

OPUS2

Manchester Arena Inquiry

Day 126

July 1, 2021

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Thursday, 1 July 2021

(9.30 am)

(Delay in proceedings)

(9.37 am)

MS TESSA TRACEY (continued)

MR DE LA POER: Sir, may I apologise for the delay in starting. The explanation is that the real time transcript is experiencing technical difficulties. I'm told the stenographer is in a position to maintain a transcript as we go along. The real time transcript will not be immediately available but it will come on line very shortly. In those circumstances, given our programme today, I propose that we make a start and I hope that nobody is inconvenienced by the short period when the real time transcript is not published.

SIR JOHN SAUNDERS: Does anyone have a problem with that?

MR COOPER: Not at all, sir.

SIR JOHN SAUNDERS: Mr Cooper.

Questions from MR COOPER

MR COOPER: As you know, I represent the bereaved families in this issue.

Can I take you immediately, please, to your statement, {INQ023880/1}, paragraph 11, please. Remind yourself of what you said in paragraph 11 concerning JESIP. You say:

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"An agreement was made with the national JESIP team that we could receive updates and information independently from the FRSSs."

You gave us this evidence yesterday. You completed, not you personally, but your organisation completed:

"... JESIP embedding self-assessment questionnaires [and we'll briefly look at one in a moment] and an ongoing survey undertaken by the national JESIP team to get a national picture."

Then you go on:

"A JESIP assurance visit was undertaken at the control centre on 17 August 2017."

And a report has been submitted. When was the last JESIP assurance visit made before 22 May 2017?

A. That was the first one that we'd had. What we had done is we had participated in an assurance visit as part of the Fire and Rescue Service assurance visits.

Q. So in terms of the JESIP assurance visit, that's the first time that the control centre had received one?

A. The first time that North West Fire Control had had one independently, yes.

Q. I think I recall, the control centre was up and running since 2014, would that be right?

A. Yes, that's correct.

Q. Would you agree it's somewhat surprising that that was

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the first one you actually had?

A. Generally, the control rooms are part of a Fire Service and therefore all the questions and everything that are actually covered within a JESIP assurance visit are captured within that Fire and Rescue Service assurance, so they had been taking place and we had had to input information into those assurance visits, and it was only then, when we decided that the best option for North West Fire Control was to be identified in our own right, and that is when, through the conversations with Mr Daniels, that that was agreed nationally, and therefore we asked whether we could then also have our own assurance visit.

Q. Was the decision made that Fire Control should have visits in their own right as a result of experiences on the 22nd?

A. I don't think that was the driver, but I think that it was -- I think that we did definitely recognise that JESIP was very much one -- we would be very, very keen to embed it within the organisation. We wanted to make sure that we were receiving all the information that we should do and that we were actually then going to be able to communicate directly with the JESIP national team, so we were always going to be able to receive that information in our own right.

3

Q. This will be a theme of the questions I'm going to be asking you shortly today. These are all fine observations, but they come a bit late, don't they, to realise how important JESIP was and perhaps the control centre needed their own independent assessments? Why did it take from 2014 to after this atrocity for that decision to be made?

A. I think very much before that time we were in the training phase and delivering that training that was only actually made available -- the control room supervisors' and managers' training became available following the input from the College of Policing, which -- that actually came about, first of all, in 2014, and it was being delivered over -- the time span was actually for it to be delivered by the end of January 2017.

Q. Would you agree it seems to be on a number of aspects of evidence, and this the more latter one, that North West Fire Control was being treated as a poor relation to the Fire Service in terms of integration into the JESIP process?

A. I wouldn't say that because we were part of that through the assurance visits with the Fire and Rescue Services, but I think it very became apparent when the training was introduced for the tri-service training and then

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1 I think we really did recognise that in our own right
 2 it would be something that we'd really like to push
 3 forward and to really establish within our own right.
 4 Q. Let's look, very briefly, for instance at the seven
 5 assurance visit recommendations, and this is
 6 {INQ016168/1}. There it is all conveniently put into
 7 one sheet. There's no date on this. But do you
 8 recognise that?
 9 A. I do, yes.
 10 Q. In a nutshell effectively it says this:
 11 "The JESIP team indicated they visited 101 emergency
 12 services throughout 2017."
 13 You say your visit was in 2018. And they say:
 14 "Seven key points were recommended to services to
 15 assist with effective embedding."
 16 Casting your eye down those seven, would you say or
 17 would you agree with me that North West Fire Control
 18 hardly met any of those recommendations on 22 May 2017?
 19 And if you think they did, tell us.
 20 A. (Pause). Do you want me to go through each one?
 21 Q. Let's do so very briefly:
 22 "Services should prioritise a review of local
 23 policies, plans and procedures based on risk."
 24 Had the control room done so?
 25 A. In relation to policies, plans and procedures, a lot of

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1 those in relation to mobilising are actually the Fire
 2 and Rescue Service's plans and policies. In relation to
 3 the risk, that would have been factored into those
 4 plans. Then we would then be able to look to see that
 5 we would be able to actually implement those.
 6 The second one --
 7 Q. Let's not move on to the second one yet. Can I suggest
 8 the answer you gave on the first one is somewhat vague.
 9 I'm not asking about what fire services did, I'm asking
 10 what Fire Control did around the time of 22 May. Did
 11 Fire Control themselves review any other policies, plans
 12 and procedures based on risk or did they simply take
 13 them from Greater Manchester Fire Service?
 14 A. We don't have the responsibility about the risk
 15 in relation to the attendance and the resources that are
 16 determined to go to an incident. We don't have the
 17 knowledge to be able to do that.
 18 SIR JOHN SAUNDERS: This somewhat contradicts on what
 19 happened on 22 May, doesn't it? Because the Fire
 20 Service say perfectly clearly: this is an explosion,
 21 that's what you are meant to do, you should have sent
 22 the fire engines there to the scene, it would have
 23 solved all the problems, the Fire Service would have
 24 been there from the beginning, it's all your fault.
 25 You say no and this is your -- and we have to make

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1 some assessment of risk, you say, and therefore as
 2 a result of our assessment of risk we thought we could
 3 be sending firemen to their deaths if we did it -- hang
 4 on. You have just said to Mr Cooper risk is not what we
 5 do, it's nothing to do with us, the risk.
 6 A. It's about being risk aware in that, but the training
 7 from the MTFA was what the control room operators
 8 considered.
 9 SIR JOHN SAUNDERS: But you have just said to Mr Cooper, as
 10 I understand it, and tell me if I've misunderstood your
 11 answer: risk is not for us to consider.
 12 A. I apologise, sorry.
 13 SIR JOHN SAUNDERS: You don't need to apologise. If your
 14 answer is not correct, just tell me and we'll correct
 15 it, as it were --
 16 A. In the principle of that then, of the -- we are risk
 17 aware in relation to the mobilising.
 18 MR COOPER: So did you -- and when I say "you", I don't mean
 19 you personally, you understand that -- but did you then
 20 work in accordance with the first recommendation, that
 21 you as a service, Fire Control, prioritise a review of
 22 policies, local policies, plans and procedures based on
 23 risk? Not just relying on the Fire Service, did you as
 24 a Fire Control act proactively to do that?
 25 A. In relation to the JESIP models and principles, yes,

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1 I would say that risk is -- it is considered.
 2 Q. Then help us, how? I'm going to suggest to you
 3 generally the attitude of the Fire Control is passive,
 4 it receives, it doesn't -- it isn't proactive. I'm not
 5 going to go through every item on the seven list here,
 6 we'll be here all morning, I'm not going to do that, but
 7 just on this: what did the Fire Control do, what did you
 8 do which was proactive to associate yourself with
 9 recommendation number 1? Not rely on the Fire Service,
 10 what did you do?
 11 A. I think that does come with the training that we try to
 12 implement with our staff in relation to the training
 13 that we have in relation to the MTFA mobilisations and
 14 so that the staff are aware of some of the
 15 considerations that they then have to make in relation
 16 to mobilising.
 17 Q. "The staff are aware of some of the considerations they
 18 have to take on account of mobilisation."
 19 That's your evidence, is it? Those were your words.
 20 Do you stand by that?
 21 "The staff are aware of some of the considerations
 22 they have to take into account when it comes to
 23 mobilisation"?
 24 A. Well, they are aware of the considerations, if I'm being
 25 fair to them.

8

1 Q. Are you sure? It seems to me you're making this up as
2 you go along. Are you sure or are you saying what you
3 think you should say?
4 SIR JOHN SAUNDERS: That's a bit of a criminal advocate's
5 phrase, if you don't mind me saying so.
6 MR COOPER: I'm sorry, sir. It slipped out. I tried to
7 hold it back. I'll put it in a nicer way.
8 SIR JOHN SAUNDERS: It's not that. This is a witness -- I'm
9 sure she is genuinely trying to help us and help me, so
10 please --
11 MR COOPER: And let me explain to you because I don't want
12 you to be distressed. I have a duty on behalf of the
13 families --
14 A. Absolutely, I understand that --
15 Q. -- as we all have duties in respect of helping the chair
16 over all of that. This is our chance just to try to
17 drill down into this.
18 A. I understand that.
19 Q. We're grateful for you coming to give evidence and let
20 that be said, but I have to put to you that the overall
21 attitude, I'll put it this way, the overall attitude
22 is that of being passive and not proactive in keeping up
23 to date with JESIP principles and making sure that they
24 were executed on the night. What do you say about that?
25 Passive.

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1 A. I can't agree with that word, "passive". The control
2 room staff on the night followed the actions that were
3 given to them to do after they had made the decision to
4 inform the national inter-agency liaison officer and
5 then they then followed the instructions, mobilised the
6 resources and, I think that I touched on it yesterday,
7 I think that some of the -- I think that the staff then
8 expected, with the training that they had in relation to
9 JESIP, for that to be more of a process that they were
10 following. And I think it has come, in particular with
11 hindsight and certainly from some of the evidence that's
12 coming to light in the inquiry, that perhaps the full
13 evaluation of the information that was being received in
14 the control room wasn't actually considered enough.
15 Q. I want to ask you about one other item here. As I say,
16 I am not going to go through them one by one but I do
17 want to ask you about item 5:
18 "Exercises should be in place which include the
19 JESIP exercise objectives."
20 Then it goes on to specifically refer to commanders.
21 Were exercises in place in the North West Fire
22 Control in and around 22 May 2017 which included the
23 JESIP exercise objectives?
24 A. We hadn't undertaken any specific exercises in relation
25 to -- other than the scenario training that was actually

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1 taking place within the JESIP and the MTFA training.
2 Q. All right.
3 SIR JOHN SAUNDERS: Mr Cooper, do you mind if I come back to
4 two issues which really concern me and where we've got
5 to, it seems to me, in the evidence you and other people
6 have given.
7 We have this difference of view which, it seems to
8 me to be absolutely apparent, between the Fire Service
9 and NWFC. The Fire Service say: there are the action
10 cards, you follow them, you don't have any discretion,
11 it's not for you to ask for advice, you just get up and
12 do it. Right? And they have emphasised this on the
13 explosion card which we've seen since this incident.
14 A. Yes, sir.
15 SIR JOHN SAUNDERS: And they've made it absolutely clear: if
16 a bomb goes off, that's an explosion and you follow the
17 explosion card.
18 A. Yes, sir.
19 SIR JOHN SAUNDERS: The people operating in NWFC didn't
20 regard that as being their responsibility to just
21 blindly follow the card. How does that come about, that
22 you have two organisations, supposedly acting together
23 to deal with an emergency, who have completely different
24 views of the obligations of NWFC? How does that arise?
25 A. I think it is influenced by the training that the staff

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1 had had and that I'd had as well in relation to the MTFA
2 training and that training identified certain risk
3 elements and methodologies that could then unfold to be
4 an MTFA-type incident. The information that they in the
5 control room got on the night was that it had been an
6 explosion --
7 SIR JOHN SAUNDERS: Can I stop you because I think you've
8 answered the part of my question I wanted answering, I'm
9 not meaning to be rude by cutting you off.
10 I well understand you give people training on MTFAs
11 so they understand the risks that MTFA brings --
12 A. Yes.
13 SIR JOHN SAUNDERS: -- that if fire appliances go directly
14 to the scene they may be facing a second explosion, they
15 may be facing a gunman, so they're being brought into
16 a trap, basically.
17 A. Yes.
18 SIR JOHN SAUNDERS: They teach you that. Does the teaching
19 go on to say what you do about it or did it?
20 Practicalities. Did they say: if you suspect an MTFA,
21 this is what you do?
22 A. It was then to lead you down that route of the
23 Operation Plato Action plan, which would then be where
24 resources could not go direct to the scene --
25 SIR JOHN SAUNDERS: Stop, stop -- sorry, I am being very

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1 rude, but if an MTFA is declared, the police are the
 2 people that have to do that and you knew that --
 3 A. Yes.
 4 SIR JOHN SAUNDERS: -- and you knew that, then I understand
 5 that you go down the MTFA route.
 6 It's not declared by the police --
 7 A. Yes.
 8 SIR JOHN SAUNDERS: -- and you're in a situation where
 9 your -- I am sorry to take over at this stage,
 10 Mr Cooper --
 11 MR COOPER: Not at all, sir, of course.
 12 SIR JOHN SAUNDERS: -- you are in the situation where your
 13 operators suspect an MTFA, but no one has said there is
 14 one.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Right? So what was your training to do
 17 then?
 18 A. The training from the MTFA training that had been
 19 delivered was then to -- if you've recognised that, that
 20 it could be something that was falling within that
 21 category, there was the Operation Plato standby phase,
 22 and then the first instruction on that was to contact
 23 the duty NILO and to seek advice.
 24 SIR JOHN SAUNDERS: Is that the action card that the
 25 operators should have followed on that night?

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1 A. From their own evidence what they have said on the
 2 night --
 3 SIR JOHN SAUNDERS: I am not interested in their evidence,
 4 I'm interested in your evidence. Should they have
 5 followed the Operation Plato standby card?
 6 A. If they had to select ... The Operation Plato standby
 7 action card would have sent them down the route that
 8 they did go down, which was to speak to the duty NILO
 9 and then he is the officer that has the knowledge and
 10 the training to --
 11 SIR JOHN SAUNDERS: Sorry, I know all about that, with
 12 respect to you.
 13 I can't bring it to mind essentially, but we've seen
 14 it a number of times, it doesn't just say that, it has
 15 a number of other actions they have to take on it. So
 16 they weren't following and they haven't said they were
 17 following the Operation Plato standby card. Did they go
 18 wrong in not doing that in your view as their trainer?
 19 A. I don't think they went wrong with that because I don't
 20 think the situation that had unfolded fit into the
 21 categories of any of the action plans. That's why it
 22 has now been changed by Greater Manchester because they
 23 must have recognised that as well, that there was
 24 ambiguity in the action cards, because the explosion
 25 action card has now been changed to say specifically,

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1 "Mobilise to the incident scene".
 2 SIR JOHN SAUNDERS: What is made clear is if you've got
 3 a bomb that's exploded, you follow the explosion card,
 4 and that requires you to send them to the scene?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: So if faced with this situation again,
 7 are you saying what NWFC would do is send them to the
 8 scene irrelevant of any consideration of risk?
 9 A. Yes, because that is what we have to do now. But the
 10 issue that could come into this, which has been raised
 11 and it has been raised in lots of different forums,
 12 is that if then a declaration of Operation Plato
 13 immediately did come in, they'd have to be stopped.
 14 SIR JOHN SAUNDERS: Right, okay. That's what's there now --
 15 A. Yes.
 16 SIR JOHN SAUNDERS: -- but it really does follow, doesn't
 17 it, that as far as your staff were concerned, on your
 18 evidence, they did not have clear enough instructions as
 19 to how to deal with this situation?
 20 A. No.
 21 SIR JOHN SAUNDERS: Okay. So that's one issue.
 22 The second issue is, which I think you've really
 23 agreed with, the obligations under JESIP were to give
 24 more information to various people than was given,
 25 right?

15

1 A. Yes.
 2 SIR JOHN SAUNDERS: I'm not going to go through them.
 3 Again, do you think sufficient training and instructions
 4 were given to your staff as to how to identify the
 5 information to pass on, who to pass it on to, who makes
 6 the decision to pass it on?
 7 A. Yes, and I think those are elements of the JESIP
 8 training that really need to be enhanced.
 9 SIR JOHN SAUNDERS: And weren't good enough at the time?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Okay. Thank you, Mr Cooper. Sorry,
 12 that was just clear in my mind.
 13 MR COOPER: Not at all.
 14 In fact, whilst the chair was asking you those
 15 questions I was reminding myself of something that was
 16 said in a multi-agency training presentation -- there is
 17 no need to take you to the reference unless wants it --
 18 saying that JESIP can be depicted as a jigsaw with all
 19 interlocking pieces making a big coherent picture.
 20 A. Yes.
 21 Q. You'd agree with that, would you?
 22 A. Yes.
 23 Q. So if you're interested in the reference is
 24 {INQ001025/50}.
 25 There are just a few more references on here in

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1 terms of training to ask you whether this was undertaken
 2 at the time. Item 3:
 3 "Control room managers and supervisors should attend
 4 a multi—agency training course every 3 years."
 5 At around the time of the arena, was that going on
 6 in North West Fire Control as far as control room
 7 managers were concerned and supervisors?
 8 A. We were being invited to attend multi—agency training
 9 courses. I can't actually recall the subjects of those,
 10 but I would be able to provide those if you would like
 11 that.
 12 Q. I understand you say you were invited. I've been
 13 invited to a lot of things but I don't necessarily go.
 14 Can I ask you, despite the invitation, did you go or
 15 your colleagues go to these attendances, which are
 16 advised in the seven assurance visits (sic)? I'll read
 17 it again:
 18 "Control room managers and supervisors should attend
 19 a multi—agency training course every 3 years. All front
 20 line responders and control room staff to receive JESIP
 21 awareness annually."
 22 Was that going on?
 23 A. The training to the staff was going on annually, yes,
 24 sir, it was.
 25 Q. What about the first part?

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1 A. The first part of it, I would not able to confirm that
 2 all of the managers and supervisors had attended the
 3 multi—agency training in 2017.
 4 Q. Would you agree that it's certainly something that JESIP
 5 seem to impress as an important matter, it's in their
 6 seven assurance visit recommendations? That's
 7 a significant error, isn't it, would you agree? Look at
 8 it carefully:
 9 "Control room managers and supervisors should attend
 10 a multi—agency training course every 3 years."
 11 And if you're saying that they probably didn't —
 12 A. I didn't — I can't say they probably didn't. I can't
 13 actually confirm.
 14 SIR JOHN SAUNDERS: You can't say one way or the other?
 15 A. I wouldn't feel comfortable to.
 16 MR COOPER: All right. Can I ask you this, and we can move
 17 off that document, Mr Lopez. It's just a self—contained
 18 document. We're asking you questions on the basis of
 19 North West Fire Control and the processes there.
 20 There's a national body, isn't there, representing fire
 21 controls?
 22 A. Yes.
 23 Q. What's that national body called?
 24 A. The National Mobilising Officers Group.
 25 Q. All the questions I'm asking you and will ask you,

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1 equally I ask you as to whether that particular national
 2 body was engaging in any of the concerns that had been
 3 expressed over the last few days in relation to the
 4 operation of fire controls? Were they being proactive?
 5 Help us.
 6 A. The Mobilising Officers Group had very much tried to be
 7 proactive. There are quite a few routes that they have
 8 in going down to improve the way that Fire Controls can
 9 operate. One of the routes was to try to get
 10 Fire Control managers to have an element of the NILO
 11 training so that they could have that higher level of
 12 security clearance so that that would mitigate the need
 13 to a degree of only having a NILO of a Fire and Rescue
 14 Service that would be able to be given information from
 15 the police —
 16 Q. Putting that to one side, and I understand, we've
 17 trammelled that evidence yesterday, but on the
 18 fundamentals, the questions about training and the lack
 19 of training, which is a theme perhaps some may think
 20 that has developed as far as North West Fire Control are
 21 concerned. Has the national body engaged with that
 22 problem?
 23 A. I am not aware of anything specific, sir, no.
 24 Q. What sort of contact, what sort of involvement do the
 25 national body have to assist people like yourself in

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1 North West Fire Control and in the regions around? What
 2 actually do the national body do?
 3 A. We have the national occupational guidance, which has
 4 been under review at the moment. The Mobilising
 5 Officers Group have now moved forward with the
 6 development of a control command course, which will
 7 really look to address some of the issues that were
 8 recognised in evidence yesterday in how the control
 9 rooms can be managed more effectively to ensure that
 10 specific individuals are assigned to specific tasks and
 11 then that would certainly aid with the collation of
 12 information to ensure that it is disseminated.
 13 Q. Again, I'll put the general proposition to you. All
 14 this seems fine, but it all could have been done well
 15 before 22 May, couldn't it?
 16 A. The focus very much has been on the training in relation
 17 to JESIP and making sure that everyone knew the
 18 principles of JESIP. I think I said yesterday, with
 19 hindsight we have recognised that there were certainly
 20 issues that emerged. At first there was nothing to
 21 indicate that those JESIP principles were not actually
 22 working in that we didn't — well, we were not aware
 23 that the NILO had not been able to get in touch with the
 24 force duty officer, and therefore what we have
 25 recognised there is that... I think that assumption was

20

1 there that that was happening because I think it very
 2 much followed the JESIP -- the JESIP training and
 3 principles as a process and so therefore if that was
 4 being undertaken, that was happening, and so that
 5 situational awareness was going on behind the scenes.
 6 Q. All right. Let me take you, please, to the
 7 self-assessment I promised you to take you to,
 8 {INQ000993/1}, which is a self-assessment I hope
 9 dated November 2016, that it was undertaken in
 10 November 2016 at North West Fire Control.
 11 {INQ000993/8-9}, please:
 12 "Do you utilise the relevant JESIP templates when
 13 planning multi-agency exercises? No."
 14 Do you see that?
 15 A. Yes.
 16 Q. Why not?
 17 A. We were not involved in the planning of the multi-agency
 18 exercises as we participated in those when the Fire and
 19 Rescue Services had arranged those.
 20 Q. And evidence has been given about the wish to become
 21 involved in that.
 22 A. Yes.
 23 Q. {INQ000993/9}, please. I think we may have covered
 24 this.
 25 I think I've already covered that in questions,

21

1 I don't need to detain you on that.
 2 Did anyone come to you from your staff, complaining
 3 that they were receiving a lack of training in relation
 4 to JESIP?
 5 A. I had never had anyone come directly to me to say that
 6 they were lacking in training.
 7 Q. Not directly to you, I hear the word "directly". Are
 8 you aware that any members of staff went and complained
 9 to someone about the lack of training they were getting?
 10 A. I wasn't, sir, no.
 11 Q. Do you know who from North West Fire Control said that
 12 they were too busy to be involved in live exercises
 13 relating to terrorist events?
 14 A. I do not know, sir, no.
 15 Q. It wasn't you?
 16 A. That was never brought to my attention, no. And it
 17 wasn't me, no.
 18 Q. I just want to complete what I'm putting to you on
 19 behalf of the families with just a précis of the
 20 evidence as we understand it now concerning the
 21 operation of North West Fire Control and put to you some
 22 of the systemic failures that we suggest occurred and
 23 just to hear what you say about them. I'll just do it
 24 one by one. This is not necessarily exclusively
 25 everything, it's just a snapshot.

22

1 We've heard that it was impossible for control room
 2 operatives or team leaders to build up a local knowledge
 3 and familiarity with the entire region covered by North
 4 West Fire Control so that they had effectively an
 5 understanding of their region because of North West Fire
 6 Control covering a number of regions. What do you say
 7 about that?
 8 A. I wouldn't necessarily agree with that. My background
 9 before I came to North West Fire Control was from
 10 Lancashire. I would say that I probably was very
 11 familiar with the areas around where I live in
 12 Lancashire and so I was very familiar with the areas
 13 local to me. But I certainly wouldn't be able to say
 14 that I had that fundamental understanding of the whole
 15 of the area of Lancashire. I think therefore, then, the
 16 same -- I'd be giving the same answer in relation to the
 17 north-west region.
 18 What has happened now is that the staff now are able
 19 to get a much better understanding of the whole of the
 20 north-west region and that could possibly be through the
 21 attending of incidents regularly in certain venues and
 22 in certain establishments.
 23 Q. The suggestion goes that in the case of no-notice major
 24 incident events, staff are likely to make mobilisations
 25 to perhaps an area that they don't know about or are

23

1 unfamiliar with. That was certainly a risk that
 2 existed, would you agree, on 22 May?
 3 A. The way we work in North West Fire Control, that
 4 wouldn't be the decision that would be made by a control
 5 room operator because the way the system works is the
 6 operators are not having to make the decisions around
 7 what resources they would send because that would
 8 already be built into the system.
 9 SIR JOHN SAUNDERS: And even if you were just in a smaller
 10 area, you wouldn't necessarily know it all in any event?
 11 A. No, that would be impossible.
 12 SIR JOHN SAUNDERS: I think the emphasis I got from the
 13 witnesses was what they did by working in a smaller area
 14 was they developed personal relationships with people
 15 who they worked with, so there was more mutual trust and
 16 understanding between them. Do you think that was fair?
 17 A. It would be fair when they worked in their own Fire and
 18 Rescue Services, but sometimes I think that can also be
 19 personalities. Because you've got often officers
 20 changing in the Fire and Rescue Services, and often
 21 changing roles and responsibilities, so I think in any
 22 environment it's quite useful if you know someone.
 23 If I'm really honest, and I've had quite a long
 24 career in the Fire Service, I've never relied on
 25 personal relationships to enable me to do my job.

