
 16 SIO.
 17 A. Yes, I did.
 18 Q. Again, is it the -- an action by you of notifying the
 19 SIO, who we will recall is the senior investigating
 20 officer, because you were expecting this to be a BTP
 21 investigation at that time?
 22 A. Yes.
 23 Q. Certainly you were working on the basis that it would
 24 be?
 25 A. Yes, and it also helps (inaudible: distorted) to bring

1 that expertise in there around the golden hour
 2 principles and making sure that overall you secure
 3 evidence, preserving and identifying victims, suspect
 4 strategies, a whole raft of important tasks that an SIO
 5 brings to that investigation.
 6 Q. On the call schedule -- and we can move through these
 7 quite quickly -- at line 32, there is a call from
 8 a person identified as Anthony Lampey; do you see that?
 9 A. Yes.
 10 Q. Is "spec ops" special operations?
 11 A. Yes.
 12 Q. You spend 2 minutes speaking to that person. To the
 13 extent that it's not operationally sensitive, what was
 14 the importance of speaking to that person at that time?
 15 A. Did you say he rang me or I rang...
 16 Q. You rang him.
 17 A. All I can think -- I am wondering if I had been tasked
 18 by somebody else to ring him. I can't remember the
 19 nature of the conversation.
 20 Q. We can see at five minutes past midnight, row 34, that
 21 there is a call from the DFIM to you.
 22 A. Yes.
 23 Q. This is probably a convenient moment to deal with this
 24 as a topic area as you are speaking directly to the
 25 deputy force incident manager at this point. As

1 Inspector Dawson explained to us, he and you were based
 2 in the control room in London. By reason of the way the
 3 system was set up, as I understood his evidence,
 4 Birmingham took the initial calls because Birmingham
 5 dealt with that part of the country, namely Manchester.
 6 And for practical reasons, Inspector Dawson didn't think
 7 it appropriate to change that in terms of where the call
 8 handlers would be based. Is that a fair summary of his
 9 evidence?
 10 A. Yes.
 11 Q. You will have heard him speak about how it affected his
 12 ability to grip the incident. Did the fact that you
 13 were based in London but the incident was being managed
 14 by Birmingham cause you any difficulties?
 15 A. Yes, I reflected on that. I think it causes me less
 16 difficulties than the FIM because the FIM is much more
 17 that core operational police response and needs to have
 18 a better feel for the geography, et cetera. It's one of
 19 those issues that -- with being a national police force,
 20 we have to be located somewhere, and one of the key
 21 roles of the SDO is about an engagement piece with the
 22 London Underground, which is based in London, and we've
 23 got an outpost of the Network Rail operating centre in
 24 London as well. So it's key to have the face-to-face
 25 interaction with those people, so my role is a hybrid

1 between oversight but also engaging and updating key
 2 stakeholders, who really appreciate and value the
 3 face-to-face contact.
 4 There seems to be -- the stakeholders based in
 5 London. However, I'm aware BTP is looking at
 6 potential -- some or all of the time locating a FIM --
 7 sorry, an SDO in Birmingham -- not as duplication but
 8 maybe an SDO moving between different locations,
 9 et cetera, maybe making it less London-centric, but
 10 still preserving those good relationships with the
 11 stakeholders we have.
 12 SIR JOHN SAUNDERS: You've actually explained how a FIM and
 13 the SDO work together. So if a decision is made that we
 14 should have a FIM all the time in Birmingham as well, it
 15 makes sense maybe to have an SDO there as well so they
 16 can have that face-to-face quick interaction?
 17 A. I suppose that's a resourcing decision for the force,
 18 sir.
 19 SIR JOHN SAUNDERS: It would have advantages?
 20 A. It would.
 21 SIR JOHN SAUNDERS: Or could.
 22 MR DE LA POER: Accepting that the ultimate answer to my
 23 next question is a resourcing issue but from an
 24 operational perspective as the person who sits above the
 25 FIM, do you have a view on what Inspector Dawson told us

1 about the importance of having a FIM and a deputy FIM in
 2 both London and in Birmingham all the time?
 3 A. Absolutely. I'm not criticising BTP for this, but about
 4 6 years ago, a decision was taken to have just one FIM.
 5 I remember thinking at the time, gosh, BTP across
 6 England, Scotland and Wales deals with some big
 7 incidents. You might have a person on a bridge at one
 8 location, you might have a person struck by a train
 9 somewhere else, you might have a package at a railway
 10 station, there's an awful lot to manage and you're
 11 looking between different logs and you can have the
 12 potential of missing -- and I remember thinking: gosh,
 13 that's leaving things quite thinly stretched doing that.
 14 Q. Did you say anything to anyone at the time when you'd
 15 had that thought?
 16 A. I didn't, no.
 17 Q. Do you remain of that view now or has your concern
 18 increased?
 19 A. Yes, I think regrettably this Manchester incident has
 20 brought this to the fore.
 21 Q. I've just got a few more matters to deal with between
 22 ourselves as we complete the chronology. The most
 23 substantial is going to be to have a look at
 24 a transcript. Mr Lopez, I regret I haven't given this
 25 reference to you. I'm sure you'll be able to find it

1 readily. We are going to look at a call that took place
 2 at 00.20. I will give Mr Lopez the reference and he can
 3 be searching for that and then we'll set the scene
 4 together.
 5 {INQ018834T/1}. We are going to go to page 13
 6 {INQ018834T/13}, but if you could just hold off bringing
 7 it up.
 8 There is an entry in the log, chief inspector, just
 9 before this call, which indicates that you were awaiting
 10 a call back from GMP. Can you recall being in
 11 a position where you were expecting a call from GMP?
 12 A. Yes.
 13 Q. We're a long way outside the golden hour at this point,
 14 but was this the first time that you had made
 15 a substantial effort to try and speak to somebody at
 16 GMP?
 17 A. I think it was.
 18 Q. Mr Lopez, if we can bring up {INQ018834T/13}, please,
 19 and crop into the bottom so it's easier to read.
 20 We can see the time. The person you are speaking to
 21 is a control room operator by the name of
 22 David Myerscough. We can see the conversation begins
 23 with you introducing yourself and with Mr Myerscough
 24 introducing himself. Do you see that?
 25 A. Yes.

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1 Q. Over the page, please, Mr Lopez {INQ018834T/14}. The
 2 first thing you say to him of a substance is this:
 3 "Yeah, okey—dokey, I need to find out is this
 4 location the actual seat of the bomb on your
 5 jurisdiction as GMP or ours as British Transport Police
 6 at the railway station?"
 7 To which, and I mean no criticism of him whatsoever,
 8 but it is perhaps — forgive me, I'll start again. What
 9 Mr Myerscough says is:
 10 "I think it will be on yours if it's within the
 11 arena itself. I believe it's BTP jurisdiction."
 12 The discussion goes on. You mentioned City Hall
 13 there. What was that a reference to do you think?
 14 A. I don't know.
 15 Q. Certainly insofar as there's any confusion,
 16 Mr Myerscough makes it clear, talking about the arena
 17 above Victoria Station, the foyer is mentioned, which is
 18 a word commonly used about the City Room. Then you say:
 19 "That's where it's gone off inside the arena? Okay.
 20 And who's the senior officer on GMP in charge of a GMP
 21 response at this time?"
 22 Mr Myerscough says:
 23 "I shall find out for you. I won't be a moment."
 24 Over the page, Mr Lopez, please {INQ018834T/15}
 25 assuming that's — no, it is, we have something more on

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1 the bottom. He comes back and says:
 2 "At the minute it's Inspector Sexton who's with me
 3 but he's just caught up on the other channel. I'm not
 4 quite sure who's going to be taking over eventually."
 5 You then ask for his mobile. Mr Myerscough says:
 6 "This is his line to get through. Have you — I'll
 7 just give you the direct number for it."
 8 Do we infer from that that you did have a line that
 9 took you through to the control room at GMP?
 10 A. It would seem so, yes.
 11 Q. Do you know where you got that number from?
 12 A. I don't, no.
 13 Q. Do you know whether or not it was something that was
 14 immediately available to you that night or whether it
 15 was something that you had to search for or ask someone
 16 else to find?
 17 A. I think it'd be something I had to search for or ask
 18 someone else to find.
 19 Q. Over the page, please, Mr Lopez {INQ018834T/16}. We can
 20 then see the telephone number is given,
 21 Inspector Sexton's name is repeated, and it looks from
 22 the transcription as if you spelt it out to make sure
 23 you had it right. You confirm that he is Oscar 1, which
 24 is certainly the BTP term for the force incident
 25 manager; is that right?

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1 A. Mm, mm.
 2 Q. And to the bottom and then you say again:
 3 "Okay, okay, right. And you think — your
 4 information at the scene is that this has occurred
 5 inside the arena and above the station and that's —
 6 your understanding is that this is BTP's jurisdiction?"
 7 He repeats the answer he's given you previously.
 8 Then over the page {INQ018834T/17} —
 9 SIR JOHN SAUNDERS: Just stopping. Again, Mr Lodge, just
 10 looking at it, are you using jurisdiction where it would
 11 have been more appropriate to use primacy?
 12 A. Yes, it would have been yes.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR DE LA POER: Over the page —
 15 SIR JOHN SAUNDERS: Do you have a problem, Mr Gibbs?
 16 MR GIBBS: I just sent a message to Mr de la Poer.
 17 SIR JOHN SAUNDERS: Thank you for telling us.
 18 MR DE LA POER: Yes, thank you very much indeed, Mr Gibbs.
 19 You've pointed out a very substantial error that I have
 20 made and I'm going to correct it just at the end of
 21 this. Thank you very much indeed.
 22 So there we see the conclusion of the call and
 23 we can take that down now. The error that Mr Gibbs has
 24 pointed out that I have made — and I'm sure it won't be
 25 the last time I make this — is in fact I have suggested

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1 to you that that time was 20 past 12. In fact, as
 2 Mr Gibbs rightly points out, that's the counter time.
 3 I can give the precise time and make clear it is within
 4 the golden hour, although it doesn't appear on the call
 5 schedule we've been looking at.
 6 That call was at 23.23, so we need to rewind in our
 7 mind and I am sorry that I have created that layer of
 8 confusion. I'm very, very grateful to Mr Gibbs.
 9 So we just need to take a step back in our mind to
 10 obviously that period when you are very concerned to
 11 identify jurisdiction. We're within the golden hour.
 12 The point that I wanted to make with you about this call
 13 remains the same. All of your conversation there was
 14 focused on this question of jurisdiction; do you agree?
 15 A. Mm.
 16 Q. Did that call give you an opportunity to follow the
 17 JESIP principles and coordinate with GMP?
 18 A. Yes, it would have done.
 19 Q. Again, is it because that wasn't at the forefront of
 20 your mind when you were making that call?
 21 A. Yes, but although later on I did call urgently and I was
 22 looking -- calling to find out what resources they had
 23 and what extra resources they might need from BTP so
 24 I was trying to coordinate but on that particular phone
 25 call.

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1 SIR JOHN SAUNDERS: It's very fair of you to say that you're
 2 actually talking to someone you believe to be a call
 3 operator. Would that give you -- would he be in
 4 a position, would you have thought, to coordinate under
 5 the JESIP principles?
 6 A. Possibly not but I could have raised it, as I say,
 7 I would like to speak to the other person about JESIP
 8 and co-locating and pass the message on --
 9 SIR JOHN SAUNDERS: Okay, but you did want to speak to
 10 Inspector Sexton, didn't you? Isn't that the whole
 11 point of the call?
 12 MR DE LA POER: So it appears. Can I perhaps give
 13 Chief Inspector Lodge an opportunity to answer what
 14 I had in mind.
 15 For example, might you have said, "The BTP
 16 rendezvous point is this. Please record it"?
 17 A. Yes, I could have said that.
 18 Q. Might you have said, "Do GMP have a rendezvous point
 19 different to that"?
 20 A. Yes.
 21 Q. Might you have said, "Have GMP identified a forward
 22 command point"?
 23 A. Yes.
 24 Q. So even though it was a radio operator you were speaking
 25 to, were those questions that you might have regarded

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1 him as being able to at least try and find out the
 2 answer for you?
 3 A. Yes, he could have passed those on or at least been --
 4 in the domain of that other organisation to consider
 5 those questions.
 6 Q. At any point did you call Inspector Sexton on the
 7 telephone number you'd been given?
 8 A. I'm trying to think. I think I did speak to him at one
 9 point in the evening.
 10 Q. Can you help us with approximately when you think that
 11 was? I'm sure we'll be able to find out if it's been
 12 recorded.
 13 (Pause)
 14 SIR JOHN SAUNDERS: I think it may be a good idea to search
 15 for this when we have a coffee break when you actually
 16 have some time and get some assistance. I'm afraid I'm
 17 confused by this call completely because Mr Myerscough
 18 says, when you're asking which number to ring, he says,
 19 with the -- this is the number to ring Sexton on, ie the
 20 one you're on at the moment, as I understand it, and
 21 then he gives you another telephone number. You did or
 22 didn't ring that or you don't know?
 23 A. I can't remember, I'm afraid.
 24 SIR JOHN SAUNDERS: Did you ask him to ring him back or not?
 25 A. What I was -- I was wanting to find out from the control

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1 room, to get through to Mr Sexton in the control room.
 2 SIR JOHN SAUNDERS: As indeed the FIM was?
 3 A. Mm.
 4 SIR JOHN SAUNDERS: Okay. Thank you.
 5 MR DE LA POER: Sir, we're fast approaching the moment that
 6 I would invite you to take that break, but I think I may
 7 be able to complete the chronology and then we can
 8 perhaps look into that between us.
 9 Returning to the sequence, we had got to a point at
 10 around 20 past midnight and if we can go back, please,
 11 Mr Lopez, to the schedule of calls. We can see at
 12 line 37, which is at the top of the next page
 13 {INQ032073/2}, a 36-second call at 21 minutes past
 14 midnight recording you calling Superintendent Mark
 15 Dexter, the ground-assigned tactical firearms commander.
 16 Do you recall speaking to him?
 17 A. I don't, but luckily the call record shows that I did.
 18 Q. The call record shows that there was a 36-second contact
 19 and it may be that people can help me with this.
 20 Certainly it was difficult for me to detect where that
 21 call was captured on Chief Inspector Dexter's
 22 dictaphone, but we will return to that also.
 23 SIR JOHN SAUNDERS: So that 36 seconds may be ringing but no
 24 contact?
 25 MR DE LA POER: As I understand call records, a call will be

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1 recorded as of a particular duration once an answerphone
 2 picks up if it doesn't otherwise connect. So 36 seconds
 3 can represent — it won't just be ringing time because,
 4 as I understand it, the networks don't record it .
 5 SIR JOHN SAUNDERS: Right, thank you.
 6 MR DE LA POER: We can just deal with one more log entry
 7 together, please, before I conclude my questioning in
 8 this session. It is at page 78 {INQ002000/79} of the
 9 log, please, if you could turn that up.
 10 A. Yes, I'm at page 78.
 11 Q. I beg your pardon, it will be page 79 in the top left
 12 hand corner. For some reason the pagination has now
 13 aligned because of the missing page that I now recall.
 14 00.31.54. We're now at half past midnight, so
 15 00.31.54:
 16 "SDO trying to contact Silver to update any update
 17 from the scene. Phone not responding."
 18 Is that the BTP Silver or the GMP Silver?
 19 A. That will be the BTP Silver.
 20 Q. So that's Chief Superintendent Gregory?
 21 A. Mm.
 22 Q. And clearly, at the time that you were trying to provide
 23 him with an update from the scene, he wasn't available
 24 at that particular moment?
 25 A. Yes, I think the purpose of that call, because I'm also

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1 keeping resources on right across the country, that's
 2 another role I was fulfilling across the divisions in
 3 London and in Scotland because I didn't know what
 4 backfilling requirement, what extra resources Manchester
 5 might need, so I had kept people standing by from their
 6 late shifts, which obviously people will do, of course,
 7 in this sort of situation, but if they're not needed,
 8 then they need to be released to go home to get rest for
 9 the next day when they might be needed. So I had a lot
 10 of resources right across the country I was
 11 coordinating, keeping them ready, so I think I was
 12 looking more for an update from him to establish what
 13 did he need from the scene, what did he need me to do to
 14 support him at that scene.
 15 Q. So you are perhaps moving away from having the arena
 16 attack as your exclusive focus and moving back into your
 17 national oversight role?
 18 A. Yes, wanting to support him with the resourcing picture,
 19 but starting to move away from, as you rightly say —
 20 because, regrettably, the world does keep turning and
 21 other big incidents can come into BTP, so I had to start
 22 monitoring for those.
 23 Q. And summarising your activity after 00.30, whilst
 24 continuing to do some tasks which were relevant to the
 25 Manchester Arena, did you begin to resume that national

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1 role to an increasing extent?
 2 A. Yes, I did, and starting to — taking more time to
 3 update other stakeholders about the incident, for
 4 example, the Met chief inspector has oversight for
 5 London, just to see what plans — they might put on
 6 reassurance patrols, et cetera, they might — just to
 7 get a sense of how other police forces were treating
 8 this.
 9 MR DE LA POER: Chief Inspector Lodge, those are all the
 10 questions that I wish to ask you at the moment. There
 11 may be some follow-up after the break when we have
 12 managed to answer those questions that have arisen in
 13 your evidence.
 14 Sir, I wonder whether that might be a convenient
 15 moment to take 15 minutes.
 16 SIR JOHN SAUNDERS: We will have 15 minutes and I hope that
 17 is long enough to get the information. If it isn't,
 18 then we might sit a bit late.
 19 (11.26 am)
 20 (A short break)
 21 (11.46 am)
 22 MR DE LA POER: Sir, thank you.
 23 Chief Inspector Lodge, just a very few questions,
 24 I hope, to bring greater clarity to one area of your
 25 evidence in relation to the calls to GMP. I'm very

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1 grateful to Mr Gibbs, who has assisted me with this, and
 2 Mr Horwell has also been in contact as well. I haven't
 3 quite got to the bottom of the detail of that, but if
 4 there is anything to add, I will do so at the end.
 5 As I presently understand the position, it is this:
 6 at 23.23, you contacted a telephone number that led to
 7 David Myerscough answering it. We've had a look at that
 8 in some detail in terms of the transcript. At one point
 9 there is a redaction applied to the document that we
 10 looked at, which is marked DPA, a reference to the Data
 11 Protection Act, because it contains a telephone number.
 12 I can tell you, chief inspector, that I have looked
 13 behind that redaction. The telephone number that
 14 Mr Myerscough gave you began 0161, so it is not a mobile
 15 telephone number, but it is a landline number, and
 16 we will be in touch with GMP and looking at the records
 17 to see if it was the same or a different number to the
 18 one you were speaking on. But you were certainly
 19 provided with a landline number by Mr Myerscough at that
 20 time. Whether it added to what you knew we will
 21 establish.
 22 Next in the sequence of calls that — you contacted
 23 the same telephone number, the FDO line, at 00.09, so
 24 9 minutes past midnight. It was again answered by
 25 Mr Myerscough. We can look at the transcript,

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1 if we need to, but this will probably be sufficient to
 2 prompt your recollection, chief inspector. In the
 3 course of that call, you asked for the contact number of
 4 the senior officer at the scene. We can then see the
 5 contact, or rather the telephone billing record, at
 6 00.21 with Mark Dexter, the senior officer at the scene.
 7 Does that help refresh your recollection?
 8 A. Yes.
 9 Q. And does that, broadly speaking, fit with the sequence
 10 as you recall them from the night?
 11 A. Yes.
 12 Q. So far as Inspector Sexton is concerned, so the force
 13 duty officer in the control room, did you ever speak to
 14 him that night that you can recall?
 15 A. I don't recall, no. I don't recall speaking to him.
 16 MR DE LA POER: Thank you very much indeed. I'm going to
 17 conclude my questions now and I will just investigate
 18 Mr Horwell's email in further detail and, if necessary,
 19 I'll come back.
 20 Perhaps while I'm doing that, I can turn to Mr Smith
 21 Queen's Counsel on behalf of North West Fire Control to
 22 see whether there are any matters that I didn't cover
 23 that he needs to attend to.
 24 MR SMITH: Thank you, sir. We have no questions.
 25 Everything has been dealt with by Mr de la Poer.

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1 SIR JOHN SAUNDERS: Thank you, Mr Smith.
 2 MR DE LA POER: Then next can I turn, please, to Mr Atkinson
 3 Queen's Counsel, who's taking the lead on behalf of the
 4 bereaved families.
 5 Questions from MR ATKINSON
 6 MR ATKINSON: Mr Lodge, I'm going to touch briefly on
 7 a number of areas that Mr de la Poer has already covered
 8 but I hope not to repeat that which he has dealt with.
 9 By reference to training first, the training records
 10 that we have for you show, by way of example, that you
 11 underwent major incident training back in December of
 12 2011 and there is no record there of you doing that
 13 training again, not a criticism. Was that training
 14 classroom-based or what? Do you remember?
 15 A. I can't recall.
 16 SIR JOHN SAUNDERS: Just for my benefit, this is before the
 17 witness joined BTP 2011?
 18 A. No, I was in BTP, sir, at that time.
 19 SIR JOHN SAUNDERS: Sorry, I should have gone back to my
 20 notes. You were already there, thank you.
 21 MR ATKINSON: Because you joined BTP just, again, to help
 22 the chairman with his note, when?
 23 A. The year 2000.
 24 SIR JOHN SAUNDERS: A long way out.
 25 MR ATKINSON: And we know that, and we'll look at a little

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1 part of it shortly, that there was a BTP major incident
 2 plan, a generic plan. Presumably you would have looked
 3 at that plan during that training or at least the topics
 4 it covered.
 5 A. I would have thought so.
 6 Q. Would you in the course of your working life thereafter
 7 have had reason on a regular basis to go back to that
 8 major incident plan?
 9 A. Not very often, no.
 10 Q. But presumably, just taking that as an example, the
 11 training that you'd be getting, you would hope would
 12 mean that if you were then having to deal with a major
 13 incident, you would know what to do without having to at
 14 that critical stage go back and go through a document to
 15 see what it had to say?
 16 A. Yes. As I referred to before, it's refreshing yourself,
 17 going through practice scenarios, mock scenarios, so you
 18 start to embed and it becomes a natural reflex. That's
 19 the ideal, to consider the key things in your mind, and
 20 thankfully major incidents are so rare that if you don't
 21 do that, you're at risk of being rusty on the day. And
 22 I know police forces are doing a lot more refresher
 23 training, a lot more scenarios than they ever did, and
 24 I'm also aware we have to be realistic. Police services
 25 want to provide a very good service to the public and

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1 there are a huge range of training requirements on the
 2 police: officer safety training to keep our officers
 3 safe, first aid training, mandatory track safety
 4 training, awareness in vulnerable and young person
 5 safeguarding, mental health protocols.
 6 With all these abstractions, we have to — I feel
 7 strongly that we want to be out there for the public and
 8 provide that service. So I'm sure — and it's
 9 a difficult decision for senior managers, there's only
 10 limited abstractions they can deal with, so they have to
 11 make difficult decisions, so anything I have said about
 12 not getting enough training is not criticising the
 13 management of the police service.
 14 SIR JOHN SAUNDERS: I'm really sorry, do you mind if I just
 15 stop?
 16 MR ATKINSON: Of course.
 17 SIR JOHN SAUNDERS: I don't know, how big is this manual,
 18 the major incident manual, or is it all online?
 19 A. I think it's quite a large tome.
 20 SIR JOHN SAUNDERS: So just being realistic for a moment, we
 21 all somehow have large tomes we're expected to look at
 22 from time to time, but whether we actually do so is
 23 another matter. Would you really have looked at it
 24 in the course of your ordinary job?
 25 A. No.

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1 SIR JOHN SAUNDERS: Were you ever required to look at it?
 2 A. There's no requirement (overspeaking) --
 3 SIR JOHN SAUNDERS: And we know when a major incident is
 4 ongoing, there's actually no time to get the book out
 5 and look at it. Was the book -- it was online, wasn't
 6 it? You just don't have time to look it up and look up
 7 things in it?
 8 A. No.
 9 SIR JOHN SAUNDERS: Since you had your training in 2011, do
 10 you think you would actually ever have looked at it, the
 11 book?
 12 A. I may well have done at some point, say if something's
 13 come up with my mind or to check something about
 14 a particular case. Once or twice, possibly, in that
 15 period.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR ATKINSON: And of course at that time, back in 2011, and
 18 the version of the major incident plan that we
 19 understand was in place at the time of this atrocity,
 20 the role of the SDO was yet to be invented?
 21 A. Yes.
 22 Q. And the plan therefore is entirely silent as to how the
 23 SDO is meant to play a part in a major incident?
 24 A. Mm.
 25 Q. And so if you were trying to understand how you're meant

1 to do your job, the major incident plan would in fact
 2 not have helped you?
 3 A. Yes. That's fair.
 4 Q. But doesn't that underline the fact that there was
 5 a real need for regular hands-on role play type training
 6 for those who would be dealing with a major incident so
 7 they knew what their jobs were and they knew how their
 8 jobs fitted in with everybody else?
 9 A. Yes, there was, and I did do some hands-on, practical
 10 scenario where I sat in the role as SDO with a mock
 11 scenario -- and that was in June 2018. So the force has
 12 made efforts to address that and, as I say, it is
 13 difficult to balance that with all the other training
 14 requirements. But I do accept that the major incident
 15 is a very important one because, as we have tragically
 16 seen here, where the impact is many lives are lost, some
 17 (inaudible: distorted) has got to come right at the top
 18 of the pile.
 19 Q. Forgive me, you had this role play in June 2018; have
 20 you done any since?
 21 A. No, there have been other scenarios -- I know other
 22 people have done it, whether I have been rest day on
 23 that day or whatever, I know there have been
 24 opportunities and others have done that training; I just
 25 personally haven't.

