

OPUS2

Manchester Arena Inquiry

Day 96

April 29, 2021

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Thursday, 29 April 2021

(10.00 am)

SIR JOHN SAUNDERS: Good morning.

MR DE LA POER: Sir, good morning.

We are joined this morning by Mrs Andrea Graham, formerly of the British Transport Police. I wonder if she may be sworn, please.

MRS ANDREA GRAHAM (sworn)

Questions from MR DE LA POER

MR DE LA POER: We'll start please with your full name.

A. Andrea Graham.

Q. Mrs Graham, is it right that you have given a total of four witness statements relating to your involvement in the events on 22 May 2017?

A. That's correct.

Q. We'll try and cover all of those in the course of the questioning, but we'll begin by introducing you, please. Is it right that you joined British Transport Police in 1994?

A. I did.

Q. Did you, over the course of the ensuing years, work your way up to the rank of chief inspector?

A. That's correct.

Q. If we go to mid-2015, did that mark your return to Manchester as a uniformed chief inspector, having

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formerly been a detective chief inspector?

A. That's correct.

Q. At about that time, July 2015, did you undertake a public order Bronze commander course?

A. That's correct.

Q. What was your role and rank on 22 May 2017?

A. I was a chief inspector in charge of the Manchester area, covering a number of other stations as well, but predominantly Manchester.

SIR JOHN SAUNDERS: Can everybody hear all right? Okay, thank you. I was just checking; I wasn't suggesting you couldn't be.

MR DE LA POER: On a day-to-day basis what would that involve you needing to do? What were your general areas of responsibility?

A. So I had quite a large sector of over -- probably about 180 officers all in all, from across Manchester into Sheffield, Doncaster, Grimsby, but because the majority and the busiest area was Manchester, I was based at Manchester. So my day-to-day duties would be looking after the crime and disorder around those stations, reviewing the previous incidents from the day before, and obviously officer welfare.

I was also the police PSD champion, which is looking after any internal complaints about officers for the

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whole sector. Looking at forthcoming events. Quite a large area of responsibility and many duties.

Q. You describe in your statement that it was a busy role; is that fair?

A. It was a busy role.

Q. So far as deployments to the Manchester Arena were concerned, particularly on event nights, was that something that you were directly involved in?

A. I had an operations inspector, Inspector Wedderburn, who would look at the individual incidents unless there was something that was bespoke or one that was a higher-risk event. But I would be aware of what events we had ongoing during the forthcoming weeks.

Q. Can we just be clear because I think there were two Inspector Wedderburns at the time. Is that Michelle Wedderburn?

A. That's correct.

Q. Does that mean essentially you had a supervisory capacity but you had an officer beneath you in rank who was responsible for organising?

A. That's correct.

Q. We can turn it up if we need to, but we may not at this stage. In your second statement you describe having had a good relationship with the arena.

A. That's correct.

3

Q. Are you speaking for you personally, are you speaking on behalf of BTP, or are you speaking for both?

A. Both.

Q. Again, we can turn to it if you want, but I'll just quote part of your statement to see if in summary this captures your view. You say:

"Unless criminal activity was anticipated, BTP's uniformed presence outside the arena was mainly to provide reassurance and direction and to make sure there was no trouble as people entered and left the stadium."

A. That's correct.

Q. Does that capture your view of the approach that was being taken by Inspector Michelle Wedderburn towards deployment?

A. Correct.

Q. There's just one email relevant to this that I would like your help with, please.

Mr Lopez, {INQ025720/1}.

We'll go to the bottom first, which is the start of what is a two-message thread. We can see that we are looking at an email which was approximately 6 weeks before the arena attack, 5 April 2017. You're not involved in this bottom email, it involves Inspector Kooper. Were you his line manager or did he sit in a different area of operation?

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1 A. No, Peter Kooper, whilst I was away on maternity leave,
 2 took the role of the chief inspector for my Manchester
 3 and other stations posts.
 4 Q. So he was a temporary chief inspector, was he --
 5 A. He was.
 6 Q. -- for that period? Were you on maternity leave at the
 7 time of this email?
 8 A. It was my first day back.
 9 Q. I think we'll see that he loops you into this shortly
 10 after receiving it .
 11 So this is indicating that there was a particular
 12 event of relevance, being boxing. The person who this
 13 email is being sent to is a gentleman by the name of
 14 Matthew Worrell and somebody with a GMP address. Do you
 15 know who Matthew Worrell was?
 16 A. No.
 17 Q. The detail of the email is perhaps unimportant, but it's
 18 really what prompts Inspector Kooper to contact you, as
 19 we will see. Once everyone's assimilated the contents,
 20 we'll see what is being said to you, which is what's
 21 important.
 22 If we can go up, please. The sort of event that
 23 we're talking about, as we can see, is a boxing event.
 24 Was that a type of event where there was an expectation
 25 that it was more likely there would be trouble from the

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1 crowd?
 2 A. That's correct.
 3 Q. So we'll hold that in our minds. This is focused on, as
 4 we see:
 5 "One of the issues that was raised to me by GMP
 6 during my time covering the chief inspector position was
 7 the lack of liaison from us about the key events at the
 8 arena. This has particularly been the case after the
 9 boxing events."
 10 He goes on to say that he had a meeting with two
 11 officers from GMP:
 12 "I gave them assurances that I would share what
 13 information we had about such events as well as
 14 providing a point of contact on the night for their city
 15 centre Bronze to liaise with. In addition, it was
 16 suggested that we could attend the multi-agency meeting
 17 on Wednesday afternoons at the Town Hall police station
 18 where a multitude of issues are discussed and addressed
 19 (they say Michelle used to go)..."
 20 Will that be a reference to Inspector Michelle
 21 Wedderburn?
 22 A. Yes.
 23 Q. "We have attended the last two and already had some
 24 value due to information gleaned about the Cornerhouse
 25 occupation, which has prompted today's meeting.

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1 Obviously a matter for you, but this liaison might be
 2 something you want to continue now you're back in
 3 position."
 4 We'll need to be clear about the sort of events
 5 he is speaking about. He's used the phrase "key
 6 events".
 7 A. Mm-hm.
 8 Q. As you understood that phrase within BTP at the time,
 9 would that have included the Ariana Grande concert or
 10 not?
 11 A. From my recollection, no.
 12 Q. Why, with an attendance of 14,000-plus people, would
 13 that not have been viewed as a key event?
 14 A. A key event would be where the audience profile may
 15 attract a higher anti-social behaviour capacity or maybe
 16 the audience profile would attract further crime inside
 17 the arena, whereas the Ariana Grande concert, the
 18 audience profile was 14 years plus, with no particular
 19 intelligence that there would be a large volume of
 20 anti-social behaviour.
 21 Q. So the focus is upon the threat that might arise from
 22 the event attendees, either to themselves or to other
 23 people?
 24 A. Yes.
 25 Q. The focus is not on what threat there might be to event

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1 attendees from third parties?
 2 A. Unless there was any relevant intelligence to suggest
 3 such.
 4 Q. The other matter arising from this is mention of
 5 a weekly multi-agency meeting, are you able to help us
 6 with what that grouping of agencies was?
 7 A. No.
 8 Q. Did you between 5 April and 22 May attend any of the
 9 weekly meetings on a Wednesday afternoon of this group?
 10 A. I can't remember.
 11 Q. Do you think if you had attended such a meeting, you
 12 would have a clearer sense of who were the attendees?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: Did you go to the Town Hall police
 15 station very often?
 16 A. I would say now and again for multi-agency meetings.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR DE LA POER: Do you have any recollection of having
 19 tasked anybody else within your line of management to
 20 attend those meetings?
 21 A. For that level of meeting, I would have asked Michelle
 22 to continue, Michelle Wedderburn, to continue
 23 attendance, knowing her integration and role with the
 24 arena and her knowledge of the events and what we needed
 25 at those events, or perhaps the sergeant. We had

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1 a logistics sergeant at Manchester who could attend
2 those meetings.

3 Q. Who was that at the time of May 2017?

4 A. I believe it was Anthony Ryan.

5 Q. So more appropriate people than you, bearing in mind
6 their knowledge and their sphere of activity to attend
7 this. Do you have any recollection of having raised it
8 with either of those people or discussed it or received
9 feedback of their attendance at it?

10 A. I don't have the recollection.

11 Q. Thank you very much indeed. Mr Lopez, we're going to
12 take that down.

13 We are going to go back to a topic we have touched
14 on already, which is your training.

15 We've already established that in July 2015 you'd
16 undertaken the public order Bronze commander course.
17 Did that mean that you were qualified to act as
18 a Bronze commander in May of 2017?

19 A. It does.

20 Q. Was that a Bronze commander course specific to British
21 Transport Police or was it a national level course?

22 A. It was a national course.

23 Q. In May 2017, had you read — by May 2017, I should
24 say — had you read the BTP major incident manual?

25 A. I will have read it at some point.

9

1 Q. Were you familiar in May 2017 with its important
2 principles?

3 A. Yes.

4 SIR JOHN SAUNDERS: I'm really sorry, I just want to go back
5 to something we've left. Is this a fair synopsis: that
6 when you're considering events at the arena, so you are
7 concerned about the nature of the people who are going
8 there or their propensity for crime, the mere fact of
9 how large the audience would be was only really relevant
10 to you for a consideration of getting them in and out,
11 moving, where they were going?

12 A. On a weekly basis we would get the information from the
13 arena, which was: give us the audience profile, the
14 number, the times, and we would review that.
15 Particularly Michelle would review that and look at what
16 resources, how many officers we would need dependent on
17 that information contained within that flyer.

18 SIR JOHN SAUNDERS: Without blockages and stuff like that?

19 A. Yes. Obviously, their ingress points and egress points
20 would be considered based on the amount of people that
21 there were due to attend.

22 SIR JOHN SAUNDERS: Okay. In reality, and this is without
23 the benefit of hindsight, at the time were you thinking
24 there's 20,000 people going to be there, that makes it
25 a potential terrorist target?

10

1 A. The consideration of being a terrorist target was
2 throughout all of the concerts.

3 SIR JOHN SAUNDERS: Okay — no, no, I really want to know,
4 are you saying once you've got a particular number going
5 there, it's very attractive, and therefore I am
6 consciously going to think in relation to Ariana Grande,
7 because of the numbers, that makes it a possible
8 terrorist target, actually consciously?

9 A. Yes, because every event would be considered a possible
10 terrorist target.

11 SIR JOHN SAUNDERS: Thank you. Sorry, I interrupted where
12 you'd got to.

13 MR DE LA POER: Not at all, sir.

14 We were just about to look at the major incident
15 manual. We've done so with a number of witnesses and
16 there are just two parts I would like you to look at.
17 {INQ025700/16}, please. We can see at 2.8, and I do
18 understand, Mrs Graham, that the issue of whether you
19 were or weren't a Bronze commander is one that you will
20 be giving evidence about in due course, but this is what
21 it says about a Bronze commander.

22 We can see that they will be:
23 "... appointed by the Silver commander, dictated by
24 the scale and nature of the major incident. The Bronze
25 commander role may be created and reviewed as the

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1 incident progresses through its different phases. This
2 will be a decision for the BTP Silver commander.
3 Bronze commanders must have a clear understanding of the
4 Silver commander's tactical plan."

5 And then it goes on to say that the roles and
6 responsibilities are outlined in a page that I'm not
7 going to take you to.

8 Going to that phrase:
9 "The Bronze commander must have a clear
10 understanding of the Silver commander's tactical plan".

11 In the course of your involvement with the emergency
12 response to the arena attack, from when you first became
13 aware up until 01.30 in the morning, did you have
14 a clear understanding of the Silver commander's tactical
15 plan?

16 A. No.

17 Q. {INQ025700/21}, please. There are three paragraphs here
18 under 3.0 and we're going to look at each of them.

19 As we're all very familiar now:
20 "The Gold (strategic), Silver (tactical) and Bronze
21 (operational) tiered command structure used by police
22 and other responding agencies are nationally recognised
23 and accepted terms. The command structure is defined by
24 role rather than rank.
25 "Each organisation that attends a major incident is

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1 responsible for all personnel they have deployed to the
 2 scene and will have their own command structure. Every
 3 person on site should be aware of who they directly
 4 report to within their own organisation and also
 5 understand who they liaise with across organisations.
 6 "Command resilience is the ability to function
 7 effectively for a period of time and commanders should
 8 consider this from the outset of the incident. Handover
 9 procedures between commanders must be robust to ensure
 10 a continuity of the management of the major incident."
 11 Let's just pick out two aspects of this, although
 12 it's all interrelated. It says every person on site
 13 should be aware of who they directly report to within
 14 their own organisation.
 15 In the course of your involvement up until 01.30,
 16 did you understand and have a clear recognition of who
 17 you directly reported to within BTP?
 18 A. Yes.
 19 Q. Was that the same person throughout the incident or
 20 throughout the period up to 01.30 or did it change?
 21 A. It changed at 01.27.
 22 Q. So before 01.27, who was it that you understood that you
 23 directly reported to?
 24 A. Silver, so Chief Superintendent Gregory.
 25 Q. And from 01.27?

13

1 A. Superintendent Gordon.
 2 Q. It says:
 3 "And also understand who they liaise with across
 4 organisations."
 5 Did you have an understanding in the period up to
 6 01.27 who you should liaise with across organisations?
 7 A. My liaison across the other organisations with Greater
 8 Manchester Police was Inspector Smith.
 9 Q. Was there anyone else within GMP that you believed that
 10 you needed to liaise with?
 11 A. Later on in the evening, around 1 o'clock, yes.
 12 Q. Who was that?
 13 A. Chief Inspector Dexter.
 14 Q. What about liaison with any other emergency service on
 15 the scene?
 16 A. There was another liaison from GMP, which was the
 17 detective superintendent from counter-terrorism. From
 18 other organisations, not emergency services.
 19 Q. So as you understood your responsibilities on the night,
 20 you didn't think that you had an obligation to liaise
 21 with anyone outside GMP?
 22 A. I wouldn't say not an obligation, but there was
 23 nobody -- I didn't see anybody at the scene to liaise
 24 with other than those people.
 25 Q. The third paragraph deals with the handover procedure

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1 and states in terms that it must be robust. At any
 2 point in the incident did you have a robust handover to
 3 you?
 4 A. No.
 5 Q. At any point in the incident did you have a robust
 6 handover to somebody else?
 7 A. Yes.
 8 Q. Who was that and when was that?
 9 A. That was at 01.27 to Superintendent Gordon.
 10 Q. Bearing in mind that you are handing over to him,
 11 what was it that you were handing over if nothing had
 12 been handed over to you? Do you see?
 13 A. I see. I was handing over in my mind the incident
 14 command of the scene to Superintendent Gordon once he
 15 arrived. I had an initial conversation when I arrived
 16 on scene with Sergeant Cawley, who at that time was the
 17 most senior officer from the very early stages of the
 18 incident, but I wouldn't say that it was robust.
 19 Q. Let's remove the word "robust". Did you have a handover
 20 from Sergeant Cawley?
 21 A. I had a situation report.
 22 Q. Was the effect of that report to hand over a command
 23 role or was that simply a briefing so that you knew
 24 a bit more?
 25 A. A briefing.

15

1 Q. If you were handing over as, and I hope I've remembered
 2 this correctly, the scene command, is that the phrase
 3 you would use?
 4 A. I would.
 5 Q. To Superintendent Gordon, at what point had you become
 6 the scene commander?
 7 A. On my arrival at Victoria Station.
 8 Q. So you're in command of, and we'll come to the timings
 9 of it, the scene so far as you're concerned from your
 10 arrival and you handed over that scene command to
 11 Superintendent Gordon at 01.27?
 12 A. Correct.
 13 Q. All right. We'll look at that when we come to the
 14 detail of the chronology.
 15 What I propose to do is to move to that now,
 16 Mrs Graham. Can I just make this clear to everybody
 17 listening and everybody watching, that it seems to me
 18 that the best way for us to do this together is to look
 19 at images from the emergency response sequence of
 20 events. These are images that have already been shown
 21 in the course of the inquiry. They show rooms within
 22 the Victoria Station complex, including the City Room,
 23 but they have been redacted in order to remove overtly
 24 distressing material, but I want everybody to have
 25 a very clear understanding that we are going to return

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1 to looking at images of those type throughout the rest
 2 of your evidence until very near the end. So if anybody
 3 wishes to step away from watching or just prepare
 4 themselves for a moment, then I'm just going to pause.
 5 SIR JOHN SAUNDERS: Let me take advantage of that to ask you
 6 to clarify this for me: what is the difference in
 7 practice between being scene commander and
 8 Bronze commander?
 9 A. In my mind, nothing.
 10 SIR JOHN SAUNDERS: Okay. So you're very deliberately, it
 11 seems to me, not describing yourself as Bronze commander
 12 but you are actually doing the same job?
 13 A. Mm.
 14 SIR JOHN SAUNDERS: Okay.
 15 MR DE LA POER: Is it important to you or do you see
 16 an important distinction that is worth drawing between
 17 the two titles?
 18 A. I think the confusion comes with some of the descriptive
 19 responsibilities of Bronze. However, reflecting on my
 20 duties on the night, there would be no difference of
 21 what I did as a Bronze commander or an incident
 22 commander. I think perhaps there is a play on words
 23 in relation to the role and I don't see that there's
 24 very much difference.
 25 SIR JOHN SAUNDERS: Thank you.