24

1 SIR JOHN SAUNDERS: Thank you.
 2 MR COOPER: But would you accept that a personal trust and
 3 rapport can be very beneficial, whether or not it helps
 4 you personally, would you accept as a general principle
 5 a professional rapport, an understanding and trust, can
 6 be critical, particularly in fast-moving events?
 7 A. I wouldn't say that it's not something that would be
 8 beneficial, but on saying that I don't think you could
 9 certainly rely on that. I don't think you should have
 10 to rely on the fact that you might want to contact
 11 someone because you know them and in particular
 12 in relation to incident management because there are
 13 processes that are built in to enable that to happen
 14 without having to bring in those personal relationships.
 15 Q. I'm giving you opportunities just to deal with the
 16 evidence as presented by others. Another aspect of the
 17 evidence is that in practice, as far as training is
 18 concerned, staff have no access to external specialist
 19 training or exercises and effectively reliance is placed
 20 on self-training within the workplace.
 21 Would you firstly accept that that is a problem and
 22 that that overriding criticism of lack of access to
 23 external specialist training or exercises can cause
 24 problems?
 25 A. In relation to the external training what we've tried

25

1 very hard to do at North West Fire Control is engage
 2 with the Fire and Rescue Services and quite often
 3 in relation to resource types, we arrange for them to
 4 come to visit so that the staff can get that
 5 understanding of what resources are available around the
 6 region.
 7 In relation to the exercising, we are trying to very
 8 much develop that a lot more in allowing staff to engage
 9 in the exercises. We will try the utmost to be able to
 10 facilitate that. The single points of contact with
 11 their fellow single points of contact in the Fire and
 12 Rescue Services were working really quite proactively in
 13 identifying exercises and inviting staff. Staff were
 14 able to go when they were off duty if they were
 15 available, but obviously we couldn't mandate that. So
 16 there are quite a lot of exercises that the staff have
 17 been able to engage in.
 18 Q. And they've been very helpful no doubt?
 19 A. Absolutely, yes.
 20 Q. But they weren't available before 22 May 2017?
 21 A. There wasn't a programme of exercises. I think I've
 22 already touched on that, I would have to actually look
 23 back. If the chairman would like me to look back on the
 24 number of exercises that had taken place, I would be
 25 able to do that, but I'm afraid I can't --

26

1 Q. I'm only --
 2 A. -- commit that from memory.
 3 Q. -- reflecting the evidence we've heard in detail about
 4 the lack of access to these exercises, but I understand
 5 what you are saying about what is being done now.
 6 A. Yes.
 7 Q. What I'm suggesting is that at the time that wasn't
 8 available and given that you're saying how useful it is
 9 now, it might have been very useful before 22 May.
 10 A. Yes, I would agree with that.
 11 MR COOPER: Just bear with me, please.
 12 (Pause)
 13 Thank you, sir, I have no further questions.
 14 SIR JOHN SAUNDERS: Thank you very much.
 15 MR DE LA POER: Sir, before I invite Mr Smith to ask his
 16 questions, I have been asked just to make one thing
 17 clear on behalf of GMFRS, just as the context for this
 18 witness's evidence and I think it's appropriate that
 19 Mr Warnock has asked me to do this. In terms of what
 20 GMFRS's position is in relation to North West Fire
 21 Control, their position is that they don't blame any
 22 single organisation or individual and, as they set out
 23 in their opening statement, they accept that GMFRS was
 24 at significant fault as well.
 25 SIR JOHN SAUNDERS: Right. Mr Warnock, I readily understand

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1 that, if I may say so. I'm actually talking more about
 2 criticisms made by individuals, so for example we were
 3 considering the criticism made by Mr O'Reilly, which no
 4 doubt we will hear about from him later.
 5 MR WARNOCK: I understand that, sir, I just wanted to make
 6 sure there was no misunderstanding.
 7 SIR JOHN SAUNDERS: I'm grateful. Thank you very much.
 8 MR DE LA POER: Mr Smith QC.
 9 Questions from MR SMITH
 10 MR SMITH: I would just like to take up with you, if I may,
 11 an issue raised by the chairman this morning.
 12 Do you see a distinction between the assessment of risk
 13 and, bearing in mind one of the answers you gave at that
 14 point, awareness of risk?
 15 A. Yes, sir. I think that the awareness...
 16 SIR JOHN SAUNDERS: There may be two different stages, I'm
 17 sorry, in one process: you need to be aware of the
 18 possibility of risk and then you assess it.
 19 MR SMITH: Absolutely, sir.
 20 SIR JOHN SAUNDERS: Sorry to cut across you. Perhaps that's
 21 what you would have said anyway.
 22 A. Sorry, sir. I've got a little bit confused myself.
 23 SIR JOHN SAUNDERS: That's my fault, I've confused it.
 24 Mr Smith, you go and ask the questions you want to.
 25 MR SMITH: Is the starting point, from the control room's

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1 point of view, awareness that there is a risk?
 2 A. Yes.
 3 Q. But the next stage to which, with respect, the chairman
 4 just made reference, is the assessment of that risk. Is
 5 the control room involved in the assessment of the risk
 6 in terms of what firefighters might be exposed to? Just
 7 pausing there, do you agree or not? In terms of what
 8 firefighters might be exposed to?
 9 A. No, sir, we're not trained in the assessment of that
 10 risk.
 11 Q. So where does this lead procedurally in terms of the
 12 thought process? For example, if you were dealing with
 13 the situation that the team leaders were dealing with
 14 at the time, where does this lead in terms of your views
 15 as to the thought process once you receive the sort of
 16 information that was conveyed by Michelle Gregson to
 17 Station Manager Berry, once you have got that
 18 information into the control room?
 19 A. I think that is where we said about the awareness,
 20 definitely the awareness of the risk is -- so the
 21 information that was coming in that the explosion had
 22 occurred and the explosion was caused by a bomb that had
 23 detonated and there was multiple casualties --
 24 SIR JOHN SAUNDERS: Do you mind if I cut across this?
 25 Sorry. I just want to -- if you don't mind. Again,

29

1 I am not trying to be rude. So you agree that there
 2 needs to be an awareness of risk by the operator?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: But he or she leaves the assessment of
 5 risk to the expert, namely the NILO?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Is that a good enough answer for you?
 8 MR SMITH: It is perfectly good enough, with respect, sir,
 9 yes.
 10 So moving on from there, if we may, I would like to
 11 just start very briefly by asking you some questions
 12 about training.
 13 A. Okay.
 14 Q. We heard reference yesterday from Lisa Owen of the fact
 15 that she did remember seeing, without remembering the
 16 detail, PowerPoint presentations that were provided to
 17 her for the purposes of training.
 18 I'd like Mr Lopez just to put on the screen, so
 19 we can see it clearly, a document for which I think you
 20 were responsible. It's {INQ001017/1}.
 21 This bears an almost identical resemblance to the
 22 PowerPoint presentation prepared by the College of
 23 Policing.
 24 A. Yes, sir.
 25 Q. Not for control room operators but for supervisors and

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1 managers; is that correct?
 2 A. Yes, sir.
 3 Q. Did you alter the document prepared by the College of
 4 Policing for a particular purpose?
 5 A. I amended the title to change it from supervisors and
 6 managers to have the control room operators referenced
 7 in that title. The reason that I did that was that
 8 at the time, the supervisors and managers were to have
 9 the full training package and the control room
 10 operators, the training that was in place for the
 11 control room operators, was just the JESIP awareness
 12 video.
 13 Myself and the other two ladies who went to the
 14 College of Policing event, we were given this PowerPoint
 15 presentation, which was then delivered to the managers
 16 and supervisors, but then I wanted to actually provide
 17 that information to our control room operators as well.
 18 I did touch on it yesterday, sir, and I said that
 19 the control room operators in our control room do the
 20 whole package.
 21 SIR JOHN SAUNDERS: Did they get the whole same material?
 22 A. Yes, there was just a very few number of slides that
 23 were taken out. So we decided to deliver that to all of
 24 the staff.
 25 SIR JOHN SAUNDERS: Right.

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1 A. So they had that full appreciation, really, of what
 2 JESIP --
 3 SIR JOHN SAUNDERS: I don't have a problem with -- I think
 4 Mr Cooper described it as common sense yesterday, JESIP.
 5 I don't have a problem with the fact that the general
 6 principles of cooperating together, co-locating, all the
 7 rest of it coming across. What I'm concerned about
 8 maybe -- perhaps you can't get it -- is practical
 9 training, advice, what do you actually do in this
 10 situation to implement JESIP? Was that ever given to
 11 control operators?
 12 A. We did have some scenario training that was implemented
 13 within the -- we've incorporated as well the JESIP
 14 training into our resilience training. And with that,
 15 we do have some scenarios within that.
 16 SIR JOHN SAUNDERS: I'm concerned with prior to 22 May 2017.
 17 A. The resilience training was in place then and it was --
 18 we had the MTFA training as well --
 19 SIR JOHN SAUNDERS: Can you describe to me or give me an
 20 example of the examples which were worked through to
 21 give practical exercises which would help people to know
 22 what to do in individual situations?
 23 A. We had the opportunity -- we'd identified some locations
 24 in each of the Fire and Rescue Services, which were
 25 either iconic sites or they were areas where they may

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1 have a lot of attendees. And then the scenarios then
2 were around looking at the incident types that you might
3 want to consider in relation to the information that you
4 got from some incident information and then what action
5 plans you would consider.

6 But I think I did touch on yesterday, sir, what
7 I think is very much missing from the JESIP training is
8 the emphasis on the type of information that really is
9 critical to the incident ground —

10 SIR JOHN SAUNDERS: So the practical thing: when you get
11 this sort of information, you convey it to A, B, C and
12 D?

13 A. Absolutely. I don't think we'd ever — I think there's
14 information that's been emerging out of the inquiry over
15 the last few days, when it's — that has never really
16 been updated in the MTFA training, that these are the
17 things that the incident commanders absolutely need to
18 know that would help them making their decisions.

19 SIR JOHN SAUNDERS: So they hadn't had that?

20 A. No.

21 SIR JOHN SAUNDERS: Thank you. Mr Smith.

22 MR SMITH: So looking, before we move next to a part of this
23 issue, at the resilience training, I needn't go back to
24 that PowerPoint because it was dealt with with Lisa Owen
25 yesterday. But I would like to take the chairman, if

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1 I may, and the inquiry to an email. {INQ001277/1},
2 please, Mr Lopez.

3 On 22 March 2017, did you distribute this email to
4 operation support, to the head of North West Fire
5 Control, and to operation managers?

6 A. Yes, sir.

7 Q. It made direct reference, didn't it, to recent events in
8 London, the London Bridge attack?

9 A. Yes.

10 Q. You pointed out, didn't you, that in the light of those
11 events, you asked that they familiarise themselves with
12 the resilience training?

13 A. That's correct.

14 Q. And that message then went out to team 1 on this email
15 to refresh themselves on the PowerPoint presentation,
16 which is — probably you remember and saw it, that
17 I dealt with with Lisa Owen yesterday; is that correct?

18 A. Yes.

19 Q. As far as the resilience training is concerned, what
20 type of emergency was it directed to?

21 A. The resilience training directed you to a terrorist-type
22 incident and it directed you then to the considerations
23 that the control room operators and the team leaders
24 would need to consider. Contained within that as well,
25 in the whole package, is about the JESIP principles and

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1 Operation Plato and —

2 Q. And METHANE?

3 A. And METHANE, yes, sir.

4 Q. That resilience training package, it's just over
5 50 pages, isn't it, the PowerPoint?

6 A. Yes.

7 Q. And I think it makes reference to the incident in the
8 shopping mall in East Africa?

9 A. Yes, sir.

10 Q. So what is not, do you agree, in any of those PowerPoint
11 presentations is what to do if you suspect or anticipate
12 that you're on the verge of an Operation Plato and
13 you're on the verge of a mobilising decision?

14 A. No.

15 Q. And which action plan should be adopted and whether you
16 should first take guidance before mobilising? None of
17 that is in those plans, is it?

18 A. No, sir.

19 Q. Do you consider that that would have been helpful
20 guidance if, in conjunction with the Fire and Rescue
21 Service, some clear message had been put across in that
22 respect?

23 A. Yes, sir, that would definitely have helped.

24 Q. And if I could just take the chairman to {INQ041473/84},
25 the sequence of communications, please, just for

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1 an issue of fact to bear in mind.

2 We can see that at 00.55.14, because the declaration
3 of Plato — that information had been passed to the
4 control room, the step that was then taken was that the
5 control room then added the Plato implementation phase,
6 followed in fact by the standby phase {INQ041473/85},
7 rather strangely in that order, rather than standby and
8 then implementation, but one had entered the
9 implementation phase; is that correct? So was it your
10 understanding and perception, so far as these events are
11 concerned, that because the control room had not been
12 informed of the declaration of Operation Plato, even the
13 Operation Plato standby phase was not added? Is that
14 correct?

15 A. Yes, sir.

16 Q. Whereas on one interpretation of the Operation Plato
17 standby phase, it requires North West Fire Control to
18 take action where a firearms incident is reported;
19 is that correct?

20 A. Yes, sir.

21 Q. So if you had been in the control room, would you have
22 taken any action in relation to the Operation Plato
23 standby plan once you received the information that
24 Michelle Gregson was aware of or not?

25 A. I wouldn't have actually added the action plan. I would

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1 have done what Michelle did, which was to contact the
 2 duty NILO and take advice. The duty NILO could have
 3 instructed them to apply one of the action plans or the
 4 duty NILO could have instructed them to mobilise direct
 5 to the scene of the explosion, but I would have
 6 contacted the duty NILO for the advice.
 7 SIR JOHN SAUNDERS: Okay. At one stage we had a situation
 8 where you know a bomb's gone off, a bomb's exploded,
 9 there have been gunshots.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: What more do you know in order to go on
 12 to the Operation Plato standby phase?
 13 A. The Operation Plato standby phase is not a declaration
 14 and so therefore it's an Operation Plato standby phase
 15 that's just in between waiting for that declaration.
 16 I think that something that we have identified, or was
 17 identified, is that I think there was a misunderstanding
 18 around that as well, that that would have been
 19 a declaration. That does no longer exist. That was
 20 actually taken out by Greater Manchester --
 21 SIR JOHN SAUNDERS: The standby phase card has gone, has it?
 22 A. Yes, it has, sir.
 23 MR SMITH: Moving on from there, if I may, you've been asked
 24 about the fact that the control room was not invited to
 25 become involved in exercises such as Winchester Accord

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1 or Hawk River. Putting aside Mr Gaskell's recollection
 2 of why that was for the moment, so far as you're
 3 concerned, would you as the senior operations manager
 4 have wanted the control room to be part of a live
 5 exercise such as Winchester Accord?
 6 A. Absolutely, sir, yes.
 7 Q. There were some exercises which were described as
 8 no-notice; is that correct?
 9 A. Yes, sir.
 10 Q. But was the position that in terms of no notice, in fact
 11 the NILOs were on notice? You're nodding your head, but
 12 it's necessary for your answer to go on to the
 13 transcript.
 14 A. Yes, sir. Yes, that's correct.
 15 Q. Were the crews who were to be involved also aware which
 16 appliances were to be used at which station?
 17 A. Yes, often that was the case so that -- there would have
 18 already been a script and sometimes those crews would
 19 have been already assigned to those exercises or
 20 reserved for use at those exercises.
 21 Q. Was the position in some instances that there was a time
 22 window and that at some stage, about which there was no
 23 notice, the precise time, the incident for the exercise
 24 would be activated?
 25 A. Yes.

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1 Q. Do you have a different view as to how a no-notice
 2 exercise ought to operate to assist the control rooms
 3 and the Fire and Rescue Service in terms of training?
 4 A. I do, yes. I did touch on it yesterday and I will put
 5 this down in the recommendations. I think that to gain
 6 that real true life experience you need to have
 7 a no-notice exercise, which is absolutely that. Then
 8 you practice your procedures, not when you often have
 9 possibly a full complement of people that you've brought
 10 in to support that so that you're actually doing it
 11 in that real, live environment where and you can follow
 12 through those actions as if it's just happened.
 13 With notice, undoubtedly, individuals are going to
 14 have read up on the procedures maybe the day before, the
 15 week before.
 16 SIR JOHN SAUNDERS: I understand the problems, yes.
 17 A. I think that's where you'd get the real learning from,
 18 from an exercise.
 19 MR SMITH: That's the point: you get the real learning
 20 in that way --
 21 A. Absolutely.
 22 Q. -- from point of call?
 23 I would like to turn next to the issue of
 24 preparedness of North West Fire Control for a major
 25 incident of this nature, all right? Can I just ask you:

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1 as far as the JESIP assurance visit of 17 August 2017 is
 2 concerned, first of all do you consider that this
 3 contained a number of very positive outcomes?
 4 A. It did, yes.
 5 Q. I don't know whether you're looking at some notes, are
 6 you, at the moment?
 7 A. Sorry? No.
 8 Q. You're not?
 9 A. No.
 10 Q. I just want you to focus on my question, please.
 11 A. Oh, sorry.
 12 Q. It contained a number of very positive outcomes, but was
 13 there one significant negative outcome that I want to
 14 draw your attention to for the control room that the
 15 chairman ought to be aware of?
 16 If Mr Lopez could put up {INQ000992/5}, please,
 17 "Training and exercising".
 18 (Pause)
 19 I may have given the wrong page reference. But
 20 I will ask you to remember this -- no, sorry, it's
 21 {INQ000992/6}:
 22 "All staff are required to undertake the JESIP
 23 e-learning every year. This is also recorded on their
 24 PDR Pro record. During the focus group it would appear
 25 that individuals across all grades haven't completed the

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1 JESIP e-learning or had an input since 2015."
 2 Was that drawn to your attention at the time?
 3 A. It was, yes.
 4 Q. Was it a matter of concern to you at the time?
 5 A. It was because I did know that the JESIP e-learning had
 6 been integrated into North West Fire Control and so
 7 therefore it did give me a cause for concern so we did
 8 go away and check that all of the staff had actually had
 9 that JESIP e-learning package. The only thing I would
 10 say on that is that when they said they had not had an
 11 input since 2015, 2015 was when we had delivered the
 12 PowerPoint presentation of the full JESIP package, so --
 13 but we did check and everyone had had the e-learning.
 14 Q. So effectively was the issue refresher training that was
 15 being identified?
 16 A. On the PowerPoint?
 17 Q. Yes.
 18 A. Yes.
 19 Q. A question arises obviously of whether the control room
 20 staff on duty on the night, and generally, were
 21 sufficiently trained and prepared for an attack of this
 22 nature. As far as Michelle Gregson's comment to the
 23 room and address to the room in concerned, which you
 24 have heard about --
 25 A. Yes, sir.

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1 Q. -- did you consider that was something she would have
 2 been trained to do or did it appear to you to be
 3 something that she had done spontaneously?
 4 A. I was very pleased Michelle had done that because she
 5 had obviously called upon her training and immediately
 6 realised that an incident of that type and magnitude
 7 would have required the principles of JESIP to be
 8 applied and therefore when she did that -- very, very
 9 early on to her team in that incident -- she had
 10 definitely recognised the importance of that.
 11 SIR JOHN SAUNDERS: I am not quite sure that's Mr Smith's
 12 question. Mr Smith's question was: is that something
 13 she was trained to do and followed it or did she do it
 14 of her own initiative?
 15 A. She did that off her own initiative, I think.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR SMITH: I would next like to ask you about the police
 18 Hailing group.
 19 A. Yes, sir.
 20 Q. You will recall, having been watching the proceedings,
 21 that Mr Horwell, quite properly --
 22 MR DE LA POER: I am so sorry to interrupt you, Mr Smith,
 23 but I have no received messages from two advocates that
 24 the BlueJeans seems to have gone down. It may just be
 25 that that is coming direct to me because they

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1 (inaudible: no microphone).
 2 I wonder, if Mr Smith doesn't mind, if we could just
 3 take a 5-minute pause --
 4 SIR JOHN SAUNDERS: I am sorry to the witness and I am sorry
 5 to break your evidence up again.
 6 Thank you.
 7 (10.42 am)
 8 (A short break)
 9 (11.03 am)
 10 SIR JOHN SAUNDERS: Can I say we're all sorry about the fact
 11 that we've had this delay, but can I also thank those
 12 who work behind the scenes for resolving it so quickly.
 13 Let's carry on. Mr Smith.
 14 MR SMITH: I was asking about the police Hailing group.
 15 I was just at the point of saying that Mr Horwell has
 16 very properly been enquiring of witnesses about their
 17 knowledge of the police Hailing group and has made the
 18 point that there are three control rooms at GMP and that
 19 the police Hailing group is a channel which is monitored
 20 by an operator within the control room, where the FDO is
 21 located. So you'll probably follow that those are some
 22 of the points that have emerged.
 23 First of all, were you aware that there were three
 24 control rooms at GMP?
 25 A. I was not aware of that, no.

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1 Q. Or that in one particular control room, the one to which
 2 the channel would be linked, was the one in which the
 3 FDO was to be found?
 4 A. No, sir.
 5 Q. Might that have been helpful at all in deciding how
 6 communication should be managed if you had had that
 7 knowledge?
 8 A. We have just one telephone number that's been programmed
 9 into our communications equipment, which had been
 10 provided to us by Greater Manchester Police. We have
 11 one emergency number and then there is an administration
 12 number. So we have only ever used that one number. So
 13 we've never been told that there was different numbers
 14 to ring different control rooms.
 15 In relation to the Hailing Talk Group, again
 16 we would be able to just bring that across and make that
 17 active, and so it wouldn't need to identify a separate
 18 control room. It would just be a transmission on that
 19 Hailing group.
 20 Q. So certainly until you have had this information in the
 21 course of the inquiry, is that correct?
 22 A. Yes.
 23 Q. That's the first time?
 24 A. Yes.
 25 Q. Certainly until you had this information, did you

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1 consider that there was any need to use the police
 2 Hailing group to communicate with GMP?
 3 A. I don't consider there was any requirement to do that
 4 because we'd not experienced any problems on the evening
 5 when we needed to contact Greater Manchester Police.
 6 That was just done by the usual method of ringing the
 7 direct dial telephone number.
 8 Q. Going back, therefore, to the resilience training, if we
 9 go to {INQ001304/50}, there was a section, was there,
 10 in the resilience training PowerPoint presentation
 11 headed "Talk Groups"?
 12 A. Yes, sir.
 13 Q. And if we look in the middle block, the second sentence:
 14 "You may need to contact another emergency service
 15 to notify them of such an incident if primary telephone
 16 contact is unavailable."
 17 So what was the source of that guidance, that belief
 18 or recommendation?
 19 A. That we would just use our normal primary method of
 20 contacting Greater Manchester Police and...
 21 SIR JOHN SAUNDERS: I'm not sure this is an answer to the
 22 question. Could you just repeat the question?
 23 MR SMITH: I will do, sir, yes.
 24 Where did the information come from which caused
 25 North West Fire Control to put that sentence into the

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1 PowerPoint presentation? In other words, what was the
 2 basis for putting that information into the PowerPoint
 3 presentation, that recommendation?
 4 A. That has actually come from the JESIP training, so I am
 5 almost certain --
 6 Q. Would you just like to explain what was the reasoning
 7 for explaining or saying that in the PowerPoint
 8 presentation?
 9 A. Just so that you would know that that would be the
 10 method of contact that we would still utilise as the
 11 primary method -- sorry, am I not answering your
 12 question?
 13 SIR JOHN SAUNDERS: No, but perhaps I can understand it:
 14 you're saying this is the police chiefs -- this is the
 15 one you adapted, as it were, for your control rooms; is
 16 that right?
 17 A. This has come from the (overspeaking).
 18 SIR JOHN SAUNDERS: So it is the standard training for
 19 everybody?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So it's not specific to NWFC?
 22 A. No.
 23 SIR JOHN SAUNDERS: Would it apply to you?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: How does it apply to you if you're

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1 saying that applies to you?
 2 A. Because the Greater Manchester Police have one direct
 3 number into our Control and the same with NWAS.
 4 MR SMITH: Was that based upon North West Fire Control's
 5 understanding as a result of its practice or was it
 6 taken from some other wider guidance, that sentence?
 7 SIR JOHN SAUNDERS: I think it has to be the latter,
 8 Mr Smith (overspeaking).
 9 A. Yes, the wider guidance.
 10 SIR JOHN SAUNDERS: So this really applies to somebody else
 11 but it's in there because you have just incorporated
 12 everything else from the JESIP training into it; is that
 13 right?
 14 A. Yes, sir.
 15 MR SMITH: Thank you, sir.
 16 If we move on to {INQ001304/51} was there also
 17 a section relating to Talk Groups, where the
 18 operationally sensitive been aspect has been removed?
 19 A. Yes, sir.
 20 Q. And was that the material that was presented in
 21 training?
 22 A. Yes, sir.
 23 Q. I would like to turn to the night of this attack and,
 24 first of all, the basis on which staffing levels were
 25 devised and the question of whether there were

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1 sufficient staff in the control room between 7 o'clock
 2 and 10 o'clock and from 10 o'clock onwards to manage an
 3 incident on this scale. So first of all, was there
 4 a different staffing structure between 7 o'clock and
 5 10 o'clock and from 10 o'clock onwards?
 6 A. Yes, sir, there was.
 7 SIR JOHN SAUNDERS: We've seen it. There was a different
 8 level.
 9 MR SMITH: From 10 o'clock, what is your response to the
 10 question of whether there were sufficient staff to
 11 manage an incident on this scale?
 12 A. I believe that there was sufficient staff in that there
 13 was no 999 calls not actually answered within that
 14 timeline because we have all that information
 15 monitored --
 16 Q. May I interrupt you?
 17 A. Yes, certainly.
 18 Q. Do you mean across all four Fire and Rescue Service
 19 regions?
 20 A. Yes, sir. On the evening of the incident, the duty
 21 operations manager was immediately called into the
 22 control room to support the incident and then the recall
 23 to duty was implemented and one member of staff did
 24 respond and just came in to support the control room for
 25 1 hour and then they left and went home again.

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1 SIR JOHN SAUNDERS: Can I deal with the recall to duty just
2 for a moment? You're obviously doing that in case you
3 get a number of other 999 calls, so potentially you
4 wouldn't have enough people, would you, when this sort
5 of incident occurs?
6 A. No. If it had ended up where we were getting hundreds
7 of calls ---
8 SIR JOHN SAUNDERS: You could have got a lot more 999 calls,
9 it could have been a widespread incident, whatever.
10 A. Yes.
11 SIR JOHN SAUNDERS: So the potential was there for you not
12 to be able to cope?
13 A. We have buddy arrangements in place with other Fire and
14 Rescue Services --- I don't know whether it would be
15 sensitive if I actually gave you the detail.
16 SIR JOHN SAUNDERS: I would understand how that would
17 happen. So calls would be sent out to another centre to
18 deal with?
19 A. Yes.
20 MR SMITH: Sir, would you forgive me for making the point
21 that the location is operationally sensitive ---
22 SIR JOHN SAUNDERS: Yes, thank you.
23 A. Yes.
24 MR SMITH: --- as was explained during Mr Dark's evidence.
25 SIR JOHN SAUNDERS: I'm not interested in the location of

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1 that in any event. If you think it's necessary to send
2 out a recall message, would it be sensible to make it
3 mandatory for some people at least who perhaps could be
4 on call to come in? It seems to me --- to send out
5 a recall notice, if it's entirely voluntary whether
6 anyone comes in, seems to me not to be a great idea.
7 What do you think?
8 A. It would be good if you could have that arrangement in
9 place because I think it would give you an element of
10 resilience. I know at one point it was something that
11 was actually looked at at North West Fire Control and
12 there wasn't necessarily that staff engagement with that
13 procedure. Because I think that it --- because it does
14 involve a degree of commitment because you'd have to
15 have some form of rota, really, to be able to manage
16 that effectively.
17 SIR JOHN SAUNDERS: Okay, thank you.
18 MR SMITH: My comment to the chairman was in relation to the
19 buddy arrangement ---
20 A. Oh right.
21 Q. --- and its locations.
22 A. Yes, sir.
23 SIR JOHN SAUNDERS: Thank you.
24 MR SMITH: Would you just bear that in mind because I do
25 want to ask you about that?