1 Q. You told us that the JESIP training that you undertook
 2 in October of 2016, you had found helpful because it
 3 involved you dealing with real scenarios with those that
 4 you would be dealing with in a real incident from the
 5 other emergency services.
 6 A. Yes, absolutely. It's very interesting to see how they
 7 operate and -- it's like anything in life: when you
 8 build face-to-face relationships and speak to people,
 9 you understand what they can bring to the party, they
 10 understand what you can bring to the party, and it just
 11 sticks in your mind more.
 12 Q. But that again was something you had done once --
 13 A. Yes.
 14 Q. -- by the time of these events?
 15 A. Yes.
 16 Q. Because would it be fair to say, Mr Lodge, that a good
 17 deal of your time on this evening dealing with this
 18 incident was dealing with others within BTP rather than
 19 outside it?
 20 A. Yes, correct.
 21 Q. With the exception perhaps of some of the stakeholders
 22 that you mentioned, some Railtrack (inaudible:
 23 distorted) had that thought, but very little time spent
 24 with the other emergency services?
 25 A. Yes, that's fair.

1 Q. And realistically, in the golden hour, it was the other
 2 emergency services who needed to be top of the list;
 3 is that right?
 4 A. Yes. With hindsight, and now in incidents I have dealt
 5 with since, they've absolutely moved up that priority
 6 list.
 7 Q. I don't want to spend long on primacy, mindful as I am
 8 of observations last week, but you've been taken very
 9 carefully by Mr de la Poer through a whole series of
 10 phone calls that you had, people asking you, you asking
 11 other people, about jurisdiction. The reality was that
 12 what you and the others were trying to identify was
 13 whether your force, the BTP, was in command of this
 14 incident or not?
 15 A. Mm.
 16 Q. Did it not seem to you realistically that the BTP
 17 couldn't be in charge of this very quickly?
 18 A. No, because at the initial scene, getting plenty of
 19 resources there, putting in the cordons, helping save
 20 life where necessary, with the Ambulance Service, we can
 21 do that as generic officers in that first critical half
 22 an hour, hour. And there was nothing for me to indicate
 23 there was anything around a marauding terrorist attack,
 24 so I know firearms officers were deployed to the scene
 25 but I personally feel that BTP had the capability and

1 were there very quickly at the time helping the public,
 2 helping those injured, preserving the scene.
 3 Yes, as you move forward, absolutely in a longer
 4 term setting or the next days that follow, you
 5 absolutely need specialist investigators with knowledge
 6 of terrorism offences, et cetera, to come to the party,
 7 definitely. But at that initial response I felt that
 8 BTP were able and competent to do that and did do that.
 9 Q. Just unpacking that slightly, if I may, and taking
 10 various parts of what you've just said.
 11 First, at no point did anyone suggest to you that
 12 this was a marauding terrorist firearms incident, did
 13 they?
 14 A. No.
 15 Q. Either within BTP or from outside BTP?
 16 A. No.
 17 Q. The information you had from when you first became aware
 18 of it was that this was a bomb?
 19 A. Mm.
 20 Q. And then without, you'll understand, going into details
 21 of information you were getting, further information to
 22 underline the fact that this had been a bomb?
 23 A. Mm, mm, yes.
 24 Q. And given the nature of the bomb, certainly criminal and
 25 almost certainly terrorist, really, from the outset?

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1 A. Yes, as the chairman helpfully pointed out to me, I'm
 2 not sure I could certainly say it was terrorist from the
 3 outset, but from a very early stage I was aware a bomb
 4 had gone off.
 5 Q. So Operation Plato was not something that you and
 6 Mr Dawson were discussing invoking in those early
 7 minutes?
 8 A. It certainly hadn't -- it didn't seem relevant to me.
 9 There was no suggestion of any parties outstanding or
 10 parties with firearms.
 11 Q. Did it strike you at the time that it was something that
 12 you needed to discuss with GMP or did it seem so clear
 13 to you, "This is a bomb", that you didn't even need to
 14 have a conversation about Plato with --
 15 A. Yes, I would say I wanted the conversation with GMP for
 16 other matters but on the Plato subject I didn't see --
 17 crossed my mind.
 18 Q. Going back then to primacy, you were aware that GMP had
 19 sent armed police in. Were you aware that your control
 20 room had no contact with those armed police at all?
 21 A. I wasn't aware of that.
 22 Q. So you had unarmed BTP officers, who you were sending
 23 in, and you had armed GMP officers who had gone in and
 24 no contact at a control room level between one and the
 25 other?

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1 A. I'd accept what you say on that, yes.
 2 Q. Which would be far from satisfactory, would it not?
 3 A. Yes. I don't know the rationale for -- I did see that
 4 armed officers were attending from GMP. I just assumed
 5 this must be purely precautionary, a real belt and
 6 braces approach, but of course I'm never going to put
 7 BTP officers at risk. Nothing is clear-cut, we are
 8 responding to an incident, there is always in my -- my
 9 view is officers have to go in and take any risk they
 10 have to try and help to save life and limb. I am not
 11 totally excluding the possibility of firearms, but
 12 I couldn't see any material risk of a marauding firearms
 13 attack.
 14 Q. And so the information, the plain fact that armed GMP
 15 officers had gone in did not make you think, maybe
 16 they're treating this as a different kind of incident to
 17 us?
 18 A. Maybe with hindsight, but at the time I just thought --
 19 Q. At the time certainly not?
 20 A. But at the time I just thought they must be doing a belt
 21 and braces approach and just being absolutely certain.
 22 Q. Would you agree actually finding out from them would be
 23 more helpful than reaching an assumption?
 24 A. I agree.
 25 Q. The golden hour principle that you have told us about

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1 and the various components of that, this was
 2 a principle, I think you've told us, that you first came
 3 to understand in the context of murder investigations;
 4 is that right?
 5 A. Mm.
 6 Q. And one can understand that in a murder incident, if one
 7 can ever have a conventional murder incident, something
 8 a good deal away from this mass murder incident we are
 9 here considering, a murder incident, a stabbing at
 10 a railway station, priorities will be the gathering of
 11 critical evidence, identification of critical witnesses,
 12 preservation of the essential scene, as quickly as you
 13 possibly can so nothing can be lost?
 14 A. Mm.
 15 Q. In a mass murder situation such as this, the critical
 16 thing is dealing with those who need immediate help.
 17 A. Mm.
 18 Q. And those other things just have to wait, would you
 19 agree?
 20 A. Yes, absolutely. And that's why in those -- the very
 21 top one is to preserve life.
 22 Q. It's just -- and again, this is just so we can
 23 understand how things were working, we can see that
 24 within that first hour you were spending time dealing
 25 with scenes of crime, crime scene examiners, persons of

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1 that sort. Those are all 2, 3, 4 of the principles
 2 underlying the golden hour principle rather than the top
 3 one, aren't they?
 4 A. But I'm looking straightaway on a very assured --
 5 I immediately want to see a good number, as many as we
 6 can, BTP officers at that scene. I believe we were on
 7 scene, a good number, 10 to 15 officers, within minutes,
 8 and I knew those officers were doing the very best they
 9 could to help those casualties, assess it, and I know
 10 there's been issues round them not standing back, but it
 11 is human nature to go in there and try to rescue people
 12 and I'm satisfied that they were doing that.
 13 Q. We'll come back to that when we look at the major
 14 incident plan in a moment, so I entirely take that from
 15 you.
 16 But just in terms of your focus and your control
 17 room's focus in that first hour after a bomb has gone
 18 off, if it had been recognised from the outset that, if
 19 this is a terrorist incident the local force will have
 20 primacy, we will provide immediate help to the injured
 21 and that kind of help, but we will be recognising
 22 that is where we stop, then the focus of BTP could have
 23 been entirely on getting people in to help and leaving
 24 crime scene examination and the like to the others?
 25 A. Yes, I think that's fair.

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1 Q. And if it had been established well before this that in
 2 this kind of situation the local force will have
 3 primacy, then all those calls would have been
 4 unnecessary between you and others because you all would
 5 have known?
 6 A. Yes, that's fair.
 7 Q. Just one aspect, please, of the senior duty officer
 8 document that you've already been taken to. It's
 9 {INQ041112/9}.
 10 "Incident command", 3.6. This, in dealing with an
 11 incident, is clearly talking about all manner of
 12 incidents that the BTP might have to deal with, is it
 13 not?
 14 A. Yes.
 15 Q. You gave some examples earlier in your evidence. It
 16 could be someone on the line, it could be a variety of
 17 incidents involving trains or involving stations?
 18 A. Mm.
 19 Q. Nothing at all to do with potentially a loss of life at
 20 all?
 21 A. Mm--hm.
 22 Q. Or certainly not loss of life on a significant scale?
 23 A. Mm. Mm.
 24 Q. There are situations this envisages where you, as the
 25 SDO, can take command, but would you accept that it

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1 doesn't make terribly clear when, so when it should be
 2 you rather than someone else?
 3 A. No, it doesn't. I think the SDO role, certainly when
 4 that document was written, was a relatively new function
 5 for BTP so it's still establishing what the role is and
 6 refining that. For example, in the SDO document there's
 7 a number of tasks outside of this remit, monitoring
 8 various statistics, that we don't do any more. So any
 9 new introduction in an organisation needs to be refined
 10 and only through learning through, unfortunately, tragic
 11 incidents like this can it be refined.
 12 Q. We can see at 3.6.2:
 13 "The role of the SDO in the initial golden hour will
 14 be to ensure that the appropriate response and resources
 15 are put to the incident. The initial command of the
 16 incident will be determined by the nature of the
 17 incident and how it comes to the attention of the
 18 force."
 19 Would you agree that appropriate response and
 20 resources will not necessarily come from BTP?
 21 A. Yes.
 22 Q. And to take an obvious example, in an incident where
 23 there's someone injured, inevitably the
 24 Ambulance Service will become involved and potentially,
 25 also depending on the nature of it, the Fire Service?

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1 A. Mm--hm.
 2 Q. So did you understand it to be a part of your role to
 3 ensure that the necessary resources were there from
 4 wherever they should come?
 5 A. Yes, I understand. I'm not -- I didn't write this
 6 document but this may be implying BTP resources when it
 7 says that, I don't know, that's just an inference,
 8 because at that time we were more inward looking,
 9 rightly or wrongly.
 10 Q. Because if your role was, as you say in your statement,
 11 to spot the gaps and fill them, a crucial area of that
 12 has to be, would you agree, that the BTP control room is
 13 coordinating not just with BTP resources but the wider
 14 resources that may be needed?
 15 A. Yes.
 16 Q. So an essential part, would you agree, of your role is
 17 to ensure that JESIP is happening?
 18 A. Yes.
 19 Q. Given the document recognises and you clearly recognise
 20 that it's absolutely essential this all happens as early
 21 as possible if it's to work, then that wider assessment
 22 of what resources need to be where has to happen from
 23 the outset; would you agree?
 24 A. Yes.
 25 Q. If we could go down, please, Mr Lopez, to the next page,

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1 please, paragraph 3.6.4 {INQ041112/10}.

2 This is, I'll be corrected when I'm wrong, as near

3 as it gets to saying when it's you rather than somebody

4 else, Mr Lodge:

5 "The SDO will only take over command of an incident

6 where immediate grip is required, where there are

7 multiple serious incidents and additional resilience is

8 required, or where there is a major incident and

9 immediate grip is required prior to the Silver role

10 being taken over by the senior officer on scene."

11 What, as you understand it, is meant by grip?

12 A. That is --

13 SIR JOHN SAUNDERS: Quite an unusual word to find in a

14 document like this, but perhaps quite descriptive as

15 well.

16 A. Yes. It means having a good grasp of the situation,

17 responding to it effectively, managing it, being in

18 control of it.

19 MR ATKINSON: Inevitably, in a situation that comes to the

20 attention of the control room, force control room, it is

21 the FIM or the deputy FIM who will be immediately in

22 control or in command of that, of dealing with that --

23 A. Mm.

24 Q. -- unless and until a Gold/Silver/Bronze chain of

25 command is established for an incident or presumably

1 unless and until you, as the SDO, take control of it

2 from them. And is it this paragraph that's meant to

3 help us as to when you might do that, when you consider

4 that there's more grip required than the FIM can

5 deliver?

6 A. Yes, I would envisage that as a situation where, for

7 example, the FIM was already deeply ensconced in other

8 serious incident and then a second one comes in, that

9 the FIM simply does not have the capacity to grip that

10 other incident properly or fully.

11 Q. How would you decide in that situation, if there is

12 a clear route to doing so, which of you would do what?

13 If in the course of a night an incident occurs which

14 a FIM is dealing with and presumably you are, as the

15 SDO, helping them to deal with, and then something else

16 comes up, would there be situations where you would stay

17 with incident 1 and the FIM would go off to deal with

18 incident 2? How would it work?

19 A. Yes, it's all about having a conversation to work out

20 what capacity somebody can deal with and it is quite

21 frequent, maybe rightly or wrongly, that the FIM is able

22 to and feels competent to manage two, three or four

23 serious incidents. It may not be the ideal, and I think

24 that has possibly been recognised, but in that context,

25 because the FIM is so used to operating like that and

1 taking, to be honest, really serious risk on their

2 shoulders, and they do a wonderful job in there and we

3 support them as best we can, I would always ask, "Are

4 you able to cope, do you want me to take one of these

5 incidents?", and it's never happened yet. I have always

6 offered.

7 Q. What this talks about in the third to fourth line

8 is that, in the context of a major incident:

9 "... immediate grip being required prior to the

10 Silver role being taken over by the senior officer on

11 scene."

12 Does that envisage that Silver Command in a major

13 incident ought to be on the ground?

14 A. Yes, it does seem to imply that.

15 Q. Thank you, that can come off the screens now, Mr Lopez.

16 Given your experience, does that make sense to you

17 that tactical command should be as near the event as

18 possible?

19 A. Not necessarily. I think it depends on the incident,

20 because you're going to have the Bronze or operational

21 commander at the scene, and it's going to be decision

22 based on -- by that Silver commander, where he or she

23 thinks they're best located to fulfil their role in the

24 best possible way.

25 Q. Because in this instance, Mr Gregory became Silver

1 commander; is that right?

2 A. Yes.

3 Q. And he was 10 minutes away from the control room in

4 Birmingham, wasn't he, rather than 10 minutes away from

5 the arena in Manchester?

6 A. Yes.

7 Q. And it was to the control room in Birmingham that he

8 went rather than to the scene in Manchester?

9 A. Mm.

10 Q. Was that your understanding at the time that he became

11 Silver commander that's what he was going to do?

12 A. Yes, it was, and for me that seemed sensible because he

13 can get to an information source quicker, within say

14 10 minutes, and start assessing it and starting to take

15 grip on the situation rather than a 1.5-hour journey to

16 Manchester.

17 Q. Again to follow that through, I wonder if we could go to

18 the major incident plan, which is {INQ025700/1}, please,

19 Mr Lopez. {INQ025700/25}, please. It's the middle of

20 the page, the FCRL and B initial actions.

21 These are the things that it's identified within the

22 incident plan should be being done by the control room

23 as their initial actions. So these are the things,

24 would you agree, that in this situation Mr Dawson, as

25 the FIM, should have been setting in train, helped by

1 you?
 2 A. Yes.
 3 Q. The first of them:
 4 "Reminding initial responders of their roles and
 5 responsibilities ."
 6 One of those responsibilities was for one of the
 7 first officers on the scene to detach themselves from
 8 the incident to give a METHANE report to you. That's
 9 what's said on the page before, in fact, of the
 10 document. Were you aware that there was a significant
 11 delay in obtaining a METHANE report from the scene?
 12 A. Yes.
 13 Q. Because the message coming back from, for example,
 14 Sergeant Cawley -- no criticism, I hasten to add, of
 15 him -- was, "I'm dealing with casualties, I can't do it
 16 now". And that created an obstacle to the operation of
 17 this plan from the outset, did it not?
 18 A. Well, for me, yeah, the METHANE report is important and
 19 it's a structure, but there were still lots of
 20 sufficient information on that log that could have been
 21 part of that in a condensed format. The METHANE report
 22 is just a summary, but there was sufficient information,
 23 so we knew what was going on on those key areas of
 24 METHANE. But yes, I accept it's important, very
 25 important, to get an early METHANE report

1 (overspeaking).
 2 SIR JOHN SAUNDERS: Just stop for a minute: Mr Atkinson,
 3 I well understand why you're saying no criticism of
 4 Sergeant Cawley, he acted in a very human way in
 5 response to seeing injuries . However, when something
 6 clearly sets out what has to be done at an early stage
 7 and it's not done, I don't think we should mislead
 8 people into thinking necessarily that that won't have
 9 some criticism, however human and understandable the
 10 response is. This is how the system is meant to work
 11 and it didn't work.
 12 MR ATKINSON: Because the plan itself recognises that it
 13 will be a challenge, but would you agree if there had
 14 been regular training of those who could be confronted
 15 with an incident like this, which could be anyone within
 16 the force realistically , but, "This is what you have got
 17 to do and this is why you have got to do it", then you
 18 and your control room in the first instance would have
 19 had a METHANE message much sooner?
 20 A. Yes, I do accept that.
 21 Q. A METHANE message is not just intended for you, is it?
 22 A. For the other organisations as well .
 23 Q. So if a BTP officer on the ground, and they were the
 24 first in, had been able to detach themselves and send
 25 a METHANE message within minutes, what should then have

1 happened is that that message was conveyed by your
 2 control room to everybody else who needed to know?
 3 A. Correct.
 4 Q. So that everybody would have known within minutes what
 5 they were dealing with?
 6 A. Yes.
 7 Q. And clearly, another benefit of that would have been
 8 that contact with everybody who needed to know would
 9 have been established within minutes?
 10 A. Yes.
 11 Q. We'll come back to that in just a moment. But number 2
 12 on the list , "Declaring a major incident". That
 13 Mr Dawson did and did at an early stage.
 14 We understand from him that references to NSPIS and
 15 references to SADD CHALETS are a reference to a previous
 16 version of things that hadn't been caught up with by
 17 this plan. But if we go down five bullet points up from
 18 the bottom:
 19 "Contact partner agencies and advise that a major
 20 incident has been declared. Identify RVP and FCP."
 21 So really as a next stage from getting a METHANE
 22 message should have been contacting everybody else,
 23 telling them what the METHANE message was, and agreeing
 24 with them what the RVP and FCP should be?
 25 A. Yes.

1 Q. You really needed to do both in terms of RVPs and FCPs,
 2 did you not? You couldn't do one and then worry about
 3 the other later , you needed to have both in place from
 4 the outset?
 5 A. Yes, because an RVP point is where all the vehicles -- a
 6 sort of administration point, as such. The forward
 7 command post must be nearby but that's where the
 8 decisions -- that's where people speak to each other and
 9 the real business takes place.
 10 SIR JOHN SAUNDERS: If we can just stop for a moment.
 11 We have heard other evidence which says you might do it,
 12 RVP and FCP at the same time, but actually, providing
 13 you've got them together at the RVP, that may be the
 14 better time to say where the forward control point is
 15 because you're nearer the scene and you know better.
 16 Mr Atkinson's saying that's not the right way, you have
 17 to have both at the same time, just of those two
 18 options, would you say which you think is preferable?
 19 A. I think again that's a decision for those on the ground.
 20 What would be the point travelling to some distance in
 21 5 minutes if you might lose 5 minutes' worth of talking
 22 time. If an RVP is a suitable place where you can
 23 conduct your business properly, safely , with all the
 24 partners I think, why not, it could be the same
 25 location .

1 MR ATKINSON: Is the difficulty with that, and 22 May
 2 perhaps is an example of that, if people are there
 3 already? If you have, because you have sent them in or
 4 because, more particularly here and to their credit,
 5 they have self-deployed themselves into the City Room,
 6 into the seat of this incident, they have gone past any
 7 RVP but what they need is to know where to get their
 8 direction from?
 9 A. Yes.
 10 Q. And they need to know where that linking-up of direction
 11 between the various people who have run in is, so to set
 12 up an RVP and not an FCP leaves those who have gone past
 13 your rendezvous point without a point of command?
 14 A. That's an option, yes.
 15 SIR JOHN SAUNDERS: Clearly, something we need to discuss
 16 but I think probably not with the witness any further.
 17 MR ATKINSON: No, absolutely.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR ATKINSON: Two up from the bottom on the list:
 20 "Identify dedicated Airwave channel for the
 21 incident."
 22 We have heard from a number of those who were on the
 23 ground of the difficulties they had with the radio
 24 because there was just so much radio traffic --
 25 A. Mm.

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1 Q. -- on the same channel, with people from around the
 2 country saying that they were on their way to help, with
 3 people at various points around the arena sending
 4 messages to each other, and also on that same channel
 5 people like Mr Dawson trying to get a word in to tell
 6 them what he needed from them. That is, would you
 7 agree, a far from satisfactory state of affairs?
 8 A. Yes.
 9 Q. Because it means that it's very difficult to identify
 10 the command messages from everything else?
 11 A. Mm.
 12 Q. And may therefore risk command messages being missed?
 13 A. Yes.
 14 Q. In much the same way as someone in your position relying
 15 on the Control Works log being able to spot the things
 16 that matter from the things that you can worry about
 17 later?
 18 A. Mm.
 19 Q. So with your experience, Mr Lodge, what is the solution
 20 to that? Is it to have a dedicated radio channel
 21 that is the channel that everyone knows they will be
 22 getting their command messages on?
 23 A. Possibly. I'm not an expert on radio procedure but
 24 I could see the risk that then -- how can they monitor
 25 the other channel when there might be useful information

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1 on the other channel. So I don't necessarily know
 2 there's any easy answers to this and there are probably
 3 people who are better skilled than me at radio channels
 4 would probably be better placed to answer that.
 5 Q. Is what's envisaged here, insofar as you can help us,
 6 Mr Lodge, that there should be a dedicated channel for
 7 the incident that will apply not just to the BTP but to
 8 others who are also engaged in the response?
 9 A. Yes, it doesn't say for other agencies but that's
 10 clearly a sensible thing to do, for other agencies
 11 (inaudible: distorted) speak.
 12 Q. Because within the context of an Operation Plato
 13 incident and by reference to the JESIP principles as
 14 explored in that context, one of the first things that
 15 needs to happen there is the three-way communication
 16 between ambulance, fire and police so that they are all
 17 speaking to each other as soon as possible.
 18 A. Mm.
 19 Q. In the time that you were dealing with this, that didn't
 20 happen, did it?
 21 A. No.
 22 Q. And it would have made life a good deal easier if it
 23 had?
 24 A. Yes. I'm not passing responsibility to the control room
 25 at all on that, but it's the control room that sets up

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1 and considers these issues rather than me.
 2 Q. Was it one of the things in your spotting-the-gaps role
 3 that you identified needing to be done?
 4 A. No, it wasn't.
 5 Q. So at a stage where you understood, I think from
 6 Mr Dawson, that he was having real trouble getting hold
 7 of his opposite number at GMP, was it something that
 8 occurred to you that there ought to be this three-way
 9 radio channel in operation which would allow those at
 10 your level to be speaking to each other and those on the
 11 ground being able to speak to each other?
 12 A. I think I was occupied with other duties, so -- but I do
 13 know now that there is that facility. I do know we now
 14 have the ability to contact each force into manning(?)
 15 the entire country at the press of a button that gets
 16 through to the line that they will answer.
 17 SIR JOHN SAUNDERS: I well understand about lessons being
 18 learnt and all the rest of it, but actually the fact
 19 that BTP might have been the site or their property
 20 might have been the site of a major incident which
 21 involved lots of or people, no one had thought about the
 22 fact in advance that, actually, we need to make sure
 23 we can communicate? As far as you were concerned, had
 24 they thought about it?
 25 A. Well, I mean, I'm detached from them and I rely on them

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1 to set up these channels and, rightly or wrongly, just
 2 assumed it was happening.
 3 SIR JOHN SAUNDERS: To some people it might seem very odd
 4 that when the FIM is trying to contact to say, "I have
 5 declared a major incident, we need this, that or the
 6 other, let's have an RVP point", and all the rest of it
 7 that he gets in a 999 queue to do it. Had that never
 8 occurred to anybody that that problem was going to
 9 happen?
 10 A. I mean, I absolutely agree with what you say, sir, it
 11 does seem an incredible situation. I can't answer for
 12 the rest of BTP. I wasn't aware of that until I watched
 13 the witnesses give evidence here and I was again
 14 surprised by that, to be honest.
 15 SIR JOHN SAUNDERS: On the night, were you told that there
 16 was this difficulty in communication going on? Were you
 17 aware of it?
 18 A. I could see some delay. Nobody came through and told
 19 me, so it wasn't raised to me as a huge issue, and as
 20 I say, with the log moving backwards and forwards --
 21 SIR JOHN SAUNDERS: The FIM didn't come in and say, "I'm
 22 having real trouble, can you help me out with this"?
 23 A. I don't recall that, no.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR ATKINSON: Realistically, given what was going on on the

1 night, how much time would a FIM have to detach
 2 themselves from their radio and from their Control Works
 3 to go and find someone else to say, "I need help with
 4 this"?
 5 A. There is that difficulty. It's always -- in these big
 6 incidents you are pulled in so many different directions
 7 and you have to make a split-second decision about what
 8 is the most important thing and if you do one thing then
 9 there is an opportunity cost that you don't do something
 10 else and you might risk dropping -- you've just got to
 11 try to prioritise the most important things.
 12 Q. Just taking each part of that sentence, there is so much
 13 that either the FIM or you, or both in this situation,
 14 will be dealing with that it's difficult to prioritise
 15 some over others --
 16 A. Mm.
 17 Q. -- and to realise what bits perhaps you're missing? But
 18 there's also, would you agree, the risk in that that
 19 you're so busy fielding internal BTP communications, of
 20 which there were a lot, that you don't step back and
 21 think, "I don't need to be speaking to these people,
 22 I need to be speaking to the FDO in Manchester, I need
 23 to be speaking to the Silver commander for the
 24 Ambulance Service instead"?
 25 A. Yes, I would agree.