17

1 MR DE LA POER: As the incident or scene commander, would
 2 you have the same obligations as a Bronze commander?
 3 A. Without being familiar with the incident commander
 4 role — it's quite a while since, obviously, I've been
 5 in that role. I don't see them being majorly different
 6 at all.
 7 Q. We'll have a look at what you did do and then come back
 8 to this issue. We will begin with your account of the
 9 events of 22 May. You gave an interview to the BBC;
 10 is that right?
 11 A. That's correct.
 12 Q. And approximately how long after 22 May was that
 13 interview?
 14 A. I can't give you specific dates. I think around
 15 6 months later.
 16 Q. All right. What you told the BBC in that interview was
 17 that you believed that you learned of the attack at
 18 about 10.35. That's the time you give there. We can
 19 look at it if you want, but that's what you say in that
 20 interview.
 21 A. I think in that interview I didn't have my data from my
 22 phone log, so I think that is a much earlier time than
 23 actually when it happened.
 24 Q. We also have, I think, a time that you gave on 28 June
 25 of 2017, 22.40 hours. That's in your first statement.

18

1 Again, sitting there now, do you think that was about
 2 the time you first learned of it or was it later?
 3 A. No, it was later. I know it was later.
 4 Q. Why do you know it was later?
 5 A. Because I can see from my mobile telephone call data the
 6 time I phoned into the control room.
 7 Q. I think we're going to come to that, but there is audio
 8 of that at 23.08?
 9 A. That's correct.
 10 Q. So how soon before 23.08 do you think it was that you
 11 learned of it?
 12 A. Seconds.
 13 Q. I think it was your husband who notified you first?
 14 A. Mm—hm.
 15 Q. He drew it to your attention and at the time I think it
 16 was necessary for you to dress yourself appropriately to
 17 leave the house?
 18 A. Yes.
 19 Q. We'll move to that audio call. You should have an audio
 20 schedule there, where we will be able, I think, to infer
 21 where exactly you were when you made this call.
 22 23.08.38. It begins, do you agree:
 23 "Hello, ma'am."
 24 And you reply:
 25 "Hello, it's Andrea Graham."

19

1 They say hello. You say:
 2 "What's the situation at Manchester? I know you're
 3 busy but..."
 4 Then the speaker says:
 5 "I've called it a major incident."
 6 So it's likely that was Inspector Dawson who was the
 7 person who called the major incident and was the FIM,
 8 but the identity of the speaker perhaps doesn't matter.
 9 You get informed that there are a number of people
 10 who are deceased and other casualties, and then you say:
 11 "I'll get myself in."
 12 A. Correct.
 13 Q. "I'll get myself in" might imply that you are at home
 14 or —
 15 A. That's right.
 16 Q. — somewhere else. Is that where you were?
 17 A. It was, I was in bed.
 18 Q. At 23.08, you make contact with control. The
 19 conversation, as we can see, concludes with them saying
 20 that they would like you to do that. Did you then make
 21 your arrangements and leave the house?
 22 A. I did.
 23 Q. Approximately how long after 23.08 do you think it was
 24 that you left the house?
 25 A. Around 10 to 15 minutes later.

20

1 Q. We do not need anything like the exact location, but
 2 at the time was your home about 3 miles from the arena?
 3 A. That's correct.
 4 Q. Did you have access to a car?
 5 A. I did.
 6 Q. And did you drive in the direction of the
 7 Peninsula Building?
 8 A. I did.
 9 Q. Were you able to get there without any major
 10 interruption or was there any interruption on your
 11 journey?
 12 A. I went through a cordon, I showed my warrant card and
 13 got through, quite a far-out cordon, so I could get to
 14 Peninsula.
 15 Q. Why were you going to the Peninsula Building rather than
 16 directly to the arena?
 17 A. That's where my protective equipment is and my radio.
 18 Q. Why did you think you needed those items in particular?
 19 A. I needed the means of communication, my radio, and
 20 I needed protective equipment because of what I possibly
 21 knew I was going to be faced with.
 22 Q. Approximately what time do you think you arrived at
 23 Peninsula?
 24 A. 23.38.
 25 Q. That's more precise than approximately. Why do you

21

1 think 23.38?
 2 A. Because I had my radio and I'd got myself ready and was
 3 leaving at 44, because I book on duty at 44, and
 4 informing control room that I'm en route to the scene.
 5 Q. We're coming to that broadcast. 23.43, the second entry
 6 in the schedule. We can go right to the middle, you
 7 say:
 8 "PM20 to BX. Go ahead. Can you show me on duty and
 9 on way to scene please?"
 10 That statement there, where were you when you
 11 broadcast that, please?
 12 A. Just leaving the office.
 13 Q. It's a short distance, isn't it?
 14 A. It is.
 15 Q. How did you choose to get to the scene?
 16 A. I was about to just walk because, as you say, it's very
 17 short. However, as I was leaving, a scenes of crime
 18 officer, Alan Davies, returned to the scene to pick up
 19 some extra equipment and he grabbed what he needed and
 20 I got in the car with him in order to get there quicker.
 21 Q. Why did you think it would be quicker to go in the car
 22 rather than walking what is about 100 metres or so?
 23 A. If I'd walked, I would have had to go in through the
 24 back entrance, whereas the vehicle could take me
 25 straight into the station.

22

1 Q. Was it your understanding it was the station you needed
 2 to go to as opposed to any other part of that complex?
 3 A. Yes, it was the RV point.
 4 Q. Who had told you that the station was the RV point?
 5 A. It wasn't. It was the Fishdock car park, which is at
 6 the side of the station where -- I'd probably have
 7 noticed it as I drove through because I had to pass it
 8 to get to Peninsula and I could see all the other
 9 emergency vehicles there.
 10 Q. You mentioned the Fishdock car park. Had somebody told
 11 you that the Fishdock car park was the rendezvous point?
 12 A. No.
 13 Q. Had you seen any activity at the Fishdock car park that
 14 had led you to believe that that was the right place for
 15 you to go?
 16 A. Yes, because when I drove in my own personal vehicle
 17 I passed that through the cordon.
 18 Q. And what could you see at the Fishdock car park that led
 19 you to believe that that was the rendezvous point?
 20 A. Just a large number of emergency service vehicles.
 21 Q. We are going to turn now to look at the first of the
 22 images, which is at 23.56. Mr Lopez, the emergency
 23 sense sequence of events please, {INQ035612/419}.
 24 You are there picked out at 23.56 on the raised
 25 footbridge. That's the first image I've been able to

23

1 identify in here, but plainly you have been within the
 2 complex in order to get there. Did you enter via one of
 3 the entrances on Station Approach?
 4 A. I entered through the side entrance, past the
 5 Marks & Spencer's, on to the main concourse.
 6 Q. Is that the entrance that runs parallel to Station
 7 Approach?
 8 A. Yes.
 9 Q. Did you make your way straight to this point or did you
 10 speak to anyone on the way?
 11 A. I spoke to, from recollection, Sergeant Cawley at the
 12 bottom of the stairs, which is before this shot.
 13 Q. We can take this image down for the time being so that
 14 we can understand that evidence. Before 23.56, you
 15 believe you had a conversation with Sergeant Cawley?
 16 A. Mm-hm.
 17 Q. Was he the first person you spoke to within the scene?
 18 A. From recollection.
 19 Q. Was it chance that you just happened to encounter him or
 20 had you sought him out?
 21 A. It was chance because he was at the bottom of the stairs
 22 that I needed to move up to get to this location.
 23 Q. By that stage did you know that he had broadcast
 24 a METHANE message?
 25 A. No.

24

1 Q. By that stage did you know that Silver had specifically
2 asked him to provide a scene update?
3 A. No.
4 Q. When you spoke to Sergeant Cawley, what did you say?
5 A. I can't exactly remember. The one thing that I do
6 remember is asking him for a situation report about the
7 injured and whether we had officers injured at the
8 scene.
9 Q. Did he give you that report?
10 A. He said, "I don't think so".
11 Q. Just answer my next question yes or no: did he give you
12 any more information in your conversation with him?
13 A. I don't remember.
14 Q. About how long did it take?
15 A. It was a moving conversation.
16 Q. Did you form any view at that stage about who had
17 incident command so far as BTP was concerned?
18 A. My view was that I didn't see any other commander from
19 British Transport Police of a higher rank than myself,
20 so no, that was my recollection, that I was the higher
21 rank there when I attended from BTP.
22 SIR JOHN SAUNDERS: The fact you couldn't see one doesn't
23 actually mean there wasn't one there, does it? Would
24 you not want to know from Cawley who's the senior here?
25 A. I didn't ask him.

25

1 SIR JOHN SAUNDERS: You did?
2 A. I didn't ask him, but I had made numerous attempts to
3 contact other senior officers en route, and I did have
4 a conversation with Alan Davies in the car, who didn't
5 inform me that there was any other officers of a similar
6 or higher rank than myself, so I came to the conclusion
7 that it was me.
8 SIR JOHN SAUNDERS: It would just seem easier to ask them,
9 Mr Davies and Sergeant Cawley, rather than come to
10 a conclusion, really.
11 A. I could well have done. In hindsight, yes, you are
12 right, I could have asked them, but I can't say that
13 I did or I didn't.
14 SIR JOHN SAUNDERS: Okay, thank you.
15 MR DE LA POER: You're the senior rank on scene so far as
16 you're concerned?
17 A. Yes.
18 Q. Who, if anyone, did you think you were relieving of
19 incident command?
20 A. I didn't.
21 Q. Again, looking back on it, was that a relevant
22 consideration? I'll give you an example. If there was
23 somebody else who thought they had incident command,
24 they may be somewhere else in the station acting in that
25 way, not realising that you were taking over and perhaps

26

1 developing a different plan or direction to them.
2 A. There could have been, but I never asked the question.
3 Q. We've seen that still at 23.56. If we have a look
4 at the audio schedule, we can see that your presence on
5 scene is confirmed, we don't know who the speaker is or
6 precisely where they are, but the controller asked at
7 23.57.16:
8 "Enquiry from Silver, is Andrea Graham on scene?
9 Over."
10 To which an unknown speaker, as they are at the
11 moment:
12 "Yes, she just walked past me. Thank you."
13 Plainly you were on scene because we can see you
14 were on the footbridge a minute or so earlier.
15 We're going to look now at a sequence. I hope that
16 we won't need to dwell on them, but if you need to pause
17 to read the text or orientate yourself, please do so.
18 It will be a sequence of images of you on the raised
19 footage.
20 Mr Lopez, {INQ035612/419}, please. That's where
21 we were. We can see in the bottom still you're picked
22 out at 23.56.28. I am just going to move through these
23 and then, because they cover a relatively short period
24 of time, just see if we can remember or you can
25 remember, rather.

27

1 So that's 23.56.28. Then if we go to
2 {INQ035612/424}, we can see you picked out at just after
3 midnight in that top still and I think it might be you
4 just to the right of that box in the bottom still.
5 You're not picked out in it, but that might be you from
6 the hat.
7 A. Mm—hm.
8 Q. Then we have {INQ035612/427}. You're now walking in the
9 company of another BTP officer towards the City Room.
10 We are going to come to the City Room in a moment.
11 Just to refresh your memory, this is a period of 3
12 or 4, perhaps as many as 10, minutes in and around the
13 same area, on the raised footbridge. What is your
14 recollection of what you were doing during that period?
15 A. I know — I took a phone call from Chief Inspector
16 Malcolm McKinnon during that time. I also located and
17 spoke with Sergeant Neil Wildridge at the top of those
18 stairs and had a conversation with him about cordons and
19 a scene log being commenced. And the person that you
20 can see that I'm talking to there, the other BTP
21 officer, is PCSO Dax Byrne—Turner, who ultimately ended
22 up taking some notes as a loggist for me.
23 Q. We can see — if we can then, just so that everybody
24 understands how that situation evolved, Mr Lopez,
25 {INQ002009/3}.

28

1 We can see this is PCSO Byrne—Turner's notes and the
 2 top one we can see:
 3 "00.02, CI Andrea Graham."
 4 And there's a reference to a scenes of crime
 5 officer .
 6 So we can take that down for now.
 7 An example for everybody to see that at around this
 8 time, that PCSO is starting to make a record of their
 9 activity with you. I think that will develop into
 10 a more formal log?
 11 A. That's right.
 12 Q. You have mentioned a conversation with Chief
 13 Inspector McKinnon.
 14 Mr Lopez, what I would like us to do is to bring up
 15 on screen page 71 {INQ002000/70}. If you could crop
 16 into the very top of that.
 17 We'll need to just see a little more of the text.
 18 This is the log that I have been dealing with other
 19 witnesses with, that we haven't been showing on screen,
 20 but I think that this is possible.
 21 We can see here at 00.02.07, so whilst you are on
 22 that bridge, CI McKinnon has made an entry — so this
 23 somebody else's entry, do you agree?
 24 A. That's right.
 25 Q. So this is not you writing it down, this is somebody

29

1 else:
 2 "I have liaised with CIU Graham."
 3 What is the U a reference to or might that be a
 4 typo?
 5 A. He does it as a uniform, so Chief Inspector Uniform
 6 Graham.
 7 Q. "... who is now on scene and provided a brief re command
 8 structure and her role as Bronze scene."
 9 That's what Chief Inspector McKinnon has written.
 10 Would that have been shortly after the conversation he
 11 had with you?
 12 A. Ten minutes later.
 13 Q. Ten minutes later? And you have checked you phone log,
 14 have you, for that?
 15 A. That's right.
 16 Q. So 10 minutes later. We can take that down, thank you
 17 very much indeed, Mr Lopez.
 18 What you say in your second statement — again we
 19 can turn to it, but I will just remind you. You said:
 20 "I don't remember the details of that conversation."
 21 A. No.
 22 Q. So you had an opportunity when preparing that statement,
 23 I think, to look at the Control Works log, you saw that
 24 entry about yourself, and that's what you were saying in
 25 your second statement? Do you have any recollection

30

1 sitting there now of the content of that conversation?
 2 A. Based on what Mr McKinnon said in his report, he says
 3 that he informs me of the command structure during that
 4 phone call.
 5 Q. Do you have a recollection of being informed of the
 6 command structure?
 7 A. I don't have a recollection of that telephone call .
 8 Q. The other note is that your role is Bronze scene.
 9 Again, do you have any recollection — is it just that
 10 as far as you're concerned in your memory that didn't
 11 happen? I'm not suggesting that's what you're saying,
 12 there's just a blank there?
 13 A. I just don't remember him specifically saying at that
 14 moment in time what he said to me during that phone
 15 call .
 16 SIR JOHN SAUNDERS: What did you not know about the command
 17 structure? You had spoken to Silver?
 18 A. No, I hadn't spoken to Silver at this point.
 19 SIR JOHN SAUNDERS: Did you know who Silver was?
 20 A. Only because Mr McKinnon would have told me during that
 21 telephone call .
 22 SIR JOHN SAUNDERS: Okay, thank you.
 23 MR DE LA POER: Somebody saying to you, "You are Bronze
 24 scene", using those words, looking back on it, would
 25 that have been a significant thing for you to be told?

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1 A. Yes.
 2 Q. In those precise words?
 3 A. Yes.
 4 Q. And why would it be significant?
 5 A. I would have remembered somebody saying, "You are
 6 Bronze".
 7 Q. But in your mind you were carrying out the roles and
 8 responsibilities which would be attached to Bronze?
 9 A. Yes, that's correct .
 10 Q. So why would it be significant just to have that
 11 additional word, do you think?
 12 A. I don't know, it's just the title , isn't it? But
 13 it would make no difference, it was just — I don't
 14 specifically remember anybody saying, "You are Bronze
 15 scene".
 16 Q. We'll move forward in our sequence now and we're going
 17 to look at a sequence of stills , again from the
 18 City Room, covering a period of about 10 minutes. And
 19 then we'll look at the audio schedule of what's going
 20 on.
 21 03.52. This is {INQ035612/428}. You are picked out
 22 walking across the City Room. We can just see the start
 23 of a white line emerging from the raised footbridge to
 24 show your direction of travel in the company of Police
 25 Sergeant Wildridge and the unidentified BTP officer who

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1 you've identified for us as your loggist --
 2 A. Mm--hm.
 3 Q. -- that night.
 4 {INQ035612/429}. We can see the description here at
 5 00.04:
 6 "BTP Chief Inspector Graham walks towards GMP
 7 Inspector Michael Smith and Detective Inspector Natalie
 8 Dalby."
 9 The next still is some time on, {INQ035612/430}.
 10 We can see you are in the background, the box office:
 11 "BTP Chief Inspector Graham walks around the
 12 City Room using a mobile phone which she is holding up
 13 to her right ear."
 14 That's the description given.
 15 The final one in this sequence, {INQ035612/431},
 16 just slightly less than a minute later:
 17 "GMP Chief Inspector Mark Dexter is seen to very
 18 briefly approach GMP Detective Inspector Natalie Dalby
 19 before he walks off again towards the exit doors that
 20 lead out into the Victoria Train Station."
 21 You are not identified there but it will be relevant
 22 for us to have an awareness of Chief Inspector Dexter at
 23 this time.
 24 So focusing upon you during this period -- thank you
 25 very much, Mr Lopez, we can take that down -- we get

1 a lot of assistance from the work that GMP have done
 2 around the body--worn camera or the number of body--worn
 3 cameras that were there.
 4 Can I invite your attention back to the schedule.
 5 The first one is timed at 04.56 but is unsatisfactory as
 6 a person is identified as Andrew Graham, and the
 7 introduction is transcribed as:
 8 "Hi Mike Smith, I'm Jill Graham."
 9 Which wouldn't be the way, I wouldn't expect, that
 10 you introduce yourself?
 11 A. No.
 12 Q. So we'll just set that aside. It's perhaps not
 13 important whether that is or is not you because of the
 14 next entry, because we can see, timed at 3 seconds
 15 later, that there are four people, including you,
 16 identified by your correct name. So we have Sergeant
 17 Kam Hare, Inspector Mike Smith, Darren Prince, from GMP,
 18 and you.
 19 This is the summary that GMP have given us of it:
 20 "Chief Inspector Andrea Graham from BTP arrives
 21 at the City Room. Inspector Smith provides an update to
 22 the chief inspector. They discuss the number of
 23 casualties and if BTP can provide cordons. The
 24 chief inspector states their Bronze superintendent is
 25 en route and a structure is in place."