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1 A. Okay, sir.
2 Q. Is there more than one other location where there is
3 a buddy facility in the event that the control room
4 cannot function with its available staff and workload?
5 A. Yes, sir.
6 Q. In your view is that an effective arrangement?
7 A. It has been utilised where we've had to take calls for
8 one of the Fire and Rescue Services that's within that
9 arrangement. We do do regular testing on those
10 procedures to make sure that that is effective if it's
11 required.
12 Q. Without giving details of the Fire and Rescue Service in
13 question or the location, has North West Fire Control
14 assisted another control room in a similar situation?
15 In other words, has one of your buddy partners asked
16 North West Fire Control to help them at any time?
17 A. Yes, sir.
18 SIR JOHN SAUNDERS: Thank you.
19 MR SMITH: I think it also bears on the evidence of
20 Mr Wilsher.
21 SIR JOHN SAUNDERS: Thank you very much.
22 MR SMITH: The word "bedlam" has been used in the course of
23 one of these calls. Do you consider that that properly
24 explains the intensity of the pressure that was on the
25 control room at this time or not? It's a very loose

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1 expression, it can mean many things, but would you just
2 like to express to the chairman your understanding and
3 appreciation of the way in which the control room was
4 managing this when you arrived?
5 A. When I arrived, I couldn't describe it as bedlam ---
6 I think I touched on it yesterday --- because by that
7 time I walked into the room and everything appeared to
8 be very calm.
9 Q. (Overspeaking).
10 A. What can happen in the control room if you start to
11 get --- it could be multiple calls, it could be a number
12 of incidents. Clearly, on those very early stages, all
13 that information is coming in and operators are engaged
14 in taking those calls. But that would be the same
15 across any control room. You can never always
16 anticipate what and how those calls are going to be
17 generated.
18 In the control room sometimes you could end up where
19 you could have a fire on a motorway and it's a car on
20 fire, just one car, you could have hundreds of calls
21 that are coming in to that. So again, it's hard... The
22 word bedlam makes it sound... I don't know what the
23 dictionary definition is of bedlam, but it sounds as if
24 it was absolutely chaotic.
25 SIR JOHN SAUNDERS: I think we get the picture: descending

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1 into hell, perhaps? I'm not sure.
 2 A. (Overspeaking), sir, sorry.
 3 MR SMITH: Moving on from there, first of all were the
 4 incident logs, in your view, maintained as they should
 5 have been and updated as they should have been?
 6 A. Yes, they were.
 7 Q. You've already answered the question whether incoming
 8 calls from outside or externally were dealt with. As
 9 far as, therefore, call management and incident log
 10 recording was concerned, have you any criticism to make
 11 of the way in which that was managed by your control
 12 room?
 13 A. No, because the way that the --
 14 SIR JOHN SAUNDERS: Okay, I'm really sorry. If it's really
 15 important then do add to it, but if the answer is no,
 16 I think that'll do for me. Is that okay?
 17 MR SMITH: The answer is no, is it?
 18 A. Yes, sir.
 19 Q. So I want to come to two points now. Following the
 20 attack, did you become aware that information, which is
 21 largely defined in the right-hand column of that
 22 sequence of communications produced by North West Fire
 23 Control, was not actively passed to Greater Manchester
 24 Fire and Rescue Service officers on the various
 25 occasions set out there? You became aware of that, did

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1 you?
 2 A. Yes.
 3 Q. When did you first become aware of it?
 4 A. I became aware of that when the Kerslake Review came
 5 out, that there was a criticism levied against North
 6 West Fire Control for not... sharing information and for
 7 not mobilising to the incident.
 8 Up until that time, I, as the senior operations
 9 manager, and Sarah Wilson, as the head of North West
 10 Fire Control, had not had any communication from
 11 Greater Manchester Fire and Rescue Service that they had
 12 not been satisfied with the response to the incident by
 13 North West Fire Control.
 14 Q. The second issue: what is your position over the
 15 question of whether a control room should have concluded
 16 that the Fire and Rescue Service response had stalled at
 17 Philips Park Fire Station? I want to split this into
 18 two: first of all on the night, and then I'm going to
 19 ask you for your views which you have reached
 20 in relation to all the material that's come out since
 21 then.
 22 But on the night, when you came in and understood
 23 the situation, was it apparent to you that the Fire and
 24 Rescue response, which had obviously moved on
 25 considerably by then, had stalled prior to your arrival

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1 because the crews had been held up at Philips Park
 2 Fire Station for all that length of time?
 3 A. When I arrived -- I know that it was detailed yesterday,
 4 the resources had already moved to Victoria Station.
 5 But I don't think that it was -- I didn't think that it
 6 had stalled because we thought that... or I would have
 7 thought that the Greater Manchester Fire and Rescue
 8 Service had a tactical plan that they were following and
 9 that they had -- we were not aware that that
 10 communication had not taken place with the force duty
 11 officer and therefore it was deemed that they'd got the
 12 resources at a muster point, they'd got the SRT crews at
 13 the muster point, described as suited and booted, ready
 14 to go, so therefore there was some reason why they were
 15 being held.
 16 Q. Were you aware that the command support room had been
 17 opened?
 18 A. The command support room was open and then there was
 19 also an officer that had gone to the force Silver
 20 command.
 21 Q. With the information that you now have, what do you
 22 consider the control room could have done to achieve,
 23 just looking at it from your point of view, a better
 24 understanding of the situation on the ground at that
 25 time?

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1 A. Once it became apparent to us, we realised that we could
 2 have been more proactive, so therefore we implemented
 3 a major incident -- a North West Fire Control major
 4 incident action plan. We found out in the Kerslake --
 5 via the Kerslake Report about the METHANE messages that
 6 had been sent but not shared. Then clearly on the night
 7 we did find out that Operation Plato had been declared.
 8 So what we put in place then was a procedure where
 9 every issue that we had recognised at that time would be
 10 captured by following our own action plan in that
 11 we would contact the Police Control and ask about
 12 a multi-agency point, albeit we didn't have the police
 13 rendezvous point, and then ensure that a Fire Service
 14 response is mobilised to that rendezvous point to make
 15 sure that we're absolutely aware of which resources from
 16 the other organisations are in attendance and all these
 17 things would be then communicated to the Fire and Rescue
 18 Service.
 19 Q. I'm just going to interrupt you by cutting this short
 20 for efficiency, if I can. I can't put the document on
 21 the screen because it's operationally sensitive, or some
 22 of the material in it relating to Airwave --
 23 A. Yes, sir.
 24 Q. {INQ000932/1} is the major incident action plan as it
 25 appears on the screen for the control room operator.

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1 Were you involved in the preparation of that plan?
 2 A. I was, sir, yes.
 3 Q. So in a few sentences, could you assist the chairman,
 4 because he will be looking at it in due course, with an
 5 understanding of what the purpose of this plan was once
 6 it was implemented by February of 2018?
 7 A. The purpose of the plan was to make sure that if, in
 8 line with the JESIP principles, that information hadn't
 9 been actively shared, we were never going to be left out
 10 of that loop again, and so that we would be able to
 11 ensure that all information was gained by checking with
 12 the control rooms. If you expected a declaration of an
 13 operational plan, that we would be asking whether that
 14 had actually occurred, and making sure that the Fire
 15 Service were absolutely aware of the other agencies that
 16 were in attendance, that the communications were taking
 17 place.
 18 We had the interoperability Airwave channel already
 19 up and running by that time and so that is something
 20 that we'd be asking to make sure that it was established
 21 by doing a radio check. And then it would be around
 22 checking who was the NILO for the NWS and making sure
 23 that the Greater Manchester fire NILO was aware of that
 24 information. And just tightening up all those areas of
 25 communication that we had recognised had not worked on

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1 the night.
 2 Q. It is in fact an extensive list, isn't it --
 3 A. It is, yes.
 4 Q. -- that the control room has to work through?
 5 A. And it has been implemented on quite a number of
 6 occasions.
 7 Q. It also requires that the mobilising officer should
 8 establish the entire incident command; is that right?
 9 A. Yes, sir.
 10 Q. Moving on from there, you've been asked about whether
 11 these failings in communication by the control room was
 12 a systemic issue. What I would like just to draw to
 13 your attention is that there are examples where the
 14 control room has passed information and has passed it
 15 appropriately. So for example, a call comes in from
 16 Lancashire and was passed -- that information was passed
 17 on to other agencies. But when Watch Manager Simister
 18 called the control room at 23.06 and explained that all
 19 the ambulances had pulled on at Central and then, in
 20 a second call, dealt with the fact that paramedics were
 21 at the scene, there was no response by the control room
 22 in terms of recognising the importance of that
 23 information or passing it on.
 24 Do you consider that there is a solution that the
 25 chairman ought to bear in mind to prevent that ever

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1 happening again?
 2 A. With that, the North West Fire Control action plan would
 3 actually capture that because what we're asking is which
 4 resources are actually on the scene and then
 5 establishing the incident commanders from each of the
 6 organisations. So the action plan itself would get that
 7 information for us if we followed all the actions on the
 8 action plan.
 9 Q. And that was the reasoning behind that, was it?
 10 A. It was, sir, yes.
 11 Q. In your first statement of 16 August 2019, you said that
 12 your role as senior operations manager was to deliver,
 13 and these are your words:
 14 "... a robust, reliable and high quality
 15 Fire Control service to the Fire and Rescue Services."
 16 I'm going to ask you bluntly: do you consider that
 17 the fire control room delivered a service of that
 18 standard on the night in question?
 19 A. On the night in question we thought that we had actually
 20 fulfilled everything that was required of us and then
 21 it -- but clearly, from the Kerslake Report and then
 22 there is obviously the learning that came from that,
 23 we have to acknowledge that there were areas where we
 24 certainly could have improved.
 25 Q. Just for the chairman's reference, paragraph 5.188 of

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1 the Kerslake Report at page 176 deals with the fact that
 2 it was considered that North West Fire Control had not
 3 been sufficiently proactive in the management of
 4 communication of information; is that right?
 5 A. Yes, sir.
 6 Q. So was that the trigger or one of the triggers for the
 7 preparation of North West Fire Control's own major
 8 incident plan?
 9 A. It was, sir, yes.
 10 Q. Before we leave that, did you engage with the Fire and
 11 Rescue Service for the purposes of preparing that major
 12 incident action plan?
 13 A. We did, yes.
 14 Q. Was that at ops group meetings?
 15 A. It was, yes.
 16 Q. Who were the officers who attended those meetings?
 17 A. The officers that attended those meetings were the
 18 single points of contact that came from each of the Fire
 19 and Rescue Services, because this plan is -- it's about
 20 the way that North West Fire Control would deal with an
 21 incident deemed a major incident or an incident that was
 22 of a really significant type. So this would be
 23 implemented across all of the Fire and Rescue Services,
 24 so that is why it was taken to that group and then it
 25 was approved as well, that they were happy with the

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1 content of the plan.
 2 Q. Nonetheless, can we be clear? This is a North West Fire
 3 Control document?
 4 A. It is, yes.
 5 Q. Prepared by North West Fire Control, but having engaged
 6 the Fire and Rescue Service in discussions about the
 7 preparation of its content; is that right?
 8 A. Yes, sir, and approval of its content.
 9 Q. And approval of its content, forgive me.
 10 A. I think the issues had been identified by us, but then
 11 it was about having that approval and input if there was
 12 anything else that we needed to consider.
 13 SIR JOHN SAUNDERS: You have to have their approval, don't
 14 you, for what you do?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Would it be useful, do you think, if
 17 each of these four adopted similar procedures? So you
 18 didn't have to work out which particular — not work
 19 out, but having different procedures for each of these
 20 four groups? Is it beyond the wit of man to think up
 21 ones that apply everywhere?
 22 A. They have tried very hard to converge on a lot of the
 23 procedures.
 24 SIR JOHN SAUNDERS: And the difficulties have been what?
 25 A. The difficulties have been that they don't always have

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1 the same resources in their Fire and Rescue Services,
 2 and then obviously there's different types of
 3 infrastructure within their specific counties. But
 4 we have tried to converge and there is actually
 5 a convergence group as well for the north—west region.
 6 SIR JOHN SAUNDERS: How long has that been around for?
 7 A. The operations group used to — it started right at the
 8 very beginning with the transition team and so that the
 9 incident types were converged at first so that the
 10 incident types were going to be the same. Because
 11 the way in which the operators work in North West Fire
 12 Control is that they are trained to operate the system
 13 so they don't have to know what Manchester will send to
 14 a road traffic collision and remember their resources.
 15 SIR JOHN SAUNDERS: I understand that.
 16 A. So that's why there are so many. So the incident types
 17 are converged, the action plans are then unique to that
 18 Fire and Rescue Service because that would then capture
 19 what resources they have available or want to assign to
 20 that specific type of incident.
 21 SIR JOHN SAUNDERS: But you have, I think, 600 action cards,
 22 if you're using them across all four areas?
 23 A. There are actually 1,200 altogether, sir.
 24 SIR JOHN SAUNDERS: 1,200. So if you're talking about
 25 people becoming familiar with the action cards and

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1 actually knowing how much better to do it, it would be
 2 rather better if you had a quarter of those, wouldn't
 3 it?
 4 A. It would. A lot of them are actually attached to the
 5 incident types, so it's not — so that's already been
 6 determined. I think that that is when in the evidence,
 7 it was — when the incident type of explosion was
 8 selected by Mr Ennis — and he had to select an incident
 9 type because you cannot progress the incident without an
 10 incident type and a validated address, that had an
 11 action plan automatically associated with that incident
 12 type. So there are a lot of them that an operator
 13 wouldn't have to think about to select.
 14 SIR JOHN SAUNDERS: I understand that, but just getting
 15 familiarity with dealing with them, if you just had the
 16 more limited number might be a help?
 17 A. It could be advantageous, sir, yes.
 18 MR SMITH: Just to clarify one point arising out of that,
 19 could you actually type in the word "terrorist"?
 20 A. Yes, that would be classed as a keyword.
 21 Q. That was a keyword for the system?
 22 A. Yes, that's another way that you can work. And you can
 23 do that for incident types and you can also do that for
 24 action plans.
 25 Q. What would it produce?

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1 A. For the incident types, it would reduce the list of
 2 incident types, so anything that's been associated with
 3 that word, and then with the action plans that's the
 4 same process as well. So if you put in that word
 5 it would then — the system would then identify any
 6 action plan that may be associated with that type of
 7 incident. So the keywords are all built into the system
 8 as well to assist.
 9 MR SMITH: Thank you very much.
 10 MR DE LA POER: Sir, unless you have any further questions,
 11 that would conclude this witness's evidence.
 12 SIR JOHN SAUNDERS: Thank you very much. I'm really
 13 grateful for the trouble you have taken in helping me
 14 with what happened.
 15 MR DE LA POER: The next witness is Mick Lawlor. We'll need
 16 a couple of minutes to re—arrange the room and then
 17 we'll be ready to go.
 18 (11.35 am)
 19 (A short break)
 20 (11.45 am)
 21 MR MICK LAWLOR (recalled)
 22 Questions from MS CARTWRIGHT
 23 SIR JOHN SAUNDERS: Thank you for coming back, Mr Lawlor.
 24 A. Thank you, sir.
 25 MS CARTWRIGHT: Good morning, sir.

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1 As you are aware, Mr Lawlor is in the witness box
 2 again. He gave evidence over 9 and 10 February of this
 3 year. I don't know whether in the circumstances it is
 4 necessary to re-swear him.
 5 SIR JOHN SAUNDERS: No, absolutely not.
 6 MS CARTWRIGHT: Mr Lawlor, you confirmed when you attended
 7 on the last occasion that you have worked with
 8 Greater Manchester Fire and Rescue Service since 1989?
 9 A. That's correct.
 10 Q. And significantly, that at the time of the incident,
 11 you were Greater Manchester Fire and Rescue Service's
 12 NILO lead and the regional lead officer?
 13 A. That's correct.
 14 Q. Mr Lawlor, in terms of your evidence today we are
 15 principally going to be dealing with your involvement on
 16 22 May of 2017. But it's also been identified on your
 17 evidence proposal that we'll deal with your second
 18 statement that deals with the action plans arising from
 19 the Contingency Planning Unit.
 20 Sir, I don't intend to take the witness through that
 21 second statement dealing with the Contingency Planning
 22 Unit, save there are few issues relating to the systems
 23 that operated both by way of material that Mr Lawlor
 24 could access but also how the CSR at Greater Manchester
 25 Fire and Rescue Service operated.

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1 It's to those I'm going to turn first of all.
 2 Mr Lawlor, in the second witness statement you
 3 provided you deal with various aspects of the action
 4 plan, but I really want to extract from those learning
 5 that had been developed and actioned in those plans.
 6 First of all, could you just describe the CSR that's
 7 at the force headquarters of Greater Manchester Fire and
 8 Rescue Service?
 9 A. Yes, that's correct. So that's the command support room
 10 and that's a room within the Greater Manchester Fire and
 11 Rescue Service headquarters.
 12 Q. And you tell us within your second witness statement
 13 that, following on from the riots in 2011, there had
 14 been extra systems put in place to assist the working of
 15 Greater Manchester Fire and Rescue Service but also the
 16 co-working with Greater Manchester Police; is that
 17 correct?
 18 A. That's correct.
 19 Q. And you tell us that computer terminals were put into
 20 place at the CSR; is that correct?
 21 A. Correct.
 22 Q. And those computer terminals would enable access to
 23 CLIO, the GMP system; is that correct?
 24 A. That's correct.
 25 Q. You also tell us that those computer terminals would

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1 also allow the CCTV that was being monitored at the
 2 force control module of GMP to be similarly viewed in
 3 the CSR of Greater Manchester Fire and Rescue Service?
 4 A. Yes, that's an option.
 5 Q. At the time of providing your second witness statement,
 6 I think you've indicated that you don't believe that
 7 CLIO would be accessed by Greater Manchester Fire and
 8 Rescue Service on those terminals; is that correct?
 9 A. The CLIO system was — the primary use of those
 10 computers what were installed in the CSR was mainly for
 11 the access to the CCTV within the local authorities of
 12 Greater Manchester, and CLIO was a by-product of the
 13 fact that we had GMP computers within the command
 14 support room.
 15 Q. I think you tell us that, other than Bonfire Night, your
 16 experience was that in reality those computers would not
 17 be used to view CCTV in a live play situation; is that
 18 correct?
 19 A. That is my understanding.
 20 Q. You also indicate that there was an issue as to the
 21 updating of the software by GMP to ensure actually that
 22 it was able to be used at various times. Could you just
 23 tell us about that, please?
 24 A. Yes. I suppose like all computer terminals, they
 25 require software updates, and because the computers

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1 weren't Greater Manchester Fire computers, we required
 2 Greater Manchester Police's IT tech personnel to come in
 3 and undertake updates every now and then, and quite
 4 often there would be some difficulty and delay in GMP
 5 coming over to make the software updates.
 6 Q. You tell us in your witness statement — and, sir, for
 7 your reference it's {INQ039922/7}, paragraph 42 — that
 8 you do not believe that CLIO has ever been used in the
 9 CSR since the GMP computers were installed.
 10 A. That's my understanding.
 11 Q. Is that still the understanding as of today's date?
 12 A. Yes.
 13 Q. I think you also set out at paragraph 46 of that second
 14 witness statement, to the best of your knowledge, as of
 15 the date of your statement, the GMP computers in the CSR
 16 had been dormant for a number of years and had not been
 17 used?
 18 A. Yes.
 19 Q. Thank you.
 20 Then secondly, can I ask you a question about your
 21 use of CLIO. Because, as you told us on the last
 22 occasion, you were one of the embedded — you were an
 23 embedded NILO at Greater Manchester Police. In terms of
 24 your access to CLIO, the computer and the laptop that
 25 you had issued to enable you to be that lead NILO, would

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1 that allow you to access CLIO if you weren't at Greater
 2 Manchester Police itself and on one of their terminals?
 3 A. Just for clarity, the CLIO system or any GMP systems
 4 weren't installed on my work laptop. They were actually
 5 installed on the GMP computers which are based in our
 6 pod within the force command module.
 7 Q. And I think you confirm also that when you did attend at
 8 the force command module on the night, which we'll come
 9 on to deal with in a moment, you at no point accessed
 10 the CLIO system?
 11 A. I don't believe I did.
 12 MS CARTWRIGHT: I don't intend to deal with any other aspect
 13 of that second witness statement, sir, unless there's
 14 anything you want to address.
 15 SIR JOHN SAUNDERS: Not at the moment, thank you.
 16 MS CARTWRIGHT: Mr Lawlor, can we now please work through
 17 your involvement on 22 May 2017.
 18 You tell us in the witness statement that you were
 19 not on duty when you first became aware of the incident.
 20 A. That's correct.
 21 Q. Had you been on duty in the day?
 22 A. Yes, I'd just completed an 80-hour on-call weekend and
 23 had booked off call at 5 o'clock on the Monday evening.
 24 Q. Thank you. You tell us in the witness statement that in
 25 fact you were in bed, asleep, and you were awoken by the

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1 sound of your telephone pingging?
 2 A. That's correct.
 3 Q. Was the pingging coming from the NILO WhatsApp group that
 4 was on your phone?
 5 A. I subsequently found that out when I looked at the
 6 messages. I didn't initially, I suppose, either
 7 consciously or unconsciously, because I was asleep, open
 8 or access the messages.
 9 Q. So perhaps if we just display -- it's the document that
 10 shows us the WhatsApp message, the NILO WhatsApp group,
 11 {INQ019040/1}.
 12 So we can see that the first message in the exchange
 13 is in fact an extract from a Sky News, and we can see
 14 that's timed at 23.02. Then a follow-on WhatsApp
 15 message at 23.08:
 16 "Any update?"
 17 And can I ask you, you describe in your witness
 18 statement --
 19 SIR JOHN SAUNDERS: So it's not misunderstood, those are
 20 both sent -- although the Sky News extract part of
 21 that is 23.02, that's when it went on Sky News. It's
 22 actually sent off as part or a forwarded as part of a
 23 WhatsApp 23.08 with the other WhatsApp at the same time
 24 saying, "any update?", I think.
 25 MS CARTWRIGHT: Thank you, sir. It's sent from Dave Keelan.

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1 And as you tell us in the witness statement, we know
 2 that he was the assistant chief fire officer. So using
 3 that time at 23.08, can you assist as to when you would
 4 have seen that message? Would it be around that time?
 5 A. I would say it was post 23.11.
 6 Q. Thank you. So when you read that extract from Sky News,
 7 would it be fair to say that you knew then there was an
 8 incident at Manchester Arena that had been characterised
 9 as an explosion?
 10 A. That's correct, yes.
 11 Q. We can see also in the message, I think you described,
 12 that there's a reference by two of the NILOs -- and just
 13 to confirm are Mark Dogget and Mr Aspinall both NILOs
 14 because they're in this WhatsApp group?
 15 A. They would have been, yes.
 16 Q. Both of them are making reference to the fact that their
 17 daughters had attended the arena that night. So I just
 18 want to ask, as part of the follow-up discussions that
 19 we're going to come on to deal with, was there any
 20 situational awareness that was given by either of those
 21 NILOs that they'd got from either going to collect their
 22 daughters or what their daughters themselves had fed
 23 back about what they'd experienced at the arena?
 24 A. I don't recall -- certainly there'd been no conversation
 25 with myself -- as you can see nothing else put on the

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1 chat there. I'm not sure when I would have seen the
 2 message from Mark Dogget because I was obviously then
 3 in the full throes of getting myself ready to leave the
 4 house.
 5 Q. Thank you. I'm just going to identify before we take
 6 that down -- we can see that at 23.41, a Talk Group is
 7 identified and the Talk Group has been redacted. But
 8 that's the Talk Group that we're going to come on to
 9 discuss, the local NILO channel 1.
 10 So do you know who put the reference to that channel
 11 to be the one that the NILOs were to go on to?
 12 A. That would have been me. Again, just for clarity, that
 13 would have followed or did follow a conversation with
 14 myself and, at the time, Group Manager Levy.
 15 Q. Thank you. We're going to work through the calls that
 16 lead up to 23.41, but Mr Lopez, please can that now be
 17 removed from the screen?
 18 You tell us in your witness statement that when you
 19 first saw the messages, you tried to phone Station
 20 Manager Andy Berry because you knew he was the duty
 21 NILO.
 22 A. Correct.
 23 Q. From the phone records that we have, we know that you
 24 tried to call him at 23.13, but at that time he was in
 25 fact on a telephone call with Mr Fletcher. So just to

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1 be clear, what was the purpose of your attempted call to
 2 Mr Berry at 23.13?
 3 A. I think it would have been at that time just to get --
 4 try and get some understanding of what had gone on --
 5 indeed, if Andy had been notified or was aware of the
 6 incident. Primarily at that time, it would have been
 7 just gathering some situational awareness.
 8 Q. Whilst you were at your home at this time, would
 9 you have put on any of the media channels to try and
 10 obtain information that was being fed through the press
 11 or any other social media access?
 12 A. I didn't do.
 13 Q. You then set out in your witness statement that you
 14 spoke to Mr Fletcher, who at the time was your line
 15 manager in the Contingency Planning Unit. And we can
 16 see the first call that you had with Mr Fletcher was
 17 when he called you at 23.16.
 18 Sir, I'm not going to ask for the document to be put
 19 up unless the witness particularly needs it. That first
 20 call with Mr Fletcher, between Mr Fletcher and yourself,
 21 lasted 1 minute and, it says, 67 seconds, but can you
 22 recall what was then discussed in that first telephone
 23 call with Mr Fletcher at 23.16, please?
 24 A. As far as I'm aware, it was just the basics around the
 25 incident, around the text message what had been sent, ie

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1 around an explosion at the arena. We probably just had
 2 some quick rudimentary conversations around who -- do we
 3 need to go anywhere, do we need to book back on duty,
 4 and I suppose really position ourselves in a location
 5 where we could assist.
 6 Q. You indicate in your witness statement that it was
 7 agreed that you would go to the command support room
 8 at -- Mr Fletcher would go to the command support room
 9 but you would go to Greater Manchester headquarters?
 10 A. Correct.
 11 Q. So at that time of the call at 23.16, had you obtained
 12 any information about what time the explosion had in
 13 fact occurred that night?
 14 A. No.
 15 Q. When you had the discussion with Mr Fletcher, was any
 16 information shared as to whether there was any other
 17 Fire and Rescue Service representative already making
 18 their way to Greater Manchester Police headquarters?
 19 A. No.
 20 Q. In arriving between the two of you that that's where you
 21 would go, what was the understanding you had about the
 22 role you'd be performing that night?
 23 A. So as the, I suppose, as the lead NILO and my position
 24 within Greater Manchester Police headquarters as the
 25 seconded or embedded officer, it just felt right that

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1 that's where I would go. In terms of any, I suppose,
 2 real scientific decision, you know, that's where we
 3 decided we would go or where I would go.
 4 Q. When we look at some of the debrief material later on,
 5 there's a reference in a conversation that you had with
 6 a member of the Kerslake Panel that describes your role
 7 as the Silver at Greater Manchester Police headquarters.
 8 Would you characterise your role that night as being the
 9 Silver commander?
 10 A. No, definitely not. My role on that night would have
 11 been the liaison officer for -- the Fire and Rescue
 12 Service liaison officer between the other agencies who
 13 was in the force command module and, indeed, fill in any
 14 gaps between the force command module and the fire
 15 officer activities and passing information to and from.
 16 Q. Again, if we follow on then other calls that then took
 17 place, we can see that following on from the call at
 18 23.16, the next call that took place was a call that you
 19 received from Mr Ben Levy at 23.21, which is a call
 20 lasting 2 minutes and 88 seconds. Could you help us as
 21 to the discussion you had with Mr Levy at that time?
 22 A. That was a conversation around Ben informing me that
 23 he was en route to the fire RVP and we agreed that
 24 we would communicate any comms traffic on the ILO
 25 channel.

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1 Q. Thank you. You mentioned that in that discussion then
 2 there was talk about an RVP. So we've heard some
 3 evidence, particularly this week, about the different
 4 action cards that were used and also the ones that then
 5 referenced an RVP. But when it was talked about Mr Levy
 6 attending an RVP point, did you give thought as to what
 7 action card was being used at that time to guide the
 8 response of Greater Manchester Fire and Rescue Service?
 9 A. No.
 10 Q. Could I then ask you about the NILO channel you've just
 11 referred to. You should in front of you a schedule
 12 that's been created that identifies those various Talk
 13 Groups with their full name revealed but obviously we're
 14 not dealing with that.
 15 In terms of the NILO group that we've already
 16 identified, it's right, isn't it, that that's only
 17 a Talk Group that can be accessed by NILOs itself?
 18 A. That's correct.
 19 Q. But it's right, isn't it, that NILOs from outside
 20 Greater Manchester Fire and Rescue Service can also
 21 access that Talk Group?
 22 A. That specific Talk Group, that's correct.
 23 Q. Thank you. It's right, isn't it also, that North West
 24 Fire Control employees or staff are not able to access
 25 that Talk Group?