1 Q. And if they're not contacting you either, then it's just
 2 not going to happen, is it? Final topic and it's very
 3 brief. You were being asked about a message in fact
 4 relating to the Ambulance Service at 23.03.23. Your
 5 comment in relation to that was that what you would want
 6 to happen is for the ambulance commander who'd arrived
 7 at the scene to speak to the BTP ground commander to get
 8 a bit of actual JESIP interoperability happening. Who
 9 was at 23.03.23 the BTP ground commander?
 10 A. I believe it was Sergeant Cawley.
 11 Q. I think Inspector Graham hadn't quite arrived yet and
 12 the Bronze commander that you appointed, Mr Gordon --
 13 A. He's actually Silver appointed, Mr Gordon.
 14 Q. Who did you appoint as Bronze?
 15 A. That was a matter for Silver to do that because Silver
 16 had taken over.
 17 Q. But certainly there was no appointed commander at the
 18 venue at all, was there, at that point?
 19 A. It depends if you define the sergeant there as the
 20 commander. He's the most senior person there, but
 21 I accept there's a huge amount of responsibility running
 22 multiple tasks and a lot to deal with.
 23 Q. And it was clear that there was more than he could cope
 24 with given the delay in relation to the METHANE message.
 25 Did it not strike you that you needed a more senior

1 level of commander at the scene immediately?
 2 A. I'd been -- seen a duty log that the duty officer, who
 3 was inspector level, was en route. I didn't know they
 4 were coming from -- subsequently, I found out they were
 5 coming from some distance away. I think my expectation
 6 was that there would be an inspector on the scene fairly
 7 shortly to help take -- relieve the pressure from
 8 Mr Cawley and take on some of those and become the scene
 9 commander.
 10 Q. Certainly we know Mr Gordon was dispatched to the scene
 11 but again arrived a good deal later than the golden
 12 hour. Did it strike you at the time that there was
 13 a lack of command on scene from the BTP given that
 14 Mr Cawley was struggling?
 15 A. It was taking a time before somebody arrived and it's
 16 difficult -- you look back and you think, everything was
 17 happening so fast, he was on the scene -- with
 18 hindsight, it's desirable if there'd been someone there
 19 sooner, but what I thought at the time, but -- "We're
 20 doing the best we can, we're in command of it, we've got
 21 resources there", so I don't think -- I thought, with
 22 the situation we're coping with, I don't think so, he's
 23 got a lot to deal with, but he's in command, there's
 24 somebody there. Not ideal.
 25 Q. This is my last question: the difference, perhaps,

1 between hindsight looking back and foresight having
 2 planned for this to an extent in advance, would you
 3 agree?
 4 A. Yes. I mean, it's very -- BTP were a national force and
 5 we have -- sometimes our duty inspectors -- ideally, the
 6 planning department will try to place them close to the
 7 area where they are supervising naturally but there are
 8 times in rosters where somebody goes ill or the duty
 9 inspector has to cover from a much longer distance away
 10 and I never know as SDO whether that inspector will be a
 11 long way or a near way, you hope it will be near, so
 12 I think under those circumstances, regrettably, that
 13 inspector was a long way away geographically.
 14 MR ATKINSON: Thank you very much.
 15 SIR JOHN SAUNDERS: There's something I want to take up and
 16 follow up on. If you know it is a terrorist event and
 17 a terrorist attack of some sort, is there some standing
 18 instruction or was there at the time that that will be
 19 dealt with by the local force?
 20 A. I think there may well have been. I think in my mind --
 21 I was thinking that somewhere in the back of my mind
 22 I knew BTP didn't deal with terrorist incidents but
 23 I thought that might come up later on in the hours and
 24 days that followed.
 25 SIR JOHN SAUNDERS: Okay. But is it written anywhere in the

1 major incident log that you know of? Is it on any of
 2 the action cards which were there but you didn't look at
 3 on the night? I'm not criticising you for that.
 4 A. Yes. I can't recall seeing anything to say that.
 5 SIR JOHN SAUNDERS: One of the difficulties may be
 6 identifying, if that is a standing instruction, what is
 7 a terrorist event. If a bomb goes off, it may not be
 8 discovered until some time later that it's a terrorist
 9 who's placed the bomb. Perhaps it's the seriousness of
 10 the event. When did it cross your mind that this was
 11 a terrorist event?
 12 A. I certainly remember an entry for Mr Smith saying it's
 13 been deemed as a terrorist event, because my natural
 14 conclusion with a bomb with that number of casualties
 15 and that level of destruction, I can't see that being an
 16 isolated incident, so the natural conclusion drew me to
 17 thinking that was -- it was a terrorist event properly
 18 half an hour, 40 minutes in, something of that nature.
 19 SIR JOHN SAUNDERS: Right. If there is a standing
 20 instruction that then primacy goes to the local force,
 21 you would have known at that time --
 22 A. Yes.
 23 SIR JOHN SAUNDERS: -- had you been aware of this
 24 instruction --
 25 A. Mm.

1 SIR JOHN SAUNDERS: -- primacy had to go to the local force?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: If a bomb goes off in whatever
 4 circumstances, would you not expect a local police force
 5 as a matter of precaution to respond with armed police
 6 going to the scene?
 7 A. Yes. I think, as I said before, that was why when I saw
 8 GMP's armed police were there, I thought it is
 9 precautionary, not necessarily that a Plato had
 10 occurred, but precautionary.
 11 SIR JOHN SAUNDERS: No, I understand that. Assuming the
 12 armed police are going to go and certainly at the time
 13 you did not have armed police yourself, or that armed
 14 police ought to go, again, would that not be a situation
 15 for saying, "Right, this is too big for us, GMP deal
 16 with it"?
 17 A. Yes, that's a fair point, sir.
 18 SIR JOHN SAUNDERS: I just want to ask your view of this,
 19 please, and I don't want anyone to take this in a wrong
 20 way, it's just to deal with the possibility. Is there
 21 a risk, or was there a risk at the time, of BTP hanging
 22 on to this incident because they didn't want in some way
 23 to be regarded as a second-class police service?
 24 A. No, I think not at all. I think it's absolutely --
 25 someone must grip it, we want to get there, we can work

1 out later on who's going to take primacy, but the
 2 priority is to get there for the public, start saving
 3 lives, and get someone there, get resources to the
 4 scene. So I don't sense any suggestion of that from
 5 anyone.
 6 SIR JOHN SAUNDERS: Okay. I wonder whether you think with
 7 hindsight that you're really right about saying let's
 8 get people to the scene. Obviously that's important,
 9 but isn't it also one of these things where you have to
 10 say, "Right, stand back, let's look at the overall way
 11 of sorting this out", and might someone who had stood
 12 back and said obviously get people to the scene as well
 13 but at the same time is standing back and saying, "Look,
 14 this just doesn't sound like something we can cope with,
 15 let's get GMP to have primacy"?
 16 A. Yes, that's a fair observation, sir.
 17 SIR JOHN SAUNDERS: Okay, thank you.
 18 MR DE LA POER: Before I turn to Mr Gibbs, can I just deal
 19 with Mr Howell's email, which adds to our knowledge,
 20 and for which I'm very grateful. I'm sure
 21 Chief Inspector Lodge will appreciate the added detail,
 22 as we understand it now.
 23 The information that GMP has drawn together, and for
 24 those that wish to consider this it's all contained
 25 within the master schedule that has been disclosed to

1 core participants. We can see that the telephone call
2 that we looked at the transcript for came to GMP via
3 999. So the effect of that, Chief Inspector Lodge,
4 is that you phoned 999 in order to have that
5 conversation. That conversation is recorded as
6 beginning at 23.21.26, so just very slightly before the
7 time Mr Gibbs gave us, but that's -- it may not be that
8 minute or so matters terribly, but certainly that
9 appears in the schedule.

10 The indication is that that call commenced about
11 1 minute and 20 seconds after you connected to 999, so
12 in other words you did not wait in a very substantial
13 queue in order to get put through. So that is all
14 contained within the master schedule for core
15 participants to consider.

16 The other point that needs to be made is that there
17 was, you will recall, chief inspector, a DPA redaction,
18 which I indicated was a telephone number. That is
19 correct. That telephone number was the FDO direct line.
20 So drawing all of that together, what we are able to
21 piece together, and I tell you all of this in case it's
22 something that absolutely stands against your
23 recollection, is that you phoned 999, you were put
24 through after about a minute of that contact being made
25 and you explaining what you wanted to the FDO line, you

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1 spoke to Mr Myerscough, who gave you the FDO direct line
2 number.

3 I hope you've been able to process what is quite
4 a lot of detail. It's absolutely not a memory test.
5 Does that strongly grate with your memory of the evening
6 in any way?

7 A. No, it doesn't.

8 MR DE LA POER: We have other records which we can draw on,
9 but thank you very much indeed, chief inspector.

10 I wanted to give you the opportunity to comment on that
11 before turning to Mr Gibbs.

12 Questions from MR GIBBS

13 MR GIBBS: While we have that fresh in our minds I was going
14 to take the witness to it. It'll be very plain,
15 I think, if I bring it up on screen.

16 Mr Lopez, could we have {INQ023493T/217}.

17 23.20.03. A female operator says:

18 "Police emergency."

19 And you introduce yourself and ask to be put through
20 to Oscar 1 in the control room:

21 "Bear with me for a moment."

22 "It's about the bomb going off."

23 You wait. You're asked for your name. And she says
24 that she'll transfer you; yes?

25 A. Yes.

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1 Q. Could we then go, please, Mr Lopez, to {INQ018834T/14}.

2 Let me just check that's right.

3 SIR JOHN SAUNDERS: There must be something slightly before
4 this, mustn't there, because they need to introduce
5 themselves?

6 MR GIBBS: Could we go to {INQ018834T/12}, I beg your
7 pardon. I'm looking at tape time 17:47. I hope this
8 helps, sir.

9 Mr Myerscough says that it's him on the duty
10 officer's line and someone says to him, it's a lady:

11 "It's Trafford Comms here. I've got Inspector Lodge
12 from BTP on the line about the explosion. Am I able to
13 transfer?"

14 And he says could she wait a moment.

15 Then if we go up to the next page, {INQ018834T/13}.

16 If we look at tape time 20:05, you are put there:

17 "It's Chief Inspector Lodge from British Transport
18 Police."

19 "Hello, sir."

20 "Who am I speaking to?"

21 He tells you who he is. And then on to
22 {INQ018834T/14}. And you ask him about:

23 "... whether the seat of the bomb is your
24 jurisdiction as GMP or ours as BTP."

25 If we go down, please, to 20:47, you ask who the

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1 senior officer on GMP in charge of a GMP response was.
2 He'll find out. And at 21:37 says:

3 "At the minute, it's Inspector Sexton, who's with
4 me, but he's caught up on the other channel. I am not
5 quite sure who's going to be taking over eventually."

6 You ask for a mobile number or a quick form of
7 contacting him and you are told this is his line on get
8 through on:

9 "Have you -- just give you the direct number for
10 it."

11 And then that, I think, as my learned friend
12 Mr de la Poer has told you, is where you're given the
13 0161 number, an FDO line.

14 After that -- so we see how you come to be speaking
15 to Mr Myerscough. Did you ever get to speak to
16 Mr Sexton?

17 A. I don't recall that I did.

18 Q. Just while we're looking at those transcripts, could we
19 go, please, Mr Lopez, to {INQ018836T/6}.

20 Again reminding ourselves that these are tape times
21 and that this log begins at -- in fact it's 23.58.30.
22 We're at about 00.09 where we see the tape time of
23 11:13.

24 Someone called Dave says:

25 "Force duty officer line, Dave Myerscough speaking."

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1 "Yeah, hello, it's Chief Inspector Lodge. I wonder
2 if you could get the senior officer at the scene of this
3 terrible bombing incident to give me a call. If I give
4 you a mobile number."
5 Did you pass over your mobile number?
6 A. Yes, I think I would have done.
7 Q. And then at tape time 11:43:
8 "And who is the senior officer?"
9 "I think it's Chief Inspector Dexter."
10 And if we go over to the next page, please
11 {INQ018836T/7}, do you remember whether you actually
12 ever got to speak to Mr Dexter?
13 A. I know there's a telephone record of that.
14 Q. There's a record of a connection between your number --
15 A. Yes.
16 Q. -- and a number of --
17 A. Yes.
18 Q. -- attributed to him which my learned friend
19 Mr de la Poer's taken you to --
20 A. Yes.
21 Q. -- at about 00.20.
22 A. Yes.
23 Q. Do you remember speaking to him?
24 A. To be honest, I don't remember speaking -- whether I did
25 or didn't speak to him.

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1 Q. And we know that he had a dictaphone on and I don't
2 think we've found a record of him speaking to you. You
3 can't remember speaking to him. Do you remember whether
4 you left him a message?
5 A. I can't say either way, I'm afraid.
6 Q. Do you still have the log, the Control Works log with
7 you?
8 A. I do, yes.
9 Q. May I just fill in one gap on the timing. So you were
10 asked about an entry on page 40 {INQ002000/41}, which is
11 timed at 22.53.43.
12 Sir, do you have a copy of this in front of you as
13 well?
14 SIR JOHN SAUNDERS: I do, thank you very much.
15 MR GIBBS: The entry is 22.53.43. You'll remember you were
16 taken to this:
17 "The SDO [that's you] has informed
18 Chief Superintendent Gregory, the on-call [C Division]
19 senior, who's currently in a hotel 10 minutes away."
20 And the question was: that's you recording the fact
21 that you've spoken to Mr Gregory; when were you actually
22 speaking to him?
23 Can I invite you to go back to page 32
24 {INQ002000/33} and the very first line.
25 A. Did you say the very last line?

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1 Q. The very first line. The time is 22.43.52 and there's
2 a remark from O1. Who's O1?
3 A. That's Oscar 1, that will be the FIM.
4 Q. So Mr Dawson has been recorded that the SDO is notifying
5 the on-call senior. Were you glad to be able to raise
6 Mr Gregory?
7 A. Yes, absolutely, and really pleased that he answered the
8 phone very quickly. He's a very experienced, very
9 competent officer who's very calm and controlled, so
10 that was a great reassurance to me.
11 Q. And the fact that he was 10 minutes away from the force
12 control room in Birmingham, was that, as you saw it, an
13 advantage or a disadvantage?
14 A. A huge advantage.
15 Q. Why?
16 A. Because he's only 10 minutes away. People in BTP, as
17 with many professions, often live a long way from their
18 place of work so he could get there very quickly and
19 assume command very quickly.
20 Q. I would like to ask, please, about another one of your
21 telephone conversations. This time it's with Mr Smith,
22 who was to be BTP's Gold. It may help, please,
23 Mr Lopez, if we have {INQ032073/1}.
24 This is the schedule of some, at least, of your
25 telephone calls. I'm looking at 22.56. We can see it's

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1 3 minutes and 58 seconds. You have rung ACC Smith of
2 BTP. Why was it him you rang?
3 A. Because the first point of call is to get the person who
4 I believe is going to be the Silver commander briefed on
5 the facts and that was Mr Gregory. The next person
6 in the chain who's at more strategic level comes second,
7 in my opinion, in the notification queue and that's the
8 person who's going to assume the role of Gold commander,
9 would be -- I assumed it would be Mr Smith.
10 Q. How did you know it was Mr Smith?
11 A. Apologies, because on our wall in the office there is
12 a roster as to who is the relevant on-call.
13 Q. Yes. Then I'm just interested in what -- it's not the
14 only time on the evening when you spoke to him but you
15 made some handwritten notes on the day, didn't you?
16 A. Mm.
17 Q. And they're not entirely legible, are they?
18 A. No.
19 Q. But Mr Smith also made some notes and I've asked -- sir,
20 I hope you'll approve of this -- Mr Lopez to arrange the
21 two notes side by side that may relate to this telephone
22 call. I know he's ready to bring that up on screen?
23 SIR JOHN SAUNDERS: Thank you.
24 MR GIBBS: To see whether it helps you to remember what was
25 discussed. If it doesn't, you should say so.

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1 A. Mm—hm.
 2 Q. So on the right—hand side, is that your handwriting?
 3 A. Yes.
 4 Q. And on the left—hand side, I think we'll hear obviously
 5 from Mr Smith, but he's made a note:
 6 "Tony Lodge SDO."
 7 And there's some bullets that he's put in there.
 8 I'm just interested in particular in this call about
 9 what you discussed, if you can remember, about
 10 jurisdiction or taking the lead or whatever we're going
 11 to call it. Shall we look at your note first?
 12 Help us to understand. Towards the bottom in
 13 a circle have you put "GMP at some point"?
 14 A. Yes, "GMP leading" and a box round it.
 15 Q. What does it say to the right—hand side of that?
 16 A. "Up and NSY and then media."
 17 Q. Is that an L for leading? "Leading up and NSY"?
 18 A. Could be "leading up and NSY", yes.
 19 Q. Well, you obviously now your writing better than I do.
 20 I'm going to make the suggestion, so everybody hears me
 21 make it and you must reject it if wrong, is that
 22 "heading up"?
 23 A. Possibly.
 24 Q. Or is that not how you write Hs?
 25 A. (Pause). I really can't say whether that's "GMP leading

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1 up" or "heading up".
 2 Q. What does it say above "GMP"? Can you decipher that for
 3 us?
 4 A. "In City Rooms."
 5 Q. I meant above the GMP which was in the circle.
 6 A. Oh right. Not sure of — it looks like "jurisdiction".
 7 Q. Then if we look across to Mr Smith's —
 8 SIR JOHN SAUNDERS: Just before we do that, can I just
 9 understand a bit more about the notes? This is a bit of
 10 paper which is beside you in your office while you're
 11 doing this. Are you making note as you are going along
 12 or is this after the event?
 13 A. No, it was as I was going along.
 14 SIR JOHN SAUNDERS: It's sort of jotting things down?
 15 A. Jotting things down in different places.
 16 SIR JOHN SAUNDERS: Are things jotted down on that bit of
 17 paper at different times? I have a habit of doing this
 18 (overspeaking) at various times.
 19 A. Yes. I think mostly it's in chronological order but
 20 there could be some instances where I've grabbed a spare
 21 piece of area on that paper and put something.
 22 SIR JOHN SAUNDERS: They could be chronological but they
 23 could be at different times in the chronology, if you
 24 know what I mean?
 25 A. Could be, yes.

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1 SIR JOHN SAUNDERS: So was there any more than one bit of
 2 paper?
 3 A. There was about seven pieces of paper altogether.
 4 MR GIBBS: For the chairman I'm going to ask, so you can
 5 see, sir, that — this I think is not the first piece in
 6 the PDF recorded on Magnum, but it's the top sheet in
 7 this run of documents.
 8 Could we just — I don't know whether you can
 9 scroll, Mr Lopez, now that we've got a split screen —
 10 scroll the right—hand side document so we can see where
 11 it begins.
 12 If you scroll so we can see the top of that
 13 right—hand side. Yes. So that's that same sheet of
 14 paper. You see how it begins. Then if you — so
 15 if we look, for instance, bottom right, sir,
 16 "Robin Smith" is underlined.
 17 If you go back to where we were, so the bottom half
 18 of that, we see where Robin Smith now sits halfway up
 19 the screen on the right—hand side.
 20 If we go to the next page just so the chairman can
 21 see how the things progresses — Bill Bryden, for
 22 instance, and the next page {INQ039246/6}. And the next
 23 page. And the next page. Thank you. I wasn't going to
 24 go any further but it continues for a few more pages.
 25 The chairman's question may be this: these entries

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1 aren't timed. Were you making them chronologically or
 2 may you have arrived at a conclusion, I don't know,
 3 an hour later and inserted it back on the first page?
 4 Are you able to say?
 5 A. Quite possible.
 6 Q. Thank you.
 7 If we then look at Mr Smith's note — and obviously
 8 this is what somebody else has written but it's someone
 9 to whom you have spoken. On this subject, do you see an
 10 entry "BTP territory"?
 11 A. Yes.
 12 Q. And then "Control GMP jurisdiction", then "GMP"
 13 underlined, a reference to Mr Gordon, and "[something]
 14 to scene", and then "aid and support". And there are
 15 other things as well:
 16 "Tomorrow morning, enhanced visibility,
 17 John Connaghan, business as usual."
 18 So just having seen what you have at some point
 19 written and what he has at some point written does that
 20 help you at all to help the chairman with what
 21 in relation to jurisdiction and GMP you discussed with
 22 Mr Smith before just 11 o'clock?
 23 A. Well, again, it reiterates in my own mind that there was
 24 obviously discussions around whose patch it was on.
 25 That's clear. Looking at Mr Smith's message, it's

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1 difficult to -- you can interpret it because there could
 2 be conflicting messages in there "GMP and JESIP", "BTP
 3 territory", "GMP jurisdiction". It's clearly a matter
 4 that's exchanged between us and is exercising both our
 5 minds.
 6 MR GIBBS: Thank you. I was going to take those off the
 7 screen, sir, unless you had any questions?
 8 SIR JOHN SAUNDERS: No, thank you.
 9 MR GIBBS: The SDO and the FIM, a door apart in the force
 10 control room in London. That is a place where you are
 11 co-located with other entities as well?
 12 A. We're positioned with -- it's a building owned by the
 13 Transport for London, we're on the ninth floor, and
 14 a crucial part of the BTP SDO model is that we are --
 15 the office next door is an open-plan office and outside
 16 my office is where the London Underground senior
 17 operating officer sits and also slightly beyond that the
 18 Network Rail senior operating officer as well, so we can
 19 have face-to-face contact with our railway stakeholders.
 20 Q. Then as between the two of you, the FIM and the SDO, the
 21 FIM, is this right, is focused principally upon the
 22 incident and the scene?
 23 A. Yes.
 24 Q. And the SDO is focused where?
 25 A. Our role is to more engaging with the railway

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1 stakeholders, updating them, any media department of BTP
 2 that might need to know, briefing senior officers,
 3 keeping those -- and there are lots of those tasks in
 4 a serious incident -- keeping those away from the FIM so
 5 the FIM doesn't have to do that, so the FIM can focus on
 6 the core operational response and focus on that.
 7 Q. Right. So you're looking upwards to senior officers and
 8 we see the telephone calls you make and you're looking
 9 outwards to other partners?
 10 A. Yes.
 11 Q. And you have told us who those might be, whereas the FIM
 12 is focusing on the scene?
 13 A. Yes.
 14 Q. How long now have you performed an SDO role for?
 15 A. About 4.5 years.
 16 SIR JOHN SAUNDERS: That's now, is it?
 17 MR GIBBS: Yes.
 18 What, if anything, do you think the SDO role brings
 19 to the FIM?
 20 A. I think it gives them the capacity -- because there's
 21 always a thirst for information from outside agencies,
 22 from internal agencies on a big incident. Without the
 23 SDO role being there, that would all get routed to the
 24 FIM and how on earth they'd be expected to manage the
 25 operational side of a big incident with everything that