1 Do you have a recollection of the detail of that
 2 conversation?
 3 A. A little .
 4 Q. Is that a fair summary of it?
 5 A. Yes. We also talked about CCTV during that conversation
 6 too.
 7 Q. Yes. We can see that the conversation continues in the
 8 next entry. In particular, Inspector Smith informing
 9 you:
 10 "We had an explo dog, just gone through the rest of
 11 it for us for suspicious packages. I think once that's
 12 done, happy really it 's just ..."
 13 There's an inaudible reply from you. And then
 14 a person who seems to continue to be referred to as GG,
 15 although that might be you:
 16 "Do we know roughly what time -- sorry, i just flew
 17 in -- what time?"
 18 Will that be you, "just flew in"?
 19 A. I don't know if that makes sense, "just flew in".
 20 I think GG is possibly me.
 21 Q. If we go over the page, because this conversation
 22 plainly goes on for some time, we can see that you are
 23 still speaking to Inspector Smith at 00.07.41. And then
 24 again the person identified as GG but you are identified
 25 as being one of those involved in the conversation, so:

1 "SIO, that's in situ. Take it as it stands... yeah,
 2 yeah, I've got DCs as well if you want them."
 3 Would that have been you --
 4 A. Yes.
 5 Q. -- offering BTP detective constables to help with the
 6 investigation?
 7 A. Yes.
 8 Q. We can see at 00.13.52 that you are identified as
 9 walking around the City Room using your mobile phone,
 10 which you're holding to your right ear.
 11 So that's a capture of the audio. Is there any
 12 other detail that won't have been captured by the
 13 snippets of conversation that we have there that you can
 14 recall?
 15 A. No, I was getting a briefing off Inspector Smith about
 16 their area, which had been obviously searched, and the
 17 ongoing golden hour actions that had been completed.
 18 Q. Was that phrase being used, golden hour, or was that
 19 just a shorthand for a list of identified actions?
 20 A. I don't know.
 21 Q. So we have a discussion about cordons?
 22 A. Yes.
 23 Q. A discussion about CCTV?
 24 A. Yes.
 25 Q. An offer by you of resources that were available to you

1 to support GMP?
 2 A. Correct.
 3 SIR JOHN SAUNDERS: Are you about to move on?
 4 MR DE LA POER: I am just going to develop a little of this
 5 but, sir, if you want to —
 6 SIR JOHN SAUNDERS: It's just this. On the entry 9058, the
 7 penultimate entry on the first page, we have the
 8 chief inspector — this is the last sentence of it:
 9 "Chief inspector states that Bronze superintendent
 10 is en route."
 11 And you'd had that information?
 12 A. From Mr McKinnon.
 13 SIR JOHN SAUNDERS: Right. And according to this, you go on
 14 to say:
 15 "And the structure is in place."
 16 A. Yes.
 17 SIR JOHN SAUNDERS: What structure, can you remember?
 18 A. That would be the GSB structure, so identifying
 19 Mr Gregory as Silver, and Mr Gordon as Bronze, and I'm
 20 pretty sure Chief Inspector McKinnon gave me an ETA of
 21 Superintendent Gordon in that telephone call as well.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR DE LA POER: Just on the point about, "I've got DCs as
 24 well", I'll just read it out — from those notes that
 25 PCSO Byrne—Turner kept we can see that there is an entry

1 timed at 00.11:
 2 "Two BTP DCs liaising with GMP CID."
 3 So that appears to be consistent with what you're
 4 talking about there in terms of the offer of resources
 5 to GMP?
 6 A. That's correct.
 7 Q. We know that the indication or the summary is that you
 8 were on your mobile telephone for a period of time.
 9 A. Mm—hm.
 10 Q. I'm just going to bring up a document that we looked at
 11 in some detail with Chief Superintendent Gregory, which
 12 is his call records.
 13 Mr Lopez, {INQ041120/1}. We'll look at the entry of
 14 00.13. We'll remember this is the period when you're
 15 said to be walking around on the mobile telephone in the
 16 City Room. We can see a telephone call from you to
 17 Chief Superintendent Gregory lasting 5 minutes and
 18 58 seconds. Do you have a recollection of speaking to
 19 Chief Superintendent Gregory whilst you were in the
 20 City Room?
 21 A. I do.
 22 Q. What was the content of your discussion with him,
 23 please?
 24 A. He needed a situation report of what the scene was and
 25 what I could see. I specifically remember him telling

1 me that I was his eyes and ears and to describe the
 2 scene and to pass over what information I'd been able to
 3 glean since I arrived on scene.
 4 Q. Did you form any impression about whether or not you
 5 were the Bronze commander so far as he was concerned
 6 pending the arrival of Superintendent Gordon?
 7 A. He did not inform me that I was the Bronze commander at
 8 that time. However, from the conversation, it was clear
 9 that I was the most senior BTP officer at the scene.
 10 Q. We can see that by the book, we looked at the major
 11 incident manual, the Bronze commander is designated as
 12 such by Silver?
 13 A. Yes.
 14 Q. Would you expect to have an explicit instruction for
 15 that role from the Silver commander or in practice does
 16 it develop in other ways as well?
 17 A. It develops in other ways as well.
 18 SIR JOHN SAUNDERS: You say it develops, but it's perfectly
 19 obvious because it was obvious to you, as you were
 20 incident commander, that you were Bronze commander;
 21 is that right?
 22 A. It was obvious that I was in charge of the scene at the
 23 time.
 24 SIR JOHN SAUNDERS: Which makes you Bronze commander in
 25 practice?

1 A. If ...
 2 SIR JOHN SAUNDERS: I'm just really... We're talking about
 3 something without a difference, it seems to me.
 4 A. It is just a word, it is a word, and the difference
 5 between — what I don't specifically remember is
 6 somebody saying, "You are Bronze".
 7 SIR JOHN SAUNDERS: Okay.
 8 MR DE LA POER: We're going to move forward in time. We
 9 just saw Chief Inspector Dexter on the last slide .
 10 {INQ035612/437}. You were last captured at
 11 00.13.52. We're now at 00.17.40 and you are out on the
 12 footbridge using your mobile telephone, which given that
 13 you had that long call with Chief Superintendent
 14 Gregory, would account for this period also.
 15 At {INQ035612/444}, please, we can see you are
 16 making your way down to the station concourse. Can you
 17 recall what prompted you, Mrs Graham, to leave the
 18 City Room and for what purpose were you travelling to
 19 the station concourse?
 20 A. That image there is me liaising with the EOD that
 21 arrived on scene and I was specifically asked to liaise
 22 with them. They were located on the top of the stairs
 23 on to the station there.
 24 Q. Who had asked you?
 25 A. I think Dax Byrne—Turner had taken the information from

1 the radio whilst I was on the phone and then relayed it
 2 to me that the EOD had arrived on scene and wished to
 3 speak to me.
 4 SIR JOHN SAUNDERS: I have momentarily forgotten what EOD
 5 stands for.
 6 MR DE LA POER: Explosives ordinance ---
 7 A. The army.
 8 MR DE LA POER: The D eludes me for the moment.
 9 SIR JOHN SAUNDERS: Perhaps I wasn't the only one who wasn't
 10 aware what we were talking about.
 11 MR DE LA POER: Explosive ordinance department, I think, but
 12 I will be told if I am wrong about that, but certainly
 13 bomb experts from the army.
 14 If we just take that down for a moment, Mr Lopez.
 15 We've got a situation here where you have spoken to
 16 Inspector Smith, you've spoken to Silver, you've been
 17 told that there are important people to the response
 18 that have arrived that you are to liaise with. While
 19 all this was going on, taking us right up until this
 20 point, had you given any thought to who was in charge
 21 overall of the scene?
 22 A. When I spoke to Inspector Smith, I'm pretty certain at
 23 this point he informed me that counter-terrorism were
 24 en route to the scene and I am aware that if an incident
 25 is classed as counter-terrorism, then the Home Office

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1 force would take the scene.
 2 Q. Up until that point where Inspector Smith gave you that
 3 information, this has occurred in an area where BTP has
 4 jurisdiction to act as a constable ---
 5 A. Correct.
 6 Q. Did the question of primacy, ie which force was taking
 7 the lead, occur to you?
 8 A. No.
 9 Q. Once you heard reference to counter-terrorism, is that
 10 when who is taking the lead came to the front of your
 11 mind?
 12 A. Yes.
 13 Q. And from that moment onwards, did you think it was BTP
 14 that were taking the lead on the scene?
 15 A. On the scene --- I don't think that I considered it at
 16 that point. I'd only been on scene minutes before
 17 I spoke to Inspector Smith, about 6 or 7 minutes, and
 18 I was very much assessing the situation and gaining as
 19 much information about the scene as I could. I don't
 20 think it entered my mind at that point who would be the
 21 lead organisation.
 22 SIR JOHN SAUNDERS: What we've heard from BTP officers on
 23 the scene, constables, is if they came across a sergeant
 24 from GMP, then he's senior to them, so he takes command
 25 and vice versa. If you have a sergeant from GMP and

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1 someone from BTP and someone of junior rank, then again
 2 it's the senior officer.
 3 A. Mm-hm.
 4 SIR JOHN SAUNDERS: So did you see anyone there who was more
 5 senior to you?
 6 A. Not until the superintendent from counter-terrorism
 7 arrived.
 8 SIR JOHN SAUNDERS: You've got to go --- it's all very well
 9 CT are coming, but actually you have to have someone in
 10 charge ---
 11 A. There was nobody more senior than me at those very early
 12 stages.
 13 MR DE LA POER: Help us understand how it works in practice
 14 because obviously we have what has been said about it
 15 outside of this incident, but on the face of it, on
 16 a rank basis, you outrank Inspector Smith?
 17 A. That's correct.
 18 Q. So you would be, on a rank basis, able to tell him what
 19 to do and expect him to follow it. Was that the
 20 relationship you had with Inspector Smith on the night?
 21 A. No, because the conversation that I had with him was
 22 obtaining the information that I needed from him about
 23 what actions have been completed. I think as a result
 24 of that conversation, I instigated some more actions and
 25 we very much worked together, but there was not

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1 a requirement for me to give him direction at that point
 2 because the things that I needed to do were not in his
 3 control.
 4 SIR JOHN SAUNDERS: Okay, we've got the situation whereby
 5 you're trying to get the information in with a view to
 6 you telling people what to do if you considered that
 7 necessary.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: But it wasn't you say he's from GMP,
 10 he's only an inspector, but he's in charge because
 11 they've got primacy?
 12 A. No.
 13 SIR JOHN SAUNDERS: You're the person of senior rank and if
 14 you think an order is necessary, people need to be doing
 15 something, you will do that?
 16 A. Yes.
 17 MR DE LA POER: Did any part of the conversation you had
 18 with him involve him asking you to arrange something?
 19 A. No.
 20 Q. Again, although it doesn't arise and it may be that it's
 21 therefore an impossible question for you to answer, but
 22 had Inspector Smith said, "I want you to get all of your
 23 BTP officers to do this right now", what would your
 24 thinking be around that in terms of what your training
 25 had prepared you for?

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1 A. If it was a logical request and it meant we were getting
 2 things done, I'd have done it.
 3 SIR JOHN SAUNDERS: You'd have assessed whether it was the
 4 right thing to do?
 5 A. Yes.
 6 MR DE LA POER: So we had reached a point where you were
 7 speaking to members of the army on the raised
 8 footbridge. If we go to {INQ035612/447}, please,
 9 Mr Lopez, we'll track you descending the staircase to
 10 the station concourse where the text indicates you have
 11 a brief conversation with a BTP officer.
 12 Then at {INQ035612/452}, we have you on the station
 13 concourse in the company of your loggist, as it's
 14 identified there.
 15 A. Mm—hm.
 16 Q. I'm not going to show this, although distressing images
 17 have been redacted from it, but at 00.39.59, you are
 18 seen in the vicinity of the casualty clearing station.
 19 Whilst this period is going on, so we're talking
 20 about the period of about 00.25 through to about 00.40,
 21 there are some important telephone calls.
 22 The first one, based upon what you said in your
 23 second statement, I don't think you had a recollection
 24 of; that's one with Superintendent Gordon. Have you
 25 managed to investigate that for yourself via your mobile

1 telephone records?
 2 A. That's correct.
 3 Q. And are you able to confirm that your records reveal
 4 a telephone conversation at 00.26 hours, lasting
 5 4 minutes and 43 seconds?
 6 A. That's correct.
 7 Q. Bearing in mind in your second statement you didn't have
 8 a recollection of it, has that memory improved at all?
 9 A. No.
 10 Q. But do you agree that it must be the case that you spoke
 11 to Superintendent Gordon for a period of time?
 12 A. That's correct.
 13 Q. Bearing in mind your training and how you would expect
 14 yourself to conduct such a conversation, what would be
 15 the main areas for that conversation so far as you were
 16 concerned in that situation?
 17 A. I would talk to him about the scene, what actions had
 18 been completed, what our concerns are, what the risks
 19 were, resources.
 20 SIR JOHN SAUNDERS: You'd probably want to know when he was
 21 going to get there?
 22 A. Yes.
 23 MR DE LA POER: We also have contact during this period with
 24 Chief Superintendent Gregory.
 25 Mr Lopez, {INQ041120/3}.

1 We'll see at 00.28, when that comes up, there's
 2 a 26—second call from Chief Superintendent Gregory.
 3 That will have been whilst you were speaking to
 4 Superintendent Gordon, so it may very well be that
 5 that's an answerphone. A more substantial contact at
 6 00.32, after you'd spoken to Superintendent Gordon,
 7 2 minutes and 11 seconds. Do you have a recollection of
 8 speaking to Chief Superintendent Gregory whilst you were
 9 on the station concourse?
 10 A. I know that I spoke to him on a couple of occasions and
 11 then later in the evening, just an ongoing situation
 12 report. I also know that I asked him to confirm about
 13 family liaison officers being en route to the scene and
 14 it was an ongoing update for Silver.
 15 SIR JOHN SAUNDERS: Family liaison officers for whose
 16 families?
 17 A. For people that needed support at the scene. Not police
 18 families.
 19 SIR JOHN SAUNDERS: No, we're talking about officers?
 20 A. No.
 21 SIR JOHN SAUNDERS: Okay.
 22 MR DE LA POER: So victims?
 23 A. Victims.
 24 Q. And other eventgoers who might need support?
 25 A. Yes.

1 SIR JOHN SAUNDERS: Did you know whether that was already
 2 being provided by GMP?
 3 A. I know I asked Mr Gregory to confirm that it'd be
 4 actioned. I don't know whether I had spoken to —
 5 I have some recollection I had spoken to Inspector Smith
 6 about it, about whether we'd asked for them. I just
 7 wanted Mr Gregory to confirm that we had them on the
 8 way.
 9 SIR JOHN SAUNDERS: And they would be provided by GMP?
 10 A. Both.
 11 SIR JOHN SAUNDERS: Both? Okay, thank you.
 12 MR DE LA POER: We're going to move forward from the station
 13 concourse, but such is the support that I have, sir,
 14 behind the scenes that I have had at least two emails
 15 telling me what EOD stands for.
 16 SIR JOHN SAUNDERS: None of us know what it is, but we all
 17 don't like to admit we can't remember what it stands for
 18 at the time.
 19 MR DE LA POER: Explosive ordinance disposal.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR DE LA POER: We'll look at another sequence now covering
 22 the period 00.40 through to about 00.50. Mr Lopez, if
 23 we can go back, please, to our sequence of events,
 24 {INQ035612/484}.
 25 Start with this. We can see the bottom still.

1 You are on the raised footbridge walking towards the
 2 City Room. The time is 00.41.14. And we can see
 3 {INQ035612/488}, although it's all been redacted, there
 4 is a description:
 5 "[You] walk across the City Room heading towards the
 6 arena entrance closely followed by GMP Chief Inspector
 7 Mark Dexter who is walking in the same direction."
 8 And then {INQ031612/490}:
 9 "Chief Inspector Graham walks towards where GMP
 10 Detective Superintendent Denise Worth, GMP Detective
 11 Inspector Natalie Dalby, and GMP Detective Inspector
 12 Neil Haywood are located."
 13 Do you recall speaking to the CID officers from GMP?
 14 A. No.
 15 Q. We saw that the description there was of Chief Inspector
 16 Dexter walking behind you; were you aware of his
 17 presence at that time?
 18 A. No.
 19 Q. We know from PCSO Byrne—Turner's log that there is an
 20 entry at 00.41, so about this time, where it's indicated
 21 that you are briefing DC Julian Hopkins about CCTV.
 22 A. That's correct.
 23 Q. Do you have a recollection of that?
 24 A. Yes.
 25 Q. Tell us why you were doing that.