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1 A. That's correct.
 2 Q. Is it also right that that Talk Group is not recorded?
 3 A. Correct.
 4 Q. Can you explain why a NILO Talk Group, where key
 5 information is being exchanged, is not recorded?
 6 A. In terms of my, I suppose, knowledge around Airwave and
 7 comms and radio comms, my understanding is that any Talk
 8 Group that was connected to the -- we call it the ICCS,
 9 I think that is the incident command system within
 10 control rooms -- those channels are recorded. Any
 11 channel what's not connected to the ICCS, it is my
 12 understanding they are not recorded. So the ILO
 13 channels are -- or were and are standalone channels.
 14 Q. Is that still the position today?
 15 A. Correct.
 16 Q. In terms of then the NILOs being able to access it,
 17 would any of the chief officers be able to access that
 18 Talk Group or are they excluded from it?
 19 A. I don't recall before the arena, but I suppose my answer
 20 is that I'm not sure whether at that time the assistant
 21 principal officers and principal officers had access to
 22 those channels.
 23 Q. In terms of the follow-on conversation, just briefly
 24 whilst we're dealing with the listening -- in to the NILO
 25 channel, why was it that you contacted a member of the

1 London Fire Brigade to advise them to listen in to that
 2 channel?
 3 A. That primarily was just to give other NILOs around the
 4 country, lead NILOs around the country, I suppose,
 5 a heads-up in terms of what's going on or what is
 6 starting to unfold within Manchester. And as we know,
 7 the methodologies at that time were perhaps to undertake
 8 simultaneous, multi-seated events. It was literally
 9 just to give them a heads-up and start to,
 10 if they needed to, stand up any of their own response
 11 capabilities to a potential attack or an event in their
 12 area.
 13 Q. Thank you. So round about then, 23.16, even though we
 14 see a later time in the WhatsApp messages, would you
 15 have then been listening in to that NILO Talk Group?
 16 A. I'm not sure. Was the NILO... I think the NILO Talk
 17 Group was probably activated just after that, probably
 18 when I got in my vehicle and chose the channel.
 19 Q. We'll deal with that in a moment. You have told us that
 20 when you spoke to Ben Levy, he was en route to an RVP
 21 and in fact what had been identified was Philips Park
 22 Fire Station.
 23 A. Mm--hm.
 24 Q. We can see from the start of the chain of the WhatsApp
 25 messages that it was clear and it was known from your

1 first look at the phone that the incident was at the
 2 Manchester Arena.
 3 A. Yes.
 4 Q. So when he mentioned the RVP being at Philips Park
 5 Fire Station, did that cause any alarm or query in your
 6 mind as to why that had been chosen as the RVP point?
 7 A. I didn't query it, and at the time, no, it didn't really
 8 raise any bells in my mind.
 9 Q. Did he tell you who had identified that RVP point at
 10 Philips Park Fire Station?
 11 A. I don't recall.
 12 Q. Can I ask you then about -- because we know that you're
 13 now essentially going to be deploying to the incident --
 14 about the system you had that night for recording what
 15 is already important conversations that were taking
 16 place with responding officers.
 17 You've provided what's described as contemporaneous
 18 notes, but they're not the handwritten notes, and
 19 perhaps if we can display, please, Mr Lopez,
 20 {INQ026726/1}.
 21 These are the typed notes which confirm that:
 22 "[It was] started on 26 May, but was a true
 23 reflection of my reflection and contemporaneous notes of
 24 my actions."
 25 And I think you reference within your witness

1 statement handwritten notes. Can you just explain then
 2 the process of where the handwritten notes are but also
 3 of the creation of this document to upload the
 4 information about your involvement that night, please?
 5 First of all, the handwritten notes. Where are those
 6 handwritten notes?
 7 A. I have submitted them as part of my evidence.
 8 Q. So what was in those handwritten notes was then
 9 transferred across into this typed note that was
 10 commenced on 26 May?
 11 A. So I guess in terms of this document, the handwritten
 12 notes would be reflected post 00.05.
 13 Q. Thank you. I want to deal with the equipment that you
 14 had available to you at your home address. We know that
 15 you deployed a little later on, and we'll come on to
 16 deal with a call where you confirmed you had deployed.
 17 At your home address is it correct that you had access
 18 to a laptop?
 19 A. Yes, that's correct.
 20 Q. Would that laptop enable you to access the incident logs
 21 that had been created already by North West Fire
 22 Control?
 23 A. It could do, yes.
 24 Q. It's right, isn't it, that at no point in the night did
 25 you access the incident logs?

1 A. Before I arrived at police headquarters, that would be
 2 correct. I'm not sure whether I accessed them later on
 3 in that evening or early in the morning. Definitely not
 4 before I arriving at police headquarters.
 5 Q. Can you explain then, bearing in mind at this time you
 6 were at home trying to gather in the information about
 7 what was occurring and what was required of you, why you
 8 didn't turn your laptop on and seek to view the incident
 9 logs that had been created already?
 10 A. I think the focus in my mind, and certainly mine and
 11 Mr Fletcher's minds, was to get me to the force command
 12 module where we knew multi-agency partners would be
 13 convening, also to delay that any more would have been
 14 a delay in gathering any information or sharing any
 15 information. But it certainly wasn't in the forefront
 16 of my mind to set up my laptop and then start to look
 17 at the incident logs.
 18 Q. Is it right that you also then had a radio that would
 19 enable you to listen to Talk Groups?
 20 A. That's correct.
 21 Q. And I think you've already identified that you would
 22 have turned that radio on when you were making your way
 23 to the command module?
 24 A. Yes.
 25 Q. Would you have had access to a dictaphone?

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1 A. Not at that time, I didn't, no.
 2 Q. In terms of then logs, you have referenced handwritten
 3 notes, but would any sort of commander-type logs have
 4 been issued to you to enable you to record in
 5 a contemporaneous way as you were making your way all of
 6 the contacts you were having?
 7 A. No, not at that time.
 8 Q. Thank you. I think you tell us later, there came a time
 9 at the force command module where a loggist was assigned
 10 to you.
 11 A. Correct.
 12 Q. We can see then after the call at 23.16 that there is
 13 then a further call that takes place and -- sorry, after
 14 the 23.21 call with Ben Levy, the next call was 23.26,
 15 a call from you to Mr Fletcher. That duration is
 16 identified as 1 minute 73 seconds. Can you assist us as
 17 to what that follow-up call with Mr Fletcher was to do
 18 with but also what knowledge you received at that time,
 19 please?
 20 A. I'll just ...
 21 SIR JOHN SAUNDERS: Take your time.
 22 MS CARTWRIGHT: Would it assist if I put the document up I'm
 23 using to track these calls?
 24 A. It would help.
 25 Q. Please can we display {INQ041473/48}.

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1 The document I'm using is the helpful chronology
 2 that North West Fire Control have prepared.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MS CARTWRIGHT: We know at this time you are still at your
 5 home address. Are you able to assist us as to this call
 6 with Mr Fletcher, please?
 7 A. What time is that, sorry?
 8 Q. The 23.26 call, please.
 9 A. That would have just been -- because although in the
 10 initial calls we discussed, I suppose, our basic plan in
 11 terms of where we was going to go, that wasn't put into
 12 place immediately because obviously we would have needed
 13 principal officer or assistant principal officer support
 14 and authorisation for that. So I am aware that
 15 Mr Fletcher was in contact with ACFO Keelan and,
 16 I believe, other officers who was on duty on that night
 17 and just to make sure and ensure that they was aware and
 18 comfortable of what our plans were, bearing in mind we
 19 was off duty. So we were kind of just putting our plan
 20 together and saying: look, you know, this is our plan,
 21 we intend to go to the force command module, we intend
 22 to go to the command support room, are you happy with us
 23 taking that action? So the later call at 23.26 would
 24 have been Mr Fletcher or the pair of us having that
 25 conversation, saying: yes, it's been agreed, go with it.

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1 Q. Thank you. Just using then this 23.26 time, what were
 2 you being told and what did you understand about the
 3 nature of the incident at the Manchester Arena?
 4 A. So again, my understanding at that time and my
 5 recollection at that time is that an explosion at the
 6 arena had occurred and, rightly or wrongly, I was under
 7 the assumption that we would have had resources there,
 8 notwithstanding there was, I suppose, a second
 9 rendezvous point for other resources, which perhaps
 10 isn't unusual. So that's what I recall at that time.
 11 Q. You say that you would assume that resources were at the
 12 arena. Why did you assume that when the discussion
 13 you'd had with Mr Levy was that he was making his way to
 14 a rendezvous point at Philips Park?
 15 A. Yes, and you know, I probably haven't got a sound
 16 rationale for that. I suppose, I was quite quickly just
 17 trying to build a picture up in my head with or without
 18 the information, rightly or wrongly. That's what we
 19 agreed. It was confirmed -- it would have been
 20 confirmed in that call there, just to make my way to
 21 police headquarters.
 22 Q. In giving your answer a moment ago, you described it as
 23 a second rendezvous point. So had you been given any
 24 information about where the first rendezvous point was?
 25 A. No.

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1 Q. You say in your witness statement, for around this time,
2 that you cannot recall now if you'd been told reports of
3 an active shooter at this time.
4 A. Yes, no.
5 Q. But again would that not be something that was important
6 that was being communicated very early on in terms of
7 your involvement?
8 A. Absolutely.
9 Q. Would that be the sort of information that you yourself
10 should have sought from those you were having
11 discussions with?
12 A. Yes. And again, sort of, looking back on
13 self—reflection, I was aware that there'd been an
14 explosion at the arena, and perhaps I should have dug
15 a bit more for other information and perhaps made the
16 connection around it being an iconic location and then
17 trigger, I suppose, further questions in my mind.
18 I didn't do. That's the only information I had at that
19 time.
20 SIR JOHN SAUNDERS: Were you thinking it might be
21 a terrorist attack?
22 A. I don't believe I was thinking that at that time.
23 SIR JOHN SAUNDERS: So it's just an explosion so far as
24 you're concerned?
25 A. That's my recollection.

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1 SIR JOHN SAUNDERS: I say "just an explosion", I don't mean
2 it like that.
3 MS CARTWRIGHT: Can I explore a little further — one of the
4 first things you described that you did was to contact
5 the London Fire Brigade to instruct them to listen in.
6 So they wouldn't be interested in a local incident,
7 would they, but you would notify them if you'd suspected
8 this was something more of a terrorist incident?
9 A. Yes, and the fact that myself and Group Manager Levy
10 at the time, we agreed to go on an [REDACTED] — and I know
11 that the ILO channel and the one we chose to go on is
12 a national channel where national NILOs can access. So
13 it was pretty much a cursory call just to say, "We've
14 got a developing incident within Manchester". I don't
15 believe at the time that I was thinking it was an
16 unfolding terrorist attack, but there's a school of
17 thought here, it could be it was. But just
18 in that 10-minute period, where I've literally woke up,
19 I'm trying to get my senses round, I'm taking phone
20 calls, I'm probably making phone calls, and at the same
21 time probably get dressed as well. So it's not
22 something I was, I suppose, going into too deeply at
23 that time.
24 Q. I'm just going to deal with this at this stage: you did
25 a lot of work after the incident around what knowledge

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1 existed and what action card was activated at North West
2 Fire Control; is that correct?
3 A. It would be, yes.
4 Q. So just in terms of what we now know sits in the action
5 cards for explosion or for "Bomb — general", and
6 leaving aside Plato, would you have had the knowledge of
7 what those action cards said at the time in terms of how
8 it impacted upon deployment?
9 A. I probably would do, yes. I probably would have had.
10 Q. Just then going back to an identification of
11 a rendezvous point, for the action card of an explosion,
12 there is not reference to a rendezvous point for that
13 action card, is there?
14 A. No.
15 Q. And the response in respect of that action card would be
16 to deploy the resources to the scene?
17 A. That's correct.
18 Q. So again, would that not be something that should be
19 triggering in your mind: what type of incident is this
20 that we're responding to?
21 A. Yeah, it probably should do, and again, you know, I'm
22 not totally ruling out — what I was thinking at the
23 time, it's ... Because now I'm filling gaps in now after
24 the event of what we know about the event. So for me to
25 sit here and say absolutely 100% that's what I was

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1 thinking or what I wasn't thinking, you know, I was just
2 made aware that there'd been an explosion and to put
3 myself on standby to mobilise to the force command
4 module.
5 Q. Thank you. We know that — I'm going to come on to deal
6 with Plato and when you found out about Plato. In terms
7 of your thought processes at that time when you were at
8 home, did you give any thought to this being an
9 Operation Plato or Operation Plato standby, particularly
10 bearing in mind your role as the NILO lead, the training
11 that you had delivered to the NILOs, but also your
12 knowledge and experience relating to MTF A?
13 A. Yes, and you know, consciously that's probably what was
14 probably my thought process, along with John's thought
15 process. I think probably what is worth highlighting at
16 this point is I was under the impression that the
17 incident was just unfolding at or around about that
18 time.
19 Q. I was just going to come on to that. You have confirmed
20 in your witness statement that your assumption at that
21 time was that it had all just happened?
22 A. There or thereabouts.
23 Q. So can I ask you, for there or thereabouts at 23.16, we
24 appreciate that you're not on duty, but in terms of the
25 role that you were in at that time and still are now,

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1 even off duty, would you expect that you would be
 2 notified, even when off duty, almost immediately when an
 3 incident of this nature is developing?
 4 A. I would probably be expected to be notified off
 5 colleagues. Certainly it wasn't an action from North
 6 West Fire Control to notify me. But yes, we share a lot
 7 of information with each other for various incidents.
 8 Q. Mr Lopez, please can you display the next call,
 9 {INQ041473/51}, please.
 10 Mr Lawlor, we see at 23.33 a further call from you
 11 to Mr Fletcher that lasted 1 minute and 93 seconds.
 12 Again, you're still at home at this point. So just
 13 under half an hour now has passed since you were
 14 notified. Was there a reason why you were still at home
 15 at this point, bearing this mind on the earlier calls
 16 you have told us it had been identified you should be
 17 making your way to Greater Manchester command module?
 18 A. So at 23.33, that would have been the time where I was
 19 probably literally walking out of the door of my house.
 20 It was probably a conversation to John, just to say —
 21 and I can't remember how which way this call is, whether
 22 it's me to John or John to me.
 23 Q. The suggestion is it's you calling Mr Fletcher.
 24 A. Yes. So that would have been me just informing John,
 25 "I'm going now", because I know — I think it was

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1 2 minutes later I made another phone call.
 2 Q. Thank you. I think we can see, just looking a little
 3 further down on that same page, we can see from the
 4 MODAS system at 23.33.43, you are showing as mobile on
 5 the MODAS system — sorry, Mr Fletcher, I do apologise
 6 for my error.
 7 Can we then deal with the telephone call that you
 8 then made to North West Fire Control notifying them that
 9 you were deploying. I'm going to ask for that call to
 10 be played, please. It's timed at 23.35, {INQ004429/1}.
 11 I don't believe there's anything sensitive within
 12 this telephone call, but plainly it's live footage from
 13 the night, and so people may not want to listen to this
 14 call. It only lasts a short period of time, just over
 15 a minute. So if anyone wants not to listen to this
 16 call, then they can just step away for a few minutes,
 17 but as I say, there's nothing in particular distressing
 18 in this call, but just to give the warning if people do
 19 not want to listen.
 20 Could that audio of 23.35 to North West Fire Control
 21 now be played?
 22 (Audio played)
 23 Thank you.
 24 Mr Lawlor, can I ask you, bearing in mind you're
 25 notifying North West Fire Control that you are going to

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1 be making your way to the force command module, you are
 2 now speaking to those that are receiving the information
 3 about the incident, why you didn't on this call seek to
 4 obtain information from the call handler at North West
 5 Fire Control so you had as much information as they held
 6 at that time about the nature of the incident?
 7 A. Yes. You know, that's again something I've
 8 self-reflecting on. I do know from historic events or
 9 incidents how busy North West Fire Control can be, and
 10 officers phoning them up for various bits of
 11 information. I do now how impactful that can be on
 12 North West Fire Control.
 13 Yes, I should have and could have asked for
 14 additional information. I believe I had the information
 15 I required at that time for me to mobilise to the force
 16 command module. Had I asked that question, I probably
 17 could have assisted the incident and the responding
 18 NILOs more than I did do.
 19 Q. Mr Lawlor, you were going to be the Greater Manchester
 20 Fire and Rescue Service's first representative at the
 21 force command module, so is it fair to say that part of
 22 your role when you arrived at GMP was to give those
 23 in Silver command the most up-to-date information about
 24 where the Greater Manchester Fire and Rescue Service
 25 response was up to?

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1 A. Ideally that would be the course of action. When
 2 I actually got into police headquarters and sat myself
 3 down at the pod there, things moved quite quickly in
 4 terms of me being informed of other events.
 5 Q. We'll come on to deal with that in a minute, but
 6 shouldn't it have been the first question you asked of
 7 the controller at North West Fire Control: who has been
 8 deployed, which pumps are already there, and where are
 9 the other pumps being held?
 10 A. That's reasonable. That's a reasonable question.
 11 Q. And that would have been information that would have
 12 been easily available to those at North West Fire
 13 Control, isn't it?
 14 A. Yes.
 15 Q. Had you asked the question at that time of North West
 16 Fire Control and been told that no pumps had been
 17 deployed, what would you have done differently? What
 18 would you have done if you'd had that information at
 19 23.35?
 20 A. Sorry, can you ask that again?
 21 Q. If at 23.35 you had asked what pumps had been deployed
 22 and you were told in fact none have been deployed to
 23 scene, what would you have done?
 24 A. I think had I had that information, I would have
 25 definitely been making more phone calls to the people

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1 who were as attending or mobilised the on-call officers,
 2 so Andy Berry, Ben, who I was already in contact with --
 3 I probably would have been trying to seek some more
 4 information out.
 5 Q. We can see you then, I think, subsequently speak to
 6 Dave Keelan at 23.37. Mr Lopez, can we display again
 7 {INQ041473/53}.

8 You can see there the call with Dave Keelan. In
 9 fact, this is the first call that you have, just lasting
 10 over a minute. What would you have been discussing with
 11 Mr Keelan at that time?

12 A. That would have been confirming to the assistant chief
 13 there that I was en route to police headquarters.

14 Q. Did the assistant chief -- was he able to provide you
 15 with any updated information at that time?

16 A. I don't recall.

17 Q. If we move, Mr Lopez, please, to {INQ041473/56}.

18 We can see at 23.43, you made a call to the command
 19 support room that lasted 42 seconds. What was the
 20 purpose of the call to the command support room, please?

21 A. Again, that would have been confirmation that I was
 22 mobile to the force command module. I think because I'm
 23 off duty and generally the officers who are on the
 24 specific group know which officers are on rota on those
 25 days or evenings, I was just conscious that I was an

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1 additional officer coming back on to duty and on to that
 2 rota group, if you will, so there would just be a number
 3 of courtesy calls just to say I've been recalled to duty
 4 and I'm back on duty now.

5 Q. Thank you. Are you able to help us, knowing the time
 6 you arrived at Greater Manchester headquarters, roughly
 7 what time then you would have been on the move, so
 8 having left your home in the car?

9 A. So I recall my AVLS and MODAS tracking, I set off at
 10 23.35. I landed at police headquarters at, I think it
 11 was, 00.05, so 30 minutes.

12 Q. Thank you. We've already talked about that NILO channel
 13 and that is on now in your car as you made your way to
 14 the force command module. Can you give us some idea
 15 about how much traffic and talk there was on that Talk
 16 Group, please?

17 A. None.

18 Q. None? And were you surprised --

19 SIR JOHN SAUNDERS: Sorry, did you say none?

20 A. None.

21 SIR JOHN SAUNDERS: Thank you.

22 MS CARTWRIGHT: Were you surprised that there was no traffic
 23 on that Talk Group?

24 A. I don't recall at the time being surprised. Now, as you
 25 know, I'm having various phone calls, so I don't really

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1 pay much attention other than if somebody had have
 2 called up or if I had needed to call up, then I knew
 3 there was people on the other end. I don't recall being
 4 surprised.

5 Q. As you make your way then, you get no additional
 6 information then through that Talk Group?

7 A. No.

8 Q. We can see from the WhatsApp messages that it was
 9 highlighted in terms of when the discussions were going
 10 on, as we see in that call -- I didn't read all of them
 11 out but as we saw displayed on the screen -- it seems
 12 you were specifically highlighting that as that's where
 13 the NILOs could go to get more information?

14 A. To transmit more information, yes.

15 Q. So is it surprising that having had that identified in
 16 a WhatsApp group that that was not where people were,
 17 the NILOs themselves were talking?

18 A. I think we'll probably make an assumption that people
 19 have seen that message. I know I put the message on,
 20 but I don't know who read that message at that time,
 21 whether people were mobilised or en route to the
 22 incident. Certainly, you know, the additional messages
 23 what were put on afterwards I wouldn't have seen until
 24 I had arrived at police headquarters at least.

25 Q. In terms of then the NILO that had been to collect his

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1 daughter from the arena itself, Mr Dogget, who we know
 2 was on that WhatsApp talk group, so must have felt, one
 3 imagines, would have seen the messages on it, and then
 4 the other, Mr Aspinall, who referenced that his daughter
 5 had been present, was there no talk from them on that
 6 Talk Group to give the information that they had by way
 7 of the situational awareness that they had from personal
 8 attendance at the arena but also from daughters who had
 9 been present at the arena that night?

10 A. Definitely not on the Talk Group, but both John and Mark
 11 would have been off duty at that time so wouldn't have
 12 had their Airwave radio with them and I'm unsure whether
 13 they have or haven't had conversations by other means at
 14 that time.

15 SIR JOHN SAUNDERS: When they got home, presumably they
 16 could have gone on to the NILO Talk Group if they'd
 17 wanted to?

18 A. They could have done.

19 SIR JOHN SAUNDERS: Yes. Looking back, it is likely they
 20 had what could have been useful information.

21 A. That's correct, sir, and as I have just highlighted, I'm
 22 unaware if they've had a conversation by mobile
 23 telephone. I don't know.

24 MS CARTWRIGHT: Thank you. Mr Lopez, moving on to the next
 25 page of the same document {INQ041473/57}.

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1 We are still now on the way to the force command
2 module. At 23.45, we see you had a further call to
3 Mr Levy that we see at 23.45.
4 So what was the purpose of you calling Mr Levy as
5 you made your way to the force command module?
6 A. Again, that probably was me informing — because I'd
7 already had a conversation with Ben, it probably would
8 have been me phoning Ben to inform him that I was mobile
9 to the command support room — sorry, to the force
10 command module. I'm literally just informing people
11 that I'm on the road.
12 Q. Again, just following on from the questions I asked you
13 about North West Fire Control, were you not seeking from
14 Mr Levy information about who was at the arena, again to
15 enable you to act as that conduit of information once
16 you arrived at the Silver command room?
17 A. Yes, I think that call there — I think Ben may have
18 just arrived at the fire rendezvous point of
19 Philips Park. And in terms of the information to and
20 fro, it probably — I know Ben, he would have said,
21 "Listen, I've just landed, I'm going to get myself
22 ready, I'll get some information and if I need to, I'll
23 share that back with you". I'm kind of just trying to
24 think what would have happened on that call. I can't
25 100% confirm that's what happened, but it would have

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1 been that sort of dialogue.
2 Q. Thank you. Again, just help us understand about the
3 information that was being fed back. Was there any talk
4 at this time or at any point as you made your way to
5 Greater Manchester Police that the firefighters
6 themselves, there was real dissatisfaction about what
7 was happening on the ground and the fact that they were
8 not being deployed? Did any of that find its way
9 through to you as you made your way to the command
10 module?
11 A. No, the first I became aware of that was the day after.
12 Q. Then just to be clear, the day after, when did you then
13 find out about that disquiet?
14 A. I can't put a time on it. It would have been during
15 that day — the 23rd, wasn't it?
16 Q. And obviously we appreciate you were on duty for a long
17 period of the night into the morning. Would it have
18 been whilst you were at the force command module at GMP
19 that you had that information or at a time after you
20 left?
21 A. I think in terms of me understanding or realising that
22 Greater Manchester Fire had no resources at this scene,
23 that was definitely when I was at the force command
24 module. I believe that was a conversation with somebody
25 else. But in terms of any upset or fire crews not

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1 attending and wanting to attend, I think that come to my
2 attention during that day at some point.
3 Q. Thank you.
4 One of the matters that you address in your witness
5 statement is that it was really the decision—making
6 between you and Mr Fletcher that caused you to deploy to
7 Silver rather than it being a request of North West Fire
8 Control to deploy to the Silver command; is that
9 correct?
10 A. Yes, it's a conversation, whether it's consciously
11 a decision — you know, decision—making. But it's —
12 we've worked together a long time, me and John, and
13 I suppose we best know where — the right place to be to
14 gather that information or communicate that information.
15 Q. Can I ask though, in terms of the work you have done
16 subsequently to look at the Greater Manchester Fire and
17 Rescue Service response, have you been able to see,
18 though, that whilst there was talk at 11 o'clock to
19 North West Fire Control from GMP that the Silver may be
20 being set up, the request itself for a NILO didn't
21 really come along until around 23.45, when you were
22 already on your way? In fact if we look at the
23 information North West Fire Control have provided, in
24 fact then when that request had been made, the
25 controllers were informed in fact that you were making

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1 your way there, so in reality that has not made
2 a difference. Have you been able to see that?
3 A. I know the timings.
4 Q. So does that fit with your looking at the timings that
5 it was not until much later that GMP then requested
6 a NILO?
7 A. Yes.
8 Q. So it almost coincided with you making your way there
9 and North West Fire Control being made aware that you
10 were a NILO on your way?
11 A. Yes.
12 Q. Thank you. You arrived at Greater Manchester Police at
13 00.05.
14 A. Mm—hm.
15 Q. And unlike other officers, this was a location you were
16 well familiar with because you were one of the embeds(?)
17 at Greater Manchester headquarters?
18 A. Yes.
19 Q. So you knew immediately where you were going to?
20 A. Correct.
21 Q. In terms of then the systems you'd be accessing when you
22 arrived, what did you have to do practically and
23 physically when you entered the Silver command room?
24 A. So I would have — we have a number of IT systems there,
25 so we have a desktop computer there, we have a docking

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1 station there for laptops, and I would have set up my --
 2 or be in the process of setting up my IT systems, my
 3 laptop, getting a notebook out. That's what I would
 4 have done.
 5 Q. I think there's reference to the Silver Vector log.
 6 Can you explain what that is and who can access it,
 7 please?
 8 A. That's an incident information sharing decision log, an
 9 electronic system.
 10 Q. Is that a system operated by Greater Manchester Police?
 11 A. Greater Manchester Fire.
 12 Q. So would just Greater Manchester Fire be able to access
 13 that rather than GMP?
 14 A. Yes.
 15 Q. So in terms of the Silver command Vector log, when you
 16 arrived at GMP, would you have accessed that system?
 17 A. I didn't access -- I would have had access to that
 18 system but I didn't access that system at that time.
 19 Q. Can I ask why you wouldn't want to access that Vector
 20 log just to understand where the Greater Manchester Fire
 21 and Rescue Service response was up to? Because you were
 22 really now going to be the means of communicating to all
 23 those in Silver command what Greater Manchester Fire and
 24 Rescue Service's response had been up to that point.
 25 A. Yes. It's not a case of not wanting to access that

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1 system, I would have accessed that system at the
 2 earliest point I could do, and literally as I entered
 3 the room and, I suppose, accessed my pod, that is when
 4 the additional information came in, so my responsibility
 5 then is to start to communicate that information
 6 outwards, but at the earliest point in terms of
 7 accessing the Vector log, we did that as soon as
 8 possible.
 9 I wasn't aware if the command support room had
 10 activated their Vector log and started recording
 11 information on their log. I know at the earliest
 12 opportunity, I started my Vector log.
 13 Q. Thank you. So what you seem to be describing is that as
 14 you entered the room, really matters developed in
 15 a different way because you were appraised of additional
 16 information that then became the focus of what you
 17 needed to do?
 18 A. Yes.
 19 Q. Is that the information that you received around
 20 Operation Plato?
 21 A. Yes.
 22 Q. Thank you. So just so I'm clear as well in terms of
 23 arriving in the room and then being given the
 24 information that we're going to deal with in a minute
 25 about Operation Plato from Greater Manchester Police's

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1 Mr Hill, had you accessed any system by way of
 2 Greater Manchester Fire and Rescue Service systems or
 3 the incident log that North West Fire Control had
 4 opened?
 5 A. No.
 6 Q. So the limited information you've already told us that
 7 you had gleaned from the various phone calls, that is
 8 what you were able to take into the room at that time;
 9 is that correct?
 10 A. Yes.
 11 Q. So could you just then describe what the scene was like
 12 in the Silver command room when you arrived, how busy it
 13 was, how it seemed?
 14 A. It kind of didn't feel any different to me. We work
 15 in that environment a lot for various types of incident.
 16 You can always feel an atmosphere in there. I wouldn't
 17 say it was bedlam. It was busy, as you would expect,
 18 but no different, really, to any other event that we
 19 support in Silver.
 20 Q. Thank you. It's right, isn't it, that you knew the
 21 tactical firearms officer, Mr Hill, from your day-to-day
 22 work as the embed at Greater Manchester Police?
 23 A. That's correct. I misidentified Chris' role on the
 24 night, how I've described him, and literally because
 25 I know the room and I know the set-up and where people

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1 sit, because of where Chris was sat at the time, in
 2 effect he was sat in the tactical adviser's seat. I've
 3 put two and two together and come up with five. But
 4 nevertheless, it was the information I'd received from
 5 Chris.
 6 Q. Thank you. So you described him in your witness
 7 statement as the tactical firearms adviser because
 8 that's where he was sat in the Silver command room?
 9 A. Yes.
 10 Q. Again, the inquiry's heard some evidence about other
 11 people not being where they should have been in terms of
 12 the division of where commanders should be, particularly
 13 some evidence around when the NWS Gold arrived in the
 14 room, they then located with the NWS Silver commander.
 15 So just so we're clear in terms of where you were going,
 16 where were you going to sit within that room?
 17 A. There are set positions for agencies to support Greater
 18 Manchester Police. So I was going to Greater Manchester
 19 Fire and Rescue Service's Silver pod.
 20 Q. When you say the Silver pod, again --
 21 A. On that floor, there are -- collectively it's the force
 22 command module, and within the force command module,
 23 there is one Gold suite and there's two Silver suites.
 24 I was going to or I went to the fire pod within the
 25 Silver suite.