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1 needed to be done and field all those phone calls as
 2 well would be just beyond comprehension for me.
 3 Q. At about 11.30, Silver command passed from the FIM to
 4 Mr Gregory, who was in the other control room in
 5 Birmingham, where he's got the DFIM and all of the
 6 controllers. So you're no longer a door away from the
 7 Silver commander. Did your role as SDO change in that
 8 time or in the minutes or hours that followed?
 9 A. Yes, I was very conscious to still offer support to
 10 Silver. I'm not part of the formal command structure,
 11 but I've got resources that if Silver commander needed
 12 them that I can bring up from London or from Scotland,
 13 search teams, for example, resources to relieve those
 14 officers that are very tired, been on cordons for hours
 15 and hours, or very distressed having dealt with a large
 16 number of casualties. My role was that resilience role
 17 then to make sure that that Silver commander had the
 18 back-up and resources from wherever I could get that
 19 arranged for him to go up there to help, you know,
 20 enhance BTP's response.
 21 Q. Right. So you were describing a resourcing role. You
 22 used the word resilience, which I think is a word that
 23 police use when they mean what? Resourcing, is that
 24 what --
 25 A. Resourcing and making sure that you've got the capacity

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1 to exist on in the next few days with this incident and,
 2 as it happened, we moved the next day to critical
 3 status.
 4 Q. So you've got to look forward to the future and you've
 5 got to look out to other stakeholders?
 6 A. Mm-hm.
 7 Q. Just make that real for us, explain what that means.
 8 Does it mean how the trains are going to run, how many
 9 officers are going to be on at the stations? What does
 10 it mean?
 11 A. It could mean that -- yeah, exactly: to set the
 12 railway's expectations that we might have an increased
 13 presence on the stations, what their role is,
 14 a reassurance role to the public, because they might be
 15 thinking there are other bombs or other attacks going on
 16 in the next few days, playing(?) to that, I know within
 17 the command structure much more locally there'd be a lot
 18 of engagement with the railways at stakeholder level to
 19 explain BTP's and GMP's activity at the scene so they
 20 could understand how to move their trains, what --
 21 expectation of when they might get their station back,
 22 those sort of questions.
 23 Q. Thank you. Then I've just three short matters which
 24 some other witnesses have been asked about.
 25 SIR JOHN SAUNDERS: One of the things that I think looking

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1 at the documents, and you'll correct me if I'm wrong,
 2 you were doing was you were contacting someone who runs
 3 or is involved with TRIM?
 4 A. Right, yes.
 5 SIR JOHN SAUNDERS: Am I right in thinking they are people
 6 within BTP who would provide support to those officers
 7 who had been involved in what went on and had no doubt
 8 been hugely distressed by what they'd seen?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So you were organising that?
 11 A. I believe I did make a phone call at some point --
 12 I don't know if I organised the whole lot of it, but
 13 I had some part to play on that.
 14 SIR JOHN SAUNDERS: That's more what we would normally call
 15 resilience than what is used by the police. Thank you.
 16 MR GIBBS: Of your training, of all your training, can you
 17 say which part or parts you think helped you most with
 18 this incident?
 19 A. I think the -- I remember from a major incident training
 20 very much the five golden hour principles and, rightly
 21 so, preservation of life not only sits at the top for
 22 a reason because it's the most important priority and
 23 I've tried to look at those actions on the log to make
 24 sure we satisfied all five of those, those criteria.
 25 Q. Of your experience as a police officer outside the SDO

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1 role, your past experience, can you say what part or
 2 parts of it helped you most on the night?
 3 A. I think it's having dealt with some serious crimes
 4 before and just trying to have a methodical approach to
 5 the incident, trying to keep calm, your generic skills
 6 as a police officer when there is a huge amount of going
 7 on of a very distressing incident, you keep going,
 8 effectively, right throughout the night. It was a very
 9 long night. I've felt very much for those victims at
 10 that scene, the families, keeping myself afloat and
 11 supported so I could just do the best I was able to do
 12 for those families and the people at that scene.
 13 Q. Lastly, you have already given us some insight into
 14 action cards and things like that, but is there anything
 15 that you didn't have that you haven't so far mentioned
 16 that you think might have helped you to perform your
 17 role on the night?
 18 A. If not -- an action card would have been very helpful,
 19 a pro forma that immediately comes up on the Control
 20 Works log that says "JESIP principles" and the five
 21 headlines around co-location, communication,
 22 coordination, joint understanding of risk, shared
 23 situational awareness. That flashing up would make me
 24 think, as SDO or FIM, "These are really important, let's
 25 make sure we start populating those boxes and we're

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1 focusing our attention on that".
 2 Q. So like an action card on the screen?
 3 A. Yes. And also I've put the JESIP -- hadn't had the
 4 JESIP app on my personal mobile but I have now got it on
 5 my phone and would receive updates on JESIP, just so
 6 that when I am on or off duty it starts embedding in my
 7 psyche around how important JESIP is.
 8 MR GIBBS: Those were my questions.
 9 SIR JOHN SAUNDERS: Thank you, Mr Gibbs.
 10 MR DE LA POER: Sir, nothing arises for me. Do you have any
 11 further questions for this witness?
 12 SIR JOHN SAUNDERS: No, I don't. I'm really grateful. You
 13 have obviously thought a great deal about this since and
 14 have thought what lessons can be learned and what went
 15 wrong at the time, so I'm grateful to you for having
 16 done that and conveyed it to me:
 17 A. Thank you, sir.
 18 MR DE LA POER: Sir, I think it's shortly before 1.10. May
 19 I invite you to resume either at five past or ten past
 20 2?
 21 SIR JOHN SAUNDERS: As it's actually five past, we'll resume
 22 at 2.05 unless you actually want the extra 5 minutes.
 23 MR DE LA POER: Not at all, I think my clock is different to
 24 that one.
 25 SIR JOHN SAUNDERS: Thank you. 2.05.

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1 (1.07 pm)
 2 (The lunch adjournment)
 3 (2.05 pm)
 4 MR DE LA POER: Sir, our next witness is
 5 Chief Superintendent Gregory. I wonder if he may be
 6 sworn, please.
 7 CHIEF SUPERINTENDENT ALLAN GREGORY (sworn)
 8 Questions from MR DE LA POER
 9 MR DE LA POER: Please can you state your full name.
 10 A. My name is Allan Gregory.
 11 Q. And your current rank?
 12 A. Chief superintendent.
 13 Q. That is a chief superintendent with the British
 14 Transport Police; is that correct?
 15 A. That's correct.
 16 Q. Chief superintendent, we're going to very briefly review
 17 your career, just to introduce you, although we will go
 18 back to some of your training in a moment. Is it
 19 correct that on 19 October 1992, you joined British
 20 Transport Police?
 21 A. That's correct.
 22 Q. And that was based in Wolverhampton?
 23 A. Yes.
 24 Q. In your subsequent career with British Transport Police,
 25 did you work in Birmingham, Liverpool, Manchester and

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1 Force HQ?
 2 A. That's correct.
 3 Q. In the course of your work at those various locations,
 4 were you promoted through the ranks?
 5 A. That's right.
 6 Q. Culminating on 16 June 2016 with a promotion to the rank
 7 of chief superintendent?
 8 A. That's correct.
 9 Q. And with that promotion, did you become commander of
 10 C Division?
 11 A. That's correct.
 12 Q. Do you have a copy of your statement in front of you?
 13 A. I do.
 14 Q. Can I invite you, please -- it's your first statement,
 15 the one you made on 25 October 2019 -- to turn up
 16 paragraphs 13 and 14, which appear on the second page?
 17 A. Yes, I have those.
 18 Q. Which summarise, I'm sure in very short form, the
 19 relevant experience and training that you had. Having
 20 just reminded yourself of those, can you please tell us
 21 what relevant training you had had for the role that you
 22 undertook on the night of 22 May 2017?
 23 A. I think primarily, that would have been the College of
 24 Policing courses at both Silver and Gold level, and
 25 primarily those two courses would have been those which

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1 informed much of what I did and my approach on the
 2 evening.
 3 Q. When approximately in relation to 22 May 2017 did you do
 4 each of those courses?
 5 A. So November 2015 was Silver, the tactical commander
 6 course, and January 2017 was the Gold command training
 7 course from the College of Policing.
 8 Q. Are those courses pass/fail courses are or they
 9 attendance-only courses?
 10 A. They are pass/fail courses, that is correct.
 11 Q. Did you pass both?
 12 A. I did.
 13 Q. Did either or both of those courses have any element
 14 devoted to JESIP?
 15 A. They did.
 16 Q. How substantial a part of each of those courses was the
 17 JESIP element?
 18 A. It's difficult from recollection to say quite what part,
 19 but they were certainly a significant reference point
 20 within the course. It absolutely hammered home the
 21 importance of JESIP as a set of principles on both
 22 occasions.
 23 Q. Were the courses specific to a Silver and Gold role at
 24 BTP or were they for Home Office forces as well?
 25 A. No, they were for Home Office forces as well and some of

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1 the power of those particular courses is you undertook
 2 those courses with Home Office colleagues as well.
 3 Q. Before 22 May 2017, had you engaged in any exercises,
 4 whether tabletop or live action, where you played the
 5 role of a Silver or Gold commander?
 6 A. Yes, I had.
 7 Q. Just help us with some detail around that, please.
 8 A. The one that comes to mind most is probably in
 9 preparation for Her Majesty the Queen's opening of
 10 Birmingham New Street, the re-opening of a newly
 11 refurbished station. We undertook quite a significant
 12 number of tabletop exercises at West Midlands Police HQ
 13 and I responded to many of those prompts, many of those
 14 feeds, as a Silver commander.
 15 Q. Were those exercises confined to participants from BTP
 16 only or did they involve other emergency services?
 17 A. They involved other emergency services as well.
 18 Q. So just drawing all of those matters together, were you
 19 adequately trained and prepared for the duties that you
 20 had to undertake on 22 May 2017?
 21 A. I don't think -- I honestly do not think that I could
 22 ever have been adequately prepared for the challenges of
 23 that night. I think many of the principles of the
 24 training, how the Gold/Silver/Bronze approach should
 25 work, what to expect from JESIP principles, they were

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1 clear to me, but in terms of the sheer scale of events,
 2 the sheer amount of information coming at you in
 3 different order, and the sheer tragedy, no, I wouldn't
 4 describe that as a full level of preparation for what
 5 happened on 22 May.
 6 Q. We'll come back towards the end of your evidence with
 7 what you think might have been done better and how that
 8 improvement might be embedded into the role that you
 9 undertook and indeed other roles. But we're going to
 10 now just talk about the Silver role at a major incident
 11 as you understood it in May 2017.
 12 We're going to do this, as we've done with other
 13 witnesses, by reference to the major incident manual,
 14 which is going to come up on the screen in front of you.
 15 A. Thank you.
 16 Q. {INQ025700/11}, please. As we turn to look at the
 17 detail, can we just understand whether this is
 18 a document that before 22 May you would have read cover
 19 to cover or been trained on? Tell us what your
 20 understanding of its contents was and how familiar you
 21 were with it.
 22 A. Yes, I'm familiar with the document. I have read it.
 23 I had read it before May 2017, probably on more than one
 24 occasion. There would have been times when I'd have
 25 dipped into specific areas, no doubt in preparation for,

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1 for example, some of the various operational exposure
 2 that I've had.
 3 Q. So the training and exercising that you'd had, do
 4 I understand from your last answer, did involve
 5 reference to this as a relevant resource?
 6 A. Correct.
 7 Q. On page 11, at 1.5.3, we see "Declaration of a Major
 8 Incident". We can see what I'm sure you will agree is
 9 a statement of some obvious facts in terms of:
 10 "A major incident for one emergency service may not
 11 be for another, however each emergency service will
 12 ensure that they have an appropriate response for the
 13 particular incident."
 14 And:
 15 "Where a major incident is declared by a local
 16 police force and the incident is within the jurisdiction
 17 of BTP it will be treated as a major incident in the
 18 first instance. When the first BTP supervisor arrives
 19 at the scene it will be their responsibility to assess,
 20 confirm or downgrade BTP's response."
 21 Just to explore this briefly with you, what this
 22 section is acknowledging is the possibility that one
 23 emergency responder will have a particular view about it
 24 and it's for BTP to make its own assessment in the
 25 knowledge of that, if they can, but independent of that;

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1 is that correct?
 2 A. That's how I would interpret that, yes.
 3 Q. As we know, in fact on the night, Inspector Dawson
 4 declared a major incident so far as BTP was concerned?
 5 A. That's right.
 6 SIR JOHN SAUNDERS: Just before you leave it, where it says
 7 "jurisdiction" in the second line of that paragraph,
 8 does that actually mean primacy?
 9 A. I think they are two very separate things and very clear
 10 in my own mind.
 11 SIR JOHN SAUNDERS: Okay, well, for instance at the arena,
 12 both BTP and GMP had jurisdiction.
 13 A. Yes.
 14 SIR JOHN SAUNDERS: So could BTP, when coming on the scene,
 15 countermand what GMP had said if they had declared it
 16 a major incident?
 17 A. According to that description there, sir, yes, they
 18 could. I think it would be highly surprising if one
 19 agency declared a major incident and another agency
 20 thought there was no major incident. But I appreciate
 21 the point you're making, which is that jurisdiction
 22 existed for both GMP and BTP.
 23 SIR JOHN SAUNDERS: Okay, thank you.
 24 MR DE LA POER: Page 14, please {INQ025700/14}.
 25 So we are now going to -- and if we can just crop

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1 into the top to start with, 2.4. We've looked at this
 2 with other witnesses so we don't need to read it all.
 3 I'm focusing here on Silver which, you'll see, begins
 4 halfway down the second paragraph:
 5 "The national guidance states that the Silver
 6 commander should be suitably located to maintain
 7 effective tactical command of the incident, and the
 8 Gold commander will be cognisant of this. Dependent
 9 upon the circumstances, the BTP Silver commander may be
 10 near the scene, eg at the forward command point, at
 11 a nearby police station, at a predesignated Silver
 12 control, at the force control room London or
 13 Birmingham."
 14 Did that accord with your understanding of the
 15 options that a Silver had when undertaking that role at
 16 a major incident?
 17 A. Yes, it did.
 18 Q. It's now well-established by the inquiry, but you can
 19 confirm as it relates to you, you undertook your role of
 20 Silver commander at the force control room in
 21 Birmingham; is that correct?
 22 A. That's correct.
 23 Q. It goes on to say:
 24 "During a major incident, many of the responding
 25 agencies will have their Silver commanders at the scene.

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1 Where the BTP Silver commander is located away from the
 2 scene, it is important to ensure that the BTP commander
 3 on scene is aware of their responsibilities including
 4 attending (and probably chairing) the Silver
 5 coordinating group meetings."
 6 So let's just look at that, particularly given where
 7 you chose to locate yourself. If the Silver commander
 8 chooses not to go to the scene, that places an
 9 additional burden upon the operational commander;
 10 is that right?
 11 A. That's exactly right.
 12 Q. Because it is an immediate consequence of the absence of
 13 Silver at the scene that some of the responsibilities
 14 that Silver at the scene would have undertaken must be
 15 discharged by someone else and that someone else,
 16 according to the manual, is the Bronze commander?
 17 A. Discharged by somebody else, but I would describe it
 18 that the Silver is clearly linking in with that
 19 individual, so I'm not suggesting -- I don't think the
 20 manual is suggesting that that individual takes the role
 21 of Silver on scene but performs the role in the name of
 22 Silver and advised by Silver.
 23 Q. However labelled, there are certain things that need to
 24 be done?
 25 A. Correct.

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1 Q. Silver is not at the scene, so can't do them?
 2 A. Yes.
 3 Q. The person who does those jobs then is the Bronze?
 4 A. That's right.
 5 Q. Does it follow from that that if the Silver is not going
 6 to be at the scene, it's absolutely essential to have
 7 the Bronze commander at the scene as soon as possible?
 8 A. Yes, it does.
 9 Q. If we go down to 2.5, again we've dealt with this with
 10 other witnesses, but your perspective as Silver
 11 commander will be valuable. We can see the first
 12 sentence begins:
 13 "Agreement on responsibilities between BTP and the
 14 local police force will be subject to negotiation with
 15 all relevant local police forces at the outset of any
 16 major incident."
 17 So that sentence there is anticipating a discussion
 18 at the outset of the incident?
 19 A. Yes.
 20 Q. We're going to take a step before that. So far as you
 21 were aware in May 2017, was there any agreement that BTP
 22 had with GMP, or indeed any other Home Office force, as
 23 to how responsibility would be divided?
 24 A. I'm certainly aware of the Home Office circular
 25 in relation to primacy, particularly in significant --

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1 perhaps major crime incidents, major incidents
 2 themselves or terrorist incidents, and there was
 3 provision and encouragement within that Home Office
 4 circular for discussion between agencies at the outset.
 5 I'm aware that did exist.
 6 Q. In terms of a predetermined arrangement, so far as you
 7 were aware, there wasn't one?
 8 A. No, no.
 9 Q. Given that, for example, the arena has, as we understand
 10 it, over 1 million visitors in a year and in high
 11 concentrations at times, so over 20,000 at one time, do
 12 you think that having an agreement specific to that
 13 before the attack in May 2017 would have assisted the
 14 response or would it have made no difference from your
 15 perspective as a Silver commander?
 16 A. Well, I'm clear that the response that BTP officers
 17 undertook in those first few minutes happened, so that
 18 response and the significant marshalling of resources
 19 would have happened irrespective of any agreement. I'm
 20 not sure whether the existence of a prearranged
 21 agreement would have changed that at all. Would that
 22 have been preferable to this wider possibility that's
 23 envisaged by this manual and also by the Home Office
 24 circular? It's quite difficult to say. It potentially
 25 could be seen as a very prescriptive one way of doing

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1 things. The risk, I guess, is that if that is deemed
 2 the way in which a major incident will be dealt with at
 3 a particular place, there is always a slight risk that
 4 everyone sees that one agency now as wholly responsible
 5 and we will effectively wait for them to take the lead.
 6 Whereas I actually think that an operational response
 7 and to do the right thing and to be there quickly and to
 8 support individuals is the right thing.
 9 SIR JOHN SAUNDERS: I think no one would say for a minute
 10 that it wasn't right (inaudible: distorted) as quickly
 11 as possible. I think there are two issues when you
 12 start: getting there to help the casualties obviously is
 13 obviously really central, but also the liaison with
 14 other agencies, other rescue services, is obviously
 15 vitally important, and it may be easier for the local
 16 police to liaise with the local ambulance and the local
 17 fire service and, in all probability, they've exercised
 18 together and things like that.
 19 A. Yes.
 20 SIR JOHN SAUNDERS: So the chances are they're in a better
 21 position than you are.
 22 A. I agree. And I think certainly in terms of subsequent
 23 negotiation between GMP and BTP in the draft MoU that
 24 now exists, it does envisage that that predetermined
 25 response and that primacy will fall to GMP in the event

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1 of an incident of this kind.
 2 MR DE LA POER: You've identified a risk as part of your
 3 answer and we'll come back to the risk that might exist
 4 otherwise. But just focusing upon what might have
 5 occurred differently. If, for example, BTP had known
 6 from the moment it was able to identify that this was
 7 a terrorist attack that GMP would have primacy,
 8 resources at a command level would be diverted away from
 9 seeking to establish jurisdiction --
 10 A. Yes.
 11 Q. -- perhaps setting up a Gold/Silver/Bronze structure,
 12 and instead be diverted to saying to GMP, "What can we
 13 do to help?"
 14 A. I absolutely do appreciate that. I think you've
 15 characterised that very precisely. I have to say, from
 16 the outset, in terms of the nature and the scale of the
 17 issue on that night, there was no doubt in my mind who
 18 or which agency would have primacy. There wasn't
 19 a sense of confusion but no doubt we'll be speaking on
 20 that later.
 21 Q. Did you see any of Chief Inspector Lodge's evidence this
 22 morning?
 23 A. I saw small parts of that, sir.
 24 Q. Certainly he identified that there were tasks that he as
 25 the senior duty officer was undertaking in pursuit of

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1 the question of primacy when he accepted he might
 2 otherwise have been spending his time --
 3 A. Yes.
 4 Q. -- with the JESIP principles of ensuring a joint
 5 approach.
 6 A. Yes.
 7 Q. So that is one example that we've heard and I see that
 8 you accept that --
 9 A. Yes.
 10 Q. -- as logical.
 11 Of course, in the absence of a pre-agreement, the
 12 word "outset" in that sentence that we can see, the
 13 phrase "at the outset" becomes all the more important,
 14 do you agree?
 15 A. I do.
 16 Q. We've heard from, in particular, Inspector Dawson about
 17 the chaos that is created by an incident of this
 18 magnitude, but do you think that it is the obligation of
 19 the police forces nonetheless to ensure that that
 20 communication happens from a very early stage?
 21 A. I do. It's hugely important.
 22 Q. The bottom paragraph here --
 23 SIR JOHN SAUNDERS: Are you going back to the middle
 24 paragraph?
 25 MR DE LA POER: I was going to deal with a different point,

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1 sir, so this might be a convenient moment.
 2 SIR JOHN SAUNDERS: I'm really concerned about the possible
 3 confusion between jurisdiction and primacy. That's been
 4 evident from other evidence we've had. I know you say
 5 you're completely clear, but I wonder whether this
 6 document itself actually contributes to any possibility.
 7 So, "Agreement on responsibilities", which we've just
 8 had read:
 9 "While most incidents on the railway fall within
 10 BTP's jurisdiction, the chief constable for the police
 11 area where the incident occurs will always retain
 12 responsibility for their geographical area and local
 13 community."
 14 Then if also we combine that with the beginning of
 15 the next paragraph:
 16 "Generally, in relation to uniform response, BTP
 17 will lead on matters within the inner cordon and on
 18 railway property, and the local police force will assist
 19 with the outer cordons and matters off railway
 20 property."
 21 Which seems to suggest that if something happens on
 22 railway property then the railway prima facie have
 23 primacy.
 24 A. It does.
 25 SIR JOHN SAUNDERS: Whereas we know that jurisdictionally

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1 both the local police force and BTP both have
 2 jurisdiction.
 3 A. That's correct. There are layers of jurisdiction which
 4 may appear very confusing and you've outlined what that
 5 confusion looks like in terms of the paragraphs.
 6 I think that that is daily bread and butter --
 7 SIR JOHN SAUNDERS: Okay.
 8 A. -- for British Transport Police.
 9 SIR JOHN SAUNDERS: Is it laid down somewhere in
 10 a memorandum of agreement with the Home Office forces?
 11 A. The Home Office circular 25/2002 will certainly speak to
 12 that.
 13 SIR JOHN SAUNDERS: We'll have a look at that. Also in the
 14 third line:
 15 "Terrorist matters will have separate arrangements.
 16 BTP and the logical police force will reach clear
 17 agreement on who is responsible for what functions
 18 relating to the major incident and discuss mutual aid
 19 dependent upon the circumstances."
 20 It's not much good doing that when the emergency
 21 happens or the terrorist attack happens, so was there an
 22 agreement, something between you, BTP, and GMP setting
 23 out the arrangements if there was to be a terrorist
 24 attack?
 25 A. No, sir, there was not.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: Third paragraph, second sentence:
 3 "At the scene, the BTP Silver commander will do the
 4 same with the local police force."
 5 That is ensuring there is a clear agreement on who
 6 is responsible:
 7 "Silver commander to ensure that they understand
 8 each other's responsibilities."
 9 A. Yes.
 10 Q. Now, if Silver doesn't go to the scene, which, as we've
 11 seen in an earlier paragraph, is a legitimate option
 12 open to Silver depending upon the circumstances, does
 13 that responsibility to reach clear agreement effectively
 14 have to be undertaken by Bronze?
 15 A. It is possible that that may happen. The way I would
 16 see that, if I am not at the scene, I will attempt to
 17 speak to the individual undertaking the role of Silver
 18 in the Home Office force within which the incident sits.
 19 It may well be that the Bronze on scene for BTP actually
 20 has a discussion with another, a Bronze for the
 21 Home Office force which is in attendance, and they may
 22 well have a discussion. And it may well be that there
 23 is clarity on the part of the Home Office force about
 24 who has primacy in this regard and it might well be that
 25 they will communicate that back to me. So at least

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1 we can see at Bronze, at Silver or at Gold level there
 2 can be expected to be some form of conversation. The
 3 way that the manual is scripted is that that agreement
 4 comes between the Gold or the Silver. In reality ,
 5 operational reality , it may well be others who have some
 6 discussion around that.
 7 Q. Although there are those three tiers of command, in fact
 8 there are two geographic locations we're really dealing
 9 with, do you agree?
 10 A. Yes.
 11 Q. The scene and not at the scene?
 12 A. Yes.
 13 Q. Not at the scene is covered by Gold, who will have the
 14 final say so?
 15 A. That's right.
 16 Q. That's what's provided for here. But whilst two Gold
 17 commanders can speak to each other, there may
 18 nonetheless be a lack of clarity on the ground, so that
 19 is where an agreement at the scene becomes important; do
 20 you agree?
 21 A. Yes, I do.
 22 Q. What the manual envisages is the Silver commander
 23 reaching that agreement, although as we've seen it's not
 24 always possible for the Silver commander or appropriate
 25 for the Silver commander to go, so really does it come

1 to -- that is one of the roles that the Bronze commander
 2 will undertake?
 3 A. Yes, that's correct.
 4 Q. So again, bearing in mind that we are talking about
 5 at the outset, if Silver is not going to be at the scene
 6 to reach that agreement, is it essential that there is
 7 a Bronze commander at the scene from the earliest
 8 opportunity to make sure that that is clear to everybody
 9 on the ground?
 10 A. Yes.
 11 Q. As we'll come to when we look at the timeline, we can
 12 see from the control log, depending on what precise
 13 timestamp you take it -- I'm going to take 23.37 and I'm
 14 sure you understand why I have done that -- that that is
 15 the moment when you unequivocally become the Silver
 16 commander; do you agree?
 17 A. That's correct.
 18 Q. At that point, the golden hour, as we heard from
 19 Chief Inspector Lodge, has been and gone. Was it
 20 therefore a high priority for you at the point that you
 21 took over to ensure that there was complete clarity
 22 around the issue of primacy?
 23 A. Yes, absolutely.
 24 Q. We're not going to foreshadow what you did, but we've
 25 seen your answer in the context of this.