1 A. I was very concerned at the time about the area that
 2 we were working in and what had been done to ensure the
 3 safety of that area. My initial considerations were
 4 that the best evidence would be to review the CCTV to
 5 make sure — we were getting lots of conflicting reports
 6 about what had actually happened and although we were
 7 searching the area and I was making sure that the area
 8 around had been — the PoSA, the police search
 9 advisers, were coordinating searches to make sure that
 10 it was safe, the best way to try and find out what had
 11 actually happened and who was responsible would be to
 12 review the CCTV.
 13 So DC Hopkins and DC Haviland were instructed to go
 14 to the control room and look at the CCTV to try and
 15 ascertain the events before the explosion.
 16 SIR JOHN SAUNDERS: So these are BTP officers?
 17 A. They are.
 18 MR DE LA POER: Did GMP, probably in the form of
 19 Inspector Smith, know that this was a task that you were
 20 arranging to happen?
 21 A. The very initial discussion that I had with
 22 Inspector Smith at just after midnight was in relation
 23 to if anybody had reviewed the CCTV and nothing had come
 24 forward since that initial conversation and before this,
 25 even though I'm liaising with Julian, he'd been tasked

1 to go, Julian Hopkins, and try and view that CCTV
 2 earlier.
 3 Q. Help us to understand as a task that you are arranging
 4 to occur at the scene and how that interacts with GMP.
 5 Was the situation that you said to Inspector Smith,
 6 "We'll do the CCTV investigation, you can leave that
 7 with me, you carry on with what you're doing, I'll get
 8 my officers to do that", or was this something that was
 9 just happening in parallel with what GMP was doing?
 10 A. So I asked Inspector Smith initially if the CCTV had
 11 been reviewed and he informed me that he had some
 12 technical officers in the control room, but there was no
 13 definitive answer that they were doing anything and
 14 I was really concerned that I wanted to make sure that
 15 we had that action in hand and that we didn't lose the
 16 evidence of what that CCTV would reveal.
 17 Q. Did you tell Inspector Smith that that's what you were
 18 going to arrange to happen?
 19 A. I can't recall whether I told him, but I know that the
 20 conversation with DC Hopkins took place in the City Room
 21 quite quickly after that initial conversation with
 22 Inspector Smith.
 23 Q. I'm sure you'll understand, Mrs Graham, I'm just trying
 24 to understand how coordinated or otherwise the entirety
 25 of the police response was, whether we have two

1 relatively senior officers from each doing what they're
 2 doing, talking to each other, or whether it's one police
 3 service operating under a joint plan. Which do you
 4 think is the better description?
 5 A. I can't absolutely confirm that I said to
 6 Inspector Smith that I would take on and send officers
 7 to the CCTV — I know we had a discussion but I can't
 8 confirm that he understood that that's what I was going
 9 to do.
 10 Q. So far as your understanding of JESIP, combined with the
 11 idea of primacy with one police service taking the
 12 lead — were those sort of thoughts in your mind
 13 consciously as you were carrying out your duties that
 14 night?
 15 A. Consciously, I know we were working together within that
 16 City Room because of the joint action around the cordons
 17 and the fact that the search teams were a mixture of
 18 both forces, and also that Inspector Smith gave me
 19 updates in relation to the Silver meetings that were
 20 happening at the time and also the fact that the
 21 firearms officers were searching the arena and our
 22 explosive dog officers were working hand-in-hand with
 23 them.
 24 So I think from that point of view, it was a very
 25 much coordinated approach in that City Room, so I would

1 say it was a joined-up approach, but there were
 2 disjointed actions that each police force was taking on.
 3 SIR JOHN SAUNDERS: The request to go and look at the CCTV,
 4 obviously you want to preserve evidence, but in a way
 5 that is down the line.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Is it because you want to look at the
 8 CCTV to see if they could get any indication whether
 9 there were secondary devices?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: So it's the immediate safety of
 12 everybody who is there that you're asking them to look
 13 for?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR DE LA POER: We'd reached a point in our chronology when
 17 you arrived in the City Room and, for part of that
 18 period at least, Chief Inspector Dexter was behind you,
 19 but you didn't know that at the time.
 20 We are now going to look at a sequence around the
 21 boundary of the City Room and the arena concourse. It
 22 involves Inspector Dexter as well as you.
 23 Mr Lopez, {INQ035612/497}. We're just before 00.45
 24 in the morning. We can see there, on the arena side of
 25 the City Room doors, a huddle of firearms officers with

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1 Chief Inspector Dexter picked out with those white shirt
 2 sleeves on the left-hand side; do you see?
 3 A. I do.
 4 Q. That's 00.44.06. Next page, please, Mr Lopez
 5 {INQ035612/498}.
 6 00.44.23. Whilst this huddle is going on, we can
 7 see that you are, as it's described there, in the corner
 8 of the City Room by the arena doors and the description
 9 is:
 10 "Chief Inspector Graham walks through the doors
 11 leading to the arena concourse."
 12 So that will be, so everybody has the geography
 13 clear in their head, where that previous image is; is
 14 that right?
 15 A. Yes.
 16 Q. Then if we go to {INQ035612/502}, which is 2 minutes on
 17 from this, we can see it's another arena-side camera
 18 angle:
 19 "Following what appeared to be a short briefing by
 20 GMP Chief Inspector Mark Dexter, a large number of GMP
 21 firearms officers start making their way around the
 22 arena concourse."
 23 Next, {INQ035612/503}, please. We can see at about
 24 that time:
 25 "BTP Chief Inspector Graham re-enters the City Room

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1 from the arena concourse."
 2 Then at 00.47.10, {INQ035612/505}, we can see that
 3 you are standing in the vicinity of the box office
 4 in the City Room using a mobile telephone.
 5 Then finally for this sequence, {INQ035612/510},
 6 which is 3 minutes after this image, we can see that:
 7 "Chief Inspector Mark Dexter exits the arena
 8 concourse back to the City Room. He walks over towards
 9 GMP Detective Superintendent Denise Worth and appears to
 10 enter into a conversation with her."
 11 So I hope that that has refreshed your memory about
 12 events. We can take that down, thank you, Mr Lopez.
 13 Do you have a recollection that at this time in that
 14 area of the arena City Room doors seeing Chief
 15 Inspector Dexter?
 16 A. No.
 17 Q. Could you tell me whether this is right or wrong? One
 18 interpretation of what we can see in those stills
 19 is that you have gone through the arena doors, stood for
 20 a period where Chief Inspector Dexter is giving the
 21 briefing, and then walked back into the City Room
 22 without having spoken to him. And certainly there
 23 doesn't seem to be any evidence from the CCTV that you
 24 had a conversation with him in that location.
 25 Doing the best you can, what do you think was going

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1 on at this point?
 2 A. I know what I was doing at that point. I was passing
 3 a description of somebody who was deceased inside the
 4 arena to Julian Hopkins in order for them to review the
 5 CCTV.
 6 Q. Was Julian Hopkins, that's DC Hopkins, with you at that
 7 point?
 8 A. No, he was in the control room with the CCTV.
 9 Q. Were you speaking to him over the radio or by telephone?
 10 A. By telephone.
 11 Q. Do you think that you were aware of Chief Inspector
 12 Dexter at this point?
 13 A. No, I don't think I recognised him, maybe because
 14 he had -- he didn't have a hat on or he had his tactical
 15 vest over the top of a white shirt and there was lots of
 16 firearms officers in that area and I was very much
 17 concentrating on the task that I had to do inside that
 18 arena bowl and then removed myself from the scene and
 19 then carried on the phone call with DC Hopkins.
 20 Q. Was Chief Inspector Dexter somebody who you knew before
 21 22 May 2017?
 22 A. I think I had met him previously at a multi-agency
 23 meeting previously.
 24 Q. Do you think that you had spent enough time with him
 25 that you'd be able to recognise him by sight if you got

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1 a clear look at him?
 2 A. Possibly. I think I did know who he was because, later
 3 on in the evening, I did speak to him.
 4 Q. What we have in the log -- I am not going to bring it
 5 up, but I will read it out -- is that PCSO Byrne--Turner
 6 has recorded at 00.51:
 7 "PM20 [which is you] passed the description to
 8 DC Hopkins (CCTV trawler)."
 9 And that appears to accord with what you have just
 10 told us you were engaged in doing at that time.
 11 A. That's correct.
 12 Q. We'll just run through the final sequence of stills .
 13 {INQ035612/517}, please.
 14 SIR JOHN SAUNDERS: Whilst that's happening, just so we can
 15 try and put things together, or I can try and things
 16 together in my mind, we heard from SMG about police
 17 officers coming to the control room in order to look at
 18 CCTV.
 19 MR DE LA POER: Yes.
 20 SIR JOHN SAUNDERS: Are these the officers we're talking
 21 about or were they officers from GMP or don't you know
 22 and someone else will tell you in a minute?
 23 MR DE LA POER: As I understand the evidence, it accords
 24 with Chief Inspector Graham's understanding that the
 25 initial approach was made by GMP officers and

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1 subsequently BTP officers joined in and I think that
 2 that was, from recollection, James Allen, the arena
 3 manager's recollection, because he had a personal
 4 connection to one of the firearms officers and via that
 5 the arrangements were made. That's my recollection
 6 but --
 7 SIR JOHN SAUNDERS: Thank you, that's good enough.
 8 MR DE LA POER: All of those supporting me will immediately
 9 tell me if I've got that wrong.
 10 We'll run through this sequence here. We can see
 11 because it'll become relevant in a moment.
 12 Chief Inspector Dexter, 00.53.01, on his way towards the
 13 station concourse.
 14 At 00.55.35, {INQ035612/523}, we can see you there
 15 in the middle of the City Room, marked, and there's
 16 an arrow indicating your direction of travel.
 17 00.57.30, {INQ035612/526}. We can see that by this
 18 stage, you have left the arena and you're down on the
 19 station concourse.
 20 {INQ035612/527}. Walking across the concourse.
 21 {INQ035612/528}. We can see you captured down by
 22 the war memorial entrance.
 23 {INQ035612/534--536}, 1 o'clock. You're by the war
 24 memorial entrance.
 25 {INQ035612/538}, just after 1 o'clock, we can see:

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1 "BTP Chief Inspector Graham exits Victoria Train
 2 Station out on to Station Approach and then immediately
 3 walks over to GMP Chief Inspector Mark Dexter and has
 4 a conversation with him."
 5 Thank you, we can take down. I hope that that
 6 refreshes your memory about the sequence of you leaving
 7 the City Room and making your way down to Station
 8 Approach where I think it's your recollection that you
 9 spoke to Chief Inspector Dexter?
 10 A. Yes.
 11 Q. What was the purpose of that conversation?
 12 A. From the evidence that's been presented to me, it's
 13 in relation to CCTV and him asking me to have somebody
 14 assist with the viewing of the CCTV for his officers.
 15 Q. When you say from the evidence that's been presented to
 16 you, do you not have an independent recollection of
 17 that?
 18 A. In my mind, I remember going to try and find him and
 19 he was very busy at the front of the station and I don't
 20 remember the content of the conversation that we had
 21 until obviously the evidence has been taken from his
 22 body--worn or his dictaphone.
 23 Q. The next and final matter to deal with in the sequence,
 24 we don't need to bring it up, but it is recorded in the
 25 log. 01.27, recorded as, "Exchanging briefing with

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1 Superintendent Gordon". Do you have a recollection of
 2 that conversation?
 3 A. Yes.
 4 Q. Where did it take place?
 5 A. It took place in the refreshment room on the
 6 Victoria Station that had been opened up for officers by
 7 the train operating company.
 8 Q. What was the content of your discussion with
 9 Superintendent Gordon?
 10 A. It was a briefing of actions and information that I held
 11 that had been undertaken for the last hour and a half
 12 since I'd been on scene and what I knew and the number
 13 of casualties, what officers we had on scene, what
 14 arrangements had been made for whether further resources
 15 were required. We talked about the fact that I'd said
 16 that none of the officers should go home before they
 17 were seen by TRiM, the trauma management counsellors.
 18 All the information that I had to hand, it was just
 19 a handover report to Superintendent Gordon.
 20 Q. Was it a robust handover in your view?
 21 A. It was.
 22 SIR JOHN SAUNDERS: Did you have the loggist?
 23 A. I did.
 24 MR DE LA POER: The log entry for that is as brief as I have
 25 described it.

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1 SIR JOHN SAUNDERS: "Robust handover"?

2 MR DE LA POER: "Exchanging briefing with Superintendent
3 Gordon" is what the record has.
4 About how long was that handover, do you think?

5 A. About 15 minutes.

6 Q. Were the words used by each of you such that it made it
7 clear that you were handing over scene command to him?

8 A. The words — I don't recall the words being said as in,
9 "You can take it from here", so to speak. I remember
10 him saying that the actions that I completed were in
11 hand and he was satisfied with the actions that I'd
12 undertaken during the night. But I don't remember him
13 saying a formal handover to say that he was Bronze. He
14 could have done, but I don't specifically remember.

15 Q. Again, is using language like that, so reference to
16 Bronze, reference to scene command, reference to,
17 "You're in charge now", or, "I'm in charge now", are
18 those in your view necessary in practice or is it
19 acceptable not to use those sort of terms?

20 A. I think in a textbook situation it would be good
21 practice so people understand. However, I don't think
22 on a fast-moving incident like this that we particularly
23 used those words and we certainly — I don't recall
24 using them on the night.

25 SIR JOHN SAUNDERS: You knew he'd been appointed

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1 Bronze commander.

2 A. I'd been told that.

3 SIR JOHN SAUNDERS: He's a superintendent, you're
4 a chief inspector, you know he'd be taking over.

5 A. I was not confused about who would be taking the lead on
6 the night.

7 MR DE LA POER: Sir, we've been going for an hour and
8 a half. What I propose to do is just ask one or two
9 very short questions to capture the remainder of
10 Mrs Graham's actions on the night and then may I invite
11 you to take a break?

12 SIR JOHN SAUNDERS: And then are you coming back to other
13 topics?

14 MR DE LA POER: We are going to deal with, which I hope will
15 capture at least most of what I have in mind, the
16 criticisms of the experts, which Mrs Graham's been kind
17 enough to prepare a statement dealing with, and that
18 goes across a number of issues.

19 SIR JOHN SAUNDERS: You ask what you want to do and then
20 I will ask one question before we have a break.

21 MR DE LA POER: Mrs Graham, I'm not going to investigate
22 with you in any detail what you did after you handed
23 over command of the scene to Superintendent Gordon and
24 I know you understand the reasons for that. But did you
25 stay on scene for a considerable period of time?

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1 A. Yes.

2 Q. About what time did you leave the Victoria Station
3 complex?

4 A. I think around 3.30, 4 o'clock.

5 Q. Did you act under the direction of the Bronze commander,
6 Superintendent Gordon?

7 A. Yes.

8 Q. Did you contribute in every way that you could towards
9 the emergency response at that time?

10 A. Absolutely.

11 MR DE LA POER: Thank you, sir.

12 SIR JOHN SAUNDERS: We see what you're doing. We see you
13 going round and you've told us what you've been doing
14 when you go round. What there is clearly not is
15 a forward control post, somewhere where if people wanted
16 to find you, they could go to find you. If you wanted
17 to find other commanders, you could find them. It's
18 important to have a forward control point, isn't it?

19 A. It is.

20 SIR JOHN SAUNDERS: Why wasn't there one?

21 A. I think at that moment in time, the fact that I needed
22 to assess the situation and gather as much information
23 as I could in order to relay that information to Silver,
24 with him being away from the scene, I think that's why
25 there wasn't a forward command point for me. I didn't

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1 think about it on the night.

2 SIR JOHN SAUNDERS: Okay.

3 A. Had the incident been prolonged, then I would have
4 obviously taken control — that's Bronze, I possibly
5 would have thought about a forward command point for
6 later in the evening, but with such a fast-moving
7 incident and the time that I had to assess the scene and
8 gain as much information as I could for Silver, it
9 didn't enter my mind at that point.

10 SIR JOHN SAUNDERS: The teaching is, the textbook is you set
11 up an FCP as soon as you can.

12 A. Mm—hm.

13 SIR JOHN SAUNDERS: Do you think it's impractical or not
14 a good idea or would it have been a good idea to have
15 one? After all, you could actually have got people to
16 come to you and brief you on what was happening rather
17 than you walking round and trying to find appropriate
18 people.