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1 Q. So would where you've sat have identified you as the
 2 Greater Manchester Fire and Rescue Service's Silver
 3 tactical commander?
 4 A. Not the tactical commander. It would identify whoever
 5 was sat there as the fire liaison officer because we
 6 work different to other agencies in terms of the Bronze,
 7 Silver and Gold. We are there as a liaison, a conduit
 8 of information officer.
 9 Q. Thank you. So as of the time when you provided this
 10 first witness statement, you had believed Chris Hill had
 11 been the tactical firearms adviser on the night because
 12 of the fact that he had been sat in that location?
 13 A. Yes. He was just sat on a chair next to the
 14 Silver commander's chair. So had he have been in the
 15 Silver commander's chair I would have twigged that he's
 16 the Silver commander. It was a mistake on my behalf.
 17 Q. But again, in terms of interoperability and command
 18 roles, there should be no ambiguity as to who in each
 19 agency is performing a key command role, should there?
 20 A. 100%, that was a mistake on my behalf. You know,
 21 Chris -- whether he was sat in the chair, I don't know,
 22 but it was a mistake on my behalf.
 23 Q. In terms of then the information that's passed to you,
 24 can you just help us as to how that came out? Because
 25 it's quite important that we hear this evidence because

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1 thus far we've not heard the live oral evidence from
 2 Annemarie Rooney, the North West Ambulance Service's
 3 Silver commander, about when she received the
 4 information about a declaration of Operation Plato, and
 5 then obviously the time when you received the
 6 information. So can we have absolute clarity about how
 7 that information was conveyed?
 8 A. Yes.
 9 Q. Is it first of all personally to you or was it to the
 10 room?
 11 A. It was personally to me. Again, I can't recall if Nwas
 12 was -- on the other side of my pod is where Nwas sits,
 13 so we basically sit facing each other. I can't recall
 14 if Nwas was there at that time. I can't see a reason
 15 why they wouldn't be. But definitely, you know, Chris
 16 came over to me and he was on that side of the pod,
 17 talked over to me, and he said, "Mick, are you aware of
 18 Operation Plato being declared?"
 19 Q. And again, just so I can understand the proximity of
 20 where the Silver commander should be sat, just using the
 21 dimensions of this room, you describe Mr Hill
 22 approaching you, where would the distance -- say you
 23 were sitting where you were on the night, just help,
 24 using this courtroom, as to where Annemarie Rooney, as
 25 the Silver commander for Nwas, would have been sat?

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1 A. Just on the other side of this box (indicating).
 2 Q. So literally as close as that?
 3 A. Yes.
 4 Q. So had she been sat there at that time she would have
 5 heard what Mr Hill was saying to you?
 6 A. Yes. Like I say, I'm not saying Annemarie wasn't sat
 7 there or sat to the right of me, I just remember having
 8 the conversation with Chris directly.
 9 Q. So he had approached you where you were sat?
 10 A. Yes.
 11 Q. And again your recollection is it was to say it was
 12 Op Plato?
 13 A. Because we know each other, we know each other well from
 14 working relationships, he came over and he said, "Mick,
 15 are you aware that Operation Plato's been declared?",
 16 and to which I responded no, and I asked the question,
 17 "When was it declared?", and he responded, "Um... I'm
 18 not sure when it was declared but I will get back to
 19 you".
 20 Q. So in terms of -- first of all, why would Mr Hill be
 21 contacting you almost as you arrived to tell you, "Are
 22 you aware that Operation Plato has been declared"?
 23 A. Because it's a definite change in information threat, so
 24 straightaway he would have been making sure that I was
 25 aware so I could push that out to any crews or officers

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1 who they needed access to.
 2 Q. So what was your reaction when you heard at roughly
 3 00.15 the words Op Plato?
 4 A. I wouldn't say there was any reaction as such. The only
 5 reaction I had was to clarify when it had been declared.
 6 Straightaway then I communicated that over the ILO
 7 channels.
 8 Q. Why was it important that you knew when Op Plato had
 9 been declared?
 10 A. I suppose it's just gathering that information in my
 11 head, just getting the picture in my head how the
 12 incident was unfolding, and again so I could pass that
 13 information over to anybody who needed it.
 14 Q. Were you surprised that Mr Hill wasn't able to
 15 immediately tell you the time that Operation Plato had
 16 been declared?
 17 A. I wasn't surprised, no.
 18 Q. So then let's -- so subsequent to receiving that
 19 information, did you have any other discussion with
 20 anyone in the room or did you immediately go about
 21 informing those at Greater Manchester Fire and Rescue
 22 Service about the information you'd just received?
 23 A. I think for me, the dynamics changed then, and my key
 24 responsibility then was to communicate that over the ILO
 25 channel so that the officers on that channel had a full

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1 information picture. I knew at that time that, because
2 of where my other colleagues were positioned, I knew at
3 that time the information was going to go into the
4 command support room and I knew the information was
5 going to be reached by the likes of Ben Levy, Andy Berry
6 and suchlike. So the key people were aware.

7 Q. I'm going to come on to deal with that in a minute, but
8 can I just check a feature of the chronology you've told
9 us about in terms of being told the information from
10 Mr Hill and what happened when you arrived.

11 Mr Lopez, please can you display {INQ026726/2}.

12 I'm going to ask to be displayed again, Mr Lawlor,
13 the notes that you wrote on 26 May 2017.

14 I just want to be clear about the account about the
15 information from Mr Hill. We can see in this document,
16 you set out:

17 "On arrival within the multi-agency command suite
18 I gestured to Superintendent Chris Hill whom I already
19 was familiar with and, due to his seating position,
20 I recognised him as being the tactical commander to the
21 GMP Silver commander."

22 So just pausing there, within this note that you
23 prepared a couple of days afterwards, you had identified
24 him as the tactical commander. So can you assist us on
25 that point?

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1 A. In terms of how I?

2 Q. I think you described him then as the tactical adviser.

3 SIR JOHN SAUNDERS: Okay, to the GMP Silver commander. So
4 are you meaning an armed tactical adviser?

5 A. In terms of my knowledge of the command roles of GMP, to
6 the left-hand side of the Silver commander, depending on
7 what type of incident it was, so whether that be
8 a firearms incident, a public order incident, they would
9 have that specialist knowledge there. So because of
10 where I believe Chris was sat at the time, I had him
11 down as the tactical commander and not the GMP Silver
12 commander. But I've learned since that Chris actually
13 was the GMP Silver commander for the evening.

14 SIR JOHN SAUNDERS: I think the misunderstanding may be that
15 the Silver commander is also called the tactical
16 commander and therefore you perhaps need to put
17 "firearms tactical". It's everyone using different
18 words to describe the same things in different services.

19 A. Yes, and again that's probably a (overspeaking).

20 SIR JOHN SAUNDERS: (Overspeaking) what you were being asked
21 about.

22 MS CARTWRIGHT: We can then see it goes on:

23 "My first actions on arrival were to establish
24 communications with partner agencies, activate my
25 information technology system, and await an incident

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1 update from Superintendent Chris Hill. It was evident
2 on arrival that Superintendent Hill was extremely busy,
3 therefore I didn't encroach his space until he was in a
4 position to be able to verbally communicate."

5 Then you describe the information you received at
6 00.15. So can I just check in terms of that note that
7 there's no difference in what you're telling us now,
8 that was what your intention was, but you didn't
9 manage to speak to any other partners during that period
10 before Mr Hill updated you?

11 A. No, and that's probably from me entering the room
12 because when you enter the room, you're -- directly in
13 front of you, you know, you can see the people in the
14 room and it would have been a hand gesture, Chris would
15 have been talking, from me -- that would probably only
16 been 1 minute, 1 minute 30 by the time all that
17 unfolded.

18 Q. Thank you. That can be removed from the screen,
19 Mr Lopez, please.

20 You have told us on receiving the information you
21 immediately went on to the NILO Talk Group to put the
22 information there.

23 A. Yes.

24 Q. So when you went on to the Talk Group at that time, were
25 there people on the Talk Group able to hear what you

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1 were telling them about Operation Plato?

2 A. Yes.

3 Q. So who was on the Talk Group when you told them about
4 the Operation Plato shortly after 00.15?

5 A. In terms of me knowing who had been mobilised or who had
6 mobilised, I knew John Fletcher was mobilised and would
7 be on that channel and was going to the command support
8 room. And I knew Ben and Andy and I wasn't -- I'm not
9 sure if I was aware Carlos was actually mobilised to the
10 incident at the time. But I knew I had three people,
11 two at two locations, where that information would have
12 reached.

13 Q. I just want to be clear because we're going to come on
14 to deal with telephone calls that you make where we can
15 see you're speaking to Mr Fletcher on his telephone
16 rather than using the Talk Group as the way to share
17 information. But it's your recollection that at the
18 time you transmitted Operation Plato shortly after 00.15
19 there were people on the NILO Talk Group that heard that
20 information?

21 A. I put the information out and then I then -- so for
22 example, I would have asked John to confirm the message.
23 Then I would have asked either Ben or Andy to confirm
24 that they'd heard a message, so I was getting
25 clarification that they understood exactly what was

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1 being pushed out.
 2 MS CARTWRIGHT: Thank you. I'm next going to go through the
 3 various calls that were made and I wonder whether that's
 4 a convenient place to stop for lunch, please.
 5 SIR JOHN SAUNDERS: Thank you. An hour? Just before 2.
 6 Thank you.
 7 (12.59 pm)
 8 (The lunch adjournment)
 9 (2.00 pm)
 10 MS CARTWRIGHT: Mr Lawlor, I apologise, before lunch
 11 I indicated we were going to deal with now the time
 12 after 00.15, but I'm just going to take us back very
 13 briefly to deal with a call you made to Mr Fletcher at
 14 00.07.
 15 Mr Lopez, please can we identify that call, please,
 16 on {INQ041473/68}.
 17 We see there the call at 00.07 that lasted 2 minutes
 18 85 seconds. And you don't deal with that call in your
 19 witness statement, but you did give details about the
 20 discussion you had with Mr Fletcher within the account
 21 that you provided on 12 July 2017 as part of the debrief
 22 process.
 23 So Mr Lopez, could that now be taken down and could
 24 I ask to have displayed on the screen {INQ030902/19}.
 25 Expand, please, just the "Mick" answer.

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1 Just to orientate you, this was the account that was
 2 given at the debrief process, I think, at The Hive
 3 subsequent to the arena attack. But we see within the
 4 extract there reference to the discussion that you had
 5 with Mr Fletcher, so I'm going to read the account here
 6 and then ask you questions about the call we've just
 7 identified at 00.07.
 8 The account you gave or the summary of the account
 9 here says:
 10 "There were a number of conversations with people at
 11 GMP at 00.05. I arrived at GMP HQ and I was to relay
 12 information of FS resources. I made my way up to... at
 13 police headquarters. To say it was a busy room and
 14 there wasn't a lot of people in there, it was confusing.
 15 I've gone over to our FS command set for me because
 16 I know quite soon there will be [a round the room] for
 17 all agencies. After arriving, I spoke to John F about
 18 what resources were where. In this case they were at
 19 G18 so that when they go round for information I have
 20 it."
 21 Just using that account that you gave about the call
 22 at 00.07, can we just be clear about what you and
 23 Mr Fletcher were discussing at that time, please?
 24 A. I think if you go off the account what's given there,
 25 it's pretty much the conversation. I probably, at

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1 7 minutes past, I probably was between the car park and
 2 getting into the command room, probably, or I've --
 3 I may well have just arrived in. It looks like, from
 4 that account there, that there's been a conversation
 5 between myself and John in terms of what resources there
 6 were or there weren't.
 7 Q. Just looking at that account, G18, that is Philips Park;
 8 is that correct?
 9 A. Yes.
 10 Q. We know that there came a time when the pumps that were
 11 at Philips Park were deployed back to Central Station,
 12 G16. But I just want to be clear because this is 00.07.
 13 So was it your understanding that all the pumps were
 14 still at Philips Park at 00.07? Is that what was being
 15 communicated?
 16 A. It's possible. Looking at that account there, that
 17 probably conflicts slightly with the contemporaneous
 18 notes I had wrote on 26 May. You know, the -- I'm just
 19 thinking in terms of this answer, I suppose after being
 20 questioned at The Hive, I may well have already had some
 21 gaps coloured in previous to -- you know, between, say,
 22 26 May and this event here.
 23 Q. If we can just take the account down now, please,
 24 Mr Lopez.
 25 But using your best recollection of what Mr Fletcher

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1 told you about where the resources were, is it your
 2 recollection that at 00.07 Mr Fletcher was still
 3 indicating to you that all the pumps were still at
 4 Philips Park?
 5 A. So I don't recall that now, I can't recollect that.
 6 However, if that's what's been captured there, I have no
 7 reason to discredit that or disbelieve that.
 8 Q. Because I think what you are describing in the account
 9 you gave at the event at The Hive was that what was
 10 important to you was, when they went round the room,
 11 that you could explain where the pumps were?
 12 A. Yes, that generally would be -- I know that there would
 13 at some stage be a round the room conversation/update
 14 between all agencies, so that would have been an attempt
 15 to -- I suppose for me to get some awareness of what
 16 activity GM Fire were doing or weren't doing.
 17 Q. I'm not going to ask for this to be displayed on the
 18 screen, but, sir, you will recall that you've heard
 19 evidence by reference to the incident log -- and again
 20 for your records it's {INQ008375/32} -- that at 00.02,
 21 in the absence of an FCP, Mr O'Reilly had directed, the
 22 log suggests, the pumps to move to G16.
 23 So again, in terms of the incident log itself and
 24 information you knew, were you aware at 00.07 that three
 25 pumps had been moved back to Central Station?

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1 A. I don't recall that.
 2 Q. But again, was that not important information that you
 3 needed to know, bearing in mind that's what you indicate
 4 you needed to tell the room, where the pumps were?
 5 A. Yes. You know, I... I knew we had resources out, out
 6 there, if we say, but in terms of them being moved from
 7 one location to another, I don't recall it being passed
 8 to me at that time. I don't recall that.
 9 Q. So to the best of your knowledge, when you arrived in
 10 the Silver suite, you still believed all the pumps were
 11 at Philips Park?
 12 A. I'm not sure where -- whether they were there or it was
 13 -- or are at 16 or were in transit.
 14 Q. Going back to the information that was relayed from
 15 Mr Hill at about 00.15, as well as being told that
 16 Operation Plato had been declared, you set out in your
 17 witness statement that you were also given information
 18 at that time about the zones at the arena. Can you tell
 19 us about that, please?
 20 A. Again, my recollection is, when Chris has come over to
 21 me, is that -- informing that Operation Plato had been
 22 declared, he also -- the additional information was
 23 where the hot, warm and cold zones in terms of location
 24 of the premises...
 25 Q. And what did he tell you about those?

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1 A. The hot zone was the arena itself. And I recall Chris
 2 informing me that it would be at least -- that would be
 3 a hot zone for at least, I think it was, 3 hours. The
 4 warm zone would be the outer perimeter of the arena, but
 5 still within the Manchester Victoria Station, and the
 6 cold zone would be anywhere beyond the Manchester
 7 Victoria Station complex.
 8 Q. Thank you. So as well as communicating over the NILO
 9 Talk Group the fact that Operation Plato had been
 10 declared, did you also share at that time on the Talk
 11 Group the information you'd received about zones?
 12 A. Yes.
 13 Q. Can I display now, please, a page of the log that was
 14 completed by Annemarie Rooney, because there are some
 15 references also that refer to Plato.
 16 {INQ014791/9}, please. We can see at the top of the
 17 page, an entry on the log at 00.18, which records:
 18 "Information passed from GMP Silver Chris Hill to
 19 Annemarie Rooney that GMP had called a Plato incident at
 20 22.47."
 21 So pausing there for a minute, you've already told
 22 us about the location of where Annemarie Rooney was sat.
 23 So would that suggest that she had been proximate to the
 24 discussion that was taking place between you and
 25 Mr Hill?

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1 A. Yes, if you were to take Annemarie's account there, yes.
 2 Q. We can see she's also able to record within those notes
 3 that she was made aware that the Plato incident had been
 4 declared at 22.47. So can you assist? You tell us
 5 originally you don't think you were given the timing of
 6 the Plato from Mr Hill, but how quickly thereafter was
 7 he able to tell you about when Plato had been declared?
 8 A. That was roughly between around about 00.40/00.50. It
 9 was some time afterwards.
 10 SIR JOHN SAUNDERS: Why was it of any interest to you what
 11 time it had been declared?
 12 A. As I highlighted earlier, it's just that -- you know,
 13 gathering that information, so I can just push out as
 14 much information as I can, because again, and I'm
 15 just ... The picture I had in my head was it was --
 16 there was an explosion at the arena. I wasn't aware of
 17 anything over and above that. So it seemed to me that,
 18 at that time, the dynamics of the incident were changing
 19 quite rapidly. So it's just a case of I try and grab as
 20 much information as I can to push out to give the
 21 officers on the ground as much information as I had.
 22 MS CARTWRIGHT: Mr Lopez, can we go on to the next page,
 23 please? {INQ014791/10}. At the bottom of the next
 24 page, an entry timed at 00.54, and Annemarie Rooney has
 25 recorded a discussion with you. I'm going to come on to

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1 deal with that in a moment.
 2 Between 00.18 and 00.54, had there been any other
 3 discussion between you and Annemarie Rooney in light of
 4 the information that you'd both received from Mr Hill?
 5 A. It's quite possible. But certainly I think things
 6 started to move a little bit faster in terms of
 7 information going both ways. I recall having
 8 conversations with NWSA on a number of times, but in
 9 terms of, I suppose, me putting a time on it, I can't do
 10 that, so I'm not saying there Annemarie's not correct
 11 there.
 12 Q. Going back to logs and notes kept, was it not important
 13 that you kept a log of every occasion where you were
 14 having discussions with NWSA representatives in the
 15 Silver room?
 16 A. Absolutely. I have provided my handwritten notes,
 17 they're not a comprehensive set of notes. It was
 18 literally, you know, me just jotting down whatever
 19 I could when I could. I haven't had -- I didn't have,
 20 if we say, the time to write comprehensive notes, as you
 21 see, on the screen there.
 22 Q. We'll come back to this in the chronology shortly. Can
 23 we then see if we can identify your handwritten notes.
 24 Mr Lopez, please can we display {INQ026726/4},
 25 please. These at the moment are the only handwritten

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1 notes I can identify for you. Are these the notes
 2 you're referring to or is there something more than
 3 this?
 4 A. No, that's what I had at the time.
 5 Q. So this entry we see written, is it written on a folder?
 6 A. Yes.
 7 Q. That reflects the extent of your handwritten notes from
 8 the night?
 9 A. Yes.
 10 Q. In terms of -- if we can work through these just to
 11 understand. When would you have started these
 12 handwritten notes?
 13 A. It looks like -- so if you look probably there in the
 14 middle of the page to the right--hand side, where it
 15 says, "Plato informed at 00.15", that's probably the
 16 first time I've wrote something down. Like I say,
 17 obviously the handwritten notes there don't depict the
 18 fast pace the information was coming in, but that's the
 19 notes I had time to write at the time.
 20 Q. Thank you.
 21 A. I think if it's just worth highlighting there, at the
 22 bottom of the page, where it says, "51", I think looking
 23 there, and I'm just trying to understand my handwriting,
 24 it either says "cold/warm zones" there... So it could
 25 be that that conflicts with me highlighting I had the

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1 hot, cold and warm zones at 15, when initially informed
 2 of Plato.
 3 Q. Just so we're clear, at the bottom of the page, the
 4 entry 51, that could reflect your note of when you were
 5 told about cold/warm zones?
 6 A. Yes, I'm just looking there at the timings there now.
 7 So you've got -- in terms of 15, 29, 38, 43, 49, 51,
 8 that's -- it's a reflection -- looking at that, it looks
 9 like that's probably where there's a bit of
 10 inconsistency.
 11 Q. Perhaps if we work through what each of those entries
 12 are meant to represent. The 00.29 entry, what's that
 13 note meant to reflect?
 14 A. So that is "rendezvous point requested".
 15 Q. In terms of that, was that the one you indicate was
 16 requested from Greater Manchester Police --
 17 A. Yes.
 18 Q. -- for the inter--agency liaison?
 19 A. So if I recall rightly, I suppose that is a formal
 20 request to use Thompson Street Fire Station as,
 21 I suppose, a tactical holding area, a rendezvous point
 22 for the various partner agencies to come. Because if
 23 you recall in previous evidence what's been given
 24 is that other agencies were turning up to --
 25 Q. Yes.

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1 A. -- Thompson Street.
 2 Q. Can I just ask -- and we'll go through the chronology in
 3 a minute. So at the time you make that entry at 00.29,
 4 were you aware that North West Ambulance Service had
 5 been using Central Station as a rendezvous point for
 6 their ambulances as the Central Station ambulances (sic)
 7 were leaving Central Park to go up to Philips Park?
 8 A. No.
 9 Q. Could you deal with, please, the 00.38 entry?
 10 A. So that's a request for me, and if I do recall, this
 11 is ... It's a conversation between myself and the chief
 12 fire officer at the time -- I think it was the chief.
 13 Nevertheless, somebody's asked me to request a police
 14 liaison officer, I suppose a marshalling officer, to
 15 attend Thompson Street Fire Station.
 16 Q. Then, please, the entry for 00.43. What's that entry to
 17 reflect, please?
 18 A. So now that is definitely a point in a conversation
 19 between myself and the chief fire officer at the time,
 20 asking if GM Fire are required to mobilise their MTFA or
 21 specialist response teams from the Thompson Street car
 22 park to the incident ground. At the time, it was
 23 confirmed by Chris Hill that, no, they can stay at
 24 Thompson Street Fire Station.
 25 Q. Perhaps we'll come on just to look at that in the

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1 chronology of calls in a minute. The next entry, 00.49,
 2 please?
 3 A. I believe that is the time where it was confirmed that
 4 Operation Plato had been declared at 22.47.
 5 Q. So you believe that is the time when you were told at
 6 00.49?
 7 A. Yes.
 8 Q. Then can we just look at the other entries? The
 9 handwriting to the left seems to be in a different form
 10 of handwriting. Are they your entries as well?
 11 A. I've made it known previously that I don't know whose
 12 handwriting that is. I can't really read the writing
 13 that much. But that could well have been the
 14 handwriting of the loggist, my loggist, when she arrived
 15 at some point.
 16 Q. Are you able to help us with what those entries say?
 17 A. No, so I've always found it difficult to read what it
 18 says. Certainly the middle line there looks like it
 19 says, "Nothing at North Manchester". Now, that could
 20 have been a reference to -- I think there was some
 21 reference to some activity at North Manchester Hospital.
 22 And the bottom one there, it looks like it's saying
 23 there -- I'm making this up -- "No requirement to move
 24 forward".
 25 Q. Thank you.