1 Page 15, please, Mr Lopez {INQ025700/15}.
 2 We can see the role of BTP Silver commander at 2.7.
 3 The first paragraph deals with the initial Silver
 4 commander who we know was the force incident manager,
 5 Inspector Dawson.
 6 It goes on to indicate, and I'm summarising here so
 7 do feel free to draw my attention to any part that you
 8 feel necessary to, but we can see the second paragraph
 9 deals with railway incidents specifically .
 10 A. Yes.
 11 Q. Then the third:
 12 "It is likely that several handovers in Silver
 13 command will occur in the first few hours of the
 14 incident until an appropriate rank is appointed by Gold
 15 to the Silver role. This is generally an officer of
 16 superintending rank."
 17 For the Manchester Arena attack, in fact we have the
 18 initial commander and then it went straight to you --
 19 A. That's right.
 20 Q. -- one rank above even the superintending rank as
 21 opposed to a situation where it moved through other
 22 people's hands --
 23 A. Yes.
 24 Q. -- in your view, from the position that you were in, was
 25 it right that it went straight to you, do you think?

1 A. Yes. I was the on-call senior officer for C Division
 2 at the time and what I would expect to have happened
 3 happened, and the SDO contacted me and explained what
 4 had happened, and it was at that stage that it was very
 5 clear to me I was going to be taking the initial Silver
 6 role and I was very fortunate to be in Birmingham in
 7 order to do that very quickly over in the control room
 8 across the way from the hotel where I was at.
 9 Q. One of the consequences of it going straight to you is
 10 where you were placed at the time, as we've heard, is in
 11 a hotel 10 minutes away from force control room in
 12 Birmingham.
 13 A. Yes.
 14 Q. And plainly, that was an advantage if Silver was best
 15 deployed at a control room. But the consequence was
 16 that there would be no Silver at the scene.
 17 A. Correct.
 18 Q. Do you know whether any consideration was given to
 19 appointing a Silver commander who could have gone to the
 20 scene in a timely fashion? I appreciate you were some
 21 distance away so that was never an option for you.
 22 A. That's correct. No, I believe that wasn't considered.
 23 It was me who undertook that role and almost
 24 self-deployed into that and, of course, what followed
 25 subsequently was an effort to get a Bronze to the scene

1 in order for me to have that situational awareness and
 2 to have that clarity about what was happening.
 3 Q. I do not want to know what the position is now, let me
 4 be very clear about it, but would it have been feasible
 5 to look within the BTP ranks in May of 2017 for a more
 6 local, appropriately trained and qualified Silver
 7 commander than you?
 8 A. At that time of night and with the role that I had, and
 9 with a wish to act quickly, promptly and get to
 10 understand exactly what was going on, no, that wasn't
 11 something that I personally considered. I was suitably
 12 qualified to undertake the role, albeit I was distant,
 13 a position within FCRB in Birmingham was appropriate to
 14 lead that, and it gave me the quickest access to that
 15 situational awareness.
 16 There's no guarantee of any individual relatively
 17 close at hand towards -- in terms of Manchester Arena
 18 who could have been on the scene and with that
 19 situational awareness any quicker than I was.
 20 Q. You weren't on the scene, but any quicker undertaking
 21 the role?
 22 A. No. I think what I'm trying to say is you've asked me
 23 was consideration given to appointing someone who could
 24 perform Silver at the scene and I think my response to
 25 that is I've moved as quickly as possible to get to the

1 control room in Birmingham to undertake that Silver role
 2 and it is not clear and wasn't clear in my mind that
 3 there was anyone closer who could have made it to the
 4 scene quicker than I could have been in FCRB.
 5 Q. Over the page, please {INQ025700/16}. I have moved over
 6 much of the text of Silver commander, it is all there to
 7 be seen, but I just wanted to deal with your
 8 understanding of the role of a Bronze commander.
 9 We can see that BTP envisages multiple Bronze roles,
 10 but is there one of those roles that effectively sits
 11 superior to the others, Bronze 1?
 12 A. Bronze 1, yes.
 13 Q. And so although there are other people with a command
 14 role --
 15 A. Yes.
 16 Q. -- with the word Bronze in the title, Bronze 1 is what
 17 would be understood in other circumstances as the
 18 operational commander?
 19 A. That's correct.
 20 Q. We can see under the heading "Bronze 1", 2.9:
 21 "At the scene of a large incident there is
 22 a requirement to have robust on-scene command
 23 arrangements. When the Silver commander is not at the
 24 scene Bronze 1 will take on key at-scene command
 25 responsibilities as directed by the Silver commander."

1 And we can see it goes on to list that very specific
 2 role of ensuring effective and timely coordinating group
 3 meetings, but no doubt you will tell us that it doesn't
 4 just stop at that formal meeting, there are many more
 5 aspects to that role than just that?
 6 A. That's absolutely right.
 7 Q. {INQ025700/21}, please, Mr Lopez.
 8 3.0. Again I'm not proposing to read it all out,
 9 it is just the third paragraph I particularly want to
 10 draw your attention to. It's a word we heard earlier
 11 today and you can help us with it, command resilience,
 12 which is defined here as:
 13 "The ability to function effectively for a period of
 14 time and commanders should consider this from the outset
 15 of the incident. Handover procedures between commanders
 16 must be robust to ensure a continuity of the management
 17 of the major incident."
 18 In terms of the scene, does that mean that there
 19 needs to be somebody performing the command role from as
 20 early as possible?
 21 A. Yes, it does.
 22 Q. It doesn't necessarily mean that it is the perfect
 23 person for that role, because the major incident manual
 24 envisages the possibility of handover, but there what
 25 we are looking at is a consecutive lineage of commanders

1 to make sure there is always a commander at the scene?
 2 A. Yes.
 3 Q. {INQ25700/23}, please. We've seen this mentioned
 4 before, the Silver coordination group. It's 3.6. We see
 5 what the manual says there. What did you as a Silver
 6 commander understand the purpose and operation of
 7 a Silver coordination group to be?
 8 A. In the incident on 22 May, I did not see the requirement
 9 for any form of Silver coordination group for BTP to
 10 chair because, I think as I've outlined earlier, from
 11 the point in time at which I took command, I was very
 12 clear that GMP had assumed primacy and were acting upon
 13 that. To a large extent, that then means any
 14 coordination really must be undertaken by the lead
 15 agency rather than BTP, so the Silver coordination
 16 group, as a body, as described in the manual here, did
 17 not take place.
 18 SIR JOHN SAUNDERS: Can I just be helped about this? We've
 19 heard from the previous witnesses that they were
 20 assuming they had primacy right up to the time that it
 21 was handed over to you. What actually happened to
 22 transfer the primacy from you to GMP or did you just
 23 assume actually they were doing it and, if so, on what
 24 basis did you assume that?
 25 A. No assumptions on my part, no, sir. I took time on

1 arrival at the control room to read that log. Hugely
 2 important, (1), to understand what you are taking
 3 command of and therefore it took some time — and it was
 4 a ticker tape type effect. What that did tell me is:
 5 this is a confirmed bomb, there was a report from
 6 a member of the public, also a METHANE report; Greater
 7 Manchester Police were mobilising in quite significant
 8 number and were on scene; GMP firearms were on scene and
 9 they were sweeping both Victoria Station and the arena;
 10 major roads had been cordoned by GMP; and, finally, GMP
 11 had a chief inspector at the scene. All of that said to
 12 me that there is a command structure, and evidence of
 13 that is the presence of the GMP chief inspector. It
 14 also said to me there are specialist assets now in
 15 place, ie the firearms, around which I would have no
 16 command, and it was very clear to me at that point in
 17 time when I took command of the Silver role for BTP that
 18 GMP had assumed primacy and were acting on that
 19 significantly and operationally.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR DE LA POER: At the point that you took that command it
 22 was shortly after a telephone call that we took
 23 Chief Inspector Lodge through with a radio operator,
 24 which is at 23.23, in which he asked in terms, "Is it
 25 your jurisdiction or ours?", and was told, "It's BTP's".

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1 Was that something that you were aware of at the time or
 2 took into account in your thinking?
 3 A. I do remember a brief conversation with the SDO just on
 4 the subject of jurisdiction. It was clear to me that
 5 the SDO wasn't familiar with the arena and the
 6 City Rooms as part of BTP's jurisdiction. But it
 7 didn't — that conversation didn't sort of then lead
 8 into a discussion about who leads here. There may have
 9 been some confusion on the part of the SDO around the
 10 presence of this location as part of our jurisdiction,
 11 but I, knowing the location, knowing that it is on our
 12 jurisdiction, was less concerned about which
 13 jurisdiction it's on, I was far more interested in the
 14 subject of primacy and who is leading now in this
 15 regard.
 16 Q. Do I understand your evidence to be that you concluded
 17 that GMP had primacy at the point that you took over?
 18 A. Unequivocal. Everything I could see, read and hear said
 19 that.
 20 Q. Did you communicate that to anyone else at BTP?
 21 A. I certainly shared that view with the Gold commander,
 22 Mr Smith. I remember remarking on it with a number of
 23 individuals in conversation early on in the evening, one
 24 of which would have been Chief Inspector Graham on the
 25 scene.

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1 The challenge which followed thereafter, of course,
 2 is that whilst I am very confident that primacy has been
 3 assumed and it's being acted on by GMP, the next
 4 responsibility I have is to ensure that I speak to GMP
 5 to ensure that that is clear and then to talk about how
 6 we as BTP can collaborate with them and support their
 7 effort in addition to everything that had already gone
 8 before.
 9 Q. If your view is that GMP has primacy, that has
 10 consequences, does it, for the role that BTP will play?
 11 A. It does.
 12 Q. You've spoken to the Gold commander and Chief Inspector
 13 Graham. Did you, for example, tell the SDO that that
 14 was your view?
 15 A. I don't recall that — I don't recall a conversation
 16 with the SDO. I would be guessing.
 17 Q. Did you communicate that to the operators in the room at
 18 Birmingham where you were so that they understood what
 19 direction you were taking BTP in?
 20 A. Just after midnight, I'd asked for a controller to make
 21 contact with GMP, establish the name of the Silver, and
 22 ask that I be able to speak to the Silver. To that end
 23 it was clear to individuals working around me in the
 24 control room environment that this was something GMP
 25 were leading on and of course the control operators

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1 could see the contents of the log as they unfolded.
 2 Q. Going back to what we can see on our screen —
 3 SIR JOHN SAUNDERS: Sorry, you had spoken to Mr Lodge,
 4 hadn't you?
 5 A. That's right.
 6 SIR JOHN SAUNDERS: And it's apparent from what he said to
 7 us that if you were talking about jurisdiction between
 8 each other, you were actually meaning different things
 9 by it because he clearly was talking about jurisdiction
 10 being primacy, but you have never had any doubt that
 11 jurisdiction is different. It sounds like you might be
 12 at cross-purposes about that.
 13 A. No, sir, I honestly had no confusion at all.
 14 SIR JOHN SAUNDERS: I'm not suggesting you do.
 15 A. No, and I don't think the conversation embodied a great
 16 deal of confusion. I think it was merely — you know,
 17 the conversation between myself and the SDO amounted to
 18 the fact that there was a most awful incident that he
 19 needed to brief me on, and there was a reference to the
 20 point that he wasn't aware of this, but it's clear that
 21 this is on our jurisdiction. I did not take that to
 22 mean that he thought that we were leading on this
 23 incident and indeed everything on the log told me
 24 we were not.
 25 SIR JOHN SAUNDERS: Right. The mere fact that you asked

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1 your control room in Birmingham to say, "I need to speak
 2 to Silver at GMP", that doesn't of itself, does it --
 3 would it indicate to them, "We now know that GMP has
 4 primacy"?"
 5 A. Well, whether it indicates it or not, it's clearly
 6 a responsibility that I have to reach out and speak to
 7 the GMP Silver to establish that beyond any confusion.
 8 It also is the responsibility on my part to have that
 9 conversation and talk about what BTP can now do in
 10 support of what is clearly your operation, GMP.
 11 MR DE LA POER: One of the responsibilities of the Silver
 12 commander is to have a tactical plan. Did you record
 13 a tactical plan in the course of the evening?
 14 A. No, I didn't, no.
 15 Q. Did you accept the force incident manager's tactical
 16 plan when you took over?
 17 A. Yes. So I remember just prior to taking the Silver role
 18 for BTP, I remember having a conversation with the force
 19 incident manager. My recollection of that is that he
 20 had struggled to get that working strategy written down,
 21 but that was a strategy I think he'd had in mind and
 22 he'd been working to, so I told him to take this
 23 opportunity to put down the working strategy.
 24 I think we discussed it very, very quickly --
 25 I think he listed it for me -- and I asked him then to

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1 make sure that it was on the log and then I said I would
 2 be looking to accept that as a very good and solid
 3 working strategy for my own purposes going forward.
 4 Q. Did that strategy make clear the issue of primacy as it
 5 existed in your mind?
 6 A. No, it didn't reference that. It talked about working
 7 in partnership with the emergency services.
 8 Q. Should a tactical commander's strategy deal with the
 9 issue of which police force is taking the lead?
 10 A. I think you would ordinarily expect primacy to be very,
 11 very clear before a tactical plan is pulled together.
 12 I would not expect to see the establishment of who leads
 13 operationally to be part of the working strategy.
 14 Q. That's not something that needs to be recorded?
 15 A. I don't think so. I think you ordinarily would know
 16 full well who is leading in order to then develop the
 17 working strategy, which you are clearly taking
 18 responsibility for.
 19 Q. What we understood from Inspector Dawson at the point he
 20 handed it over was, until he was told otherwise, BTP was
 21 taking the lead.
 22 A. I listened to some parts of his evidence and I can fully
 23 understand why it is that he took that approach. If in
 24 doubt, he clearly pushed on to ensure that there was
 25 a good response to the challenging scene that had

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1 unfolded and, in the absence of a conversation with
 2 a comparable colleague within GMP, I don't think he
 3 could do anything other than what he did.
 4 Q. We're going to deliberately move over what I have taken
 5 other witnesses to in terms of the forward command
 6 point, but was that something that was in your mind when
 7 you took over as being an important issue to be
 8 resolved?
 9 A. I must admit I didn't put a huge amount of thought into
 10 the forward command point. From my perspective, the
 11 incident had unfolded, of course, a large number of
 12 resources were now on scene, I was aware a GMP
 13 chief inspector was on scene, and I clearly identified
 14 that GMP had assumed primacy. Therefore, some of my
 15 thoughts around what would ordinarily have happened --
 16 perhaps I would have thought about a forward command
 17 post -- fell by the wayside on the basis that I think
 18 GMP were leading this and therefore would take the lead
 19 in terms of identifying a forward command post as well.
 20 Q. Even if you, that is to say BTP, were not taking the
 21 lead, there still needed to be commanders co-locating
 22 at the scene?
 23 A. Yes, correct.
 24 Q. And knowing where your scene commander should go, was
 25 that important to you?

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1 A. Yes, and I think subsequent conversations that happened
 2 with Andrea Graham, the chief inspector on scene, which
 3 indicated she had indeed located the GMP
 4 chief inspector, which suggested to me that they had
 5 spoken or attempted to speak and that gave me the
 6 impression there was a focus in terms of commanders,
 7 nothing more than that.
 8 Q. I think that won't have been until at least half an hour
 9 after you took control.
 10 A. Yes, I would agree with that. I would agree.
 11 Q. {INQ025700/66}, please, Mr Lopez.
 12 Here we see a distillation of the responsibilities
 13 of the Silver commander. I just want to take you to six
 14 down:
 15 "Consult the other Silver commanders from other
 16 emergency services and Silver representatives from other
 17 agencies."
 18 In the course of the incident, did you speak to the
 19 Silver commander for the Fire and Rescue Service?
 20 A. No, I didn't, and an absolute point of learning for me
 21 is that I didn't do that. My sole focus was really
 22 around Greater Manchester Police and the Silver
 23 commander for that organisation. That's a matter of
 24 regret, I think, that I should have been more diligent
 25 around reaching out to Fire Service Silver and the

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1 ambulance Silver and having conversations about what
 2 they understood perhaps about the forward command post
 3 and other parts of the — the situational awareness, as
 4 it were.
 5 Q. Were you working to any sort of action card when you
 6 undertook this role?
 7 A. I didn't. But I was fully aware of the Silver
 8 commander — the expectations and the lists you
 9 currently have on screen there. I was aware of those
 10 sort of key roles. I did not have an action card. The
 11 major incident manual is a rather unwieldy document. It
 12 doesn't make for a very flexible and fast-time search
 13 for those key points as a checklist in what are
 14 absolutely chaotic and difficult circumstances.
 15 Q. I wouldn't for a moment suggest that you didn't have
 16 that in your mind in an unpressured situation if you
 17 were asked to rehearse it, but you've accepted that it
 18 was something you overlooked on the night. Do you think
 19 that if you had had a prompt to ensure that you
 20 didn't —
 21 A. Yes.
 22 Q. — miss it out, that that would have helped?
 23 A. Yes, absolutely, or perhaps a tactical adviser alongside
 24 me who could just ensure things weren't missed.
 25 SIR JOHN SAUNDERS: Would you have known how to contact the

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1 Silver commander for the ambulance service?
 2 A. Sir, that would have been an instruction to a member of
 3 the control room around me to find that individual?
 4 SIR JOHN SAUNDERS: So you hoped they would know how to do
 5 it?
 6 A. Yes, indeed. I would fully expect that to happen and
 7 the telephony is all there around us in FCRB to make
 8 that happen.
 9 MR DE LA POER: The evidence that we've just heard from
 10 Chief Inspector Lodge, and it very much chimed with what
 11 Inspector Dawson told us, is despite the hardware in
 12 terms of the telephony around you, in terms of numbers
 13 which were useful, whatever was available, both the
 14 force incident manager and the senior duty officer
 15 resorted to 999 to get hold of GMP.
 16 A. Yes.
 17 Q. Were you aware of that until I told you that?
 18 A. No.
 19 Q. Finally in relation to this document, {INQ025700/70},
 20 please.
 21 A mirror document for Bronze 1, the at-scene
 22 commander. If they are to fulfil that role most
 23 effectively, do they need to be present during the
 24 golden hour?
 25 A. Ideally, yes.

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1 Q. And if the preferred person cannot be available during
 2 the golden hour, does the next most appropriate person
 3 need to be clear that they were undertaking that role
 4 until relieved?
 5 A. Yes, I think that would be very fair. I think that some
 6 of those things will happen as a matter of course. So
 7 liaison with other emergency services would clearly
 8 happen with a supervisor who was on a difficult scene
 9 like that and act as a potential point of focus. But
 10 that would only happen in the course of events rather
 11 than a structured way as envisaged here, so yes.
 12 SIR JOHN SAUNDERS: Okay, but they do need to know the
 13 Bronze commander should not get too involved in doing
 14 things?
 15 A. That's correct.
 16 SIR JOHN SAUNDERS: He needs to be the one standing back?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: So unless he knows he's got that role,
 19 he doesn't know to stand back and be —
 20 A. Yes, that's correct.
 21 SIR JOHN SAUNDERS: Okay, thank you.
 22 MR DE LA POER: My next topic is that of primacy, but in
 23 fact in the course of our previous questions we have
 24 explored almost everything that I wanted to say to you
 25 about that, so I'm afraid this next question is slightly

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1 out of context of other questions I would have asked
 2 immediately before it.
 3 I'm going to invite you, please, to look at part of
 4 what you said to Lord Kerslake's review.
 5 Mr Lopez, {INQ000261/1}.
 6 This is a record of a conversation that you took
 7 part in on 12 October of 2017, as it's dated. Can I say
 8 from the off, and I'm going to try to be very careful
 9 with my questions here, chief superintendent, that these
 10 are not your notes of the event; is that correct?
 11 A. That's absolutely right.
 12 Q. Were these notes of that discussion ever sent to you for
 13 you to consider after they had been created?
 14 A. No, they weren't.
 15 SIR JOHN SAUNDERS: So was it not recorded, your
 16 conversation? Do you not know?
 17 A. Not personally by myself or Mr Smith, sir. We took part
 18 in this conversation on a telephone with Lord Kerslake
 19 and I'm assuming Kate Macdonald and I am also I'm
 20 assuming Kate Macdonald took a note.
 21 SIR JOHN SAUNDERS: Thank you.
 22 A. It certainly wasn't at GMP HQ, it was at BTP HQ.
 23 MR DE LA POER: That may be a description of where others
 24 present at the meeting were if you were on the
 25 telephone.

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1 A. It may be.
 2 Q. Yes. You will readily understand the part that I'm
 3 going to ask you about given that we are talking about
 4 primacy. About halfway down, we can see the word
 5 "regarding".
 6 A. Yes.
 7 Q. This is in the context of a paragraph that begins:
 8 "Allan explained..."
 9 It appears to be a reference to you. The way the
 10 note reads:
 11 "Regarding the division of roles between GMP and
 12 BTP, BTP has primacy in the arena and train station, so
 13 not under Home Office jurisdiction... Not always easy.
 14 On the night was driving up [and that must be
 15 a reference to Mr Smith] and had a 2 am conversation re
 16 primacy with GMP Gold. No-brainer. Would swamp BTP.
 17 Agreed GMP primacy."
 18 We can see the paragraph starts with a reference to
 19 you. Immediately after the section that I want your
 20 assistance on, we can see that that is something that
 21 Mr Smith must have said because you weren't driving and
 22 speaking to GMP Gold. Do you recall saying words to the
 23 effect that are recorded here?
 24 A. No, I'm terribly sorry, it does appear to be something
 25 of a jumble of misattribution. I don't... I cannot

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1 pick out specifically out of that something that I would
 2 absolutely hand on heart would say is something I've
 3 said unequivocally. I recognise the conversation,
 4 I recognise — but there are a mix of messages within
 5 there.
 6 Q. You would agree that as a matter of the understanding
 7 that you have told us you have, the proposition that the
 8 arena and train station are not under Home Office
 9 jurisdiction is just plain wrong?
 10 A. I think you're talking about the sentence beginning
 11 "regarding"?
 12 Q. Yes.
 13 A. "Regarding the division of roles between GMP and BTP...
 14 BTP has primacy in the arena..."
 15 I recognise I am going to place my interpretation on
 16 that in terms of, business as usual, BTP has
 17 jurisdiction over the arena on the basis that it is part
 18 of the railway infrastructure and to that end BTP, for
 19 business as usual policing, will exercise primacy in
 20 responding to crime, incidents of disorder, in normal
 21 times.
 22 I don't think there's anything there that I am
 23 reading that suggests that I had a view about primacy on
 24 the evening in question. Not at all.
 25 SIR JOHN SAUNDERS: Except, sorry, the use of the word

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1 "jurisdiction of the Home Office" does appear to confuse
 2 jurisdiction and primacy because we know they have
 3 jurisdiction there.
 4 A. Yes, sir, sadly this is a note that's been written by
 5 another —
 6 SIR JOHN SAUNDERS: I'm not blaming you. When you said
 7 there's nothing there —
 8 A. Well, around the specific part I read, sir, around BTP
 9 and primacy in the arena and train station.
 10 MR DE LA POER: It was the part of the sentence that says
 11 "so not under Home Office jurisdiction" that I was
 12 inviting you to agree is plain wrong.
 13 A. Correct.
 14 SIR JOHN SAUNDERS: A much better way of putting it than
 15 I did.
 16 MR DE LA POER: That being the case, do you think that
 17 that is something that you said in those terms?
 18 A. I wouldn't recognise that as something that I said.
 19 I recognise that as a position.
 20 Q. What do you mean by that?
 21 A. Well, I'm not sure I can say hand on heart that I said
 22 those words, but I think that the conversation would
 23 have revolved around issues around primacy and
 24 jurisdiction. I'm very clear that whilst BTP has
 25 jurisdiction over the arena and the railway network

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1 generally, there is an existing jurisdiction also for
 2 Home Office forces alongside which we work, including in
 3 this case GMP.
 4 SIR JOHN SAUNDERS: Are you obliquely saying Mr Smith might
 5 have said it?
 6 A. No, sir, no. I'm sure he'll have the same view.
 7 SIR JOHN SAUNDERS: Not if he had the conversation with
 8 Mr Lodge that Mr Lodge told us he had, but we'll see.
 9 MR DE LA POER: I have asked you about that and I think
 10 I can leave the topic of primacy as a free-standing one
 11 where we need to deal with in the course of the events
 12 of 22 May.
 13 Before we get to those, a simple question, I hope:
 14 were you aware in the course of the evening that Greater
 15 Manchester Police had declared Operation Plato?
 16 A. No, I was not aware.
 17 Q. Following up from that, would it have been your
 18 expectation on 22 May 2017 that GMP would have told you
 19 or communicated in some way to you as Silver that
 20 Operation Plato had been declared?
 21 A. Yes, it would be.
 22 Q. Why do you say that?
 23 A. Because it was clear that there were a large number of
 24 BTP resources present on the scene and if Plato is
 25 declared then it would mean there are consequences for

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1 those resources and the withdrawal of resources from any
 2 identified hot zones. So the conversation I would
 3 expect to happen is to say: Plato has been declared,
 4 this is where the declaration pertains to, and this is
 5 what we want you to do.
 6 Q. Because we know that there were limits, to put it
 7 neutrally and possibly inaccurately, to how widely the
 8 declaration was communicated by GMP, this doesn't in
 9 fact arise on the facts of 22 May 2017, but the fact of
 10 a declaration of Operation Plato has potentially very
 11 serious safety implications for emergency responders --
 12 A. Yes.
 13 Q. -- in terms of what it conveys may be happening?
 14 Is that another reason, do you think, that it is
 15 important that there is communication by on-scene
 16 commanders at an incident such as this so that that
 17 information can be disseminated if it is publicly
 18 declared?
 19 A. Yes.
 20 MR DE LA POER: Sir, I am about to move to the events of
 21 22 May. We've been going a little over an hour but not
 22 much. I'm entirely in your hands whether we take
 23 a break.
 24 SIR JOHN SAUNDERS: Perhaps we could have a 10-minute break
 25 now. Is that long enough for you?