19 A. It's a good idea and on reflection it should have been
20 done.

21 SIR JOHN SAUNDERS: Is it something that you should have
22 done?

23 A. Yes.

24 SIR JOHN SAUNDERS: Okay, thank you. I'm not trying to get
25 that as some sort of self-criticism, I just need to know

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1 for the future whether you think it's something that
 2 should happen.
 3 MR DE LA POER: Sir, can I invite you to take a 15-minute
 4 break, please?
 5 SIR JOHN SAUNDERS: Yes. Is that long enough for you?
 6 A. Yes, thank you.
 7 (11.32 am)
 8 (A short break)
 9 (11.52 am)
 10 MR DE LA POER: Sir, it's been drawn to my attention that on
 11 occasions I may have been reading too fast from
 12 documents that people didn't have access to. I'm really
 13 grateful that that has been made known to me. I wish to
 14 apologise and I will do my best to improve.
 15 SIR JOHN SAUNDERS: It's always good you're not too old to
 16 learn. It is true, actually, for those who have the
 17 documents like this, it's obviously much easier to
 18 follow. I did notice at the time and I did think was
 19 there anything significant that was being missed and had
 20 I thought there was, I would actually have said
 21 something, but I think it was all fairly comprehensible.
 22 As long as you do better in the future, that's fine!
 23 MR DE LA POER: That's my aspiration.
 24 Mrs Graham, we're going to go to your third witness
 25 statement, where very helpfully, if I may say so,

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1 you have picked out the comments made about you by the
 2 policing experts in their report and you have provided
 3 your answer. We have covered some of this already
 4 together. We will all bear in mind, as I rehearse what
 5 the policing experts said in their report, that they
 6 reached those conclusions on the basis of the
 7 information that they had seen at the time and plainly
 8 they had not heard yours and others' accounts.
 9 Let's just have a look. The first heading that
 10 we have is, "Time of arrival at Manchester Victoria
 11 Station". We can deal with that very shortly. Are you
 12 satisfied, based upon your review of the material, which
 13 includes material that we have looked at today, the CCTV
 14 evidence, among other things, that you arrived at the
 15 station complex at about 23.55?
 16 A. Yes, that's correct.
 17 Q. I think a source of potential confusion, and I don't
 18 mean that in a critical way, was your subsequent
 19 realisation that at an early stage you thought you had
 20 received an earlier notification than in fact you had.
 21 A. That's correct.
 22 Q. Next, "BTP Bronze at the scene". We've talked about
 23 this a considerable amount and we've got to a position
 24 where the difference may be just in a word. But what
 25 you say at paragraph 4 is:

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1 "From the time of my arrival until the arrival of
 2 the Bronze commander, Superintendent Gordon, at about
 3 01.25, I was the most senior BTP officer on the scene at
 4 Victoria Station/Manchester Arena. There was no command
 5 structure at the scene. I never saw myself as BTP
 6 Bronze commander of the arena and railway station. If
 7 I had seen myself as such it would have made no
 8 difference to my actions."
 9 A. Correct.
 10 Q. I think that you have dealt already with those last two
 11 sentences, but can I just ask you to reflect upon the
 12 sentence, "There was no command structure at the scene".
 13 Do you think that's an accurate description of the scene
 14 when you arrived?
 15 A. There was a command structure such that there was an
 16 inspector present and there was a sergeant present, but
 17 as in a defined structure then, no, not at my time of
 18 arrival.
 19 Q. So perhaps it's not quite as stark as there was no
 20 command structure, but as you've identified, not one
 21 that had been predefined and directed by Silver?
 22 A. That's right.
 23 SIR JOHN SAUNDERS: I'm not sure that paragraph,
 24 paragraph 4, actually says what you've described it as.
 25 You're talking about the whole of the time you were

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1 there, you are not talking about the time of arrival,
 2 I don't think.
 3 MR DE LA POER: I was going to come to ---
 4 SIR JOHN SAUNDERS: I'm so sorry.
 5 MR DE LA POER: Not at all, sir, but you're quite right.
 6 Once you've arrived, you've told us that you
 7 regarded yourself as the scene commander.
 8 A. Mm-hm.
 9 Q. So again, "There was no command structure at the scene",
 10 does that capture accurately your view?
 11 A. Upon arrival.
 12 Q. Upon arrival?
 13 A. Upon arrival there wasn't. But then clearly, upon my
 14 arrival we have the chief inspector, a number of
 15 inspectors, and a sergeant from BTP, along with other
 16 ranks from GMP.
 17 SIR JOHN SAUNDERS: That's actually not what paragraph 4
 18 says. The paragraph says:
 19 "From the time of my arrival until the arrival ...
 20 I was the most senior until the arrival of the
 21 Bronze commander, Superintendent Gordon."
 22 I am doing what you do and read it out too quickly:
 23 "From the time of my arrival until the arrival of
 24 Bronze commander, Superintendent Gordon, at about 01.25,
 25 I was the most senior BTP officer on scene at

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1 Victoria Station and Manchester Arena. There was no
 2 command structure at the scene."
 3 I don't read that as meaning at the time of arrival,
 4 I read it as meaning the whole time you are there.
 5 There seems to be this backing-off of the word
 6 "Bronze commander" in some way. But anyway, in reality,
 7 you were doing the same job?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Okay, thank you.
 10 MR DE LA POER: You go to say what you have told us already
 11 at 5:
 12 "I do not remember anyone briefing me or informing
 13 me that I was the Bronze commander pending
 14 Superintendent Gordon's arrival."
 15 And we've covered the conversations that you had
 16 with, firstly, Chief Inspector McKinnon, secondly with
 17 Superintendent Gordon, and thirdly with
 18 Chief Superintendent Gregory, which would have been the
 19 occasions, if it was said to you, where it might have
 20 been mentioned.
 21 A. Yes.
 22 Q. And I don't think you have a clear recollection of any
 23 of those?
 24 A. No, not word for word.
 25 Q. I am going to leave paragraph 6 and move on to what is

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1 said about JESIP. The way the policing experts frame
 2 it is to suggest that you could have rescued the
 3 situation from a command perspective. I don't think
 4 that that was the way that you saw it; is that correct?
 5 A. That's correct.
 6 Q. Please just explain what you mean by that.
 7 A. So they've used the words "rescue the multi-agency
 8 non-armed police tactical coordination". From my
 9 recollection, there was not a scene or a police response
 10 to rescue at that point. Everybody was doing as much as
 11 they possibly could. So I didn't see it in my mind that
 12 there was a situation to rescue. There were people to
 13 rescue, there was people to help, but not a police
 14 operation to rescue.
 15 Q. As I understand what they're saying, what they're
 16 driving at is before your arrival, the multi-agency
 17 command at the scene was deficient in some way. They're
 18 identifying your arrival as an opportunity to improve
 19 that, so we'll avoid the word "rescue". Do you regard
 20 the multi-agency command structure at the scene as
 21 having been adequate whilst you were the incident
 22 commander?
 23 A. On reflection, I think there's learning points
 24 in relation to liaison with commanders, if they are
 25 talking about that, but I genuinely don't think there

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1 was a rescue, an operation to rescue at that point in
 2 time.
 3 SIR JOHN SAUNDERS: Okay. JESIP does not work without
 4 a forward control point?
 5 A. No.
 6 SIR JOHN SAUNDERS: That's not a lesson to learn. It's been
 7 a lesson which has been out there for a long, long time.
 8 I'm not being particularly critical of you in this, I'm
 9 just saying, you're there, no forward control point, all
 10 the commanders are not getting together to have a proper
 11 joint operation, so the police experts are saying, you
 12 come in, you're incident commander or whatever, it was
 13 your possibility to say: right, let's have all the
 14 commanders here at the forward control post, let's do it
 15 properly. I think that is what they are saying.
 16 A. I accept that.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR DE LA POER: Because if we just think about some of the
 19 things that we've seen on the footage, you move between
 20 the station concourse, the raised overbridge, the
 21 City Room, just into the arena concourse, back again.
 22 Would you agree with the description that you're quite
 23 mobile during the period that we're looking at?
 24 A. That's correct.
 25 Q. Which, as I think you've already agreed, means that

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1 you're not in a single place that everyone will know
 2 that they can come and find you to receive direction?
 3 A. That's correct.
 4 Q. Similarly, we can see that Inspector Smith has chosen to
 5 position himself in the City Room for much of the
 6 conversation and that includes when he's speaking to GMP
 7 CID officers. But again, do you think that it was open
 8 to you to say, "Right, Inspector Smith, this isn't the
 9 right place for the multi-agency commanders to get
 10 together, we should go to this place, you and me, that's
 11 BTP, GMP together, we'll send this person to go and find
 12 the ambulance commander, they can come and join us,
 13 we'll see what's going on with the Fire and Rescue
 14 Service, and we will have all of those commanders
 15 together working to a joint plan"?
 16 A. I accept that would be a better solution.
 17 Q. Paragraph 8 --
 18 SIR JOHN SAUNDERS: Can I just make clear, the
 19 responsibility was not simply on you, there were other
 20 commanders around who were actually not doing the same
 21 thing. Mr Gibbs is not happy with what I'm saying from
 22 the way he is looking at me, but we'll see when he asks
 23 questions later.
 24 MR DE LA POER: We know with Chief Inspector Dexter, as we
 25 have seen, that he, like you, was mobile around the area

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1 and I think, ultimately, where you and other commanders
 2 come together is out on Station Approach just after
 3 1 o'clock; is that right?
 4 A. That's correct.
 5 Q. "JESIP", paragraph 8, I'll read it slowly, I hope, and
 6 in full:
 7 "I did not implement JESIP as confirmed at
 8 paragraph 12.16.8 of the report. There is an entry in
 9 PCSO Byrne—Turner's pocket notebook timed at 00.07,
 10 shortly after I arrived on scene, which notes that
 11 a Silver meeting was to begin at GMP. I was aware that
 12 this meeting was taking place and knew that it was in
 13 compliance with JESIP. I did not see myself as having
 14 the authority to instruct GMP officers in what to do.
 15 There was a GMP inspector on the ground who was
 16 commanding his own officers."
 17 You wrote that some time ago and clearly your
 18 understanding has developed since.
 19 A. Yes.
 20 Q. But does that still reflect your view of the incident
 21 and your role within it?
 22 A. When I say that the GMP inspector was on the ground, I'm
 23 referring to Inspector Smith in the City Room and that
 24 he was commanding his own officers in relation to the
 25 officers that were completing the search inside the

1 arena bowl, who were firearms officers. So when I say
 2 I don't have the authority, I don't have the authority
 3 to instruct firearms officers of what to do, and in my
 4 view they were doing what they should have been doing at
 5 that moment in time, as were many other officers that
 6 I could see. They were completing actions that needed
 7 doing right then and there.
 8 Q. Looking at the way that you phrased it, I seek your
 9 comment on this, you appear to be describing two
 10 parallel actions from, on the one hand, GMP and, on the
 11 other hand, BTP: he had his officers, you didn't have
 12 the authority to command them; is that how you saw it on
 13 the night?
 14 A. No, I think there was lots of engagement between the two
 15 forces. Certainly within the City Room, there was many
 16 searches taking place around the areas, not just in the
 17 City Room. I had a lot of conversations with
 18 Inspector Kooper, Inspector Wedderburn,
 19 Michael Wedderburn, and Sergeant Brian Dickinson about
 20 their searches that were being coordinated around the
 21 areas, not just in the City Room, but the platforms and
 22 the station, to ensure that the area was safe for us to
 23 work in.
 24 And many of those actions that were ongoing were
 25 joint forces, both BTP and GMP. And obviously the

1 conversation within the City Room with Inspector Smith
 2 was about those risks and the CCTV and the searches that
 3 needed to be done for secondary devices or any other
 4 articles that had been placed that we didn't know about
 5 to make the area safe.
 6 Q. I'm just wondering whether it is still your view, "I did
 7 not implement JESIP", because some of those actions
 8 you're describing are coordinated actions --
 9 A. That's correct.
 10 Q. -- on your description. They involved a degree of
 11 co-location. There was a sharing of situational
 12 awareness within that. Do you still say that you did
 13 not implement JESIP or is it a bit more nuanced than
 14 that?
 15 A. I think there's some areas of JESIP that I didn't
 16 implement, for example the forward command point, and
 17 the other areas of JESIP, the coordination, the
 18 co-location and the communication, there's elements
 19 there that were completed.
 20 Q. We'll go on to see perhaps the other side of that
 21 though. If we turn over the page to paragraph 10, this
 22 is a reference to paragraphs in the report:
 23 "In the next two paragraphs, reference is made to
 24 Inspector Kooper and me as failing to liaise with GMP
 25 and Chief Inspector Dexter in carrying out a search of

1 the entire station. As far as I was concerned, the
 2 station was my patch [in italics] and I did not need to
 3 liaise with another police force before deploying my own
 4 officers. The authors of the report do not explain in
 5 terms why they consider carrying out the search in this
 6 way was high risk. Over an hour and a half had passed
 7 since the detonation of the bomb with no secondary
 8 device detected. Incidentally, I understand a number of
 9 the search teams included GMP as well as BTP officers,
 10 an example of compliance with the JESIP principles."
 11 So we'll just look at the different aspects of that.
 12 The reference to the phrase "my patch": do you think
 13 that that was the correct way of thinking about your
 14 role on the night?
 15 A. When I refer to "my patch", the jurisdiction of the
 16 areas that I was concerned with at that moment in time
 17 was on BTP jurisdiction, so it's my patch.
 18 SIR JOHN SAUNDERS: Actually it's both your patches, as it
 19 happens. It's GMP's as well.
 20 A. Yes.
 21 MR DE LA POER: That means that you have the jurisdiction to
 22 act as police officers?
 23 A. That's correct.
 24 Q. But isn't having a single police force in charge where
 25 there is an overlap of jurisdiction an important

1 principle?
 2 A. Sorry, could you ask the question again?
 3 Q. Isn't having a single police force, as between GMP and
 4 BTP, in charge, taking the lead, an important principle
 5 where we have overlapping jurisdictions? In other
 6 words, you have the authority to act there, they have
 7 the authority to act there.
 8 A. It is important, but at the time the firearms searches
 9 needed to be completed and BTP don't have that facility.
 10 So as much as I saw it as my patch and my jurisdiction
 11 and I was carrying out the actions that I felt needed to
 12 be completed for safety, I wasn't able to do that all on
 13 our own and it needed GMP to be able to carry out those
 14 firearms searches.
 15 SIR JOHN SAUNDERS: Can you just tell me some more detail
 16 what this criticism is because I want to make sure we're
 17 actually addressing this particular criticism? Is it
 18 that Chief Inspector Graham should have spoken to GMP to
 19 make sure it was safe to search?
 20 MR DE LA POER: Yes.
 21 SIR JOHN SAUNDERS: So I think the thought is that before
 22 you sent your officers in to do something, you should
 23 have coordinated with GMP, who had the firearms people
 24 on the scene, to make sure that it was safe from the
 25 firearms officers' point of view. That appears to be

1 the criticism.
 2 On the one hand you're saying, actually, I needed to
 3 speak to them before I let my officers search. So
 4 perhaps you're just saying it's not justified at all and
 5 that you did do that?
 6 A. I did do that because the firearms officers were
 7 searching the inside of the arena bowl and then there
 8 was -- after that had been completed, Inspector Kooper
 9 took over the coordination of the rest of the searches
 10 in conjunction with GMP. So I don't understand the
 11 criticism because it was very much a joint approach, all
 12 hands to the pump, to search the areas.
 13 SIR JOHN SAUNDERS: The confusion therefore comes in with
 14 you saying, "I was concerned it was my patch and
 15 I didn't need to liaise with anybody before I search my
 16 patch". That sounds like you were a bit cross about the
 17 criticism, were you, at the time? It reads a bit that
 18 way perhaps.
 19 A. I just felt it was unjust because --
 20 SIR JOHN SAUNDERS: Okay.
 21 A. -- there was lots of coordination and the reason for the
 22 coordination was to make the environment safe.
 23 SIR JOHN SAUNDERS: They'll be listening, so perhaps you'll
 24 have convinced them it's unjust.
 25 The other thing that slightly concerned me is that

1 if you are operating proper JESIP with two police
 2 forces, which I understand is very unusual for that to
 3 happen, but nevertheless if two police forces are trying
 4 to cooperate, does it work if you're saying: well,
 5 although I'm a chief inspector, I can't tell GMP
 6 officers what to do and they can't tell my officers what
 7 to do?
 8 A. You can tell them what to do if you feel that what
 9 they're doing isn't appropriate or if something needs
 10 doing, then there's no reason why I wouldn't instruct
 11 a GMP officer to do something if it needed doing.
 12 SIR JOHN SAUNDERS: You say:
 13 "I did not see myself as having the authority to
 14 instruct GMP officers in what to do."
 15 A. Firearms officers.
 16 SIR JOHN SAUNDERS: Okay, so we should put in "firearms
 17 officers" there, should we?
 18 A. Mm--hm.
 19 SIR JOHN SAUNDERS: All right.
 20 MR DE LA POER: "Command on scene" is the next paragraph.
 21 You recite the paragraph of the report that makes
 22 reference to the absence of any multi--agency or
 23 effective scene command by BTP officers. If I
 24 paraphrase what you say:
 25 "The authors say it would have been appropriate for

1 me to have taken the multi--agency lead at tactical
 2 level. I was due to receive public order Silver command
 3 training before going on maternity leave but this didn't
 4 happen. Consequently, I was not qualified to take on
 5 the tactical lead."
 6 A. Correct.
 7 Q. Do you stand by that?
 8 A. I do.
 9 SIR JOHN SAUNDERS: If we talk about tactical leads and
 10 things like that: we have a strategy, not surprisingly
 11 the strategy was to save life, to preserve the scene and
 12 things like that. So were you aware, or would you have
 13 in your mind that general overall strategy?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: So the tactical thing is putting that
 16 strategy into practice. Were you not qualified?
 17 A. I was qualified to put that strategy -- I think the
 18 confusion here is they're talking about tactical as in
 19 Silver tactical command. I think there was confusion
 20 about what they've asked and I've responded by saying
 21 that I was Bronze trained but not Silver trained. But
 22 in relation to your question, yes, very much so.
 23 A tactical deployment of officers of what I wanted them
 24 to do would be absolutely right.
 25 SIR JOHN SAUNDERS: So in practice you could and did do it?