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1 A. But I don't know.
 2 Q. In the top left —hand corner, we see redacted out as
 3 OS — the entry behind there was what's been described
 4 as the tactical command Airwaves channel but it was also
 5 the channel that had been the subject of a visit by
 6 Laura Lewis and Jo Hoyte in advance of 22 May to be the
 7 inter—control room communication channel. Can you
 8 assist us as to why you have recorded that channel in
 9 the top left —hand side of your notes?
 10 A. It's highly likely that's from a conversation with
 11 John Fletcher, that he's informed me that he's requested
 12 or made a request for that channel to be activated. So
 13 I'm literally just writing little prompts or notes down.
 14 Q. Can I ask, in terms of you being an officer based within
 15 the command suite and you have clarified that you were
 16 the ILO rather than a Silver commander, at any point
 17 whilst you were at the force command module did you
 18 monitor that channel?
 19 A. No, because I only have one radio.
 20 Q. So even if you'd wanted to, you continue to monitor the
 21 NILO Talk Group rather than the multi—agency either
 22 tactical channel or the one that control rooms could
 23 communicate on?
 24 A. Yes, we sort of — I was the best, I suppose, in place
 25 to push stuff, to push information out to the NILO

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1 network.
 2 Q. Mr Fletcher then identifying that as a channel, had he
 3 indicated to you then who would be monitoring that
 4 separate channel?
 5 A. I don't recall that. That would have been just
 6 a comment within a conversation and he's probably just
 7 informed me that he's requested for that channel to be
 8 activated.
 9 Q. Can you assist as to decipher what the notes under
 10 "resources" are meant to reflect, please?
 11 A. There we've got an RVP now at Thompson Street, so that's
 12 the fire station. At that Thompson Street there are
 13 three NILOs, with a line. Then underneath the line
 14 there we've got M/C, P1 and P2. So that's
 15 Manchester Central, both of Manchester Central's fire
 16 engines. The next one under there is GOR, so that's
 17 Gorton, the first appliance. And then we've got PP,
 18 Philips Park, which again is one appliance. Looks like
 19 there, there is four fire engines.
 20 Underneath that we've got SRT times 2, so that's
 21 both the vehicles. It looks like an air unit's been
 22 mobilised or on scene. Then underneath that it says:
 23 "Route: Miller Street and Corporation Street."
 24 So at some point I've been asked for a blue route
 25 from Manchester Central to the arena, so that's

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1 Miller Street, Corporation Street.
 2 And then underneath that is says, "Three pumps, Vic
 3 Station". So I've been made aware then that three pumps
 4 have mobilised from Central to Victoria Station.
 5 Q. Are you able to assist us at all, but when you would
 6 have been making those entries? The inquiry's heard
 7 some evidence about when the three pumps were directed
 8 to leave Thompson Street to make their way via the route
 9 you've identified there.
 10 A. Best guess, best understanding, that would have been
 11 between the period of me communicating Op Plato to
 12 probably around about — I would say between 00.15 and
 13 00.45 in the morning as a guess.
 14 Q. Thank you.
 15 Mr Lawlor, can I ask, in terms of the role you
 16 continued as a NILO, taking away from your involvement
 17 that night, have you implemented changes in terms of
 18 your own recording and note keeping?
 19 A. Yes. I think it's... We endeavour to complete the
 20 decision logs and rationale. We now have a voice
 21 recording device. And again, on reflection, looking at
 22 these notes compared to perhaps Annemarie's notes,
 23 there's no comparison, but what I would say is that just
 24 shows, I suppose, I'm in the battle and I don't have
 25 time to write.

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1 SIR JOHN SAUNDERS: I think we all understand that on the
 2 night, what you were doing is getting on with the job,
 3 trying to run the rescue that was happening. But as you
 4 know, on frequent occasions, people actually look at
 5 things afterwards to see what could have been done
 6 better, what went wrong, and it obviously leaves you in
 7 a considerable amount of difficulty as compared with had
 8 you recorded at the time on a dictaphone, which other
 9 people have done, to remember yourself what actually
 10 happened because, obviously, we all appreciate it's
 11 really difficult after this amount of time.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: You don't know whether you are repeating
 14 other people's information which was given to you or you
 15 were giving the information to them. It's just really
 16 difficult, isn't it?
 17 A. Yes, and not that I'm asking for defence, I think what
 18 that allowed me to do, to a certain degree, was complete
 19 my contemporaneous notes a couple of days later, but
 20 also in addition to what you see here, we also activated
 21 the Vector log, which is that recording of information.
 22 On the Vector log there was certainly retrospective
 23 information placed at the first entry.
 24 SIR JOHN SAUNDERS: You have access to, I know you didn't
 25 use it, a police computer. Would that have recorded,

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1 and perhaps someone will tell me whether it actually
 2 did, the declaration of Operation Plato?
 3 A. That would be on the police — yes.
 4 SIR JOHN SAUNDERS: Had you been able to access that, you
 5 would have been able to see it fairly well immediately?
 6 A. I think I received the information quicker than it would
 7 have taken me to log on to a police computer and then
 8 navigate my way through their systems.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MS CARTWRIGHT: We'll just look briefly then at the Vector
 11 log you've just identified where retrospective
 12 information is recorded and the extent of that
 13 information, please. It is {INQ026729/11}, please. If
 14 we could expand the bottom entry, please, timed at
 15 01.23.
 16 Mr Lawlor, this is the retrospective recording that
 17 you're indicating that was made on the Vector log?
 18 A. Yes.
 19 Q. So again looking at the extent of the information that
 20 was recorded at 01.23 on 23 May, we can see:
 21 "Retrospective information.
 22 "SM Lawlor attended GMP Silver as NILO.
 23 "SM Lawlor rec'd updates from GM Fletcher regarding
 24 resources on scene.
 25 "Confirmed Blue Route to Victoria Station.

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1 "SM Lawlor was informed that OP PLATO had been
 2 declared at 00:49.
 3 "A request for [Victoria Station] floor plans to be
 4 sent to GMP.
 5 "At 00:29 GMP requested Thompson Street to be used
 6 as a multi-agency RVP.
 7 "00:38 GMP RVP liaison officer confirmed by Insp
 8 Chris Hill.
 9 "00:43 Chris Hill confirmed that MTFFA resources to
 10 remain at RVP.
 11 "00:51 Cold and warm zones confirmed at Victoria
 12 station."
 13 Again that reflects the totality of the information
 14 recorded even at 01.23?
 15 A. Yes. So I think, just in terms of clarity there, where
 16 it says on — that SM Lawlor was informed that Op Plato
 17 had been declared at 00:49, that has since been
 18 corrected further on in the log that actually it was
 19 declared at 22.47.
 20 This Vector log was actually updated by the loggist
 21 or the lady who came and supported me and that is,
 22 I suppose, a précis of what I was asking the individual
 23 to put on the log based on the notes of what I'd wrote
 24 down on my folder. And it clearly says at the bottom
 25 there at 51 that I was informed of the various zones, so

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1 that gives me some clarity and confidence that it was at
 2 51 the various zones were communicated.
 3 Q. Thank you.
 4 Mr Lopez, one other document, please, to be
 5 displayed. See if you can assist us with this,
 6 Mr Lawlor. {INQ004453/1}, please.
 7 This has been described as the Greater Manchester
 8 Fire and Rescue Service's decision log and we'll perhaps
 9 display the second page as well {INQ004453/2} and we can
 10 see a number of individuals' names that we recognise.
 11 Again there's no recording on this decision log by
 12 reference to yourself. Can you just explain what this
 13 document is and whether or not this is somewhere you
 14 should also have been recording your decisions on the
 15 night?
 16 A. So the Vector log provided an ability to record,
 17 I suppose, logs from different locations. So what
 18 you're looking at in this log is the command support
 19 room's decision logging or logs, and the one I was
 20 populating was the GMP — the Vector log in GMP Silver,
 21 so they are two separate logs. But I know the
 22 information I'm putting on can be viewed by the command
 23 support room and, vice versa, I could view the command
 24 support room's log as well.
 25 Q. Thank you. Can we now then work through the calls you

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1 made subsequent to the Plato declaration knowledge at
 2 00.15, please?
 3 Mr Lopez, can we please display back on the screen
 4 {INQ041473/71}.
 5 We can see at 00.18, you called Mr Fletcher for
 6 a call lasted 1 minute and 60. So this will be after
 7 you put the call out on the NILO log. Can you assist as
 8 to what you were discussing with Mr Fletcher at that
 9 time, please?
 10 A. Based on the timings there, that would have been a call
 11 around the information I'd just received around Plato.
 12 So again — I'd be conveying again the information.
 13 Q. So having had the discussion you have told us about at
 14 00.07 about where resources were, would you have
 15 revisited where the Greater Manchester Fire and Rescue
 16 Service's resources were, but significantly where the
 17 MTFFA specialist vehicles were?
 18 A. I don't recall the conversation, but it's highly likely
 19 that we would have had that discussion around where
 20 those resources were at that time.
 21 Q. Then could we please move over to {INQ041473/78}.
 22 At 00.29, we can see that you called Mr Levy for
 23 a call lasting 1 minute and 15. Can you assist us as to
 24 what that call was about, please?
 25 A. Again, that probably would have been a repeat of the

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1 information and confirmation of information I'd received
 2 via GMP Silver. It will all have been around the
 3 declaration of Op Plato.
 4 Q. At that time would you have had greater knowledge of
 5 where the Fire and Rescue Service's resources actually
 6 were?
 7 A. It's likely, yes.
 8 Q. Then there are a number of calls that you had with the
 9 chief fire officer, Mr O'Reilly. Can we look at those,
 10 please, Mr Lopez, {INQ041473/82}.
 11 I'm going to track, because there's a number of
 12 calls, rather than asking you what each related to, if
 13 you can identify them, you can give us an update.
 14 At 00.38, Mr O'Reilly called you, a call lasting
 15 33 seconds.
 16 Moving down a little we can see, at 00.39, a further
 17 call that lasted 2 minutes.
 18 If we could then move, please, over the page, to
 19 {INQ041473/83}, we can see, at 00.45, another call from
 20 Mr O'Reilly to you lasting 1 minute and 93.
 21 I'm going to -- there are others calls but I'm going
 22 to come on to deal with those in a moment. Can you give
 23 us an overview of what these three calls from
 24 Mr O'Reilly and the discussions with you at that time
 25 were about, please?

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1 A. The recollection there would have been -- I think
 2 Mr O'Reilly was communicating some frustration, I would
 3 suggest, that we hadn't had resources at the scene
 4 sooner. Again, within those calls there was -- I think
 5 there was reference to asking GMP for a joint
 6 understanding of risk from the Silver suite. There is
 7 a number of conversations based around was -- GM Fire
 8 not being at the scene sooner.
 9 Q. So in terms of a joint understanding of risk from
 10 Greater Manchester Police, did you seek that
 11 information?
 12 A. There was a period in the evening, probably earlier
 13 in the evening, around about that time, where John and
 14 myself, North West Ambulance Service, and Greater
 15 Manchester Police via Chris Hill, had a conversation and
 16 I suppose really just confirming and clarifying exactly
 17 what was happening at the arena.
 18 Q. Can we then look at a conversation that follows shortly
 19 on from when the call from Mr O'Reilly would have
 20 finished and that Annemarie Rooney has referenced by way
 21 of information you were asking of her. Again, when we
 22 look at this log, it perhaps evidences the benefit of
 23 keeping a record of what the discussions are in calls
 24 because it does enable careful analysis of what was
 25 known when and what was discussed.

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1 Annemarie Rooney's incident log, {INQ014791/10},
 2 please.
 3 It has been recorded by Annemarie Rooney that:
 4 "GM Fire Service Silver at GMP HQ, Mick Lawlor,
 5 asking if there is an AITC at scene to liaise with fire
 6 and police relating to evacuation of casualties.
 7 Annemarie informed Mick casualties were already being
 8 moved. Jon Butler to contact Joe Barrett in relation to
 9 AITC request."
 10 And over the page {INQ014791/11}:
 11 "Mick Lawlor stating after liaising with the police,
 12 there is a risk to the crews at scene so needed to meet
 13 tri -- service to review risk assessment."
 14 So looking at the note, and I know you've had an
 15 opportunity before giving evidence today to review
 16 Annemarie Rooney's notes, do you agree with her summary
 17 about what the discussion was at that time?
 18 A. It's probably a fair record. I know we had a number of
 19 conversations. I know that there was some confusion
 20 around certainly when I'd communicated Op Plato and the
 21 various levels of crews what should and shouldn't be
 22 at the incident. I think all around that time, you
 23 know, it's fair to say we was just trying to get
 24 information to communicate.
 25 Q. Why were you asking about NWS's AITC crew?

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1 A. That would be an individual, so that's a commander.
 2 That would be to meet the Fire Service NILO or
 3 commanders, whoever were at the scene, to basically get
 4 together and jointly assess the risk in terms of what
 5 was in front of them at the arena.
 6 Q. Did you know at this time that there were already pumps
 7 at the arena, this included Mr Berry, and the three G16
 8 and G18 pumps, who'd arrived, I think, around 00.36?
 9 A. Yes, I would have known that. I'm not sure -- and
 10 I accept that the timings here -- because you know, I'm
 11 not... I'm not sure in terms of how accurate the
 12 timings are and whether there was a delay in the request
 13 coming in to GMP, then for us to ask that question, then
 14 for us to push that information back out again. But
 15 yeah, it's absolutely fair there's every chance that
 16 would have happened.
 17 Q. We've looked at the calls you had before this time with
 18 Chief Fire Officer O'Reilly. So were the discussions
 19 you were having with him at that time that there was
 20 a risk to the firefighters that were at the scene?
 21 A. Probably. I know -- and quite soon afterwards I know
 22 there was some discussion around -- following me putting
 23 the Op Plato communication out, there was some
 24 discussions on what resources should or shouldn't go to
 25 the scene. So that -- this would have been a fair

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1 opportunity for me to try and get somebody at the scene
 2 so the three agencies could meet and discuss.
 3 Q. Had you at any point prior to what's recorded by
 4 Annemarie Rooney, over the NILO Airwaves, and
 5 particularly to Mr Berry, communicated the view that
 6 there was a risk to the firefighters at the scene on the
 7 basis of information you had at that time?
 8 A. So I wouldn't have communicated that information. The
 9 likes of Andy, the likes of Ben, would, I'd -- be
 10 absolutely sure on what the risks are and what the
 11 resources are required for an Op Plato event. So it
 12 wouldn't be for me to communicate that because that's
 13 well-versed in their training.
 14 Q. The note that's been -- I appreciate it's not your note
 15 but the recording that we do have from Annemarie Rooney
 16 suggests that you were saying to her at that time, just
 17 before -- at 00.54, on the basis of what the police had
 18 told you that, that there was a risk to the crews at the
 19 scene. So would that not be information that you should
 20 be passing over the NILO group to inform those at the
 21 scene?
 22 A. Yes. Yes, and you know, whether I did or didn't, it's
 23 something -- I can't recall if I did or I didn't do in
 24 terms of exactly what was pushed over that communication
 25 channel at that time. But I accept, when you're looking

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1 at Annemarie's logs there, they're very concise and
 2 timed against mine.
 3 Q. Just going back to the note you've already told us
 4 about, about the information when you were told about
 5 the zones and where the zones were, I think at 00.51,
 6 is that the information you were feeding in about risk
 7 to the crews at the scene?
 8 A. Yes, again now, I suppose, looking at the timings, it
 9 kind of does fit in with that information but I don't
 10 want to sit here and say yes, absolutely 100%, that's
 11 what happened because I don't recall that as
 12 a conversation.
 13 Q. Mr Lopez, can we go back to display, to finally track
 14 the last few calls that I want to deal with,
 15 {INQ041473/85}.
 16 We can see at the bottom of the page there,
 17 Mr Lawlor, that the chief fire officer, Mr O'Reilly,
 18 called you at 00.01 for 1 minute and 40. Then moving on
 19 to {INQ041473/90}, just again to deal with these
 20 globally, we can see at 01.14 a further call from you to
 21 Mr O'Reilly lasting 1 minute and 62.
 22 And then if we can move forward to {INQ041473/94},
 23 please, Mr Lopez. At 01.27 a call lasting 42 seconds
 24 from you to Mr O'Reilly.
 25 And finally moving forward please to {INQ041473/99}

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1 at 02.08, we can see a further call from Mr O'Reilly to
 2 you lasting 20 seconds, and then a recording that
 3 Mr O'Reilly was then at that time at the Silver command
 4 suite.
 5 Again just -- I appreciate we could go to each call
 6 and if there is (inaudible) any of those calls, please
 7 do so. What were the purposes of those further calls
 8 from Chief Fire Officer O'Reilly that we've just
 9 identified, please?
 10 A. Again there's a mixture of calls there with the chief
 11 and myself. I probably was getting some clarity around
 12 the resources, where they were or where they weren't and
 13 what we were being mobilised from and to. I certainly
 14 know some -- at least one of those calls would have been
 15 to the chief, informing him that there was going to be
 16 an SCG meeting.
 17 And probably at around about -- where we say 02.08
 18 there, that's probably the chief informing me that he's
 19 at police headquarters and where I met him and then gave
 20 him a brief update, probably we gave each other a brief
 21 update in terms of where we were with the incident.
 22 Q. You've already identified when we went through your
 23 notes about the holding of the MTFA resources that they
 24 didn't need to go to scene. But at any point was there
 25 a discussion between you and Mr O'Reilly about deploying

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1 the SRT to scene?
 2 A. No.
 3 Q. Again, perhaps it follows on from the answer you've just
 4 given, we are going to hear potentially about the
 5 confusion Mr O'Reilly may have had about whether all
 6 firefighters were trauma trained when we hear from
 7 Mr Fletcher. Was there any information that Mr O'Reilly
 8 gave to you that night that suggested he did not
 9 understand the training of firefighters on standard
 10 pumps?
 11 A. No, I don't recall having any conversation with the
 12 chief around the detail of what should be mobilised at
 13 that the type of incident, no, whether they are trauma
 14 trained or not.
 15 Q. Then a separate topic relating to Chief Fire Officer
 16 O'Reilly. Was there any discussion by him about why
 17 he was coming to the GMP force command module? Was that
 18 because of the SCG?
 19 A. Yes.
 20 Q. Had you had any discussion before then about whether he
 21 should have located to the force command module sooner
 22 than he did?
 23 A. No, absolutely not, no.
 24 Q. I'm not going to take you through the rest of the calls
 25 that you had that night, but I think you also tell us in

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1 your witness statement that at 01.15 in the morning your
2 loggist arrived to assist you with recording and she
3 commenced her log at 01.23 by recording the
4 retrospective actions you had already taken and we've
5 looked at those on the Vector log.

6 You also tell us that at 01.18:

7 "Officer Hill confirmed that a controlled explosion
8 at the rear of the cathedral would take place at 01.20."

9 And you were also informed that the strategic
10 coordinating group would be meeting at 02.30.

11 A. Yes.

12 Q. When Mr O'Reilly attended at headquarters, was there
13 a discussion about Greater Manchester Fire and Rescue
14 Service's response?

15 A. Yes, we exchanged information and, quite rightly, the
16 chief fire officer quite rightly was frustrated at the
17 lack of response.

18 Q. Had you appreciated then the issues that would happen
19 that night about the Greater Manchester Fire and Rescue
20 Service's response?

21 A. I think the picture became much clearer as the evening
22 went on.

23 Q. You have indicated that he was expressing frustration,
24 but was he able to identify what his belief was as to
25 why there hadn't been a response that he was obviously

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1 expressing frustration about?

2 A. I think the expectation was that or we expected that we
3 would have had resources much earlier than we did.
4 Whether they were front line appliances as part of
5 a predetermined attendance, we probably would have had
6 that conversation, and then subsequent conversations
7 around the declaration of Op Plato and the resources
8 what were mobilised thereafter.

9 Q. Could I ask you, please, about information you give in
10 your witness statement about information that a
11 Julie Walker had received. You tell us in the witness
12 statement that because you were the first multi-agency
13 partner in the command suite, you recall, shortly after,
14 a representative from NWAS arrived, followed by
15 Julie Walker, of the Civil Contingencies Resilience
16 Unit. You say this in your witness statement:

17 "Incidentally, she had been informed at
18 approximately 11 o'clock that Plato had been declared.
19 This information became available post the event.

20 I believe she had been one of the lucky ones who had
21 been able to get through to the FDO sooner."

22 Can you just confirm, first of all, when did you
23 become aware that she — about this 11 o'clock being
24 told by the FDO about an Operation Plato?

25 A. That would have been some time, I suppose, between Julie

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1 coming into the room and me — I suppose me writing the
2 contemporaneous notes or statement there. I can't
3 really remember exactly when I was made aware but I was
4 made aware quite soon.

5 Q. Is this directly from Julie Walker?

6 A. That's a conversation we will have had, yes.

7 Q. Can I just be clear, you've indicated in your witness
8 statement approximately 11 o'clock?

9 A. Yes.

10 Q. We don't, I think, see a note about this conversation.
11 But how can you assist us as to clarity about the
12 timing?

13 A. I think just in terms of the statement there, and I have
14 raised it since, certainly it was my understanding when
15 I attended the Silver suite there that I was the first
16 responding agency to arrive. That's clearly not correct
17 because NWAS was there much sooner. I think my
18 misunderstanding around NWAS not being there is
19 certainly the NWAS team were using a breakout room for
20 perhaps some internal meetings or conversations. So it
21 may be that, at that time, they was out slightly before
22 coming in.

23 Q. It's not so much that, it's the timing of information
24 that Julie Walker had spoken to the FDO at around
25 11 o'clock and been told that Plato had been declared.

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1 It's that that I'm interested in, the accuracy.

2 A. That would have been a conversation between me and Julie
3 around in terms of when we was informed Plato had been
4 declared and Julie's informed me that at approximately
5 23.00, she'd had a conversation with the force duty
6 officer. I can't nail down exactly when that
7 conversation happened.

8 Q. I'm going to summarise the rest of your time that night.

9 You set out that:

10 "[You] remained at Greater Manchester Police
11 headquarters until around 8 o'clock in the morning of
12 23 May. The response began to calm down at 3 o'clock in
13 the morning. [You were] not required to make any
14 command decisions. [You were] a conduit of information
15 back and forth, which is a normal role in a multi-agency
16 command suite."

17 Is that all accurate?

18 A. Yes.

19 Q. You also say this:

20 "I am confident that Greater Manchester Fire and
21 Rescue Service were well prepared for an incident of
22 this nature. This was substantiated through our
23 training exercise and national audits, which took place
24 prior to the arena. We had simply not envisaged the
25 level of communication difficulty or information cascade

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1 that we experienced on the night of the attack."
 2 Do you stand by that?
 3 A. Absolutely.
 4 Q. You also say that:
 5 "[You were] not asked at any stage about any delay
 6 on the part of Greater Manchester Police Fire and Rescue
 7 Service's deployment, nor did anyone indicate that they
 8 had been waiting for the Fire and Rescue Service's
 9 attendance at the incident."
 10 Is that accurate too?
 11 A. Yes.
 12 Q. I'm going to move now to information that was provided
 13 subsequently, just by way of debrief and other forums
 14 where you were given information, and I'm going to
 15 firstly turn briefly to the debrief, the structured
 16 debrief.
 17 We've already identified the notes from The Hive,
 18 but can we please display, Mr Lopez, {INQ004498/1}.
 19 This is the structured debrief of 12 July 2017 and
 20 my understanding — was this after the event that had
 21 been held at The Hive where I have already taken you to
 22 and we've captured what — information from that
 23 already?
 24 Because I can see there's a star next to your name.
 25 There's a list that identifies you as participant 2.

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1 But within the debrief report itself there's no
 2 information that's referable to yourself as
 3 participant 2. So can you assist us as to your extent
 4 of involvement in the debrief, please?
 5 A. I think this is the event what occurred at The Hive.
 6 Q. Yes. So if we go back then, Mr Lopez, to {INQ030902/1}.
 7 Would these be the notes then of your involvement
 8 in that debrief?
 9 A. Yes.
 10 Q. I have taken you already, and I'm not asking for it for
 11 re—displayed, to page 19 where you gave your account in
 12 respect of information relating to the discussion with
 13 Mr Fletcher at 00.07. But other than that, we don't see
 14 much information referable to you within the document.
 15 Was there a reason why you weren't giving particular
 16 information within the debrief or holding back?
 17 A. Um... So this event, albeit it was — it's been
 18 suggested it was a debrief, I would — from my personal
 19 view of the event it wasn't a debrief as such. Albeit
 20 there was an attempt to go through a debrief process,
 21 this was very much a volatile discussion between some of
 22 the individuals who was at the event, and I suppose
 23 expressing their frustrations on the evening itself.
 24 Q. Can we then look at another document to see if you can
 25 assist us a little more. So you described it as

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1 a volatile event. Is that why we don't really see much
 2 input from you within what's recorded being fed back by
 3 the participants in that event?
 4 A. It's quite possible. It was a very — there was some
 5 very heated debates, not a debrief process in terms of
 6 what I have been used to in the past in terms of
 7 undertaking or being a participant in a debrief. This
 8 wasn't a debrief.
 9 Q. Can we look then at another document, which is the
 10 recording of a conversation that you had with
 11 Alan Goodwin from the Kerslake Panel. {INQ000280/1},
 12 please.
 13 We can see this is notes of GMFRS's conversations on
 14 18 October 2017. The format of the document suggests
 15 that there were appointments with various
 16 representatives, where their accounts were captured.
 17 We can see on the first page, at 9 o'clock, Damian
 18 O'Rourke. If we move to the bottom of page 1, we can
 19 see your name by reference to 10.20. And the recordings
 20 then follow.
 21 If we could go to pages {INQ000280/2–4}, please.
 22 We can see at page 4 Andy Berry's account seemed to be
 23 captured at 13.10.
 24 So would you agree, first of all, that that's what
 25 this document represents? So if we look at pages 2 and

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1 3, in reality that captures information you were giving
 2 to Mr Goodwin, who was part of the Kerslake Panel, on
 3 18 October 2017?
 4 A. I think the notes what have been captured are a brief
 5 overview of the conversations we had with the
 6 Kerslake Panel. Yes, I'd agree with that.
 7 Q. Just to identify Mr Goodwin, is it right that he was a
 8 deputy chief constable at Derbyshire Constabulary, but
 9 he was also a member of ACPO and also a UK national
 10 policy lead for civil emergencies? Does that fit with
 11 your understanding of who he was?
 12 A. That's probably how he introduced himself.
 13 Q. Can we move back then to {INQ000280/2}, please,
 14 Mr Lopez.
 15 I wonder if you can assist us with a comment we see
 16 on the top of page 2? By reference to "Mick" it says
 17 this:
 18 "'Gagged at early degree'. Not had chance to say
 19 what happened. Have spoken to chief. Restricted from
 20 holding hot debrief because of ongoing investigations.
 21 Welcome review. 1st opportunity to speak about it.
 22 Certain individuals are not being put forward who you
 23 would benefit from. Alan explained other participation
 24 opportunities."
 25 Can you assist us first of all by reference to the

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1 comment "gagged at early degree"?
 2 A. Yes, I think that ... So one week after the arena event,
 3 it was the following Monday, it was a bank holiday
 4 Monday, we realised quite quickly this wasn't our finest
 5 moment, to say the least, and we realised we needed to
 6 do things differently, and when I say we, it was an
 7 opportunity to bring the NILO cadre together to
 8 basically discuss what happened or, more importantly,
 9 what didn't happen on the night.

10 Just as we were about to undertake, I suppose, if
 11 you want to call it a hot debrief, because that was
 12 the -- it was the first time we had an opportunity to
 13 come together -- just about the time we was going to
 14 start the meeting, if you will, ACFO Keelan come in,
 15 come to the room and instructed us not to discuss the
 16 arena, and the rationale was because of potential
 17 ongoing investigations, so there was a rationale there.

18 Q. The rationale being ongoing investigations. Can you
 19 explain that any more, so there's an understanding?

20 A. There was an early understanding that there would be
 21 a number of investigations, interviews, processes to try
 22 to get to the bottom of the whole event, of the night
 23 itself. And the way I took that is that we wasn't to
 24 discuss it and we didn't discuss it until after the
 25 Kerslake Report.

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1 Q. If it wasn't to be discussed, how is it that a state
 2 agency such as Greater Manchester Fire and Rescue
 3 Service cannot quickly in quick time identify what went
 4 wrong on the night to ensure, should another incident
 5 happen in the days that follow the arena attack, that
 6 the Fire and Rescue Service had done what they needed to
 7 do quick time to put in place actions to ensure the
 8 failure of Greater Manchester Fire and Rescue Service to
 9 attend until after midnight was not repeated?

10 A. I think just on this piece alone, I'm not suggesting
 11 that Greater Manchester Fire as an organisation weren't
 12 going to put things in place or undertake debriefs by
 13 a number of groups or as a whole. But in terms of
 14 learning and in terms of trying to understand what
 15 happened on that night, I thought, because I was the
 16 NILO lead, I requested for this to be put together and
 17 we were stopped. It was an opportunity and we were
 18 stopped from doing that.