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1 A. It is, sir.
 2 SIR JOHN SAUNDERS: Thank you. Ten minutes.
 3 (3.11 pm)
 4 (A short break)
 5 (3.212 pm)
 6 MR DE LA POER: Chief superintendent, we are going to move
 7 now to the events of 22 May and we'll do so principally
 8 by looking at the call records which exist for your
 9 phone. But before we come to that, let's just introduce
 10 things. Were you on duty that evening?
 11 A. I had actually just finished duty.
 12 Q. We know from other evidence, and you've confirmed it
 13 today, that you were at a hotel. Were you taking part
 14 in a railway event at that hotel?
 15 A. That's correct, it was an Office of Road and Rail
 16 Stakeholders event.
 17 Q. About what time had that concluded?
 18 A. Probably half 9, quarter to 10, something like that.
 19 Q. Where were you when you first received notice of the
 20 arena attack?
 21 A. I was in my hotel room.
 22 Q. I'm going to bring up the call log now, please,
 23 Mr Lopez, {INQ041120/1}.
 24 This is identified as the schedule of communication
 25 between you and other parties. We can see the first

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1 entry doesn't relate to you.
 2 A. No.
 3 Q. Second entry, "Divisional commander on-call phone", to
 4 you, that is at 22.27, so it's prior to the attack.
 5 A. Yes, I am slightly confused by that one. I am the
 6 divisional commander and I was on call.
 7 Q. It appears to be the divisional commander's on-call
 8 phone that was contacting you, so presumably in the
 9 hands of someone else?
 10 A. No, no.
 11 Q. No? Well, there we are.
 12 SIR JOHN SAUNDERS: Probably not relevant anyway.
 13 MR DE LA POER: Quite.
 14 What we don't have on here is the first notification
 15 that you received. The first entry we have is 23.05, so
 16 unless that was your first notification, it appears that
 17 it isn't recorded on the schedule.
 18 A. That's correct, yes.
 19 Q. If you need to, we are beginning at paragraph 19 of your
 20 first statement, where you make reference to an entry in
 21 the Control Works log that you refreshed your memory
 22 from when preparing this statement.
 23 A. Yes.
 24 Q. Does that confirm that by 22.53.43, so shortly before
 25 22.55, there is a record indicating that the SDO had

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1 contacted you?
 2 A. That's correct.
 3 SIR JOHN SAUNDERS: I think Mr Gibbs has helpfully
 4 identified the call -- because this 22.53 is after that,
 5 isn't it? That's when it was written up.
 6 MR DE LA POER: Yes, it is earlier than that.
 7 SIR JOHN SAUNDERS: The call is earlier than that?
 8 MR DE LA POER: Yes. We know from the evidence earlier it
 9 was 22.44.43, thank you very much indeed, which was when
 10 you were first notified. What were you first told
 11 in that telephone call?
 12 A. That there was the most terrible incident to brief me
 13 on. I remember that expression. It indicated that
 14 there had been some form of explosion at the arena, that
 15 there were four reported fatalities and about
 16 100 casualties at that time.
 17 Q. What, if anything, did you say in reply to that
 18 information?
 19 A. That I was very close to Force Control Room Birmingham,
 20 literally across the road from that, and I would be
 21 there somewhere in the region of 10 minutes later.
 22 I think I asked the SDO to make some contact with the
 23 Chief Officer Group on-call on the basis that that
 24 individual would perform the Gold function while
 25 I effectively got myself ready and made my way to the

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1 FCRB. It's a fairly short call.

2 Q. We're now going to return to that call schedule. 23.05,
3 a telephone call from ACC Smith, timed at 2 minutes and
4 12 seconds. It's line 9. Between receiving that
5 initial notification from the SDO and this telephone
6 call with ACC Smith, what did you do?

7 A. Sorry, between the SDO's call and receiving this call
8 from ACC Smith?

9 Q. Yes.

10 A. I think I effectively made my way across to the control
11 room environment. I seem to think that the call from
12 ACC Smith happened when I was in the control
13 environment. I seem to think that's right.

14 Q. On that basis, by 23.05 you were in the Force Control
15 Room Birmingham?

16 A. That's right.

17 Q. What was the content of your discussion with ACC Smith,
18 please?

19 A. The only recollection I have, I think, is --- I was aware
20 Mr Smith had been advised that he should attend the
21 strategic coordinating group and was going to be making
22 his way and we both exchanged shock and horror, really,
23 at what had happened and what was beginning to unfold.

24 Q. Was there any discussion about the command structure?

25 A. There was discussion only to the effect that I had made

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1 my way across and I was going to take the sort of lead,
2 Silver lead, for the BTP contribution to the response.

3 Q. Is the Silver role in your gift to self—appoint to or
4 does that need to be formally ratified by the
5 Gold commander?

6 A. It is entirely within my gift to put myself in
7 a position where I can assume that command, but it would
8 need to be ratified and I remember it being ratified.
9 I think Mr Smith did ask me, "Are you in the best place
10 to perform the role?", and I indicated that I thought
11 that I was and it was the quickest way for me to gain
12 access to the details of the log and have access to the
13 control room.

14 Q. At that early stage in your involvement, how were you
15 able to make a judgement about whether Silver was best
16 placed in a control room or at the scene?

17 A. I know of course, from Birmingham, Manchester is quite
18 some considerable distance. This is clearly a very
19 significant and major incident. I have to say, it
20 didn't take a huge amount of time for me to calculate
21 that the fastest way to gain situational awareness and
22 to have the sort of power of a control room to call upon
23 would be for me to go to the force control room in
24 Birmingham and, from there, I have exercised Silver
25 command roles for pre-planned events, football or

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1 whatever it may be, and I know that the control room
2 environment can work very effectively to make sure that
3 I can understand exactly what's going on at the earliest
4 point.

5 Q. Back to the call log. We can bring up and then ---
6 SIR JOHN SAUNDERS: I'm really sorry to interrupt. You said
7 that ACC Smith was going to --- he should attend the SCG?

8 A. Sorry, sir, yes, the strategic coordinating group.
9 I was given the impression, I think, that he had had
10 a conversation with the chief constable and had been
11 directed that he should attend the strategic
12 coordinating group at GMP and should begin ---

13 SIR JOHN SAUNDERS: So he was to make his way to Manchester?

14 A. That's correct.

15 SIR JOHN SAUNDERS: Thank you, that's what I wanted to know.

16 MR DE LA POER: Was it your expectation based on what he
17 told you that that would take him several hours?

18 A. Yes.

19 Q. So back to the call log. The next call --- that must
20 have occurred very shortly after the call terminated
21 with ACC Smith --- was a telephone call to
22 Superintendent Wylie.

23 A. That's correct.

24 Q. That is timed at 23.08 and the duration of it is
25 22 seconds. Who is Superintendent Wylie?

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1 A. Superintendent Wylie was the subdivisional commander for
2 the Pennine subdivision within which Manchester Arena
3 sits and is a superintendent or was a superintendent at
4 that time.

5 Q. Why were you calling Superintendent Wylie?

6 A. Expressly to ask him to make the scene and to take up
7 the role of Bronze.

8 Q. The records indicate that the contact between the two
9 phones was 22 seconds. Did you in fact speak to
10 Superintendent Wylie?

11 A. No, I didn't.

12 Q. Did you speak to his answerphone?

13 A. I did.

14 Q. So having not been able to speak to
15 Superintendent Wylie, let's bring up the call log again.

16 SIR JOHN SAUNDERS: Ringing a mobile?

17 A. I was ringing his mobile, sir, yes, that's right, and it
18 went to voicemail.

19 MR DE LA POER: So far as you were aware at that time, was
20 Superintendent Wylie on call or on duty?

21 A. He wouldn't have been on call and he wouldn't have been
22 on duty.

23 Q. So at that time, for all you knew, he was fast asleep?

24 A. Correct.

25 Q. The next line is line 11. We can see --- the colouring

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1 doesn't help terribly. It's a call to "Kyle Gordon
2 private", as it's marked here.
3 A. Yes.
4 Q. It's 23.12, and the duration is 1 minute and 2 seconds.
5 So same questions then: in May 2017, who was Kyle Gordon
6 within the BTP?
7 A. Kyle Gordon was a superintendent and head of operations
8 for C Division and to my knowledge, at that point in
9 time, was the next most proximate superintendent to the
10 arena with whom I could have a conversation with an
11 expectation that he should attend the arena as the
12 Bronze scene.
13 Q. We are still within 35 minutes or so of the detonation,
14 certainly at the time of the call to
15 Superintendent Wylie. We're within the golden hour. At
16 this time which police force did you think had primacy?
17 A. GMP.
18 Q. Even at this time that was your thinking?
19 A. Correct.
20 Q. We've explored whether, once you took over as Silver
21 commander, you communicated that to anyone. I don't
22 want to go over that. At this stage of the incident, up
23 until you took over as Silver commander, did you
24 communicate that view to anyone?
25 A. I can't remember whether I communicated that in the

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1 conversation with Kyle Gordon. I can't quite recall.
2 I think I was very clear -- I was clearer certainly from
3 the point in time when I took command because of what
4 I could read on the log, but at that stage I had a sense
5 that with that significant impact with the numbers
6 reported to be deceased and that were reported to be
7 injured, it had all the hallmarks to me of being
8 something that the host force would ultimately lead on.
9 Q. Is a consequence of that, that your belief was that it
10 was likely that the home force was going to lead on, if
11 nothing else, that BTP would therefore be providing
12 a supporting role to that leading force? Is that
13 what was in your mind as to how it was likely to
14 develop?
15 A. Yes. But equally, there was a need to move quickly to
16 establish a command structure and I was trying to speak
17 to Mr Wylie and trying to speak to Mr Gordon to make
18 those arrangements in anticipation of a level of command
19 support around this clearly hugely significant incident.
20 Q. Tell us please what was said in the 1-minute and
21 2-second conversation between you and
22 Superintendent Gordon.
23 A. I briefed him on what I knew and I asked him to make
24 that scene as quickly as possible, to take that Bronze
25 role. Whether I used the term Bronze, I can't recall,

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1 something akin to that. You know: get to the scene and
2 assume that command for BTP. A fairly short call,
3 I have to say, and I got every sense back from him that
4 he understood the criticality of the issue and would
5 make his way, and everything about that said he would be
6 there.
7 Q. At the time that you called him, did you know where in
8 the country he was likely to be?
9 A. I was aware he was resident in Blackpool. We didn't
10 discuss whether he was in Blackpool on the night. Quite
11 honestly, there was that much going on, there were that
12 many issues to think about, quite frankly I just made
13 the expectation on him clear and I didn't get anything
14 back to say, "This is not going to be possible". So
15 I didn't reach any conclusions about where he was or
16 whether it would be difficult for him to perform the
17 function. He replied in the affirmative and that he
18 would make it.
19 Q. Was establishing from him in clear terms what the
20 minimum time it would take him to get to the arena
21 important information at the point of this conversation?
22 A. In all honesty, I would expect an individual who is
23 asked to make a scene, knowing how critical this issue
24 is, having been briefed on it, I would expect that
25 individual to say to me, "These are the difficulties

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1 I will have in making that", or, "It's a role that
2 I will not be able to perform in any quick time".
3 I didn't get that back. Could I have enquired a little
4 more? Perhaps I could. But quite frankly there was so
5 much going on that I made a fairly perfunctory,
6 transactional call to him, asked him to get there, and
7 that was it.
8 Q. You said that you knew he had residency in Blackpool.
9 In May 2017, what did you think the journey time from
10 Blackpool to Manchester Arena would be?
11 A. Probably around an hour. But it could clearly happen
12 more quickly if you could find your way in a response
13 car. But quite frankly, Mr Gordon would be senior
14 enough to make whatever arrangements he could to get
15 there.
16 Q. What in your mind was the earliest you thought that
17 Superintendent Gordon might get there when you briefed
18 him?
19 A. I would say an hour would be fair. Certainly no more
20 than that.
21 Q. So the call takes place at 23.12. Does it follow then
22 from your last answer that you were expecting him to be
23 there by quarter past midnight?
24 A. Thereabouts.
25 Q. We're still in the golden hour, do you agree --

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1 A. Yes.
 2 Q. -- at the point of this conversation? By choosing
 3 Kyle Gordon, even on the basis of your expectation --
 4 A. Yes.
 5 Q. -- he was not going to arrive until 40 minutes after the
 6 golden hour had finished. Why then did you think that
 7 he was the appropriate person to take scene command on
 8 behalf of BTP?
 9 A. I think you can see from the call log that I thought the
 10 most appropriate person, most proximate to the scene,
 11 who I was aware lived some 25 miles distant, first and
 12 foremost was Superintendent Wylie. I just couldn't make
 13 that call connect. So my next option effectively was
 14 Superintendent Gordon. I'm not sure whether I felt
 15 I had a significant amount of choice if I wanted to get
 16 someone there of that level of seniority to really lead
 17 for BTP on the scene.
 18 Q. So that then is the choice, is it? If you have somebody
 19 that senior they're going to get there at 00.15, you
 20 expect, or do you agree you could have looked for
 21 someone more junior who could have undertaken that role?
 22 A. "Yes" is clearly the answer to that, that could have
 23 happened, but I was focused on the gravity of the
 24 situation. I knew that Superintendent Gordon's teams
 25 were all in response mode and were attending the scene,

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1 ie operations department officers, as well as others,
 2 and he would have to have a role to play come what may.
 3 It's unfortunate, I guess BTP is not arrayed around
 4 Manchester, the officers are living across the UK, but
 5 my instinct at that stage was: this is an issue of such
 6 seriousness, of such consequence, I need the
 7 superintendent, the senior leadership team, to support
 8 the work that I was attempting to undertake.
 9 Q. We know that the Bronze commander for GMP was an
 10 inspector. We know that that individual was Inspector
 11 Michael Smith, who positioned himself in the City Room
 12 and arrived on scene, or at least at the railway
 13 complex, within 10 minutes of the detonation. Arriving
 14 slightly before him, the operational firearms commander
 15 was a police constable. The GMP ground-assigned
 16 tactical firearms commander was a chief inspector. So
 17 at both Bronze and indeed at Silver level, so far as the
 18 ground-assigned tactical firearms commander was
 19 concerned, GMP deployed officers of a lesser rank than
 20 superintendent.
 21 Why did BTP need somebody of that rank, given what
 22 you now know about GMP's choices, when it came at the
 23 cost of an arrival time?
 24 A. Well, first of all, at that stage I did not know about
 25 GMP's arrangements and I didn't know that subsequently

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1 the chief inspector ground-assigned was a tactical
 2 firearms commander chief inspector. I can only say that
 3 I thought that that was the most appropriate choice
 4 at the time. I think that, looking back in hindsight,
 5 a lesson for me, there may have been other, more
 6 appropriate choices. Ultimately, I would still have
 7 expected Superintendent Gordon to attend. But in terms
 8 of that Bronze role, yes I would have to accept that's
 9 my choice, and there may have been better candidates to
 10 undertake that more quickly, and of course subsequently
 11 Chief Inspector Graham self-deployed from home in order
 12 to support me with that work whilst superintendent
 13 Gordon was en route.
 14 Q. We looked at the major incident manual and we saw that
 15 term "command resilience" and we saw that it envisaged
 16 a lineage of commanders taking an unbroken control.
 17 A. Yes.
 18 Q. There was nothing to stop you deploying Kyle Gordon but
 19 looking for a more local person who could undertake
 20 Bronze 1 until he arrived?
 21 A. Yes, I absolutely agree. I have to say, the pressure
 22 and the challenge and the sheer weight of what I had
 23 just been briefed on is something that means you are
 24 looking to get a team that you know well and that
 25 you have confidence in, trust in, to get them to the

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1 scene to work. I must admit, that's a source of regret
 2 for me that perhaps there could have been better
 3 choices. You will see, of course, initially I did start
 4 with what I thought was the most proximate choice, and
 5 it was only on the basis that that call went unanswered
 6 that I subsequently went to Superintendent Gordon.
 7 SIR JOHN SAUNDERS: Nothing had been discussed between you
 8 and Mr Smith about suitable people for Bronze or the
 9 suitable rank that you needed to get in?
 10 A. No, I don't recall a conversation, sir. I think
 11 Mr Smith would have trusted me to try and reach the most
 12 appropriate conclusion.
 13 SIR JOHN SAUNDERS: Would you have good knowledge -- you
 14 knew about Superintendent Wylie?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Would you have knowledge of other
 17 senior-ish officers who might have been available close
 18 by in Manchester?
 19 A. Probably one other obvious candidate would have been
 20 Chief Inspector Graham.
 21 SIR JOHN SAUNDERS: Do you have a duty inspector overnight
 22 in Manchester?
 23 A. No, sir. The duty inspector regime in BTP means that
 24 they are arrayed anywhere across the country and indeed
 25 I think on the evening in question the duty officer was

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1 based at Newcastle.
 2 SIR JOHN SAUNDERS: Right, thank you.
 3 MR DE LA POER: Of course you made your decision, as you've
 4 told us, expecting that particular challenges that
 5 Superintendent Gordon might know that he faced to be
 6 brought to your attention. Did he give you any
 7 indication of how long he thought it would take him to
 8 get there?
 9 A. I can't remember a call on — I can't remember
 10 a conversation on that, quite frankly, no. But I know
 11 how long it should take from where I assumed he was.
 12 Q. Did you know that he didn't have a police radio with
 13 him?
 14 A. No, I didn't.
 15 Q. Is that something that you could have been expected to
 16 know or is it something that he could have been expected
 17 to tell you or does it just fall between the gaps?
 18 A. It falls between the gaps. It's not — quite frankly,
 19 there is no expectation on officers who are off duty and
 20 not on call to have a radio. It didn't sort of enter my
 21 mind that I should check. Equally, if he had access to
 22 a radio, it may have been that calls may have made their
 23 way to the control room at some stage and then I would
 24 have been very clear on that, but I didn't get into
 25 a conversation around that, no.

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1 Q. Given that it was going to take him at least an hour to
 2 get there, do you think whether or not he had a police
 3 radio was an important piece of information for you to
 4 know?
 5 A. No, I didn't think that. He had access to his mobile
 6 phone so he could gain some situational awareness
 7 en route potentially. I didn't think that that was
 8 a key part of our conversation or in my thinking. Quite
 9 frankly, after this call, I was then on to a series of
 10 other calls and interactions and, of course, trying to
 11 get a position within the control room from whence
 12 I could work.
 13 Q. Did you know that he didn't have a police vehicle?
 14 A. No, I didn't.
 15 Q. Did you expect him to have a police vehicle?
 16 A. No, I wouldn't. If he was, again off, duty and not on
 17 call, he ought not actually to have a police vehicle.
 18 Q. How did you imagine that he would travel from Blackpool
 19 to Manchester Arena?
 20 A. With all due respect, at that level of seniority,
 21 I think that's entirely a matter for the superintendent
 22 to make arrangements. By all means flag up issues with
 23 me if it cannot happen and he cannot make Manchester,
 24 but I am incredibly busy, I've just had a very, very
 25 significant briefing, there are lots of things to do,

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1 and I don't think that that was for me to think how
 2 a very senior officer is going to make his way to
 3 Manchester. I would have expected him to flag if there
 4 were issues.
 5 Q. Wouldn't that information help inform you better about
 6 whether or not your expectation that he would take
 7 an hour was realistic or not?
 8 A. I concluded he was about an hour away. I don't even
 9 think we talked about that. I got just the
 10 impression — he was very clear on the gravity and
 11 Mr Gordon fully understood what he needed to do and
 12 I got the sense that he fully understood the priority.
 13 Q. Help us with how BTP worked. Would an option for
 14 Superintendent Gordon be to arrange a local BTP vehicle
 15 to drive him under blue lights from wherever he was in
 16 Blackpool to Manchester Arena?
 17 A. Yes, that could be an option and he would have the
 18 wherewithal to arrange that in his own right.
 19 Q. Without a police radio, how would he go about that?
 20 A. Mobile phone to BTP Preston, contact the control room to
 21 facilitate that, contact the police station direct
 22 potentially. Of course that's not — that's
 23 presupposing they are not assisting in the response,
 24 of course, to the arena potentially.
 25 Q. Certainly that is one option that he could explore,

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1 which might be thought to be, depending on where that
 2 vehicle may be when he contacts, a fast way of getting
 3 there.
 4 A. Yes.
 5 Q. As his superior on the night, do you regard the use of
 6 a taxi as being an appropriate way for
 7 Superintendent Gordon to have travelled from Blackpool
 8 to Manchester Arena?
 9 A. I found out about that subsequently, I think in either
 10 an email or a text, I can't remember which, whilst
 11 Superintendent Gordon was en route. Highly
 12 unconventional, of course, and no doubt
 13 Superintendent Gordon will be very frank around that.
 14 Q. You have used the word unconventional. I was asking
 15 whether it was acceptable.
 16 A. No.
 17 Q. Did Superintendent Gordon tell you that he did not have
 18 his daybook with him?
 19 A. No.
 20 Q. Would you have expected him to have had his daybook with
 21 him?
 22 A. I'm not really familiar with the term "daybook".
 23 Q. That's his word, so we'll ask him about it.
 24 A. Yes.
 25 Q. Did you know that he didn't have a decision logbook with

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1 him?
 2 A. No, I didn't know that.
 3 Q. Would you have expected him to have had such a book with
 4 him?
 5 A. I am aware they are certainly commonly taken home and
 6 kept and stored in a grab bag, whatever it may be,
 7 in the event of an issue like Manchester Arena, or any
 8 other major incident. Equally, it is not
 9 a responsibility or a demand that the organisation
 10 places on individuals who are off duty and not on call.
 11 Q. Is it a relevant part of your decision-making process
 12 when appointing him as Bronze 1 whether or not he had
 13 a decision log?
 14 A. No, that does not have a bearing on the --
 15 SIR JOHN SAUNDERS: He can grab a bit of paper presumably
 16 and transfer it to his log later?
 17 A. That's correct, sir, and as you will see there are four
 18 scrappy notes that I endorsed on the night before
 19 starting to endorse a decision log or enter on to
 20 a decision log.
 21 MR DE LA POER: Did Superintendent Gordon say anything about
 22 how much power he had on his Blackberry device at that
 23 time?
 24 A. No.
 25 Q. Bearing in mind, although you didn't discuss it, that he

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1 didn't have a police radio, but nor were you expecting
 2 him to have one, would that have been relevant
 3 information for you to know?
 4 A. Well, it clearly would impact on my ability to
 5 communicate with him, yes. I would be surprised if
 6 someone told me that was the case and that was put up as
 7 a bar to them attending the scene. I'd clearly be
 8 disappointed in that. There are other ways to charge
 9 a phone, let's face it, on the way.
 10 Q. Quite so, but as we expect to hear from
 11 Superintendent Gordon, his ability to email later in his
 12 journey was compromised by the fact that his device ran
 13 out of power, which effectively -- and we'll hear it
 14 from him -- limited one of the lines of communication
 15 you might otherwise have expected. That's what
 16 I understand him to be saying in his statement. We'll
 17 hear from him. If that is what he's saying, then a line
 18 of communication you might otherwise have expected him
 19 to have in order to acquaint himself with the situation
 20 and be ready to hit the ground running when he arrived
 21 appears to have been lost to him at some point.
 22 A. That's correct.
 23 Q. So it might be relevant when saying, "I can be Bronze 1
 24 but you should know I may have limitations on how
 25 contactable I am in the short-term"; do you see?