1 A. Yes.
 2 SIR JOHN SAUNDERS: Even though you weren't qualified, as
 3 you have put in the last sentence?
 4 A. I think the reflection was about being Silver command
 5 qualified rather than just a tactical ...
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR DE LA POER: The authors of the report say that it's not
 8 clear what actions you completed and you list them, so
 9 let's look at the list :
 10 "Putting an officer on the cordon surrounding the
 11 City Rooms to log those who entered and left the areas,
 12 insofar as I can remember.
 13 "Ensuring the officers viewed the CCTV footage of
 14 the City Room in the minutes before the explosion.
 15 "Arranging a video sweep of the City Room.
 16 "Requesting the attendance of family liaison
 17 officers .
 18 "Arranging searches for secondary devices."
 19 And I think that we've established that we can add
 20 some other things to that list . Based on what we can
 21 see, you offered officers to GMP for their criminal
 22 investigation ?
 23 A. Mm—hm.
 24 Q. Is that correct?
 25 A. That's true.

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1 Q. Any other now that you've had a chance to consider all
 2 of the evidence as it relates to you that is available,
 3 any other actions that you would like to draw attention
 4 to to make clear what actions you completed for the
 5 duration of you being the scene commander?
 6 A. So there was liaison with the military . There was
 7 assessing the situation in relation to how many
 8 resources we needed or whether we would stop them.
 9 Consulting with the officers , ascertaining who was first
 10 on scene, who may hold vital information for Silver .
 11 Arranging and confirmation of what areas had been
 12 searched.
 13 I don't feel I need to justify my time within that
 14 hour and a half, but looking at my schedule I had very
 15 little minutes in between those actions to do anything
 16 other than what I've listed .
 17 SIR JOHN SAUNDERS: Could you tell me what's meant by
 18 "arranging a video sweep of the City Room", because
 19 I don't think we've actually heard that.
 20 A. I wanted to make sure that when I arrived on scene and
 21 I had the discussion with Inspector Smith that the scene
 22 of the City Room was captured at the most earliest
 23 opportunity and the best way to do that would be to take
 24 what we call a video sweep, so just a very quick
 25 360-degree video of what was there at the time.

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1 SIR JOHN SAUNDERS: So you had somebody there with a video
 2 camera doing that?
 3 A. Yes.
 4 MR DE LA POER: Is that an important action in relation to
 5 a criminal investigation at the very least?
 6 A. Yes.
 7 Q. There is then an indication about the golden hour.
 8 I think we've established that in fact you arrived after
 9 the golden hour, if we start that from 22.31. But
 10 within the first hour that you are on scene, do you
 11 regard yourself as having acted within what is required
 12 of the actions of someone in your position in the golden
 13 hour?
 14 A. Yes.
 15 Q. I think you've identified the CCTV as being an
 16 identified golden hour action. Were there any others
 17 that you had in your mind at the time?
 18 A. As we've just discussed, the video sweep of the scene as
 19 it was. Organisation of support. I think when I talk
 20 about the golden hour, as much as I understand the
 21 golden hour principles, they all should be within the
 22 hour, but if they have not been done within the hour,
 23 it's paramount you get them done as soon as possible.
 24 So yes, I would say the CCTV, the cordons are very
 25 important, making sure that we've got a record of who

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1 goes in and out of the scene.
 2 Q. I think that certainly the operational log that was
 3 being operated by PCSO Byrne—Turner has a list of the
 4 golden hour activities . That's certainly one place.
 5 Shall we just bring it up on scene now so that everybody
 6 knows how this is captured?
 7 Mr Lopez, don't bring up the page until I give it to
 8 you. It's {INQ001992/39}, please. We see in the
 9 right—hand corner a reference to golden hour. This
 10 isn't specific to a major incident response, it could be
 11 other police activity; is that right?
 12 A. That's correct.
 13 Q. So the investigation of crime?
 14 A. Yes.
 15 Q. Did you bring either this aide—memoire or any other
 16 source of it up in front of you to work to a checklist?
 17 A. No.
 18 Q. Do you think having a specific major incident of this
 19 type checklist to work to, accessible at the back of
 20 your pocket notebook or somewhere else, would have
 21 helped you prioritise what you needed to do?
 22 A. I think this aide—memoire is in a pocket book anyway.
 23 However, from my experience of the majority of my career
 24 being in the Criminal Investigation Department, I would
 25 have this to mind rather than having to refer. So quite

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1 a lot of these things are things that I knew were
 2 happening, such as the officer going to hospital to
 3 ascertain the injured. That would be done.
 4 CCTV is on there. Forensics, that wouldn't be
 5 important at that moment in time, it would be very
 6 important later, but the preservation of the scene is
 7 important and we knew that was happening with the
 8 detective superintendent from CT en route -- and in fact
 9 very soon after arrival the scene was closed down for
 10 that. We have some details of some information that
 11 came in from witnesses that Dax Byrne--Turner has in his
 12 pocket notebook.
 13 Street searches are not relevant on this particular
 14 occasion for us to enact at that point. The cordons
 15 were in place. So I think what I could do from that
 16 golden hour list I was doing.
 17 Q. I wasn't suggesting this list wasn't accessible. I was
 18 proposing a list which is specific to major incidents.
 19 So you've identified that some of these are obviously
 20 not relevant to the golden hour.
 21 A. That's right.
 22 Q. And the list might start with JESIP?
 23 A. Mm--hm, yes. That would be very helpful.
 24 Q. Thank you very much indeed, Mr Lopez. Can you make sure
 25 that we've shown the whole document just so that it's in

1 evidence? Yes, thank you very much indeed.
 2 I'm not going to deal with paragraph 16 beyond
 3 confirming that you knew a major incident had been
 4 declared; is that right?
 5 A. That's right.
 6 Q. Cordons. You have quoted the report which says that you
 7 did not integrate with the cordon command action. Do
 8 you understand that criticism? You begin the sentence
 9 with:
 10 "I'm not sure what they mean."
 11 A. Yes. So I know that there were cordons in place because
 12 I came through them when I arrived at the scene, and
 13 I asked Sergeant Wildridge to make sure that there was
 14 a record of the scene log cordon at the top of the
 15 City Rooms, so I'm not sure what they mean by "integrate
 16 cordon command actions".
 17 Q. Bearing in mind you were in a crime scene, do you have
 18 that in mind whilst making decisions about where you
 19 walked and where you went?
 20 A. I thought I'd entered the crime scene through a common
 21 approach path, but clearly the CCTV shows me walking
 22 around the edge of the concentrated crime scene area.
 23 Q. I think some of the CCTV, certainly at least one still ,
 24 shows you walking through the middle of the City Room.
 25 Do you agree that that's what we've seen?

1 A. Yes.
 2 Q. Upon reflection, do you think, bearing in mind that that
 3 was a crime scene, that that was a route you ought to
 4 have walked? I'm not for a moment suggesting that
 5 anything of consequence actually resulted, I'm talking
 6 about best practice and how you should conduct yourself
 7 in that situation, which I think is what the policing
 8 experts are going to.
 9 A. Yes. On reflection, yes.
 10 Q. In fact, once you had spoken to Inspector Smith, was
 11 there any need for you to be in the City Room?
 12 A. Yes, there was.
 13 Q. What was that?
 14 A. Because I needed to pass the description of the person
 15 suspected to be the bomber inside the arena.
 16 Q. This is a description to the officers that you have
 17 in the CCTV room searching through the CCTV?
 18 A. That's correct.
 19 Q. Other than that task, so we've got speaking to
 20 Inspector Smith, we've got passing that description, any
 21 other reason why you needed to be in the City Room?
 22 A. I think that's the only two occasions that I went into
 23 the City Room: to speak to Inspector Smith and then
 24 return to inspect the description that was needed.
 25 Q. The next matter I don't think we need to deal with at

1 all. As I understand it, that concern has evaporated.
 2 We come to paragraph 21 in which we will bring to
 3 mind the sequence that I showed you of you in the corner
 4 of the City Room by the arena doors, just crossing into
 5 the arena concourse and then coming back, and you've
 6 explained what you were doing then.
 7 That's characterised by the report as trying to
 8 speak to Chief Inspector Dexter and abandoning the
 9 attempt. What you say is:
 10 "I was probably asked to speak with him before I had
 11 returned to the concourse at about 1 o'clock before the
 12 arrival of Superintendent Gordon at 01.25. When I went
 13 to see him, he was briefing a large group of firearms
 14 officers at the time when there had been a number of
 15 reports of secondary devices. This was clearly
 16 important work. Rather than interrupt him or waste time
 17 waiting, I decided to leave him until there was a more
 18 convenient time to speak. In the 20 minutes or so
 19 before Superintendent Gordon arrived on scene and took
 20 command, Chief Inspector Dexter remained outside the
 21 station at the front while I remained inside on the
 22 concourse. In an ideal world we would have got our
 23 heads together. This incident was not part of an ideal
 24 world."
 25 So the explanation you gave before the break was

1 that you were focused upon the tasks that you were
 2 undertaking in relation to the CCTV and, as I understood
 3 it, you weren't there to speak to Chief Inspector
 4 Dexter, rather you were there to do a particular task.
 5 We'll take this slowly. Firstly, do you agree that
 6 the way that reads, as you have written it, it appears
 7 that you have a definite memory of trying to speak to
 8 him and making a decision not to because, and you give
 9 a reason, he was briefing people doing an important
 10 task?
 11 A. Yes.
 12 Q. That's how it reads. Just help us with the two, that
 13 alongside what you told us before the break.
 14 A. My recollection that I did not see Chief Inspector
 15 Dexter before 01.00 hours, and I know the CCTV shows
 16 that we were in the vicinity. I did not have
 17 a conversation with him before 1 o'clock. My
 18 recollection is that I was on the concourse dealing with
 19 something else when somebody asked me to come and speak
 20 to Chief Inspector Dexter and I go immediately outside
 21 to speak to him, but he's in the middle of a briefing
 22 with firearms officers, and I wait — my recollection
 23 was that I waited a while for him to finish, but then
 24 could clearly see that I was just stood there and I had
 25 other actions that I could do, so I decided to leave it.

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1 But clearly, I did have a conversation with him that
 2 I just don't recall.
 3 Q. I suppose there are two moments that you might be
 4 speaking about in your statement. The criticism of the
 5 policing experts was about in the vicinity of the arena
 6 concourse.
 7 A. Yes.
 8 Q. When you write here, bearing in mind, and I particularly
 9 draw your attention to the following sentence:
 10 "In the 20 minutes or so before
 11 Superintendent Gordon..."
 12 So that would be in the period from 1.00 to 1.25 or
 13 so. When you said, "I decided to leave him", were you
 14 talking about your state of mind outside on Station
 15 Approach or up in the City Room?
 16 A. At the Station Approach.
 17 Q. We can see in the next clause:
 18 "Chief Superintendent Dexter remained outside the
 19 station at the front while I remained inside on the
 20 concourse."
 21 I am not proposing, bearing in mind you were not the
 22 author of the log, to deal with 22 with you. I'm just
 23 going to conclude with the final matter, which takes us
 24 away from events on 22 May and looks more generally at
 25 your involvement in the Greater Manchester Resilience

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1 Forum.
 2 You know, Mrs Graham, that one of the concerns
 3 expressed by the policing experts is whether or not in
 4 different ways GMP and BTP prioritised engagement with
 5 that organisation. So that's where this is coming from;
 6 is that right?
 7 A. That's correct.
 8 Q. They draw attention to a lack of representation by BTP
 9 at six of the nine meetings in the 2 years before the
 10 attack. They say:
 11 "The senior nominated representative is recorded as
 12 Chief Inspector Graham."
 13 Do you agree with that?
 14 A. Yes.
 15 Q. "She attended a meeting only once in the 2 years before
 16 the attack. The meetings held on 13 March 2015 to just
 17 before the attack on 27 March are listed."
 18 And then I think you are going to speak against that
 19 list of dates in the next paragraph; is that right?
 20 A. That's right.
 21 Q. So next question: did you attend only one of those
 22 meetings?
 23 A. I believe I did.
 24 Q. Taking them each in turn, why did you not attend any of
 25 the others, given that you are recorded as being the

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1 senior nominated representative?
 2 A. Out of the number of meetings that would have taken
 3 place — I think they are three-monthly — whilst I had
 4 the chief inspector command for Manchester, from my
 5 recollection, one I didn't attend and Inspector Michelle
 6 Wedderburn attended on my behalf. For four of them,
 7 I was on maternity leave. There is one occasion where
 8 I didn't attend and without access to my Outlook
 9 calendar, because I am no longer part of British
 10 Transport Police, I can't say where I was or what I was
 11 doing. I can't give an explanation for that particular
 12 occasion where I didn't attend.
 13 So out of those, there's no explanation apart from
 14 one meeting. It could have been a number of reasons —
 15 I could have been on call the night before, I could have
 16 been sick — I just can't give an answer to that
 17 particular one.
 18 Q. One inference, looking at the whole picture, and this is
 19 the one that emanates from the policing experts, was
 20 a lack of priority was being given to engagement with
 21 the Greater Manchester Resilience Forum, a lack of
 22 priority being given to it by BTP. You can speak for
 23 yourself on this, and possibly on behalf of BTP if you
 24 know what the corporate attitude was. Was a lack of
 25 priority being given to it by BTP or you?

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1 A. No.
 2 Q. What do you say about the appropriateness or otherwise
 3 of sending an officer more junior than yourself to
 4 attend the meeting?
 5 A. From my recollection, it wouldn't be unusual for an
 6 inspector to attend that particular meeting. I can't
 7 speak for Chief Inspector Kooper, what he attended when
 8 I wasn't there, whether he went himself or somebody else
 9 went but I specifically know it wasn't — you know, it
 10 was a priority to attend and there would be a good
 11 reason for me not attending on that occasion. I can't
 12 tell you why I didn't go.
 13 Q. Were there other more senior officers than you within
 14 BTP who were based in Greater Manchester?
 15 A. Not for the Manchester command as a command. There
 16 would be more senior officers that have more regional
 17 responsibility.
 18 Q. Do you think that a more senior officer than you, who
 19 appears to have been physically able to attend if
 20 they're based in the locale, was justified for
 21 attendance at those meetings or was your rank senior
 22 enough?
 23 A. My rank was senior enough.
 24 Q. Why do you say that?
 25 A. There would be no other chief inspector who would attend

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1 that particular resilience forum that had geographical
 2 responsibility for the area in which the meeting was
 3 for.
 4 Q. We know that very senior officers from other
 5 organisations did attend. Was the fact that you were at
 6 times several ranks less senior a problem for you in
 7 terms of representing the interests of BTP?
 8 A. No.
 9 MR DE LA POER: Thank you very much indeed, Mrs Graham.
 10 Sir, I don't know whether you have any questions.
 11 SIR JOHN SAUNDERS: I have one point. Can I take you back
 12 to paragraph 21 of your third statement. You're talking
 13 about your contact or lack of it with
 14 Superintendent Gordon. You say at the end:
 15 "In an ideal world, we would have got our heads
 16 together. This incident was not part of an ideal
 17 world."
 18 MR DE LA POER: Sir, do you mind if I interrupt?
 19 Chief Inspector Dexter is also mentioned.
 20 SIR JOHN SAUNDERS: So sorry, yes. Sorry. Chief Inspector
 21 Dexter was the one you should have got your heads
 22 together in an ideal world. Thank you for that. This
 23 is just really recommendations for the future. It's
 24 JESIP which makes the requirement for those sort of
 25 meetings and you're saying: in an ideal world we can do

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1 that, but this isn't an ideal world. Actually, the sort
 2 of occasions like this when JESIP is required is never
 3 going to be an ideal world, so when I come to do my
 4 recommendations do I just say, "Forget JESIP" —
 5 A. No.
 6 SIR JOHN SAUNDERS: — "it just doesn't work, can't be done,
 7 and there's plenty of examples where it hasn't been done
 8 despite recommendations for it", so should we just be
 9 realistic and say, "Actually, forget it"?
 10 A. No, I completely take your point and the situation
 11 should have been that Chief Inspector Dexter and I would
 12 have been at a forward command point.
 13 SIR JOHN SAUNDERS: I'm not criticising the point being
 14 made, and if the reality is we just can't make it work
 15 in practice, then the whole thing needs to be—looked
 16 at. If it's some ideal textbook thing, you're not the
 17 first person to have said it to this inquiry: it's just
 18 an ideal we can't achieve. So shall we look for
 19 something else completely?
 20 A. I think it's very difficult to remove yourself away from
 21 a situation if you are the commander and be able to deal
 22 with what you need to be done without being on then
 23 scene. And I think that's the problem that we've both
 24 encountered. We've got into an operational world rather
 25 than setting ourselves away and having that joined—up

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1 approach.
 2 SIR JOHN SAUNDERS: So it's what has been called the
 3 stepping—back that is required?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR DE LA POER: Do you think JESIP was at the forefront of
 7 your mind as you made your decisions?
 8 A. No.
 9 Q. So might one solution be that ensuring that JESIP is one
 10 of the first thoughts that all people in a command role,
 11 whether badged as Bronze, Silver or Gold, that that is
 12 right at the forefront of their thinking? Because
 13 I think what your evidence amounts to is that if that
 14 had been your thought, it was physically possible to
 15 take steps to make it happen?
 16 A. Yes.
 17 Q. The scene was not so impossible, so chaotic when you
 18 were there that that couldn't have been arranged; is
 19 that right?
 20 A. I think it made it difficult with the Silver being away
 21 from the scene and the need for me to give a situation
 22 report to Silver from the scene. So I accept what
 23 you're saying would be good practice.
 24 Q. And possible —
 25 A. And possible.