19 I understand -- I understand why that happened and
 20 the issues behind that, but I say as a group, it put us
 21 behind slightly.

22 Q. From your perspective as someone who's explaining you
 23 were stopped, who do you identify caused that stop from
 24 your perspective of giving your account? Is that
 25 ACFO Keelan?

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1 A. ACFO Keelan was the messenger. I don't know at what
 2 level that was stopped from, above or within the
 3 combined authority, I don't know.

4 SIR JOHN SAUNDERS: Remind me of the rough date of this, I'm
 5 sorry.

6 A. That was the Monday after the 22nd.

7 SIR JOHN SAUNDERS: Thank you.

8 MS CARTWRIGHT: In terms of all the work you had done over
 9 the years in terms of the development of the ILO role
 10 and the NILO role, and being the regional NILO, is that
 11 not something that was counter-intuitive for you?

12 A. Absolutely(?).

13 Q. So did you raise that as a concern anywhere?

14 A. I voiced my opinion on many occasions.

15 Q. Who did you voice your opinion to?

16 A. I couldn't -- throughout the organisation at various
 17 levels, at all levels.

18 Q. Did you voice your concern to the chief officer,
 19 Mr O'Reilly?

20 A. Me and the chief, you know, after the event, we had
 21 a meeting, a conversation, and we had an open and frank
 22 discussion between each other. That's not to say -- you
 23 know, I fully support the chief, but it was an
 24 opportunity for us to try and understand what happened
 25 on that night.

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1 Q. You indicated a moment ago that it was only then, after
 2 the Kerslake Report, that you then felt able to speak;
 3 is that correct?

4 A. So the very Friday -- I can't recall what day the
 5 Kerslake Report was -- but the Friday, the very next
 6 Friday, coincidentally there was a NILO meeting, a local
 7 NILO meeting, and that was the first time as a group of
 8 individuals who came together, who would have been key
 9 to this incident type, the first time we've come
 10 together and openly discussed the event.

11 Q. Mr Lawlor, just going back -- Mr Lopez, can we display
 12 again {INQ000280/2}, please.

13 When you said to Mr Goodwin:

14 "Certain individuals are not being put forward who
 15 you would benefit from."

16 Who did you mean that was not being put forward who
 17 Mr Goodwin or the Kerslake Review needed to hear from?

18 A. I can't recall, ma'am.

19 SIR JOHN SAUNDERS: It's not my job to review -- are you all
 20 right?

21 A. Absolutely, yes.

22 SIR JOHN SAUNDERS: To review Kerslake or their procedures,
 23 but just as a matter of procedure, who suggested to
 24 Kerslake who should be interviewed or did Kerslake say
 25 who they wanted to interview?

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1 A. There was an internal team put together who facilitated
 2 the Kerslake Review.
 3 SIR JOHN SAUNDERS: Okay, thank you.
 4 MS CARTWRIGHT: If we continue down the note:
 5 "Came into mix 11.15."
 6 Would that be referencing -- what you have already
 7 told us about in terms of your involvement from about
 8 11.15 as you have told us today?
 9 A. Yes.
 10 Q. "We have come in for a kicking from crews and social
 11 media. Not had opportunity to put our side in first
 12 hour and 30 minutes. In GM we are highly skilled cadre
 13 of officers, well-versed in other agencies."
 14 What was "your side for the first hour and
 15 30 minutes" that you were wanting to give to Kerslake or
 16 tell them about that had not been portrayed up to that
 17 point?
 18 A. I think that was just the complications what unfolded,
 19 you know, whether -- you know, the communications
 20 between agencies and the events of that night, the
 21 complications Andy had in terms of responding from his
 22 home address to the event. It just seemed that we
 23 didn't have an opportunity before then to express our
 24 thoughts. We knew that there was lots of social media
 25 activity and I suppose, as a group of officers, of

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1 professional officers, we refrained from openly
 2 discussing the events.
 3 Q. You mention then a little further down about the
 4 rendezvous point of Cathedral Gardens. So when did you
 5 become aware about the mention of Cathedral Gardens?
 6 "Tried to contact Andy... mobile engaged. I think
 7 he was en route. Had been given Cathedral Gardens as
 8 RVP. Somewhere in the mix bomb gets mentioned. Control
 9 room bring up bomb actions. Mick believes RVP too close
 10 to incident."
 11 A. Sorry, which paragraph is that?
 12 Q. Page 2. If you orientate yourself with 23.15.
 13 A. Yes.
 14 Q. Seven lines down from there.
 15 SIR JOHN SAUNDERS: Just read that to yourself.
 16 (Pause)
 17 A. Yes.
 18 SIR JOHN SAUNDERS: It may be difficult to actually
 19 distinguish when you're being told things and getting
 20 information. Is this information you had on the night,
 21 do you know?
 22 A. Not initially, no. This would have been information
 23 what's come out over the hours, days, weeks afterwards
 24 and within the department, because the department was
 25 myself, John Fletcher and Neil, so we would have been

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1 having these discussions.
 2 MS CARTWRIGHT: Mr Lawlor, I'm not going to take you through
 3 every aspect of these notes that in the main run for the
 4 two pages. I know you've had an opportunity before
 5 today to look at the notes and there are other aspects
 6 I am going to take you to very briefly, but when you
 7 reviewed these notes, just when the chairman takes into
 8 account these notes at a later date, is there any aspect
 9 that's recorded there that is not accurate that you want
 10 to draw to his attention? Because I'm not going to take
 11 you line by line through this account.
 12 A. I think the only observation I would make is that last
 13 week was the first time I've ever seen the notes what
 14 have been taken from a 2-hour and 40-minute interview,
 15 if you will. So there's probably a lot more detail or
 16 context behind what you're seeing there. I feel for
 17 a 2-hour and 40-minute --
 18 SIR JOHN SAUNDERS: Again, you would have been happier if
 19 they'd all been taped so you could see a full transcript
 20 or you'd seen the notes at the time when you could have
 21 commented more accurately?
 22 A. Yes, I have not seen these before last week.
 23 MS CARTWRIGHT: But one of the things that you do
 24 communicate is that first hour and a half had not gone
 25 well for the Fire and Rescue Service. When you were

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1 asked the question at the bottom of page 2 by
 2 Mr Goodwin:
 3 "Was the force too risk averse?"
 4 It records:
 5 "Mick agrees. We should have been there but lots of
 6 other stuff needed communicating. Didn't have info to
 7 make assessment. JESIP principles."
 8 Would you agree with that summary of the information
 9 you gave?
 10 A. I think the force as a whole -- I don't think we're risk
 11 averse at all. Looking back, and if we're being totally
 12 honest with ourselves, looking back on this particular
 13 incident, it could come across that we were risk averse
 14 in some areas.
 15 Q. Can we turn over the page {INQ000280/3}, please?
 16 Thank you. I am looking at the middle of the page,
 17 where under the question -- where it goes on after:
 18 "Did BTP primacy call issues?"
 19 And then a little below that you say this:
 20 "How did GMP and NWS not spot we were missing?"
 21 Again, is that something you still hold today?
 22 A. Yes, especially in particular around the declaration of
 23 Op Plato, when Plato was aware at the scene, I do find
 24 it hard to understand, after all of the training and all
 25 of the exercises we've done, is that two partner

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1 agencies ...

2 Q. Sorry, if we look a little bit further down by reference

3 to the question:

4 "Was there much to do when crews went in?"

5 You responded:

6 "Not much. Andy managed resources."

7 Then the question is:

8 "So would have done this if had got in earlier?"

9 And your response was:

10 "Yes. Treat—leave or treat—recover directed by

11 medical HART assessments."

12 Again it's a summary of an answer, but were you

13 really conveying there that there was very much a role

14 for Greater Manchester Fire and Rescue Service to assist

15 in the treatment and evacuation of casualties from the

16 City Room?

17 A. Definitely .

18 Q. Just moving to the bottom of the page where it says,

19 "Three key areas", you identified :

20 "If resources were mobilised, would have had eyes on

21 the ground. Police declaring Plato, we would have been

22 there early doors."

23 Again just to look at this point 2, if you had been

24 told that Plato had been declared earlier , that would

25 not have precluded Greater Manchester Fire and Rescue

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1 Service's attendance, would it?

2 A. No.

3 Q. Quite the contrary, it would have ensured you were there

4 but with the appropriate resources that were trained in

5 MTFAs; do you agree with that?

6 A. Definitely .

7 Q. Then you go on:

8 "Declaration of FCP never pushed to Andy. Would

9 have different multi—agency response — confident of

10 Airwave radio now. All London incidents, fire and

11 ambulance notified of Plato in minutes."

12 Mr Lawlor, you completed a timeline — I'm not going

13 to go through the timeline with you, but, sir , for your

14 reference it's {INQ004187/1}. Could you just explain

15 why it was that you felt the need to create a timeline

16 that identified by reference to timings and the Greater

17 Manchester Police, NWAS, North West Fire Control and BTP

18 but also the NILOs, why you needed to conduct this

19 analysis?

20 A. I just — because of my role, I just wanted to get it

21 clear in my head on paper the various times information

22 was coming in so I could talk with confidence with other

23 people and other agencies around the events of the

24 night. I didn't — although the information was

25 probably available, my understanding was it was

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1 available in different locations and places, so I've

2 just took the time just to pull it all in one document

3 so I could actually see it in paper and understand it in

4 greater detail .

5 Q. Thank you. Following on from that, can I ask you

6 a question about evidence Mr Gaskell gave? First of

7 all , can you clarify one matter? Mr Gaskell, when he

8 came back on the second day of his evidence, indicated

9 that information had been received from you, and I think

10 it has been clarified subsequently that it related to

11 information received at an earlier time. Can you first

12 of all confirm, at any point between Mr Gaskell giving

13 evidence did you communicate with him?

14 A. Yes.

15 Q. You did communicate with him?

16 A. Between?

17 Q. So in the course of his evidence, so between the first

18 day and then the day he came back. I'll read what he

19 said:

20 "Question: You have told the chairman that since

21 you last gave evidence, some further evidence has been

22 placed before you, some further documents. How did that

23 arise?

24 "Answer: I requested that from a colleague.

25 Without discussing my evidence, I requested a — and I

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1 know he has done some work on that, on the early stages

2 of the response to the incident , so I requested a

3 transcript of the communication, sir."

4 Then the question was:

5 "Question: Mr Gaskell, let me make it clear, I'm

6 not suggesting anything untoward has happened. The

7 colleague was?

8 "Answer: That was a colleague of mine, Michael

9 Lawlor.

10 "Question: Thank you. What documents were you

11 given, Mr Gaskell?

12 "Answer: It's not an official document, sir, it's a

13 document that has been prepared by Mr Lawlor purely to

14 be able to evaluate the initial response by GMFRS."

15 Can you assist us as to the contact you had with

16 Mr Gaskell please?

17 A. We had a telephone conversation following a text on the

18 Sunday night at 22.15. Yes, so the telephone

19 conversation followed a welfare text I sent to Neil and

20 he subsequently, a couple of hours later , asked me if

21 I was okay for a quick question.

22 Q. As a result of that quick question, did you provide

23 a document?

24 A. Absolutely not. I'd like to assure the chair and

25 reassure the inquiry, at no point have I provided Neil

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1 with a document.
 2 Q. So what was the quick question you were asked by
 3 Mr Gaskell?
 4 A. I think ... When Neil phoned me, he just wanted some
 5 clarity around timings, so I briefly — he wanted just
 6 a little clarity on timings of the night, so I quickly
 7 said: right, okay, at 32 this happened, at 40 this
 8 happened — sorry, at 35 this happened, at 40 this
 9 happened. It was literally just a brief overview of
 10 timings. It wasn't related to the timeline document.
 11 The call lasted approximately 19 minutes and I would
 12 say for the — out of the 19 minutes we probably had
 13 a 2-minute conversation on clarity around the timings
 14 and the rest was personal, friendship, retirement
 15 discussions.
 16 MS CARTWRIGHT: Can I be clear then, what were you using as
 17 the source for the timings that you were giving to
 18 Mr Gaskell over the phone?
 19 A. My memory.
 20 Q. Your memory? So you didn't have reference to
 21 a document, you were giving him timings from your
 22 memory?
 23 A. Absolutely.
 24 Q. Can I then ask you about another document then that
 25 after Mr Gaskell has given evidence that we have been

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1 provided with. It referenced a timeline, so it's
 2 {INQ041593/1}, please, Mr Lopez. These were the notes
 3 that were subsequently provided, and the context given
 4 to the disclosure of these notes was that:
 5 "Further to the evidence of Neil Gaskell on 21 June,
 6 he referred to a document he received from Mick Lawlor
 7 to evaluate the initial response by Greater Manchester
 8 Fire and Rescue Service. The Fire and Rescue Service
 9 have made further enquiries and it is understood that
 10 the document Mr Gaskell was referring to was
 11 a handwritten note he had made of a conversation he'd
 12 had with Mick Lawlor whilst Mr Gaskell was working at
 13 the Home Office. It is understood that Mr Gaskell's
 14 best estimate is that the handwritten note was probably
 15 written towards the end of 2017."
 16 Looking at this document, are you able to assist us
 17 at all with this timeline and a reference to an account
 18 given that you would have given that information to
 19 Mr Gaskell in 2017?
 20 A. I can't comment on the information what's on the screen.
 21 I obviously — back in 2017, I don't recall the
 22 conversation with Neil. But that's not to say that the
 23 conversation didn't happen because Neil was working
 24 in the Home Office at around about that time and he
 25 would have been briefing his colleagues.

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1 Q. Mr Lopez, could I just ask us to display each page —
 2 I know you've had an opportunity before you gave
 3 evidence today, Mr Lawlor, to review that. That's
 4 {INQ041593/2}, the notes, and {INQ041593/3}. Again, I'm
 5 not going to go through these notes, but prior to
 6 attending court today, had you seen or considered those
 7 notes?
 8 A. No.
 9 Q. So the conversation you've described that you had with
 10 Mr Gaskell during the course of his evidence between —
 11 when he went part heard overnight was not in relation to
 12 these notes?
 13 A. No. If you go back one page, please. So the
 14 conversation would have been from the time — or my
 15 timeline would have been from the 22 to around about 48,
 16 where I knew the NILO Andy Berry was mobilised. So
 17 I literally would have said: at 32 this happened, at 35
 18 that happened, at 40, 42 and 48.
 19 Q. And again just looking at these notes, you didn't have
 20 access to those when you discussed with Mr Gaskell?
 21 A. No.
 22 Q. You have not seen these notes before today?
 23 A. No.
 24 Q. And so that's the extent to which you can assist us, but
 25 you may have had a discussion when he was with the

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1 Home Office that did a similar exercise where you gave
 2 him information as part of his role with the
 3 Home Office?
 4 A. Quite possibly, yes.
 5 Q. Thank you.
 6 Finally from my perspective, Mr Lawlor, I just want
 7 to summarise what you said in your witness statement
 8 about post-incident changes. You say that:
 9 "A number of changes have been implemented since.
 10 The duty NILO will now maintain a position of
 11 coordination NILO on being notified of an incident, to
 12 make calls and gather information unless they are the
 13 closest NILO to the scene. The duty NILO will liaise
 14 with North West Fire Control to mobilise the other two
 15 NILOs on the rota who will respond."
 16 And you also indicated that the NILO cadre has been
 17 increased to provide cover for this.
 18 A. That's correct.
 19 Q. And you also indicate that a no-notice training event
 20 exercise occurred, which we have heard some reference
 21 to, Exercise Powerhouse, where Greater Manchester Fire
 22 and Rescue Service did not have prior knowledge of the
 23 RVP or FCP. And you also personally have spoken
 24 nationally at the Fire Service College, at multi-agency
 25 events, about the challenges that you faced in

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1 responding to the attack and the lessons that the Fire
 2 and Rescue Service has learnt as an organisation. And
 3 you have provided references -- I'm not going to take
 4 you to it -- to a PowerPoint that you created,
 5 {INQ022395/1}.

6 A. That's correct.

7 MS CARTWRIGHT: That, for my purposes, concludes the
 8 questions I want to ask Mr Lawlor.

9 SIR JOHN SAUNDERS: Just help me about this, Mr Lawlor: you
 10 rang into North West Fire Control to tell them that you
 11 were going where you were going, what you were going to
 12 do, so they had a record of it. Apart from that, you
 13 had no contact with NWFC, the control room, at all?

14 A. No.

15 SIR JOHN SAUNDERS: I just wonder why. We'd imagine the
 16 control room would be a place where information would go
 17 into because they're the people who are actually meant
 18 to be circulating the information out. For example,
 19 when you knew that Operation Plato had been declared,
 20 you didn't notify them. Is there any particular reason
 21 why not?

22 A. Generally, that would be communication between the
 23 incident ground or the commanders and North West Fire
 24 Control or the command support room and North West Fire
 25 Control. I wouldn't -- or generally the position at the

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1 GMP Silver wouldn't generally talk to North West Fire
 2 Control. We would have access to the iNet viewer, the
 3 incident log, so anything we needed or to query would be
 4 on the screen. We wouldn't generally liaise with them.

5 SIR JOHN SAUNDERS: Not to give them information they might
 6 need? Is it because the command support room has now
 7 taken over?

8 A. I would push that through the command support room.

9 SIR JOHN SAUNDERS: The command support room, before they're
 10 up and running, would you communicate information
 11 you have with NWFC?

12 A. If it was risk critical and it was information what
 13 needed to be pushed then yes.

14 SIR JOHN SAUNDERS: Did you ever that night look at NWFC's
 15 log?

16 A. I don't recall what time, but there would have been
 17 a time when I would have done.

18 SIR JOHN SAUNDERS: Early on, later on? Any idea?

19 A. I would suggest roughly when the loggist came and
 20 assisted me because for almost 45 minutes I was
 21 literally on my own and I didn't have a team wrapped
 22 round me, which again, we've reflected and that's
 23 a change.

24 SIR JOHN SAUNDERS: And you had to get a loggist from the
 25 Fire Service to do it?

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1 A. Yes. So I had a phone call from a colleague, another
 2 NILO, group manager Phil Nelson. He had -- I think it
 3 was Phil -- a number of people phone in to him to offer
 4 their services.

5 SIR JOHN SAUNDERS: In the interim would it not have been
 6 possible to borrow a police --

7 A. Not at that time, I don't believe, not at that time.

8 SIR JOHN SAUNDERS: Thank you. We'll have 10 minutes.
 9 We are not going beyond 4.30. I'm sorry, but we
 10 simply -- I can't tonight go beyond 4.30. It's also
 11 been a fairly tough and long week. I would like to get
 12 as much of this witness done as possible, but I'm not
 13 stopping people asking questions. It has taken longer
 14 than we anticipated at this stage.

15 MR COOPER: I anticipate we will not finish this witness
 16 today from the questions I have. I know not of others,
 17 but (inaudible) convenient time --

18 SIR JOHN SAUNDERS: How difficult is that going to be for
 19 you, coming back on Monday?

20 A. Coming back on Monday, it won't be difficult.

21 MS CARTWRIGHT: I have had communication with -- NWS had no
 22 questions, but there are certainly bids from North West
 23 Fire Control and my learned friend Mr Cooper. The
 24 Greater Manchester Police have a small portion of
 25 questions they had indicated and then there's equally

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1 Mr Warnock to complete.

2 SIR JOHN SAUNDERS: Thank you.
 3 (3.29 pm)

4 (A short break)

5 (3.40 pm)

6 MS CARTWRIGHT: Could I ask Mr Smith to ask his questions on
 7 behalf of North West Fire Control, please.

8 Questions from MR SMITH

9 MR SMITH: Mr Lawlor, I would like to take you, if I may,
 10 first of all to the debrief at The Hive on 12 July 2017.
 11 Not only were you present, but Mr Keelan was present
 12 as well, wasn't he?

13 A. That's correct.

14 Q. Together with the chief fire officer?

15 A. That's correct.

16 Q. I'm going to ask Mr Lopez, who operates the portal, to
 17 take us, please, to {INQ030902/3}.

18 What we see against the name Janine is:
 19 "Our training is tell the NILO, think NILO. Think
 20 NILO because we don't know what we are sending crews
 21 into. We have had NILOs in for training of what
 22 information they need to assist them in the initial
 23 stages."
 24 I'll come back to this page in just a moment. Do
 25 you remember her saying words to that effect?

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1 A. I don't recall that, sir, but that doesn't surprise me.
 2 Q. Why doesn't it surprise you?
 3 SIR JOHN SAUNDERS: Probably because it's written down on
 4 a note.
 5 MR SMITH: Well, it may be for another reason.
 6 SIR JOHN SAUNDERS: I'm sorry, why doesn't it surprise you?
 7 A. Certainly because — the relationships with Janine. And
 8 I suppose it's reasonable for North West Fire Control,
 9 as the incident is developing, to seek some clarity from
 10 the NILO. Certainly as the months and years have moved
 11 on, it doesn't surprise me.
 12 MR SMITH: This is why I'm asking the question. Not because
 13 it's in the note.
 14 SIR JOHN SAUNDERS: Sorry, Mr Smith, it was a facetious
 15 remark, which I apologise for. It's been a long week.
 16 MR SMITH: It has. A long day as well so far.
 17 So the point is this: the training of members of the
 18 staff at the fire control room, the guidance that was
 19 given to them would be consistent with that, wouldn't
 20 it?
 21 A. Yes.
 22 Q. Your NILO is the man or woman who has the specialist
 23 expertise to be able to assist the fire control room; do
 24 you agree?
 25 A. Yes.

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1 Q. We'll move on down the page slightly and pick up the
 2 name Janine again. Nick, just before that, said:
 3 "Just wondering why the PDA wasn't sent on the
 4 explosion?"
 5 Now, had you wondered that by then?
 6 A. By the time —
 7 Q. By the time of this meeting?
 8 A. Absolutely, sir. I think I've been more than vocal in
 9 me trying to get an understanding of what happened on
 10 that night. But as I've said, as time has moved on,
 11 I wasn't there, I wasn't receiving that information
 12 what was coming in fast time, so the actions of North
 13 West Fire Control, on reflection, are reasonable.
 14 Q. Would you also say that presented with the information
 15 that Mr Berry was presented with at 22.40 — it might
 16 just be helpful if I take you to it. We'll go to the
 17 sequence of communications, if we may, {INQ041473/5},
 18 just at the bottom. There's the start of the 22.40
 19 call.
 20 If we go over the page to {INQ041473/6}, it begins
 21 with the words from Michelle Gregson:
 22 "We are receiving reports of an explosion."
 23 If I can just ask you to run your eyes down the
 24 first paragraph.
 25 A. Yes.

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1 (Pause)
 2 Q. Whatever the quality of communication on other occasions
 3 is concerned, that was, I would suggest, accurate
 4 information being provided to Mr Berry. So what I'm not
 5 going to ask you to deal with is what your response
 6 would have been in Mr Berry's position. What I would
 7 like you to assist the inquiry about is whether
 8 Mr Berry's decision was a reasonable one in the sense
 9 that it fell within a range of reasonable
 10 decision—making that a NILO in his position might have
 11 made at that time.
 12 A. Yes. The early communications, the early decisions
 13 across all parties, I would suggest is reasonable.
 14 Q. There's no doubt, is there, that the iNet viewer had
 15 provided Mr Nelson — a colleague of yours, is he?
 16 A. Yes.
 17 Q. Had provided Mr Nelson with the opportunity to view the
 18 incident logs, hadn't it? Because if we look on
 19 {INQ019040/1} — if that could come on the screen,
 20 Mr Lopez — what we can see is Mr Nelson has picked up
 21 from the incident log that the force was stepping up the
 22 MTFA capability. That's the message at 23.11. So,
 23 first of all, there are two things arising out of this.
 24 Anybody reading that message on WhatsApp would
 25 appreciate that the force was responding to a potential

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1 terrorist incident, do you agree? I think you're
 2 nodding.
 3 A. I am sorry, yes.
 4 Q. It's just because it's being recorded, Mr Lawlor,
 5 I wasn't being discourteous to you.
 6 Also the incident log itself shows, at 22.51.26, the
 7 reference to the MTFA capability. So what is plain
 8 is that Mr Nelson has picked up that the MTFA capability
 9 was being deployed from his reading of the incident log.
 10 A. Yes.
 11 Q. Do you agree that on the night that was an option
 12 available to you before you left home?
 13 A. I have to agree it was an option.
 14 Q. There may be all sorts of reasons why in that situation
 15 you didn't do it, but may I just put it this way: you'd
 16 done 80 hours of full duty, on call.
 17 A. An on-call weekend, yes.
 18 Q. And you volunteered, didn't you, to come into this
 19 incident, after being asleep and being woken at that
 20 time of night?
 21 A. Yes.
 22 Q. And do you agree it's very easy to make judgements
 23 afterwards as to what might have been done, which wasn't
 24 done?
 25 A. Absolutely.

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1 Q. And looking at the iNet viewer is one of them, isn't it?
 2 A. Yes.
 3 Q. I would just like to take the chairman, if I may,
 4 through you, to what the iNet viewer would show for
 5 incident log 9074.
 6 If Mr Lopez could go to {INQ004279/1}, please. This
 7 is the view through the iNet viewer of the log 9074,
 8 created by Mr Ellis.
 9 It's quite easy to follow the detail through, isn't
 10 it?
 11 A. I wouldn't say it's easy.
 12 Q. All right. Well, I haven't found it easy until I became
 13 familiar with it.
 14 A. Yes.
 15 Q. But it's slightly easier than looking at the one that
 16 the inquiry's been looking at so far; do you agree?
 17 A. Yes.
 18 Q. It displays quite well on the screen, doesn't it?
 19 A. Yes.
 20 Q. It's right though, isn't it, that your colleagues who
 21 also responded to the incident, if they had been at
 22 home, those of them who were at home, would have had the
 23 opportunity to look at the incident log through the iNet
 24 viewer simply by logging in?
 25 A. Yes, if they wasn't mobilised to the incident, yes.