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1 A. I absolutely accept your point.
 2 SIR JOHN SAUNDERS: And it wouldn't have led you to say,
 3 "Okay, you stand down, I'll get someone else"?
 4 A. Absolutely not, sir. He had a key role to play --
 5 SIR JOHN SAUNDERS: Perhaps the taxi had a charging point...
 6 MR DE LA POER: Yes. Well, we'll ask Superintendent Gordon
 7 about it.
 8 At the conclusion of that conversation with him,
 9 were you satisfied that his appointment as Bronze 1 was
 10 the correct choice based upon your understanding of the
 11 situation at the time?
 12 A. Based upon my understanding at the time it felt like the
 13 most appropriate appointment. In retrospect, as we've
 14 discussed earlier, there may have been other more
 15 appropriate and proximate choices. But yet again I just
 16 take you back to the first call to Superintendent Wylie.
 17 That was my intention.
 18 Q. Sitting there now, do you know what time
 19 Superintendent Gordon in fact arrived?
 20 A. Some time after 1, but sorry, no, I don't have the exact
 21 detail.
 22 Q. I think we're still in the process of identifying to the
 23 minute, but there is a taxi receipt which is timed just
 24 after 1 o'clock, which will be the very earliest time.
 25 We will explore that in greater detail with

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1 Superintendent Gordon later in the week.
 2 On the night what time did you understand that he
 3 reached the arena? Did you have a sense of that?
 4 A. I can't recall from the log. I think the log is
 5 endorsed with the fact that he is on the scene and is
 6 quizzed around a situational report, but I can't
 7 remember the time exactly.
 8 Q. I would like to just have a look at a document from
 9 Lord Kerslake's investigation, which obviously comes
 10 with the same caveats as the previous one, but to
 11 explore with you what is recorded there in your name.
 12 {INQ000262/2}.
 13 If you could crop right into the bottom, please,
 14 Mr Lopez.
 15 SIR JOHN SAUNDERS: We've heard that the log, because
 16 there's so much been put on it, is a very fast-moving
 17 document.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Is that a problem? Was that a problem
 20 for you as Silver in the Birmingham control room?
 21 A. It was, sir. I would say of all of the things that
 22 I did in preparation for taking command of the BTP
 23 contribution, that was the thing that took the longest
 24 time to achieve. A read-through of the log of the
 25 content whilst all around me is ambient radio traffic,

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1 mobile phones ringing, texts arriving, briefing people,
 2 talking to people. It's the thing that took the most
 3 time to read through that log and understand exactly
 4 what are the key issues there, because there is so much
 5 extraneous material as well.
 6 SIR JOHN SAUNDERS: When you've got it going and you're up
 7 to date with it and you're then watching it in current
 8 time, as it were, as well as doing other things, did the
 9 speed with which it worked and going up the page and out
 10 of sight — was that a problem for you?
 11 A. Yes. There was just so much material coming through.
 12 SIR JOHN SAUNDERS: Is there a solution to it? You're back
 13 tomorrow, you can have a think overnight if you want.
 14 A. I think it's the nature of how difficult these things
 15 are and, quite rightly, individuals contributing to the
 16 scene want to put their updates on. It fills with
 17 extraneous material, such as people being assigned or
 18 people being deployed and things which are transactional
 19 and low value. But the real core of it, the meat of it,
 20 it would be helpful if that could almost be put to one
 21 side. I think it's a technological solution, sir.
 22 SIR JOHN SAUNDERS: Right. We may come back to that if
 23 necessary. Sorry about that interruption.
 24 MR DE LA POER: This is a record of an interview which, as
 25 I understand it, you participated in on

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1 14 November 2017. At the bottom we can see:
 2 "Alan got my call at 22.43 from Tony Lodge, duty
 3 officer. I was duty chief officer sphere, probably half
 4 a dozen calls over the next 20 minutes. At first,
 5 didn't understand geography, not been before. At one
 6 stage was suggesting that transformer had fallen off
 7 ceiling, telling me four or six casualties. Cranking up
 8 additional resources. Think talked about primacy more
 9 in manuals than actually happens. This magnitude.
 10 Local force. Carl (sic) Gordon, SPOC, arrived quickly.
 11 I think I'm in charge on paper at that stage. Issue of
 12 command. In reality, GMP outnumber us. Get there
 13 quickly but in terms of formality, as was being driven,
 14 spoke to ACC Debbie Ford. Straightforward, agreed GMP
 15 primacy."
 16 We can immediately see that ACC Smith who
 17 participated in this has been captured in part of that
 18 paragraph, the reference to speaking to ACC Debbie Ford.
 19 The part I just want your help with, given what we know
 20 now to be the case is, and his full name is
 21 mistranscribed:
 22 "Kyle Gordon [it should read, three lines up from
 23 the bottom] SPOC [single point of contact is the common
 24 use of that acronym] arrived quickly."
 25 Whoever said this or whatever they said, is that an

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1 accurate description of what happened with Kyle Gordon?
 2 A. No.
 3 Q. Did you ever say to Lord Kerslake that Kyle Gordon had
 4 arrived quickly?
 5 A. No.
 6 Q. Was that ever said in your presence?
 7 A. No.
 8 Q. We remind ourselves that that particular interview was
 9 not something that you transcribed yourself and is it
 10 also correct that you weren't shown the notes of that
 11 afterwards to consider?
 12 SIR JOHN SAUNDERS: It's the same telephone interview, is
 13 it?
 14 MR DE LA POER: I think it's a different one.
 15 A. It looks like it's the actual sit—down with the Kerslake
 16 team. I would take ownership of the one introductory
 17 element of the one sentence, that Tony Lodge called me
 18 at 22.43. The rest is, I'm afraid, a mix of various and
 19 it's misattributed.
 20 MR DE LA POER: Yes, thank you.
 21 We're going to move forward in the chronology and
 22 I'm going to do so by just boxing off how the log deals
 23 with the conversation you had at 23.12. You should have
 24 the log in front of you. You can just refresh your
 25 memory from it. Page 51 {INQ002000/51}, I hope,

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1 although sometimes the page numbers align, sometimes
 2 they don't, because of the way the document is set out.
 3 SIR JOHN SAUNDERS: They haven't aligned at this stage.
 4 MR DE LA POER: I don't think that they have.
 5 SIR JOHN SAUNDERS: Would you like 51 at the top or at the
 6 bottom?
 7 MR DE LA POER: I would like 50 in the top left—hand corner.
 8 We can see at 23.16.46:
 9 "O5 [who we know is the DFIM] from
 10 Chief Superintendent Gregory. Superintendent Kyle
 11 Gordon has been requested to attend and is making from
 12 his home address."
 13 A. You started at 23.12 and — sorry, is the time —
 14 Q. 12.12 is the conversation and the entry I'm looking at
 15 is 23.16.46.
 16 A. Right. Yes, I recognise that.
 17 Q. So that is, if you like, the bookend to the conversation
 18 that you had having spoken, as we saw, at 23.12, with
 19 Superintendent Gordon, there is then an entry made at
 20 your request, I think by Sergeant Freeman, O5, as to
 21 what is taking place so far as Kyle Gordon is concerned.
 22 A. That's correct, I recognise that.
 23 SIR JOHN SAUNDERS: Just so everybody knows, I think we are
 24 intending to sit until you have finished asking your
 25 questions, which you estimate may go on until about

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1 5 o'clock.
 2 MR DE LA POER: I hope not that late, but it's going to go
 3 past 4.30.
 4 SIR JOHN SAUNDERS: I hope that's not a problem for anybody.
 5 Thank you.
 6 MR DE LA POER: So chief superintendent, having boxed off
 7 that conversation, we're going to go back, please, to
 8 the call log and just work through a number of the
 9 entries on it. We have seen the Control Works entry so
 10 far as you are concerned in terms of Inspector Dawson
 11 putting his strategy, his plan, on there, and you taking
 12 over the incident, so we'll just look at the calls for
 13 you.
 14 We are going to look at lines 12 and 13.
 15 A. The references 12 and 13 sadly don't figure on my sheet.
 16 Q. It's been cropped off.
 17 SIR JOHN SAUNDERS: We can count.
 18 MR DE LA POER: Or I can give a time. 23.17, {INQ041120/1}.
 19 We see there are back-to-back calls with ACC Smith after
 20 you have spoken to Superintendent Gordon.
 21 A. Yes.
 22 Q. The first one looks unlikely to have resulted in any
 23 meaningful contact, but 2 minutes and 9 seconds then,
 24 what was that conversation about?
 25 A. Only from recollection I am very confident I would have

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1 been briefing Mr Smith that Kyle was going to be making
 2 his way. I can remember no more of that conversation.
 3 Q. 23.23. We have a telephone call to you from
 4 Inspector Dawson, the FIM?
 5 A. Yes.
 6 Q. Is this a phone call, as he told us, building towards
 7 you taking over as Silver commander?
 8 A. On my record that's a 4-second call; is that right?
 9 Is that the one you're ...
 10 Q. Yes, it is. Do you recall if you spoke to him at this
 11 time? He certainly appears to have attempted to speak
 12 to you.
 13 A. I remember speaking to the FIM just prior to taking the
 14 command role and that was the reference I made earlier
 15 that -- that was the point at which we ran through,
 16 I think verbally, his working strategy and he indicated
 17 that he had not had time and I encouraged him to use the
 18 time now to put the working strategy that he had been
 19 working under onto the log. A call happened just prior
 20 to me taking command.
 21 Q. I think we can see that at 23.22 is a 22-second call
 22 between you and the FIM.
 23 A. Perhaps then.
 24 Q. But as far as I can tell I don't think there's another
 25 call between you and Inspector Dawson before you took

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1 command.
 2 A. Yes, I agree.
 3 Q. Certainly not on this record that we've been provided
 4 with.
 5 We know at 23.37 it is recorded on the incident log
 6 that you took command. We can have a look at that if
 7 you need to, although we have discussed its content with
 8 Inspector Dawson in some detail. Does that accord with
 9 your recollection of the time you became Silver
 10 commander?
 11 A. It does, thank you.
 12 Q. The next entry that I'd like to look at which -- we can
 13 see there's a conversation at just before midnight with
 14 what is identified as not a conversation but a wrong
 15 number followed by a 51-second call at midnight with
 16 Matt Woodhouse, who I think is a press officer; is that
 17 right?
 18 A. Yes, that's right.
 19 Q. At 00.02, we can see a contact with Kyle Gordon.
 20 I think I know what's happening here because certainly
 21 on my version it's indicated that that is -- there
 22 we are. In the second column from the right, that's an
 23 email --
 24 A. Yes.
 25 Q. -- to you. We are going to have a look at that now,

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1 please. That is {INQ025530/1}.
 2 If we can go to the pages below just to see the
 3 context. The initial email is at 11.54, just between
 4 Mr Woodhouse and Kyle Gordon. So we'll discuss that
 5 further with Superintendent Gordon if necessary.
 6 We go up in the thread, please, {INQ025530/1},
 7 cc-ing you in.
 8 A. Yes.
 9 Q. "Matt, as discussed."
 10 Which is a reference to the email below, but then:
 11 "Boss..."
 12 Is that speaking to you?
 13 A. That's absolutely right.
 14 Q. "... I will take command of the scene when I arrive
 15 unless otherwise directed. Have we any idea who has
 16 command primacy? GMP, MPS, or ourselves?"
 17 Is MPS a reference to the Met?
 18 A. It is, that's right.
 19 Q. Was that a serious possibility in your mind on the night
 20 that the Met would take command?
 21 A. Well, I took that to mean a reference to
 22 Counter-terrorism Policing HQ.
 23 Q. So there's his question at just after midnight. As
 24 we've got the document up, we'll have a look and see
 25 what the reply is. We'll just look at the bottom one

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1 for now, 23 May, 12.10 am:
 2 "Take command on scene initially. Will call GMP
 3 around command arrangements. Met inevitably will pick
 4 it up."
 5 A reference by you then to Counter—terrorism HQ?
 6 A. Yes.
 7 Q. Thank you, we can take that down.
 8 So we can see two email contacts. We can go back,
 9 Mr Lopez, to the schedule. {INQ041120/1}, and those
 10 emails are identified on this, separated by one line
 11 in the middle, page 1, which is 2 minutes past midnight.
 12 So at the time Kyle Gordon is sending you that first
 13 message or cc—ing you in, you speak for 4 minutes and
 14 15 seconds to ACC Smith. Again, can you help us with
 15 the content of that conversation?
 16 A. I'm sorry, ACC Smith, forgive me, which reference?
 17 Q. We're looking at 00.02, 4 minutes 15 seconds, you to
 18 ACC Smith. I think the cursor is just indicating —
 19 A. Right, thank you. I'm afraid I don't recall the
 20 specifics of that conversation. It was done on mobile.
 21 I ... I am sorry, no, I really could not say
 22 specifically .
 23 Q. The next entry that I would like you to look at is at
 24 00.13 hours, which follows your email reply to
 25 Superintendent Gordon.

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1 A. Yes.
 2 Q. We can see a 5—minute and 58—second contact between
 3 Chief Inspector Andrea Graham's telephone and yours.
 4 A. Yes.
 5 Q. Do you remember speaking to Chief Inspector Graham?
 6 A. I do, yes.
 7 Q. Help us, please, with the content of that conversation.
 8 A. That was the first opportunity for me to speak to
 9 Chief Inspector Graham. She was on scene and I became
 10 aware she had self—deployed from her home address, and
 11 her role, her usual role, is or was sect Chief Inspector
 12 for the Manchester area, so I was pleased to see that
 13 there was an individual of rank, suitably trained and on
 14 the scene.
 15 Earlier, on the log, I think at 00.02, I think
 16 Chief Inspector McKinnon, who was acting as the Bronze
 17 resources, had indicated that he had briefed Andrea
 18 around her role on the scene, that she ought to expect
 19 to take a Bronze scene role on. I think between that
 20 call and this call, I was becoming aware that clearly
 21 she was about to arrive at the scene. I think this was
 22 the first opportunity to speak to her.
 23 We talked about the things that — the expectation
 24 that she ought to be my eyes and ears on the scene.
 25 I briefed her that Kyle Gordon had been briefed and in

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1 anticipation of his attendance to take up the Bronze
 2 scene role.
 3 My learning from this is that I was not — I don't
 4 remember being explicit with Andrea Graham to say,
 5 "You are the Bronze scene until such time as Kyle Gordon
 6 arrives". I think I used an expression around her being
 7 the eyes and ears, and yet the things that we talked
 8 around really revolved around her getting an early
 9 appreciation of exactly what was happening on the scene,
 10 the resources.
 11 In that quite lengthy call she talked to me about
 12 what BTP officers had done and were doing in terms of
 13 the support to the rescue effort. We talked about her
 14 efforts to speak to a GMP chief inspector and this must
 15 have been, this particular call, noting the time, we
 16 talked about a picture of the scene and how difficult it
 17 was and how tragic it was. I think we touched on things
 18 like cordons and I think we talked about the resource
 19 picture for BTP and whether she had enough resources
 20 present at the scene.
 21 That was my, I think, my recollection of the main
 22 points of it. We talked about a number of things and
 23 quite frankly my recollection is clearly dimmed by
 24 4 years, but I think those are the key issues. And she
 25 was clearly the senior BTP officer on the scene at that

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1 time.
 2 Q. You acknowledged learning yourself around the language
 3 that you used.
 4 A. Yes.
 5 Q. Because do you agree that describing someone as "eyes
 6 and ears" might be thought to be a passive role in terms
 7 of acting as a leader and acting in a JESIP role?
 8 A. Yes, I absolutely agree with that.
 9 SIR JOHN SAUNDERS: I am very sorry, it is my fault, but
 10 I haven't really followed how this came about.
 11 Did Chief Inspector Graham tell the control room
 12 before she set off from home that she was self—deploying
 13 or when did the control room first know that she was
 14 going to go there or had she arrived by the time they
 15 learned?
 16 A. If my memory serves me right, sir, I thought that the
 17 first reference to Chief Inspector Graham was at 00.02,
 18 which was — Malcolm McKinnon was a chief inspector
 19 based at Liverpool, I'd appointed him as Bronze
 20 resources. I think he had had a conversation with
 21 Andrea just to check her awareness and I think she had
 22 made her way, self—deployed from her home address to the
 23 scene, and I think the point in time at which we learnt
 24 that she'd reached the scene was around about this time,
 25 unless I'm mistaken, and then that was the first

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1 opportunity to speak to her.
 2 SIR JOHN SAUNDERS: So you would have known she was coming
 3 or the control room would through McKinnon?
 4 A. That's right, and we did observe that commentary there.
 5 That's where I was clearly looking for her arrival .
 6 MR DE LA POER: Sir, I can give you this help. We can turn
 7 it up, although I'm sure the chief superintendent will
 8 take it from me, and we'll certainly look at it with
 9 Chief Inspector Graham, but at 23.39, the log records:
 10 "CI Graham is en route to Manchester direct ASAP."
 11 SIR JOHN SAUNDERS: Thank you, I'm very grateful.
 12 MR DE LA POER: Then, as the chief superintendent says,
 13 quite rightly , there is a record from Chief
 14 Inspector McKinnon relating to --
 15 A. Yes.
 16 Q. -- Chief Inspector Graham.
 17 Your recollection is that you recall having an
 18 awareness of Chief Inspector Graham before she called
 19 you?
 20 A. Yes.
 21 Q. We can see that the call is to you, your reaction
 22 wasn't, "Who are you?", but, "I know something about
 23 you, I can speak to you about what I need".
 24 A. Exactly.
 25 Q. There would have been no difficulty formally appointing

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1 Chief Inspector Graham even at quarter past midnight --
 2 A. Yes.
 3 Q. -- as Bronze 1 until Superintendent Gordon arrives; is
 4 that right?
 5 A. There would have been no difficulty at all . I think
 6 reflecting on it, I think I've got it in mind that I've
 7 just appointed Superintendent Gordon to make the scene,
 8 probably in anticipation of an arrival reasonably soon
 9 after. Then, to find that I had a chief inspector on
 10 scene -- perhaps I think in my mind I didn't want to
 11 overcomplicate the command structure, but again I think
 12 I would have been in a better position to definitively
 13 say, "You are Bronze scene", rather than the terminology
 14 that I did use.
 15 SIR JOHN SAUNDERS: What we know is that there's been
 16 a sergeant running the team really from the outset. So
 17 did you discuss with her what he was doing and whether
 18 he was doing it well or whether that was all under
 19 control?
 20 A. Reference was made to Sergeant Cawley being on scene and
 21 I had every sense, sir , that he had been under the most
 22 enormous pressure. Nothing in terms of effectiveness of
 23 the role. Sergeant Cawley was a very experienced
 24 sergeant and I'm sure we would have both expected him to
 25 have performed very, very well.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: The next event we're going to look at we
 3 don't need to bring up the call log for, but it is
 4 there. It's an email that you received from
 5 Superintendent Gordon just minutes -- or in fact at the
 6 point you were concluding that call with Chief Inspector
 7 Graham.
 8 {INQ025529/1}, please.
 9 SIR JOHN SAUNDERS: This is different from the ones we have
 10 seen?
 11 MR DE LA POER: The way it's laid out is we have the same
 12 start to the thread but, as can often happen, threads go
 13 off at a tangent. So we can see that, we're familiar
 14 with that. If we move up, please, {INQ025529/2}, and up
 15 again, please, {INQ025529/1}, we can see your reply at
 16 12.10, which we've already looked at, and if we go up
 17 one more, this email says at 00.19 from
 18 Superintendent Gordon to you:
 19 "PS Any briefing I can get from anyone? I'm about
 20 20 minutes out according to taxi but may be diversions
 21 so want to arrive briefed if possible. Kindest regards,
 22 Kyle Gordon."
 23 Do you recall receiving that email?
 24 A. Yes. Well, whether I received it at the time at which
 25 it was transmitted is another matter. I do remember the

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1 email. That was the first understanding that a taxi had
 2 been used.
 3 Q. That was my next question. How proximate to the time it
 4 was sent do you think you saw it?
 5 A. Presumably there will be a reply.
 6 Q. Not that I have seen.
 7 A. Okay.
 8 Q. There may be. I'm not for a moment suggesting the fact
 9 I haven't seen it is any aspersion on anyone. But I'm
 10 sure Mr Gibbs will give me that time.
 11 MR GIBBS: {INQ041111/1}.
 12 MR DE LA POER: Having disavowed having seen that, I think
 13 that was a reference I sent to you this morning,
 14 Mr Gibbs, so could you bring that up.
 15 SIR JOHN SAUNDERS: Obviously coordination is going well!
 16 MR DE LA POER: Mr Gibbs has been extremely helpful.
 17 SIR JOHN SAUNDERS: Just seeing that, you would know for
 18 a taxi to get through an operational scene like the one
 19 that was going on outside that station, I should think,
 20 would be virtually impossible without a blue light .
 21 A. It would certainly require an explanation at every
 22 checkpoint.
 23 MR DE LA POER: There we have it. In fact it's the next
 24 item on my notes, I regret to say.
 25 We can see at 01.23 hours, you email back:

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1 "Speak to Andrea Graham, K."
 2 If you're replying at that time, would that be the
 3 time you saw his email, do you think?
 4 A. That's a very difficult question to answer. That's
 5 clearly the first opportunity I've had to reply,
 6 probably indicative of how much is going on. It's an
 7 awful long time to wait for a reply. So I'm sorry,
 8 I wouldn't know whether I had seen his original email
 9 earlier than that.
 10 SIR JOHN SAUNDERS: Particularly as it's 40 minutes after
 11 his estimated time of arrival.
 12 MR DE LA POER: Certainly your instruction at that stage is,
 13 bearing in mind your conversation with Chief Inspector
 14 Graham, that he should seek her out?
 15 A. Yes.
 16 Q. That can be taken down, please.
 17 I'm just going to deal with other matters in the
 18 chronology in a slightly different way and potentially
 19 in less detail. At any point in the evening did you
 20 manage to speak to the GMP Silver?
 21 A. No.
 22 Q. What efforts did you make over the course of the evening
 23 to speak to the GMP Silver?
 24 A. Shortly after midnight I asked a member of the control
 25 room staff to make contact with GMP, establish who the

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1 GMP Silver was, and indicate that I needed to speak to
 2 the GMP Silver.
 3 From recollection, the response back from that was
 4 that GMP were not aware of who the Silver was at that
 5 stage and then I made a further call to a control room
 6 member of staff to again reach out, make a call to GMP,
 7 again to establish who the Silver was, and I think that
 8 was made some 10 minutes later.
 9 As I recall, it came back that they would get a call
 10 back and they would supply the details to BTP of who
 11 that Silver was.
 12 Q. Did you regard the efforts that were made and the lack
 13 of satisfactory resolution as being acceptable on the
 14 night?
 15 A. It was a source of frustration. Clearly, I could see --
 16 going back into the commentary earlier, I could see that
 17 clearly GMP had assumed primacy and were acting on it.
 18 An awful lot of activity was going on. I wanted to be
 19 a part of that conversation and collaborate with that
 20 and support that, so it was clearly a source of
 21 frustration I could not speak. Within any control room
 22 environment, one call requesting the details of the
 23 Silver should, in all effect, enter a sort of drum and
 24 it should revolve around as a sort of live action until
 25 it's picked up and finalised. That's how it should

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1 happen. So repeated calls would not be appropriate into
 2 an already saturated control room with GMP. So I didn't
 3 consider it would require any more than at least two
 4 phone calls before I would then choose my next step and
 5 subsequently I then appointed Chief Inspector Sue Peters
 6 from her home address in Liverpool and required her to
 7 make to the GMP command, to GMP HQ, to effectively
 8 achieve what I was hoping to achieve in terms of some
 9 dialogue between GMP and BTP, effectively to try to
 10 embed somebody in their control to make the conversation
 11 happen.
 12 SIR JOHN SAUNDERS: So in these days of communications, it
 13 would have been quicker to send a carrier pigeon,
 14 perhaps? (Overspeaking) attention to your call if you'd
 15 done that.
 16 A. Yes, clearly frustrating, but I appreciate GMP will have
 17 been under the most enormous pressure. I appreciate
 18 that. However --
 19 SIR JOHN SAUNDERS: It's a way of giving priority in the
 20 call somehow to you rather than going on the 999 system,
 21 which everybody I think will think should have happened.
 22 A. I got the impression actually when the phone calls were
 23 made the return from the GMP control was actually fairly
 24 rapid.
 25 SIR JOHN SAUNDERS: Okay, but they just couldn't give you

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1 the information you wanted quickly?
 2 A. That's correct.
 3 SIR JOHN SAUNDERS: Actually, you have two police forces
 4 operating together in a venue, the arena. It's really
 5 quite important that you coordinate at whatever level is
 6 required, tactical for Silver, and Bronze on the ground?
 7 A. Everything about the scene is telling me that GMP have
 8 complete lead here, but there needs to be a conversation
 9 to establish that, confirm that for sure. And there
 10 needs to be then a conversation, in the spirit of JESIP,
 11 about: what do you need from us, this is what we have
 12 there, how are we going to speak together for the rest
 13 of the evening, what can we do to make this horrific
 14 situation better in terms of, at least, the
 15 coordination?
 16 SIR JOHN SAUNDERS: Can I apologise for the comment about
 17 the carrier pigeon. Clearly everybody is doing their
 18 best at the time, but lack of communication must have
 19 been a considerable frustration for you.
 20 A. Yes, it was.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR DE LA POER: Did it occur to you at around 00.15 that one
 23 possible line of communication that you potentially had
 24 at your disposal was Chief Inspector Graham to go and
 25 speak to the GMP commander on the ground to find out the

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1 information you wanted to know or even to put you on the
 2 phone with the chief inspector that you understood was
 3 at the arena to get the answers to the questions you
 4 needed?
 5 A. Yes, and I was very confidently assured by
 6 Chief Inspector Graham that she had tried to have
 7 a conversation and would continue to try. She did give
 8 an indication that the chief inspector was incredibly
 9 busy and she had not thus far been able to achieve that
 10 conversation. That was another way in which we could
 11 have some dialogue with GMP, yes.
 12 Q. At all events, a solution that you came up with to
 13 resolve this was to seek to embed Chief
 14 Inspector Peters --
 15 A. Yes.
 16 Q. -- in GMP HQ?
 17 A. Yes, that's right. Again, it comes down to choice of
 18 personnel to undertake that role and my view at the time
 19 was that her seniority in the organisation, my ability
 20 to get hold of her, her ability to make her way to
 21 GMP HQ to take up that role, it worked for me.
 22 I appreciate there is again a period of time in which
 23 she's travelling, but ultimately that will allow BTP to
 24 have some representation within GMP's thinking about how
 25 they are managing this.