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1 Q. -- provided the thought process actually occurs?
 2 A. And possible.
 3 MR DE LA POER: Thank you very much indeed.
 4 Sir, unless you have any questions at this stage,
 5 Mr Atkinson Queen's Counsel on behalf of the families is
 6 taking the lead.
 7 Questions from MR ATKINSON
 8 MR ATKINSON: Mrs Graham, a number of short topics just for
 9 a little more clarification on behalf of the families,
 10 if I may.
 11 Just touching on that last topic first, JESIP. How
 12 much hands-on, multi-agency JESIP training had you done?
 13 A. I'd done a course in December of 2014 specifically for
 14 JESIP.
 15 Q. Was that BTP or was that multi-agency?
 16 A. It was an e-learning BTP training course.
 17 Q. So going back to my question, but thank you for your
 18 answer, in terms of hands-on, multi-agency JESIP
 19 training, would the answer be that you had done none?
 20 A. The answer would be it would be woven into the Bronze
 21 2-week course with GMP.
 22 Q. So that was with GMP?
 23 A. It was based at a GMP -- but it was a national course.
 24 Q. In terms of working through, for example, the
 25 application of JESIP to a major incident, which would

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1 inevitably, would you agree, involve the
 2 Ambulance Service, almost certainly the Fire Service, as
 3 well as the local police force and you?
 4 A. Mm-hm.
 5 Q. Any training of that kind?
 6 A. No.
 7 Q. Do you think training of that kind would have helped?
 8 A. Yes.
 9 Q. In terms of you understanding what everybody else would
 10 be doing and how you're all going to need to work
 11 together and the best ways of achieving it?
 12 A. Yes.
 13 Q. And would you agree that, looking back on it, as you're
 14 now able to, if that kind of training happened on
 15 a regular basis, it would become nearer to being second
 16 nature?
 17 A. That's correct, yes.
 18 Q. Because the challenge in any actual incident is that
 19 there's a lot to think about very quickly and the more
 20 your training can give you a structure to that, the
 21 better?
 22 A. Yes.
 23 Q. One area in which there had been an attempt to provide
 24 a bit of multi-agency planning was through the
 25 resilience forum. I wonder, Mr Lopez, if we could have

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1 {INQ012418/1}.
 2 This is the terms of reference of the resilience
 3 forum and it's just to get a bit of your help, using
 4 this as a guide, all right? Because nominally, from
 5 what period of time were you the BTP senior
 6 representative on the forum?
 7 A. It was obviously broken --
 8 Q. Clearly, there was a period when you were very much
 9 doing something else, we understand.
 10 A. I took over command of Manchester as the chief inspector
 11 in 2015, I think spring, and then I went off on my
 12 10-month maternity leave in June 2016.
 13 Q. When you took up that post, did you understand that one
 14 of your responsibilities was to attend the forum?
 15 A. Yes.
 16 Q. And what did you understand your role on the forum to
 17 be?
 18 A. To understand the BTP contribution and also be aware of
 19 the other multi-agencies that were attending and to
 20 coordinate the responses to obviously the topics that
 21 were discussed during the forum.
 22 Q. We heard from your former assistant chief constable,
 23 Mr Smith, that he, having worked both for a Home Office
 24 force and the BTP, that there was perhaps some lack of
 25 understanding by Home Office forces as to exactly how

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1 the BTP fitted, particularly in relation to a response
 2 to an incident. Did you see it as a part of your role
 3 on the forum to try and change that understanding?
 4 A. I think it's important to note that a lot of the topics
 5 that were discussed at the resilience forum were not
 6 predominantly involving BTP. So you know, very much
 7 different topics of what we're talking about today. So
 8 if something of that nature would have arisen during the
 9 meetings then I would have been confident enough to
 10 interject with some BTP involvement and some
 11 considerations of the way that we police.
 12 Q. One of the things that we explored with Mr Argyle, who
 13 was the chairman of the resilience forum at the relevant
 14 time, was the whole range of things that the resilience
 15 forum had to consider at its meetings, from flooding to
 16 goodness knows what. Was the reality that certain areas
 17 of planning for major incidents didn't really get that
 18 much --
 19 A. No.
 20 Q. -- room on the agenda?
 21 A. I don't recall discussing that.
 22 Q. So for example, if we look at this list of objectives,
 23 we can see that the first one is:
 24 "To decide on joint strategic and policy decisions
 25 relating to Greater Manchester's preparedness and

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1 response.”
 2 In terms of its preparedness and response to power
 3 shortages or floods or matters of that sort, that
 4 perhaps got more attention than preparedness for
 5 a terrorist incident?
 6 A. From my recollection in the ones that I attended, yes.
 7 Q. Similarly, the third bullet down:
 8 "To ensure that appropriate multi-agency plans,
 9 procedures, training and exercises necessary to address
 10 identified or foreseeable local and wider area hazards
 11 are in place and outstanding gaps identified."
 12 Again would you agree, not much time spent in the
 13 terror context or a major incident context on that?
 14 A. Not from recollection, no.
 15 Q. Unless, sir, you have anything else on that, that can
 16 come down. Thank you.
 17 For example, by the time of this incident, had you
 18 seen Greater Manchester Police's contingency plan for an
 19 incident such as this?
 20 A. Not Greater Manchester Police's.
 21 Q. Had you seen SMG's, as in the arena owners' plan?
 22 A. Yes.
 23 Q. Had there been any training, as in people physically
 24 going through roles and incidents relating to the arena
 25 and arrangements for the arena, that you had been

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1 involved in?
 2 A. Not that I'd been involved in.
 3 Q. Or aware of happening?
 4 A. It's difficult to remember in what capacity I was --
 5 I worked at Manchester for a long time before I went off
 6 to Birmingham. But I was very much, in CID, working
 7 with the arena on other matters. So I'm aware of their
 8 contingency plans, but I can't say that it was in the
 9 capacity of a chief inspector.
 10 Q. Because again, their contingency plans, as you'd expect,
 11 deal with a range of contingencies, for example a fire,
 12 an incident of public disorder, all kinds of other
 13 things to do with electricity and things like that.
 14 In relation to a major incident, anything like this,
 15 were you aware of any training that BTP was involved in
 16 with the arena at the time that it was on your patch?
 17 A. I personally wasn't aware.
 18 Q. Again, do you think that might have helped?
 19 A. Absolutely.
 20 Q. If we could go back, Mr Lopez, to the document we just
 21 had. To help you, it's {INQ012418/2}, and if you could
 22 go down to the next page, please.
 23 I may have got that wrong. I'm sorry, it's the
 24 bottom of the first page rather than the top of the
 25 second, if you would, Mr Lopez, my fault {INQ012418/1}:

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1 "Membership. Strategic/board level representation
 2 from Greater Manchester's category 1 and 2
 3 responders..."
 4 And then a list to follow.
 5 Clearly, you were not in the BTP a Greater
 6 Manchester-based organisation, as has been made very
 7 clear, you were a national one.
 8 A. Mm-hm.
 9 Q. But "strategic board/level representation". Did you
 10 understand that there was an expectation that it was
 11 that level of person who was meant to be coming from the
 12 various services that were present?
 13 A. No. My understanding was that the superintendent
 14 responsible for the division moved that representation
 15 down to the respective chief inspectors because there
 16 will be a number of resilience forums across his area of
 17 responsibility for the Pennines.
 18 Q. And just so it's clear, are you talking about the BTP
 19 superintendent --
 20 A. Yes.
 21 Q. -- responsible for the BTP division?
 22 A. Yes.
 23 Q. So one can understand given the size of C Division,
 24 which covered up a large part of the country, there
 25 would be a large number of resilience fora that it would

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1 cover, and so a deliberate decision had been taken to
 2 reduce the level of rank required to attend?
 3 A. Yes.
 4 Q. The reality is, as the table in the experts' report
 5 shows, that there were a significant number of the
 6 meetings in that period of years when there was no one
 7 from the BTP there at all. Was the reality of that that
 8 you could not be there on those meetings, not least
 9 during your period of parenting leave, and no one else
 10 went in your stead?
 11 A. I think looking at the dates and the research, there is
 12 two occasions where I didn't go out of the period of
 13 time that I was in command. One, Michelle Wedderburn
 14 attended on my behalf, and the other, as I've previously
 15 mentioned, without having access to my calendar I can't
 16 give a reasonable explanation why I didn't go.
 17 Q. This is not a criticism of you because we can
 18 understand, for example, when you're on parenting leave
 19 why you wouldn't have been going to a resilience forum.
 20 But in terms of the force involving itself in
 21 multi-agency planning and being seen to do so, would you
 22 agree that there should have been somebody there?
 23 A. Yes.
 24 Q. And there should have been someone there at least of
 25 your seniority?

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1 A. Looking at the cohort of people who should attend from
 2 the board, then I would say that a chief inspector would
 3 be the appropriate attendee from the BTP.
 4 Q. Moving on to an entirely different topic, and that's the
 5 observation that you made in your third witness
 6 statement at paragraph 4, that there was no command
 7 structure at the scene.
 8 As we understand it, and you will, I know, correct
 9 me if I'm wrong, Mrs Graham, you came to be at the scene
 10 because you heard what had happened and went there. So
 11 self-deploying?
 12 A. Yes.
 13 Q. As indeed did a significant number of your colleagues,
 14 a good many of the police constables, for example, who
 15 were there deployed themselves to be there. An
 16 observation that you made in that regard in the BBC
 17 interview that you gave was that you were rather struck
 18 by how young a lot of those PCs who first turned up
 19 were. This isn't an ageist comment, but the reality
 20 is that if people self-deploy, there is no
 21 predetermination as to what experience or skills they
 22 may have?
 23 A. Mm-hm.
 24 Q. And that's always a risk, I suppose, that people will
 25 just go in and do their best?

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1 A. Mm-hm.
 2 Q. But do we understand that in your case, no one had
 3 contacted you as the Manchester Detective
 4 Chief Inspector, given that this was a Manchester
 5 incident to say, "You need to get yourself there ASAP",
 6 you heard about it and went?
 7 A. Yes.
 8 Q. So no one had --
 9 SIR JOHN SAUNDERS: I don't want anyone to be -- you heard
 10 about it and you rang in?
 11 A. I did.
 12 SIR JOHN SAUNDERS: And they said that they wanted you to
 13 come in?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: It looks to me as if they're saying,
 16 "We're in the process of contacting everybody to get
 17 them in". It's not quite that you just went in without
 18 anyone expecting you --
 19 A. No.
 20 MR ATKINSON: I entirely accept that correction, thank you,
 21 sir.
 22 Without going again through all the discussions of
 23 metals, there was never a stage when you had a call from
 24 someone saying, because you were the most senior
 25 personal who could get to that scene quickly, "You are

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1 going to be our Bronze on scene"?
 2 A. No.
 3 Q. It was rather that you were the most senior person who
 4 attended and therefore you took command of the scene
 5 until someone more senior than you, in the form of
 6 Superintendent Gordon, arrived?
 7 A. That's correct.
 8 Q. You knew he was coming, didn't you --
 9 A. I did.
 10 Q. -- for some time before he got there?
 11 A. I did.
 12 Q. Did that in any way inhibit your decision-making in the
 13 sense of thinking: I will leave those things for the
 14 Bronze commander when he gets here?
 15 A. Absolutely not.
 16 Q. When you arrived, you had a conversation with
 17 Sergeant Cawley, who had been the most senior BTP
 18 officer for some time --
 19 A. Yes.
 20 Q. -- on scene? Do we understand that you did not learn
 21 from him one way or the other whether there had been
 22 a METHANE message sent out?
 23 A. I didn't ask the question.
 24 Q. You didn't learn from him that Fishdock had been decided
 25 upon as an RVP, you worked that out for yourself?

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1 A. That's correct.
 2 Q. Did you learn either from him or at all whether that
 3 location had been searched to determine whether it was
 4 safe as an RVP or not?
 5 A. There was a conversation between myself and Inspector
 6 Michael Wedderburn, quite early on after my arrival,
 7 about the searching of that Fishdock car park and
 8 whether it had been done. As a result of that
 9 conversation, I instructed him to coordinate it to be
 10 done. Whether it had been done once or not, it was to
 11 be done again because I don't think that we had
 12 clarification that it was absolutely done.
 13 Q. Do we understand that you had a concern more widely
 14 about safety in the scene and the risk of secondary
 15 devices and what had been done or needed to be done
 16 in that regard?
 17 A. Yes.
 18 Q. Do we understand that you did not establish from
 19 Mr Cawley whether there was a forward command post when
 20 you arrived? You've been asked questions about whether
 21 you set one up and clearly others had been there before
 22 you. Did you establish whether anyone else had set one
 23 up before you got there?
 24 A. I didn't ask the question of Sergeant Cawley.
 25 Q. And the consequence of that, in terms of you arriving

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1 at the scene, was that you needed to find out for
 2 yourself where others of a senior rank were rather than
 3 knowing almost before you got there where they would be?
 4 A. Yes, because I spoke to Sergeant Wildridge very soon
 5 after arriving, who informed me that Inspector Smith was
 6 in the City Room. So although not identified as
 7 a forward command point, that's where he was located and
 8 where I spoke to him.
 9 Q. So in terms of the benefits of a forward command point,
 10 it would have helped you, would it not, if you had been
 11 told, "This is the forward command point", so you'd have
 12 known where everyone was going to be and where you could
 13 speak to them?
 14 A. It would have helped.
 15 Q. One thing that you had been asked to do, is this right,
 16 before you got there, by Mr Gregory, was to be his eyes
 17 and ears or was that after you had arrived?
 18 A. I didn't speak to Mr Gregory until 00.13.
 19 Q. And was it because of that request that you then were as
 20 mobile as we have seen that you were, looking at many
 21 areas of this scene so that you could report to him on
 22 them?
 23 A. I think I was mobile not because of what
 24 Chief Superintendent Gregory asked me to do, I was
 25 mobile because I was getting requests to speak to other

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1 individuals as well. I don't remember him giving me any
 2 instructions to go here, there, to other locations as
 3 such from direction from Silver.
 4 Q. One of your actions, just again to clarify, was to
 5 request the video sweep. Just so we understand, is that
 6 someone viewing footage that was already in existence or
 7 is that someone creating a new source of footage? Is it
 8 someone recording something or reviewing something?
 9 A. A new source of footage, so the scenes of crime officer
 10 taking a handheld video of the scene as it was so that
 11 we have an audit trail of evidence or forensics, making
 12 sure that we know things haven't been disturbed of the
 13 scene.
 14 Q. You may not know the answer to this and I know you will
 15 tell me if that's the case, do you know if that footage
 16 was provided to the BBC as part of the preparation for
 17 their documentary?
 18 A. I doubt very much it would be.
 19 Q. You'd certainly hope not, wouldn't you?
 20 A. No.
 21 Q. I think the final thing, just for your help. We have
 22 seen heavily redacted images of you in the City Room.
 23 Now, by the time you arrived, those who could be helped
 24 had already been removed from the City Room.
 25 A. Absolutely.

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1 Q. But those images are redacted because there were those
 2 who could not be helped and who were still there.
 3 A. Yes.
 4 Q. And this is not aimed at you individually, but what
 5 thought was being given by those who were in the
 6 City Room as to whether there were places more
 7 appropriate for them to be talking or using their phones
 8 than there?
 9 A. From recollection, the only people within that City Room
 10 when I arrived and spoke to Inspector Smith at 00.04
 11 were police personnel with the exception of one
 12 individual.
 13 Q. But in terms of it being used as a makeshift forward
 14 command post in the sense that that's where Mr Smith was
 15 and where you spoke to him and in terms of using it as
 16 somewhere where you have phone calls with people that
 17 you've been asked about, did you think it perhaps was
 18 more appropriate not to do that in that room?
 19 A. The situation when I arrived was — there was still
 20 actions ongoing to make sure that it was a safe
 21 environment, so the work that was being conducted at the
 22 time was to ensure that there was no secondary devices,
 23 that they could clearly identify who was responsible,
 24 and to secure the area. As soon as that work had been
 25 done, the scene was shut down.

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1 MR ATKINSON: Thank you very much. Thank you, sir.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR DE LA POER: Mr Gibbs, please, sir.
 4 SIR JOHN SAUNDERS: Mr Gibbs, are you happy to carry on?
 5 Questions from MR GIBBS
 6 MR GIBBS: Absolutely, if you are, if the witness is and if
 7 everyone else is.
 8 Some really just loose ends, I think, Mrs Graham.
 9 You mentioned attempts to contact other senior officers
 10 en route in from home. Which officer in particular were
 11 you trying to get hold of?
 12 A. My direct line manager, Superintendent Wylie.
 13 Q. And were you able to raise him?
 14 A. No.
 15 Q. When you then get to Peninsula, and you've described
 16 meeting the scenes of crime officer, Davies?
 17 A. Yes.
 18 Q. And going with him to the scene. Had he, from your
 19 conversation, already been in the City Room?
 20 A. Yes.
 21 Q. Did he tell you anything about that therefore before you
 22 got there?
 23 A. I think he gave me a situation report en route to the
 24 scene about the number of casualties and a fair amount
 25 of information because I knew what kind of situation

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1 I was walking into and obviously I'd only been in the
 2 office a couple of minutes before I left, so he was my
 3 first source of information aside from the control room.
 4 SIR JOHN SAUNDERS: Could you tell me who it was? I missed
 5 the name.
 6 A. Alan Davies.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GIBBS: In fact, I think he appears, although he's not
 9 identified, on some of the stills later.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR GIBBS: You've just said, I think, that you went to the
 12 City Room on account of something that
 13 Sergeant Wildridge told you or -- what was the
 14 conversation with Sergeant Wildridge?
 15 A. The conversation at the top of the stairs when I first
 16 got there was about -- I wanted to make sure that there
 17 was a cordon in place and that there was details of
 18 people going in and out of that City Room, so
 19 I instructed him to place an officer to take those
 20 details, and he informed me of the whereabouts of the
 21 GMP inspector.
 22 Q. May I just -- I'm going to give you, sir, a reference.
 23 We're not going to bring it up on screen. It's to the
 24 transcript of the radio traffic. It's {INQ028932/129}.
 25 We'll find a tape counter time there, which doesn't,

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1 I think, quite coincide with the CCTV stills, but
 2 there's an exchange that goes like this. Wildridge:
 3 "Any officer with Chief Inspector Rainie?"
 4 Is that your maiden name?
 5 A. Mm--hm.
 6 Q. Sergeant Cawley:
 7 "I'm stood next to her now."
 8 Wildridge:
 9 "Send her to the City Rooms, ident to the GMP
 10 inspector, and also chief medical officer for a brief of
 11 the area."
 12 Cawley:
 13 "Yeah, I'll let her know."
 14 Does that fit in with your memory of the order of
 15 events?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Did you see the chief medical officer?
 18 A. I didn't, he must have left before I got there.
 19 MR GIBBS: Then we get to your meeting with Inspector Smith
 20 in the City Room and I think you have been looking at,
 21 although we deliberately have not been bringing these
 22 documents up on screen during witnesses' evidence, but
 23 it's -- are we describing it as the log? Some extracts
 24 from the master chronology.
 25 MR DE LA POER: An audio schedule.

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1 MR GIBBS: Thank you very much. I think the chairman has it
 2 in front of him probably and you do too. For others,
 3 the reference is {INQ041131/1}.
 4 On the left-hand side of it there are some sequence
 5 identifier numbers and then part that captures this
 6 meeting or snippets of this meeting with Mr Smith begins
 7 at identifier 9057 and it is about 00.05. I'm not going
 8 to read it out, but can I just, so that we can follow
 9 it, ask you to identify some topics which plainly were
 10 there discussed: the number of casualties; where the
 11 suspected bomber was?
 12 A. Yes.
 13 Q. That the injured had gone to hospital?
 14 A. Yes.
 15 Q. And that somebody from GMP, an officer from GMP, was
 16 going to try to collate all of the hospitals to which
 17 injured people had gone? That there had just been
 18 what's described as a Silver meeting in
 19 GMP Headquarters?
 20 A. Yes.
 21 Q. Did you know about that?
 22 A. Smith told me that he thinks that they had just had
 23 a Silver meeting.
 24 Q. Did you know the content of it?
 25 A. No.

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1 Q. Continuing -- and I'm at identifier 9098 -- there's
 2 a reference to a BTP crime scene manager called
 3 Allan Hobson.
 4 A. Mm--hm.
 5 Q. What is the BTP crime scene manager doing?
 6 A. He's the person that conducted the sweep, the video
 7 sweep, that we've already discussed.
 8 Q. Yes, thank you. So was he with you at the time of your
 9 meeting with Inspector Smith, do you remember?
 10 A. He was in the City Rooms. Whether he overheard the
 11 conversation -- but he was definitely in the vicinity.
 12 Q. So the video sweep, is that one of the topics that was
 13 discussed at that very first meeting with the GMP
 14 officer?
 15 SIR JOHN SAUNDERS: It looks like he's there, from the
 16 description here, as part of the same meeting.
 17 MR GIBBS: Yes, quite.
 18 A. Yes.
 19 Q. Reference to an explosive dog having been used. What's
 20 said is:
 21 "Having gone through the rest of it for suspect
 22 packages."
 23 And something about firearms. Was that a BTP dog
 24 who had done that, do you know?
 25 A. I don't know whether it's a GMP dog, but I know that we

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1 had a BTP dog and a handler at that location at that
 2 time.
 3 Q. Working in conjunction with anybody?
 4 A. They were working together with the firearms as well.
 5 Q. From GMP?
 6 A. Yes. And I know that because the BTP dog was resting at
 7 that point, but there was another GMP dog on the scene.
 8 Q. Then if we go to identifier, and I think we're still
 9 in the same place, 9138, you mentioned a question about
 10 CCTV and what attempts had been made to -- and Mr Smith
 11 says that he's asked a couple of his technical officers
 12 to look into that.
 13 Then in the next box, 9150, you offered a couple of
 14 your detectives to help with that.
 15 A. Yes.
 16 Q. Is that the two detectives who then went to the control
 17 room?
 18 A. Yes.
 19 Q. Thank you.
 20 Moving on to the moment at about 00.40, when
 21 you have gone into and through the City Room again and
 22 there's the question of did you notice, did you register
 23 that Chief Inspector Dexter was also just inside the
 24 concourse and you said you didn't. I don't want any of
 25 the details. Can we just understand the nature of the

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1 task that you had set yourself at that moment, just
 2 in the barest terms? Were you focused upon the body of
 3 the bomber?
 4 A. Yes.
 5 Q. And in contact at the same time with your officers in
 6 the control room?
 7 A. Yes.
 8 Q. By which I mean the arena control room rather than the
 9 force control room.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Mr Gibbs, just to expand on that, so
 12 everyone understands this: you are focused on the
 13 bomber, the reason being to give some sort of
 14 description to the people looking at the CCTV to see if
 15 he has put another device somewhere, which could be
 16 seen?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Just so we all understand why that is.
 19 MR GIBBS: Thank you very much, exactly.
 20 Did you regard that as something of a priority?
 21 A. Yes.
 22 Q. In the master schedule of events, which you have been
 23 taken to, and I think it's -- I'm going to ask that
 24 Mr Lopez again brings this up, please. It's
 25 {INQ035612/1}. We looked quite quickly at some of the

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1 later entries.
 2 {INQ035612/528}. I hope that it will be a CCTV
 3 still with some text on the left-hand side. Yes.
 4 It's now nearly 1 o'clock and we see just the text,
 5 you're downstairs on the concourse and near the mouth of
 6 the station, and you're walking towards the exit and
 7 talking with an unknown male.
 8 A. Mm--hm.
 9 Q. Do you know who that is?
 10 A. Yes.
 11 Q. Who is that?
 12 A. That's DC Julian Hopkins.
 13 Q. So this is one of the detectives who you'd sent to the
 14 control room to look at the CCTV and now he is with you
 15 on the concourse?
 16 A. Yes.
 17 Q. The second box on that page at 00.58 refers to a mobile
 18 telephone being passed to you and you perhaps watching
 19 a video or looking at images. Can you recall what was
 20 happening there?
 21 A. DC Hopkins had taken an image on his mobile phone from
 22 the camera within the -- in the CCTV room to show me
 23 whether I felt that the description of that person
 24 matched the description of the bomber.
 25 Q. Of the person whose body you had been looking at inside

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1 the concourse?
 2 A. Yes.
 3 Q. Thank you very much. Then is it shortly after that, if
 4 we go to {INQ035612/538}, that you go outside. You
 5 don't remember this conversation with Mr Dexter at all
 6 now, do you?
 7 A. If you'd asked me before we knew what it was about then
 8 I don't remember.
 9 Q. And you now know what it's about and what was it about?
 10 A. It was about him asking me to organise some of his
 11 officers going to view the CCTV.
 12 Q. Which you had just been looking at on the mobile
 13 telephone?
 14 A. Yes.
 15 Q. Which DC Hopkins had passed to you?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: I don't doubt it, but how have you found
 18 out what the conversation was?
 19 A. I believe from Chief Inspector Dexter's dictaphone.
 20 SIR JOHN SAUNDERS: Thank you. That's fine. I just wanted
 21 to know.
 22 MR GIBBS: Two other things, very quickly, on your training.
 23 The Bronze course that you have spoken about, I think
 24 you said it was a 2 weeks. Is that two solid weeks of
 25 training, 10 days?

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1 A. I believe so.
 2 Q. It's a national training course you and attended a GMP
 3 office in order to do it, did you?
 4 A. A training school.
 5 Q. The training school?
 6 A. Yes.
 7 Q. Lastly this, arising out of a question the chairman
 8 asked you. It's about forward control points and
 9 I just -- I'm not going to suggest anything to you, but
 10 just for the assistance of the chairman going forward,
 11 a forward control point, would that have been helpful on
 12 the night for people to know where to find you?
 13 A. Yes.
 14 Q. But if you had been at a forward control point, could
 15 you have done all the things that you felt you needed to
 16 do?
 17 A. No. Eventually I could have, but probably not as
 18 swiftly as I did.
 19 Q. Yes. So could you, for instance, have taken upon
 20 yourself the task of inspecting the body of the bomber?
 21 A. No.
 22 Q. Could you have gone to speak to the GMP inspector, and
 23 as you were being told on the radio, perhaps also the
 24 chief medical officer, in the City Room?
 25 A. No.

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1 Q. Unless the forward control point had been the City Room?
 2 A. Yes.
 3 Q. Would that have been an appropriate forward control
 4 point, do you think?
 5 A. No.
 6 Q. Why not?
 7 SIR JOHN SAUNDERS: Well, it's not the easiest place for
 8 everyone to get to. Obviously the front of the station
 9 is the best place.
 10 I don't want to go down what may be a blind alley.
 11 What we have actually heard -- and you, I think,
 12 confirmed this -- if the forward control point is
 13 important, obviously commanders need to go off elsewhere
 14 but they leave their representative at the forward
 15 control point to make liaison happen. So it's not an
 16 either/or as I understand it, but you tell me. It's not
 17 an either/or that you have to be there, you can leave
 18 a representative there who can make sure the liaison
 19 takes place; is that your understanding that?
 20 A. That could happen. I think it would prolong matters by
 21 leaving and keep coming back, but I take your point.
 22 SIR JOHN SAUNDERS: I thought that was what we heard --
 23 MR GIBBS: Absolutely. Could I ask the witness to explain
 24 what she meant by that last comment? Of course you can
 25 leave someone there. What do you mean by it would

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1 prolong matters?
 2 A. I think the location of a forward command point should
 3 be away from the main scene. From my experience,
 4 certainly from this incident, there is a requirement for
 5 you to go to the scene for some -- for example the
 6 examination of the bomber. I could have asked somebody
 7 to do that for me, however in my mind it wasn't
 8 a pleasant task and not one that I wanted to ask
 9 somebody else to do.
 10 SIR JOHN SAUNDERS: No, no, I understand this, and this is
 11 along what I'm saying: are they a complete waste of
 12 time, forward command posts? Shall we just forget about
 13 them because actually you need to go off and do much
 14 more important things? Or is there some way it's
 15 organised so you actually do have a forward command
 16 post?
 17 I mean, Chief Inspector Dexter needed to go off and
 18 supervise his armed policemen, whereas I understood, if
 19 it worked properly, you'd at least have a person there
 20 who'd know what is going on and can actually correlate
 21 to people, but we'll hear from other commander down the
 22 line.
 23 As I understand it, you agree in general with the
 24 idea of a forward command post?
 25 A. I believe they are beneficial later on in the

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1 incident -- they could be beneficial. It's difficult
 2 because I didn't use one and I didn't --
 3 SIR JOHN SAUNDERS: I'm not sure the textbook says, "Don't
 4 worry until later".
 5 A. No, it doesn't.
 6 SIR JOHN SAUNDERS: Perhaps you can rewrite the textbook!
 7 MR GIBBS: Those are the questions I had, thank you.
 8 SIR JOHN SAUNDERS: Thank you very much.
 9 Further questions from MR DE LA POER
 10 MR DE LA POER: Just two follow-ups, please, Mrs Graham.
 11 So far as you were aware, I'm going to look at the
 12 question of explosive dogs for a moment, did you know
 13 when the explosive dog from BTP arrived on scene?
 14 A. My recollection is they were there before I was there
 15 in the City Room.
 16 Q. Did you have any information about when they'd got
 17 there?
 18 A. No, not before I got there.
 19 Q. Once you were there, were you given any indication as to
 20 how long they'd been there?
 21 A. I think he was there before I attended the City Room,
 22 I think they were already in there.
 23 Q. Sorry, were you told how long they'd been there?
 24 A. How long they'd been there?
 25 Q. Yes.

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1 A. No.
 2 Q. Is the same true of any GMP explosive dog on the scene?
 3 A. True, yes.
 4 Q. Thank you.
 5 The second matter is just arising from the
 6 questioning of Mr Atkinson in relation to the
 7 Greater Manchester Resilience Forum. As he did,
 8 I absolutely appreciate that you were on parental leave
 9 at the time, so this is not something for you to
 10 organise, but can you help us with whose responsibility
 11 in your absence it would have been to organise that,
 12 firstly ?
 13 A. Temporary Chief Inspector Kooper was taking my role, so
 14 he would take command of my responsibilities whilst
 15 I was absent.
 16 Q. When you returned to work, were you informed by him or
 17 anyone else that there hadn't been attendance at every
 18 meeting in your absence?
 19 A. No.
 20 Q. Was that something it was relevant for you to know or
 21 was that something you didn't need to know when you
 22 returned to work?
 23 A. He could have informed me on a handover. I have no
 24 recollection of him telling me that. I would want to
 25 know because obviously I would pick up the attendance

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1 again and would need to know why.
 2 Q. So in your mind, relevant information for you to know
 3 about how often that attendance had been achieved from
 4 him, but you don't have a recollection of having
 5 discussed that with him?
 6 A. Correct.
 7 Q. So it may be that your previous answer incorporates the
 8 answer to this question: is this inquiry the first time
 9 that you are aware that you've learned about a lack of
 10 attendance in your absence?
 11 A. Yes.
 12 MR DE LA POER: Thank you very much indeed, Mrs Graham.
 13 I have no further questions for you.
 14 SIR JOHN SAUNDERS: One more general point, which you can
 15 just help me about, and that's the interrelationship
 16 between Home Office forces and BTP. We know that on the
 17 station, on the concourse, both of you have
 18 jurisdiction .
 19 A. Mm—hm.
 20 SIR JOHN SAUNDERS: How does that relate between the two of
 21 you? Suppose you're on Victoria Station,
 22 Piccadilly station, and there is a Greater Manchester
 23 police constable there. Can you go and say to him,
 24 "Just go and do this for me", or is he entitled to
 25 say — I'm sure he wouldn't — "No, you're not anything

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1 to do with me"?
 2 A. No. He would —
 3 SIR JOHN SAUNDERS: He would do what you say?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: So the ranks work?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: And similarly, if you're out of your
 8 jurisdiction area, as I understand it, you can be, as it
 9 were, asked or required by a Home Office force to go and
 10 help them and then you have the powers of a constable
 11 when you're doing it?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Again, do the ranks work in the normal
 14 way?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Okay, thank you.
 17 Timetabling
 18 MR DE LA POER: That concludes the evidence for the day and
 19 concludes our week.
 20 Sir, the position is this, as has already been
 21 communicated to the core participants' legal
 22 representatives, but I understand that not every single
 23 core participant necessarily will have learned this by
 24 now. The inquiry will sit next week Wednesday to
 25 Friday, so it will not be a sitting day on Tuesday and

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1 Monday, obviously, is a bank holiday.
 2 This is in order to allow the chairman and the
 3 inquiry legal team to work on other matters outside the
 4 hearings on Tuesday. As a result, the timetable as
 5 previously published will be amended.
 6 On Wednesday, 5 May, we will be hearing from
 7 Chief Inspector Sexton, as he is now, Inspector Sexton,
 8 the FDO on the night.
 9 On Thursday, 6 May, we will continue Chief Inspector
 10 Sexton's evidence and start and do as much as we can,
 11 hopefully to conclusion, of Police Support Staff
 12 Ian Randall, who was the force duty supervisor on the
 13 night.
 14 On Friday, 7 May, we will hear from Sergeant
 15 Andrew Core and Police Support Staff David Myerscough.
 16 Because we have a lot to get through next week, and
 17 because we had originally had Friday as a catch-up day
 18 if we had failed in that objective, may I propose that
 19 we sit at 9.30 on Wednesday to give us the best prospect
 20 of completing all of that evidence?
 21 SIR JOHN SAUNDERS: Right. Can I apologise to everyone for
 22 changing the arrangements very much at the last minute.
 23 It is made necessary because we do need to do something
 24 urgently and I'm very sorry about it and we are sitting
 25 Friday, as it were, instead of sitting on Tuesday, but

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1 we would obviously normally try and give you much more
 2 warning about that. There are some aspects we've got
 3 behind with and we'll only catch up if we do it on
 4 Tuesday.

5 Can I thank you very much for giving your evidence.
 6 It's vital to us to know how things work in practice as
 7 well as how they work in a book and if there are
 8 problems with the reality, so thank you very much for
 9 your help.

10 A. Thank you.

11 SIR JOHN SAUNDERS: Thank you.

12 (1.24 pm)

13 (The inquiry adjourned until 9.30 am
 14 on Wednesday, 5 May 2021)

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