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1 SIR JOHN SAUNDERS: Do we know her arrival time? No doubt
 2 you do.
 3 MR DE LA POER: Not at my fingertips. I will be given it in
 4 seconds, I have no doubt.
 5 I am going to turn away from the events of the
 6 evening, although we will just come back to them when
 7 dealing with what the policing experts have said and we
 8 will perhaps deal with them also through this
 9 penultimate short topic, which is the Operation Newtown
 10 debrief.
 11 So I would like, please, Mr Lopez -- and we'll need
 12 to start at page 4 of this document -- for us to bring
 13 up {INQ000788/4}.
 14 In fact, just before we look at it, I can see that
 15 at 01.53.57 Control Works records that Chief
 16 Inspector Peters had just arrived at GMP HQ.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR DE LA POER: It will be better for both of us if you help
 19 me with your handwriting, which is substantially better
 20 than mine, I hasten to add.
 21 A. Shall I carry on until you stop me?
 22 Q. We will take them in turn.
 23 These are, as the questionnaire requires you to
 24 answer:
 25 "From your own perspective what aspects of the

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1 Operation Newtown strategic multi-agency response went
 2 well and should be highlighted as good practice for
 3 future exercises?"
 4 A. First up, number 1:
 5 "Joint work on scene in immediate aftermath given
 6 sheer scale of the event."
 7 Q. Is there anything that you feel you need to add to that
 8 or does that rather speak for itself?
 9 A. I think that speaks for itself. Everything that I --
 10 at the point in time when this Newtown debrief was
 11 happening, everything that I'd heard and read and spoken
 12 to staff about said that the BTP officers, the GMP
 13 officers, and those other emergency services who
 14 attended the scene and security personnel, Northern
 15 staff, had all worked incredibly hard in a very
 16 difficult scene, of course.
 17 Q. Next, could you read number 2 for us?
 18 A. "BTP's welfare provision was in Manchester from 0700 the
 19 following morning. Some suggestion could have been
 20 quicker but feedback from front line resources is that
 21 they identified welfare provision was a key upside."
 22 Q. I don't need you to expand that any further. Number 3,
 23 please.
 24 A. "Establishment of transport cell at Silver level to
 25 facilitate awareness-raising racing to Gold, share

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1 situational awareness in anticipation, restoration of
 2 services in due course."
 3 Q. What do you mean by "transport cell at Silver level"?
 4 A. So Chief Inspector Peters, who was embedded within GMP's
 5 headquarters, and in their command cell, effectively
 6 went on to develop with Greater Manchester and the
 7 Transport for Greater Manchester a transport cell, and
 8 that transport cell was designed to advise the Gold at
 9 GMP around the challenges of restarting some elements of
 10 public transport in Greater Manchester. So it was about
 11 sharing situational awareness of the trapped trains at
 12 Victoria, which were trapped for a number of days, and
 13 to talk about how Manchester could almost come back to
 14 life.
 15 Q. Number 4?
 16 A. "Embedded inspector at Network Rail Manchester working
 17 with scene manager to share understanding, stakeholder
 18 issues."
 19 Q. Again, I don't need you to expand that. 5, please.
 20 A. "Embedded BTP presence at the Silver suite throughout."
 21 Which refers to Chief Inspector Peters' role.
 22 Q. When you say "throughout" there, bearing in mind, and
 23 I have taken it from paragraph 49 of your statement,
 24 that she wasn't in fact at force HQ until 01.53.57 --
 25 A. That's correct.

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1 Q. -- do you think "throughout" is the right word to use?
 2 A. Don't forget this is about the entirety of
 3 Operation Newtown, this is about the number of days at
 4 which the embedded BTP presence at the Silver suite
 5 supported that. It wasn't a commentary about how quick
 6 or otherwise that person got to the Silver suite.
 7 Q. And number 6?
 8 A. Straightforward:
 9 "Power of personal relations."
 10 No more, no less than that: people who know each
 11 other exercise with each other, effectively who have an
 12 interaction daily, can work better.
 13 Q. If we just go down over the page to make sure I haven't
 14 missed any of your list. We've got until 3, which we'll
 15 come back to in a moment. Before we do, can we go up
 16 two pages because there's another box. We've just
 17 looked at box 2 which are things that went well.
 18 A. Yes.
 19 Q. This box is blank --
 20 A. Yes.
 21 Q. -- which is "Did not go well". Is it your view now that
 22 that box should remain blank if you were completing this
 23 now?
 24 A. I don't think that's a commentary and I don't think
 25 that's an indication that I thought things went

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1 incredibly well at all. I merely move to point 3 about
 2 recommendations for the future and within that and
 3 implied within that are some of the challenges of the
 4 night writ large.
 5 SIR JOHN SAUNDERS: A lot of these, and they're the same
 6 sort of thing, put down what didn't go well, put down
 7 what did go well, key recommendations. It is quite
 8 important to know for people to know what didn't go
 9 well, isn't it, on a debrief?
 10 A. I can't explain why I just chose to just move to point 3
 11 around recommendations for the future. If I had my time
 12 again, yes, I would endorse that. That's fair.
 13 MR DE LA POER: My question was if you were sitting there
 14 now, completing this form, would that box be blank?
 15 A. No.
 16 Q. Is that because your understanding of what could have
 17 been done better has deepened?
 18 A. Yes.
 19 Q. So there are things that you could put in there now that
 20 would not have been in your consciousness when you
 21 completed this form?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Now he's going to give you an
 24 alternative.
 25 MR DE LA POER: Well, but was it also the case that there

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1 were things that you knew at the time of completing this
 2 form that could have been done better?
 3 A. Yes.
 4 Q. Let's have a look at your recommendations. Two pages
 5 down. Down to {INQ000788/5}, please.
 6 Number 1, please.
 7 A. "Joint training around large scale scenarios such as
 8 this. Sheer sense of scale to be incorporated."
 9 Q. Can you speak to that for us, please?
 10 A. I think it was evident that the sense of the challenge
 11 was incredibly difficult on the night. The sheer volume
 12 of traffic, the sheer weight of information and some of
 13 that scale, you know, in other training or exercise
 14 pieces that I've been involved in has never been
 15 replicated. So it's impossible -- so perhaps for an
 16 average training scenario, for example, in an incident
 17 like this, if replicated, you could anticipate that
 18 a very ordinary thing I would want to do is communicate
 19 with the GMP lead. In a training scenario I'm very
 20 confident that that would probably be delivered as part
 21 of one of the feeds into the training.
 22 One thing training doesn't do is reflect some of the
 23 realities that actually: if you can't do that and if you
 24 can't speak to GMP Silver, what are your next steps?
 25 I think some of that sense of scale being incorporated

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1 would be helpful.
 2 Joint training, I think much of my training --
 3 sorry, much of my input is around pre-planned
 4 operations, it's far less about major, sudden onset
 5 incidents like this. I think I would welcome more joint
 6 training around this so we could perfect some of the
 7 JESIP issues.
 8 Q. And we see JESIP mentioned in number 2.
 9 A. Yes, and I would say that applies to me as much as to
 10 other organisations on the night as much to other
 11 personnel.
 12 SIR JOHN SAUNDERS: Looking now, would you have included
 13 other recommendations as key recommendations?
 14 A. I think you touched on one before, sir, which was just
 15 around if we are truly try to help commanders make sense
 16 of all that's going on, I think some form of
 17 technological solution to logs and the management of
 18 information would be very helpful. It's
 19 a recommendation which may be something that the police
 20 service and other agencies can do to help themselves or
 21 it may be there's a technological solution to that, but
 22 I would probably add that in.
 23 SIR JOHN SAUNDERS: What might cry out to an objective
 24 observer for recommendation is much better
 25 communications. I mean, the difficulty that BTP had

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1 generally on the night in communicating with anyone when
 2 you're part of the rescue services you're on seems to me
 3 to be — well, it seems to be crying out to be looked at
 4 and maybe and no doubt it has been to some extent
 5 already.
 6 A. I know JESIP holds as one of the key principles
 7 communication. I think that's what I was probably
 8 hinting at what we talked about greater understanding
 9 and training of it .
 10 SIR JOHN SAUNDERS: So JESIP, practically everyone can tell
 11 me the five key features of JESIP, they can recite them
 12 off. It seems to be actually putting it into practice
 13 where the difficulty arises .
 14 A. Yes, that's right .
 15 SIR JOHN SAUNDERS: That's why you're saying —
 16 A. Greater understanding of it and greater understanding as
 17 well of when principles are not adhered to, the
 18 consequences of that for other agencies involved .
 19 SIR JOHN SAUNDERS: And had you practised with the others,
 20 the other agencies, no doubt the fact, the difficulty of
 21 getting through on the phone and communication would
 22 have — must have become apparent mustn't it?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR DE LA POER: Sir, my final topic. I am conscious of the

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1 hour and I've asked for an enquiry to be made of the
 2 transcribers .
 3 I wonder if could, as representatives of some at
 4 least who are watching, just check that everybody in the
 5 room is content for us to continue for another 10 to
 6 15 minutes. I appreciate that that is a very small
 7 consultation, but it may be indicative. I know that the
 8 Chief Superintendent is expecting me to ask him these
 9 questions and in fact welcomes the opportunity to deal
 10 with them, so I'll just look to the solicitor to the
 11 inquiry who I know is just checking with the
 12 transcriber .
 13 SIR JOHN SAUNDERS: I'm perfectly happy to stop now if
 14 that's what people want. Equally, it may help people
 15 who are asking questions tomorrow to know the end of the
 16 evidence.
 17 MR DE LA POER: In fairness, the chief superintendent
 18 undoubtedly should have a say on this because I know
 19 this is part of the questioning that he wants to deal
 20 with. We're late in the day and I want him to feel he
 21 can give his best. Equally, leaving them over until
 22 tomorrow may not be his preference either.
 23 A. I'm very happy to continue if others...
 24 SIR JOHN SAUNDERS: We haven't had a dissent so far.
 25 (Pause)

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1 SIR JOHN SAUNDERS: You can go on.
 2 MR DE LA POER: I'm going to turn now to deal with what the
 3 policing experts have said about your performance on the
 4 night. Clearly they did so before they heard any of
 5 your live evidence, but they did it on the basis of the
 6 documents. You had parts, at least, of the policing
 7 expert report shared with you; is that correct?
 8 A. That's correct.
 9 Q. So you know what they have said?
 10 A. Yes.
 11 Q. I'm going to try and summarise as best I can three
 12 points that they make and seek from you your response to
 13 it .
 14 A. Yes.
 15 Q. The first is that they suggest that:
 16 "[You] made no significant contribution to tactical
 17 scene command that [they] have been able to identify.
 18 As BTP may have had operational primacy [they say] or
 19 believed they had primacy, we do not understand why
 20 Chief Superintendent Gregory was not more active in
 21 command."
 22 That's how it was formulated before you gave your
 23 evidence. What do you say in response to that, please?
 24 A. Well, I hope the independent experts have been able to
 25 see that I was very, very clear that BTP did not have

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1 primacy and I don't think you will find anything within
 2 the log or my decision—making which would indicate that
 3 I believed that that was the case. I accept their
 4 observation and I think — I accept the observation so
 5 far as there was little impact on tactical scene
 6 command. I think that that is entirely appropriate
 7 given that at the point in time at which I took command,
 8 the things I knew, I think it's worth repetition, are
 9 that it was a confirmed bomb, that GMP were aware, that
 10 they were mobilising in significant number, and were on
 11 scene, that GMP firearms were on scene and sweeping both
 12 Victoria and the arena, that the major roads had been
 13 cordoned around by GMP, and there was a GMP
 14 chief inspector on the scene.
 15 To that end, you know, I think it would be wholly
 16 unfeasible for me to try to make decisions and try to
 17 drive(?) those from a distance over a scene at which
 18 another police agency clearly has command and primacy.
 19 That would risk creating potential conflict and
 20 countermanding and clearly with the firearms presence as
 21 well, that's something around which I have no ability to
 22 command and is clearly a specialist deployment for
 23 an issue that I am not aware of.
 24 Q. Next, they say that:
 25 "[They] believe based on what [they had] seen that

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1 you were aware of the strategy that ACC Smith had but
 2 [they] are not aware of the strategy being translated
 3 into a tactical plan by you.”
 4 They go on to say:
 5 “Chief Inspector Graham may have been advised of the
 6 strategy by the SDO when he briefed her at
 7 00.02 hours...”
 8 I think that should be a reference to
 9 Chief Inspector McKinnon rather than the SDO:
 10 “... but she makes no reference to it in her
 11 statement.”
 12 That’s the context. At the heart of it is the
 13 suggestion that Gold strategy was not translated into
 14 a tactical plan by you.
 15 A. We can deal with the first point. The development of
 16 a tactical plan, I have to say I think it’s quite
 17 unrealistic to develop a tactical plan around
 18 a fast-moving scene around which it’s clear that there
 19 is another policing agency operating with primacy in
 20 mind. I think if you read through the Silver
 21 responsibilities in the major incident manual, they are
 22 designed to provide a sense of the responsibilities
 23 across the whole of that command from start to finish,
 24 hence the point around Bronze recovery right at the very
 25 bottom. It isn’t to indicate the things that must

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1 happen when you take a Silver command role.
 2 Perhaps further in, and if BTP were the lead agency,
 3 then a tactical plan would ultimately be developed, but
 4 that would have to be done with a full understanding of
 5 the risks because a tactical plan will incorporate all
 6 of the risks which were apparent and the mitigations
 7 which I would put in place as a Silver. None of those
 8 things were there for me to be able to pull together
 9 a tactical plan.
 10 It’s a fast-moving thing, it’s a working strategy
 11 which will make its way on to the decision log, and it’s
 12 about people trying to service that working strategy in
 13 live time.
 14 The second point was around whether the points of
 15 the working strategy, I think, were communicated to
 16 colleagues on the ground. I’m very clear in
 17 conversations actually that we did touch upon — I don’t
 18 think I ever listed the working strategy, I think
 19 I talked to that strategy, I knew that some aspects of
 20 it were already well underway, so preservation of life
 21 and looking after those who had been injured. That was
 22 already ongoing and had been ongoing for some time.
 23 And there were many parts of that which I did talk
 24 to with both Andrea Graham and indeed with Kyle Gordon,
 25 and I think, quite frankly, the working strategy speaks

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1 to very instinctive policing in any case. I honestly
 2 don’t think I would need to read through that working
 3 strategy and list it to ensure that my colleagues were
 4 doing those things and doing their very best on the
 5 scene, but I’m very confident I did talk around the
 6 working strategy.
 7 Q. You have referred in the first part of your answer to
 8 a lack of realism around a working strategy. Can we be
 9 clear about whether or not, when you’re talking about
 10 that realism, that’s about writing it down or having one
 11 at all in terms of a tactical plan?
 12 A. I think you started the sentence by saying a lack of
 13 realism around the working strategy.
 14 Q. Yes.
 15 A. Do you mean lack of realism with tactical?
 16 Q. That was my mistake. You are quite right.
 17 A. Could you continue the rest of the question?
 18 Q. Yes. I’m trying to paraphrase your answer, so what’s
 19 important is your evidence, but are you saying that it’s
 20 not realistic to write the tactical plan down or are you
 21 saying it’s not realistic to have a tactical plan,
 22 whether written down or not?
 23 A. I’m saying it’s not realistic to write down a tactical
 24 plan at that stage, given everything is so fast-moving
 25 and, quite frankly, you do not know at that stage what

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1 the full picture is of what you’re actually dealing
 2 with.
 3 Q. The fact that you have not written down something called
 4 a tactical plan, does that mean that you don’t have
 5 a plan for your involvement in the incident?
 6 A. No, it doesn’t mean that. The working strategy
 7 effectively operates as a sort of plan. The updates on
 8 the log, the conversations, the decision-making, all
 9 works to support the working strategy. So as a perfect
 10 example of that in terms of the point 1, preservation of
 11 life and limb, that was delivered by the FIM providing
 12 a significant number of resources to the scene.
 13 When I took command, that work continued on, such
 14 that there were 62 officers on scene, I think within the
 15 first 3 hours, and 80 plus that night. All of that was
 16 working towards preservation of life in the first
 17 instance and then later on specialist resources which
 18 would support evidence and evidence — and the
 19 importance of evidence and collection of that was part
 20 of the working strategy as well. So all the time, the
 21 activity feeds that working strategy, you don’t need
 22 more than that at that stage.
 23 Q. Finally —
 24 SIR JOHN SAUNDERS: No, sorry. I just want to relate this
 25 to the FIM. By the time you were taking over from the

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1 FIM, you said to him, "What's your working strategy" or
 2 "What's your tactical plan?", one or the other?
 3 A. Working strategy, sir, and that was following
 4 a conversation in which he indicated he had not had time
 5 to commit that to paper. I then gave him the time.
 6 SIR JOHN SAUNDERS: So he committed it to paper and
 7 effectively you adopted it?
 8 A. That's correct. If I had a significant aversion to any
 9 of the points, I could have put those aside and adopted
 10 a different one, but I thought that was appropriate and
 11 a good working strategy: simple, straightforward,
 12 instinctive .
 13 SIR JOHN SAUNDERS: Right. It all looks to a layman
 14 incredibly general.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: And it's almost like it's actually an
 17 aide-memoire of what you need to be doing, what you need
 18 to have as your priorities . Should a tactical plan go
 19 beyond that, or would you anticipate it would, or would
 20 it be the same?
 21 A. I anticipate a tactical plan probably would, but
 22 ultimately that would have to be developed further along
 23 from those initial hours so that when the risks are very
 24 clear, we can understand what they are and how we will
 25 manage around those. But of course, as I say, BTP were

1 not the lead agency in this either, so there would have
 2 to be some consideration about what a tactical plan
 3 would look like, bearing in mind we are contributing to
 4 a GMP-led response.
 5 SIR JOHN SAUNDERS: So the FIM has done his in the belief
 6 that you were the lead agency at the time because that's
 7 what he thought. So on that basis, would you have
 8 expected a more detailed tactical plan to have been
 9 developed or would that be something which would come
 10 further down the line?
 11 A. I think the working strategy that was provided,
 12 accepting the FIM's point of view that he was operating
 13 with primacy in mind, we could continue to work to that
 14 working strategy even as a collaborating force. It's
 15 not -- you don't need a working strategy only if you're
 16 the lead agency. Even if you're supporting a lead
 17 agency, you would still need a working strategy. You
 18 can develop it over time.
 19 SIR JOHN SAUNDERS: But in your belief that this was clearly
 20 GMP's primacy, if anyone was going to develop a more
 21 detailed tactical plan, you would expect it to be them?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: And to have two maybe conflicting
 24 tactical plans wouldn't be a great idea?
 25 A. I agree.

1 SIR JOHN SAUNDERS: But of course it would help if you knew
 2 what their tactical plan was.
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Okay.
 5 MR DE LA POER: Finally, we've touched on some of this
 6 already, but let's condense it into what's said in the
 7 report. They say:
 8 "We have seen no evidence to support any
 9 communication at a tactical level or to support any
 10 attempt to make such contact until a number of failed
 11 attempts by Superintendent Gregory and calls were made
 12 to GMP OCB, trying to get through to tactical command.
 13 Each call went without contact actually being made as
 14 those answering the call did not know who to contact,
 15 did not know who the tactical Silver commander was.
 16 They promised to call back with information, but there
 17 is no evidence that the calls were ever made and the
 18 information certainly never materialised."
 19 Plainly, at least part of that, if not the
 20 substantial part, is for GMP to deal with. But what
 21 do you say in response to that?
 22 SIR JOHN SAUNDERS: The criticism perhaps here is, "Didn't
 23 do enough to pursue it. Shouldn't just have sat there
 24 and waited for the call back". This is your drum
 25 account?

1 A. I thought I was active, actually, in trying to get hold
 2 of GMP just after midnight. The things that I did
 3 before that point I had to do to make sure that my
 4 Bronzes knew what was expected of them. I don't think
 5 I could have moved any more quickly to try to get hold
 6 of GMP just after midnight.
 7 When that first call effectively indicated that they
 8 were not aware who the Silver was, the second call was
 9 placed, just 10 minutes later, with a level of urgency,
 10 which I think I have seen has arrived in some of the
 11 transcripts of the call. It's quite clear that BTP
 12 really do want to speak to the GMP Silver, and now.
 13 When that ultimately went unanswered, I think it was
 14 only a matter of 10/15 minutes later, I think that I got
 15 a chief inspector from Liverpool to leave her home
 16 address and make her way to GMP HQ in order to achieve
 17 that interaction with GMP. So I think I worked hard to
 18 try to reach out to GMP. You're absolutely right,
 19 you've made some points about whether some more could
 20 have been achieved on the ground, but equally I was also
 21 satisfied Chief Inspector Graham was trying her best to
 22 speak to GMP.
 23 SIR JOHN SAUNDERS: The other person you could try and get
 24 hold of is the FDO, the force duty officer. I know
 25 people tried to contact him before but he appears to be

1 the centre of everything.
 2 A. Yes.
 3 SIR JOHN SAUNDERS: At least until Silver is appointed.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Did you think of trying to do that?
 6 A. No, sir, and I'll tell you -- the point of that,
 7 I think, is that I am fully aware that they are going to
 8 be under significant pressure. The point of the Silver
 9 is there is an ability now as tactical commander, with
 10 JESIP in mind -- tactical commanders will be looking to
 11 speak to other tactical commanders from other agencies.
 12 SIR JOHN SAUNDERS: Okay, thank you.
 13 MR DE LA POER: Thank you very much indeed,
 14 chief superintendent. Those conclude the questions that
 15 I want to ask of you.
 16 I wonder, sir, whether we could break now until
 17 10 o'clock tomorrow.
 18 SIR JOHN SAUNDERS: Certainly. It has been a long session.
 19 Thank you very much.
 20 (4.55 pm)
 21 (The inquiry adjourned until 10.00 am
 22 on Tuesday, 27 April 2021)
 23
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