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1 Q. And once at the command support room, it would be clear
 2 to them the nature of the incident from the logs, which
 3 would be on display on the screens; do you agree?
 4 A. If they accessed them, yes.
 5 Q. So it would be possible, it may be time-consuming, but
 6 it would be possible to trawl through the logs, is that
 7 correct, and to develop an understanding of all the
 8 information that had been provided to North West Fire
 9 Control, which they had placed on the log?
 10 A. Correct.
 11 Q. I would like to take you, if I may, back to
 12 {INQ041473/5}, to take you to the call involving the
 13 Ambulance Service at 22.38.50.
 14 In the right-hand column, North West Fire Control —
 15 you have probably read this already, have you?
 16 A. Yes.
 17 Q. North West Fire Control have inserted comments from your
 18 timeline to which leading counsel to the inquiry has
 19 just made reference. These are the two comments that
 20 you included in the timeline.
 21 At 22.38.47 you recorded in the timeline that those
 22 words "Bomb is for a bomb threat" could be heard. And
 23 at 22.39.17, "Not going to mobilise anyone, we'll go to
 24 NILO".
 25 It is not easy to hear this, is it, over the

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1 recording?
 2 A. Not at all.
 3 Q. So what steps did you take to make sure this was an
 4 accurate assessment by you of the words that could be
 5 heard in the background?
 6 A. For me to produce the timeline?
 7 Q. Yes.
 8 A. I think, I suppose, just adding a little bit more to the
 9 "Bomb is for a bomb threat", there is a comment just
 10 before that what says, "It's been an explosion, not
 11 a bomb". Because of the work and because of the
 12 involvement, because I've been so close to this now
 13 for — obviously since the event, I've just picked out
 14 background conversations, just by listening to the calls
 15 so many times. I suppose to the untrained ear or
 16 somebody who's just listening for the first time they
 17 probably wouldn't pick that out, but actually then you
 18 can pick it out the more you hear it.
 19 Q. Would that suggest to you that somebody in the
 20 fire control room based on your experience and knowledge
 21 of the action plans has been conducting a conversation
 22 in relation to the question of whether, for example, the
 23 "Bomb — general" action plan is for an explosion or for
 24 a bomb threat?
 25 A. Yes, that would be how I thought. When I have pulled

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1 this together, in my head, I've just imagined
 2 a conversation between the control operators and maybe
 3 indeed this supervisor. But yes, it's a conversation
 4 what's happening between them and going through that
 5 process of trying to do the right thing.
 6 Q. No doubt this is something that you only insert in
 7 a timeline when you are confident that you could hear
 8 it?
 9 A. Absolutely, yes.
 10 SIR JOHN SAUNDERS: Can I just get the background to all
 11 this? We know that at one stage it looked from the
 12 statements produced by NWFC like they were actually
 13 following the bomb directions and is that why you were
 14 doing that, looking for that, as it were, because it
 15 goes to that issue of whether they were really following
 16 the bomb guidance?
 17 A. No, I don't think so, sir. I think actually, my
 18 knowledge of North West Fire Control not following the
 19 bomb action card come some time after I have produced
 20 this. This was just for my own interests, my own
 21 credibility and confidence when I am talking to people
 22 so I can talk with a broader knowledge and understanding
 23 of what's happened in all areas.
 24 SIR JOHN SAUNDERS: Fair enough. Thank you.
 25 MR SMITH: Just turning to the action plans that I'd like

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1 your help about, please. On 21 June 2017, the "Bomb —
2 general" action plan was amended by the Fire and Rescue
3 Service to require North West Fire Control to mobilise
4 to an incident if the bomb had exploded because it
5 required them to follow the explosion action plan.

6 A. Yes.

7 Q. That's correct, isn't it?

8 A. Yes.

9 Q. Do you agree that the reasoning behind that decision to
10 amend the "Bomb — general" action plan was to clarify
11 a potential ambiguity in those plans?

12 A. That's correct, sir. We'd never seen that before. The
13 event happened, so we had a closer look at the action
14 cards and, yes, we saw that as an ambiguity.

15 Q. It's obvious, isn't it, that if North West Fire Control
16 had followed the explosion action plan, if they had,
17 crews would have been at the scene with appliances
18 within minutes, having been placed on pre-alert at
19 22.38, they could have been, within minutes, at the
20 800 metres to the arena, the Fire and Rescue Service
21 would have had situational awareness from those crews,
22 and that would have made a whole difference, wouldn't
23 it, to everything that happened from the Fire Service's
24 point of view that night?

25 A. Correct, absolutely.

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1 Q. Do you agree that from your point of view, a way of
2 looking at this is that if the team leaders in the
3 control room recognised the existence when making the
4 decision of what they were going to do of a serious and
5 obvious risk of fatality to fire crews, which would
6 arise in the event that they sent those crews direct to
7 the arena, without taking advice on what to do, that it
8 was perfectly reasonable therefore for the control room
9 to contact the duty NILO before mobilising?

10 A. I think the moment the control supervisor had doubt in
11 their mind, then yes, that's reasonable.

12 SIR JOHN SAUNDERS: And I believe you've already said that
13 once.

14 MR SMITH: He has, sir.

15 SIR JOHN SAUNDERS: Always risky, isn't it, to ask the same
16 question again just in case you get a different answer?

17 MR SMITH: Yes, but I felt I was on firm ground on this
18 occasion, sir. So risky or not.

19 SIR JOHN SAUNDERS: Okay, he's said it again now.

20 MR SMITH: He has said it again.

21 SIR JOHN SAUNDERS: Thank you.

22 MR SMITH: But I haven't quite finished. I'll just develop
23 this point.

24 SIR JOHN SAUNDERS: You may need to say it a third time.

25 MR SMITH: No, sir, I don't think I'm going to ask him

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1 a third time.

2 The second point I want to come on to, Mr Lawlor, is
3 where you have this type of situation, the fire control
4 room does not have the expertise, does it, to assess the
5 risk? In other words, to make a risk assessment?

6 A. I tend to agree. I suppose it's all predicated on what
7 information they're receiving. So yes, it's reasonable.

8 Q. And do you agree that it's also important to bear in
9 mind that the control room would be aware of the fact
10 that if there was a potential MTFA, if there was, that
11 might require the SRT to be deployed and they did not
12 have the authority in any event to deploy the SRT, did
13 they? That had to be done on the authority of a NILO.

14 A. So they certainly would be, I suppose, looking at and
15 following the Op Plato action card.

16 Q. But the guidance information issued by the Fire and
17 Rescue Service to North West Fire Control, a separate
18 document that we've seen already, makes it very clear,
19 doesn't it, that the SRT can only be mobilised on the
20 instruction of the duty NILO?

21 A. There would be a conversation between —

22 Q. There'd have to be a conversation?

23 A. Yes.

24 MR SMITH: That's all I have to ask, sir.

25 SIR JOHN SAUNDERS: Thank you, Mr Smith.

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1 MS CARTWRIGHT: Can I ask Mr Horwell on behalf of Greater
2 Manchester Police, if he has any questions, please, to
3 ask those now.

4 Questions from MR HORWELL

5 MR HORWELL: Mr Lawlor, two very short issues, please.

6 The multi-agency Hailing Talk Group, a channel that
7 enables emergency services such as GMFRS and NWFC to
8 contact the GMP control room where the FDO is based,
9 that channel being monitored 24 hours a day by GMP.
10 Were you aware of that channel and its usefulness?

11 A. I was aware of the channel, sir, yes.

12 SIR JOHN SAUNDERS: Can I just clarify, because there was
13 quite a lot of information in the question.

14 Did you know that that went to the control room
15 where the FDO was based?

16 A. I wasn't aware it was with the FDO or in the FDO's pod.
17 My understanding, it went into — for example, if it's
18 the police Hailing group, the police control room.

19 SIR JOHN SAUNDERS: There's more than one police control
20 room; did you know which one?

21 A. No.

22 SIR JOHN SAUNDERS: Thank you.

23 MR HORWELL: For how long have you known of the existence of
24 that channel, Mr Lawlor, roughly?

25 A. I would say a number of years prior to 2017.

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1 Q. And known by others within GMFRS to your knowledge?
 2 A. I don't think it would be widely known. It certainly
 3 would be known by the Airwave tactical advisers, but
 4 they're not the uniformed staff, if you will. But yes
 5 it would be known by someone, but I would suggest not
 6 widely known.
 7 SIR JOHN SAUNDERS: We know that NILOs from time to time
 8 have to urgently get hold of the FDO --
 9 A. Yes.
 10 SIR JOHN SAUNDERS: -- in this sort of situation, so should
 11 all NILOs be aware of this Hailing channel?
 12 A. They will be.
 13 SIR JOHN SAUNDERS: They will be? Thank you.
 14 MR HORWELL: The second topic. We heard evidence from
 15 Mr Gaskell, and he was quite clear, he said that he
 16 received a document and that the document had been
 17 prepared by you.
 18 Mr Lawlor, I have, of course, heard your evidence
 19 today. You have said, without any doubt whatsoever, you
 20 had a conversation with Mr Gaskell but you never gave to
 21 him a document?
 22 A. Correct, sir.
 23 Q. Did you ever in the course of the discussion refer to
 24 a document?
 25 A. No.

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1 Q. You've said that before the telephone call, there was --
 2 was it a text or texts in the plural between the two of
 3 you?
 4 A. No, that was just one text. It was a welfare text to
 5 a friend to say --
 6 Q. From whom to whom? Who sent the text?
 7 A. That was from myself to Neil and it was a text just to
 8 say, "Hope everything goes okay tomorrow, speak soon".
 9 Q. Mr Lawlor, I'm not asking to see it, but it's still on
 10 your phone, is it?
 11 A. I've provided the text.
 12 Q. To?
 13 A. To the legal team.
 14 MR HORWELL: Thank you. Well, I'm sure we will be hearing
 15 an explanation from Mr Gaskell, and until we hear that,
 16 it's not a matter that I can take any further at the
 17 moment. Thank you for answering my questions.
 18 SIR JOHN SAUNDERS: Thank you, Mr Horwell.
 19 MS CARTWRIGHT: Could I ask Mr Cooper to ask his questions,
 20 please, on behalf of the families.
 21 Questions from MR COOPER
 22 MR COOPER: Let me just carry on on that theme of this
 23 telephone conversation you had with Mr Gaskell. This
 24 was in the middle of Mr Gaskell giving his evidence,
 25 correct?

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1 A. It would be.
 2 Q. And do you think that was advisable, regardless of what
 3 the conversation was about?
 4 A. To be honest, sir, I didn't really think too much about
 5 it. But yes, on reflection, it's not advisable.
 6 Q. And obviously if we go part heard today you're not going
 7 to be taking any calls on your evidence, are you?
 8 A. Not at all, no.
 9 Q. No. Did Mr Gaskell at any stage talk about the evidence
 10 that he'd given? Because obviously it must have been
 11 fresh on his mind.
 12 A. I am sorry, I tried to make it clear in terms of what
 13 the conversation was. It was a 19-minute conversation.
 14 Q. 19, did you say?
 15 A. 19, one nine. It was literally 2 minutes of what I've
 16 discussed earlier. The rest of that conversation was
 17 about friendship and retirement issues.
 18 Q. You'll understand by you making yourself vulnerable like
 19 this, by having that conversation, you are opening
 20 yourself up to questions that I'm putting to you now on
 21 behalf of the families.
 22 A. Absolutely.
 23 Q. Are you sure, Mr Lawlor, that given that Mr Gaskell was
 24 in the middle of giving his evidence in an important
 25 inquiry, he only spent 2 minutes talking to you about

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1 his evidence? Are you sure about that?
 2 A. Sir, I've assured the chair, reassured the inquiry, that
 3 I've provided Mr Gaskell no documents at all.
 4 Q. Have you rung up anyone else to give them a well-being
 5 telephone call during the course of their evidence?
 6 A. No.
 7 Q. Why Mr Gaskell?
 8 A. I didn't ring, it was a text.
 9 Q. Why text? Have you texted any other witness in relation
 10 to fire after they've given their evidence for
 11 a well-being text?
 12 A. I don't recall.
 13 Q. So why Mr Gaskell?
 14 A. It was a text just to say, "Hope everything goes all
 15 right".
 16 Q. I'm sure it was. Have you sent such a text to anybody
 17 else while they have been giving their evidence?
 18 A. No.
 19 Q. So why Mr Gaskell?
 20 A. Because he's a friend, a personal friend.
 21 Q. But the only personal friend you've had who's given
 22 evidence in this inquiry?
 23 A. No, sir.
 24 Q. So why Mr Gaskell?
 25 A. I can't answer that, sir.

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1 Q. No. On 30 March 2018, it has been given in evidence
 2 before, Andy Burnham wrote an open letter, and he said:
 3 "The failure here, as far as the Fire Service was
 4 concerned, was one of process, leadership and culture."
 5 Do you agree with Mr Burnham?
 6 A. I would have a different -- I wouldn't agree with that.
 7 Q. You wouldn't agree with it:
 8 "A failure of process, leadership and culture in the
 9 Fire Service"?
 10 SIR JOHN SAUNDERS: Let's take them all independently.
 11 MR COOPER: I was going to break it down. If I'd got an
 12 agreement on all three, I'd have moved swiftly on.
 13 A failure of process. Was there a failure of
 14 process?
 15 A. Yes.
 16 Q. In what way?
 17 A. I think in terms of being reliant on the action cards,
 18 being reliant in what perhaps we thought, when I say we,
 19 the cadre, in terms of only having one route of
 20 information into the force duty officer. I think they
 21 would be the main ones, the comms.
 22 Q. We'll ask you some more questions whether there are more
 23 a little later but that's process.
 24 A failure of leadership. Would you say there was
 25 a failure of leadership?

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1 A. In my experience, no.
 2 Q. What about Mr O'Reilly? Did he fail them?
 3 A. You would have to speak to Mr O'Reilly.
 4 Q. You've got a good overview of this. You know what's
 5 being suggested so far as Mr O'Reilly is concerned,
 6 about his decisions, about whether specialist equipment
 7 should go in, as an example. Was there a failure of
 8 leadership?
 9 SIR JOHN SAUNDERS: Okay, sorry. I think we need to maybe
 10 discriminate between making the wrong decision and
 11 actually failing to take the lead. Let's take what may
 12 be a simpler example. I expect you have seen the
 13 evidence from the other NILOs and suggestions made that
 14 it took an awful long time for anyone to get a grip of
 15 what was going on. That might be decided as a failure
 16 of leadership. Do you think there was a delay in
 17 anybody actually taking a grip in the leadership
 18 position of what was going on?
 19 A. Just for clarity then, Mr Cooper's talked purely about
 20 Mr O'Reilly.
 21 SIR JOHN SAUNDERS: I'm not. You can come back to
 22 Mr O'Reilly. Was there a failure when no one got a grip
 23 of the situation when people were waiting at
 24 Philips Park when I think, without argument, they should
 25 have been at the arena? Was that a failure of

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1 leadership?
 2 A. I have to agree.
 3 MR COOPER: So we have a failure of process, you agree, and
 4 a failure of leadership, you agree. So far so good with
 5 Mr Burnham. A failure of culture within the Fire
 6 Service? Would you say --
 7 A. Can I bring you back to the last point?
 8 Q. Yes.
 9 A. Your question direct to me was failure of leadership by
 10 Mr O'Reilly.
 11 Q. Yes.
 12 A. I disagree with that point. I agree with the --
 13 Q. There it is, a failure of leadership nonetheless.
 14 A. Okay.
 15 Q. And finally then: you accept a failure of process, you
 16 accept a failure of leadership, do you accept a failure
 17 of culture as well?
 18 A. The culture within Greater Manchester Fire Service at
 19 that time has been -- was challenging and still remains
 20 challenging.
 21 Q. What do you mean by the culture within the Fire Service
 22 at the time and still to this day remains challenging?
 23 A. I think it's just ... I don't know if I can put my
 24 finger on it, but the overall culture, the overall --
 25 I suppose there's a lack of trust maybe, maybe... Like

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1 a trust in engaging with each other. It just feels
 2 different. Felt different at that time.
 3 Q. What about, for instance, those in leadership positions,
 4 perhaps not having enough operational experience? Would
 5 that be perhaps a culture that needs to be changed so
 6 those that take up leadership roles have more
 7 operational experience?
 8 SIR JOHN SAUNDERS: You may have more knowledge of what
 9 Mr Burnham meant by the culture. I'm not sure I would
 10 regard actually a failure of -- work on the ground as
 11 being a cultural failure. It may be, I don't know.
 12 Do you think that is a failure, that there are
 13 people in leadership positions who simply hadn't had the
 14 experience on the ground?
 15 A. In terms of -- and I'm not protecting anybody here, but
 16 in terms of getting to a certain position right from
 17 firefighter, right through the ranks, those individuals
 18 have to go through robust assessment processes. People
 19 within the organisation at all levels have different
 20 experiences to each other. I'm not sure you can pin it
 21 down just to --
 22 MR COOPER: All right. We'll go back to the original, your
 23 original answer on culture, that it's challenging.
 24 Drawing this together before we go to a few references
 25 in a document on the same matter, you in fact are

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1 agreeing then, are you, with Mr Burnham's assessment
 2 that the failure of the Fire Service on the night was
 3 one of process, leadership and culture? You must do
 4 because you have just accepted there's a failure of
 5 process, leadership and culture.
 6 SIR JOHN SAUNDERS: Okay, I am going to be really pedantic
 7 -- I am really sorry -- he has absolutely agreed that
 8 for process and leadership, there was a failure on the
 9 night. And he said there's a problem with culture, a
 10 lack of trust. Did that affect the response on the
 11 night?
 12 A. The leadership, culture and...
 13 SIR JOHN SAUNDERS: Just the culture now. We've had the
 14 other two, accepting it affected what happened on the
 15 night.
 16 A. No.
 17 MR COOPER: Lack of trust?
 18 A. I personally don't see that, sir. We know through the
 19 timeline of the inquiry that there have been a number of
 20 issues raised, but I don't personally see that.
 21 Q. You indicated, if I understood you, and I may have
 22 misunderstood you, that one of the failures of culture
 23 was a general lack of trust that existed at the time.
 24 A. I do. I wouldn't attribute it to the events of the
 25 night.

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1 Q. No, but that lack of trust, between who was that lack of
 2 trust? You say it continues and is that lack of trust.
 3 A. I think so. I think we've got a long -- still got
 4 a long journey in front of us and we are having to work
 5 hard collectively, I say collectively, right across the
 6 board, from ground level to the chief fire officer.
 7 We've got a long road in front of us to build back up
 8 what I saw a long time ago.
 9 Q. Some have said in the statements we've read that there's
 10 been a change of leadership, hasn't there, recently,
 11 in the Fire Service, and some have said that that change
 12 of leadership is actually quite refreshing and is a new
 13 step forward for the Fire Service; would you agree with
 14 that?
 15 A. I agree with change is always good.
 16 Q. As far as this --
 17 SIR JOHN SAUNDERS: I'm not sure I agree with that. Quite
 18 often perhaps.
 19 MR COOPER: As far as this change is concerned, I'm not just
 20 putting that question to you out of the blue, there is
 21 a trend of material that we've read that says that the
 22 change of leadership with the Fire Service now is
 23 perhaps the opportunity for a refreshing new beginning;
 24 would you agree with that?
 25 A. I'd agree with that, sir. I personally didn't have any

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1 real issues with the leadership beforehand, if we're --
 2 (overspeaking).
 3 Q. I was going to come on to that. Could one of the
 4 reasons be that the old guard, my words, that existed
 5 at the time of the Manchester Arena bomb have now all
 6 gone?
 7 A. Are you referring to the chief?
 8 Q. Mr O'Reilly, Mr Harris. They've gone now, haven't they?
 9 A. They've retired, yes.
 10 SIR JOHN SAUNDERS: What guard are you in, the new guard or
 11 the old guard?
 12 A. I'm not in no guard.
 13 SIR JOHN SAUNDERS: Can I go back to the culture?
 14 MR COOPER: By all means.
 15 SIR JOHN SAUNDERS: It may be and I'm not going to ask
 16 Mr Burnham to come and tell us, but it may be coming
 17 from reports that what he may have meant by culture is
 18 a risk-averse culture.
 19 A. I have an issue of how Mr Burnham has handled this
 20 whole --
 21 SIR JOHN SAUNDERS: I'm not interested in that.
 22 A. That's fine.
 23 SIR JOHN SAUNDERS: I'm really not looking for comment on
 24 that.
 25 Let me say this: do you think that the Fire Service

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1 as a whole was risk averse, and that includes risk of
 2 corporate responsibility if something happens to fire
 3 officers, risk with the unions -- although I'm not
 4 criticising the unions or suggesting anything by that at
 5 all, please understand -- and indeed all of the
 6 firefighters have indicated that they behave with
 7 considerable courage and they wanted to behave with
 8 considerable courage on this night. So somebody stopped
 9 them. Do you think that is a general attitude of
 10 culture?
 11 A. I don't agree we was risk averse in the organisation.
 12 SIR JOHN SAUNDERS: Okay, thank you.
 13 MR COOPER: Let me take you --
 14 SIR JOHN SAUNDERS: Find a time when you want to finish.
 15 MR COOPER: Thank you, sir.
 16 I think I can do this section within the time that
 17 we've got. It's logical to deal with this or at least
 18 part of it.
 19 {INQ030902/1}. Mr Smith has already taken you to
 20 this. You indicated you were present and indeed
 21 contributed. Can I take you to {INQ030902/4}, please.
 22 Let's look at what Andy Simister says because it's
 23 just after what you said. I'm going to ask you whether
 24 you agree:
 25 "Why are we hiding behind policies and procedures

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1 when we have the capability? I could have told you all
 2 the information we needed. I could have spoken to
 3 a senior paramedic and the police and by not being there
 4 I couldn't. You couldn't get in touch with the FDO
 5 because he's busy and we got nothing by the policies.
 6 That needs to change."
 7 Do you agree with Mr Simister?
 8 A. 100% there were difficulties on the night. Can I agree
 9 with that as a whole statement in terms of hiding behind
 10 policies and procedures? No, I don't think we do do.
 11 I think in terms of the attempts on the night was to try
 12 and gather information albeit we struggled, we didn't
 13 get the information we thought we was going to get, and
 14 there was delays. I don't -- I can't -- I don't
 15 attribute it to hiding behind policies and procedures.
 16 I can understand why Mr Simister sees that as his view,
 17 I can do, but I don't see that.
 18 SIR JOHN SAUNDERS: Well, let's put it this way -- I'm
 19 sorry, Mr Cooper, again.
 20 MR COOPER: No, sir, of course.
 21 SIR JOHN SAUNDERS: This has been my phrase throughout: you
 22 couldn't get hold of the FDO, you were dependent on
 23 that, there was no plan B., you had the original
 24 procedure and you just stuck to it, and no one there had
 25 leadership, whatever, the idea of saying, "We have got

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1 to do something about this now", which is actually what
 2 the rank and file firefighters were saying.
 3 A. Yes, in terms of timely, we didn't, we failed at that.
 4 In terms of the question what's been raised, hiding
 5 behind policies and procedures, I don't agree with that.
 6 But I do accept things should have happened much quicker
 7 for the service to be at the Manchester Arena and
 8 that's -- you talk about a plan B. I don't suppose we
 9 ever envisaged all of the communication issues that
 10 there were going to be on that night. We probably would
 11 have been on plan Z. But I have to accept that we
 12 didn't perform well on that night.
 13 MR COOPER: Well, you say you couldn't have envisaged some
 14 of the failures. You were involved with
 15 Winchester Accord, I presume.
 16 A. Sir.
 17 Q. And Winchester Accord flagged very clearly, didn't it,
 18 a year before this, what was going to happen?
 19 A. It flagged the very issue, correct.
 20 Q. Finally on this issue, {INQ030902/21}, please, of this
 21 document. Let me just familiarise myself with it.
 22 Looking at the top, Neil says:
 23 "What is clear is we all [sort of] at the bottom and
 24 if want [to] work our way up we all take risks. We have
 25 heard lots of policies and not one of us has said got

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1 ourselves in there and helped regardless [as read]."
 2 And it goes into the Plato mantra as he puts it.
 3 And then he goes on:
 4 "We are all commanded by policy and procedure. Not
 5 one person in this room has taken charge of this
 6 incident we see wearing uniform I might to it [as
 7 read]."
 8 I am reading this verbatim, obviously. Then Todd
 9 said:
 10 "I completely agree. From our point of view I am
 11 [something] to do something and I haven't been able to
 12 do that. I don't think it's accepted enough. I haven't
 13 been able to fulfil that thanks to a [maybe] piece of
 14 paper."
 15 Neil:
 16 "We are expected to make a decision so I want you to
 17 tell me to get stuck in if it results in something else.
 18 Grenfell has just shown that we have to against policy
 19 sometimes [as read]."
 20 Then it's said:
 21 "There is no one at this end of the table who
 22 disagrees."
 23 So who was that the end of the table? Just trying
 24 to clarify who is agreeing with what's just been said.
 25 SIR JOHN SAUNDERS: Is that Mr O'Reilly, Pete? Who is Pete?

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1 I was going to ask you to interpret what you have just
 2 read out, Mr Cooper.
 3 MR COOPER: Thank you, sir.
 4 SIR JOHN SAUNDERS: There are bits of that I don't fully
 5 understand. Perhaps you get the overall message.
 6 MR COOPER: I'll take up the invitation. Can I suggest to
 7 you, please, that is someone saying they are moribund by
 8 policy and procedure, they felt constrained by it, and
 9 wanted to do their duty to save and help people and,
 10 just like at Grenfell, the Fire Service haven't come up
 11 and done their duty and the rank and file feel aggrieved
 12 because they've not been allowed to do their duty
 13 because of policy and procedure? That is what I'm
 14 suggesting to you is the essence of that and there was
 15 general agreement, certainly at one end of the table,
 16 wasn't there?
 17 SIR JOHN SAUNDERS: And including by Mr O'Reilly, I think.
 18 MR COOPER: If that is Mr O'Reilly then, yes.
 19 SIR JOHN SAUNDERS: I am told it is.
 20 MR COOPER: There it is. There is Mr O'Reilly. I will
 21 review my position perhaps.
 22 There it is, Mr O'Reilly agreeing with that. Do you
 23 agree with Mr O'Reilly?
 24 A. If that's Mr O'Reilly, I would agree. I would say
 25 everybody in that room would agree, you know.

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1 Q. Well, think before you commit yourself to that. What
 2 people are saying is that they have been restricted by
 3 policy and procedure from going in and helping people.
 4 Mr O'Reilly seems to be agreeing with that. You're
 5 agreeing with Mr O'Reilly. I agree with Nick, as it
 6 were, as we see later — it says so further down.
 7 So that's a pretty poor state of affairs, isn't it,
 8 that policy and procedure prevents firefighters going in
 9 and saving people? A pretty poor state of affairs,
 10 isn't it?
 11 A. To a certain degree we are bound by policies and
 12 procedures, health and safety. I'm not saying that's to
 13 suggest we shouldn't make progress because we absolutely
 14 should. I think, if I'm getting the gist of the
 15 conversation there between the various people, the main
 16 gist is: we should have been there, we should have been
 17 doing what we should be doing. Yes, there's reference
 18 to policy and procedure. Personally, I don't agree with
 19 the policy and procedure. I wholeheartedly agree that
 20 we should have been at the arena.
 21 Q. As Mr O'Reilly seems to be saying, the reason you
 22 weren't was because you are restricted, straitjacketed,
 23 by policy and procedure?
 24 SIR JOHN SAUNDERS: Sorry, I just want to analyse what it
 25 means in real terms. You have accepted that NWFC were

1 perfectly reasonable to ask the NILO to give them
 2 advice. The only way he could get risk assessments was
 3 with the FDO, he tried, and that couldn't happen.
 4 I think maybe the complaint is why someone else
 5 didn't do something else. There are a number of things
 6 which have been suggested. Someone could have gone
 7 down, so perhaps that's where policy was saying you
 8 couldn't by just not sending somebody forward to the
 9 arena to find out for themselves. It does seem
 10 extraordinary that no one was doing that, particularly
 11 with the sort of information that the firefighters were
 12 getting at the time.
 13 A. I wouldn't say it's policy and procedure, I would
 14 suggest that there was a lack of progress and thought to
 15 do something.
 16 MR COOPER: You say that — and I'm conscious of the time
 17 and this is my last question. You say you wouldn't say
 18 policy and procedure, but that's the exact terminology
 19 used in this document I've just referred you to. You
 20 see it there, a quarter of the way down:
 21 "We are all commanded by policy and procedure. Not
 22 one person in this room has taken charge of this
 23 incident. We see wearing uniform..."
 24 I'm not sure what that means, but I'll just read it:
 25 "We are all commanded by policy and procedure. Not

1 one person in this room has taken charge of this
 2 incident."
 3 Mr O'Reilly agrees with that observation.
 4 SIR JOHN SAUNDERS: Well, we know he agrees with the last
 5 one. I'm not sure you can infer what he actually agrees
 6 with.
 7 MR COOPER: Do you agree with that observation?
 8 "We are all commanded by policy and procedure. Not
 9 one person in this room has taken charge of this
 10 incident."
 11 A. I agree with "not one person has taken charge of it".
 12 MR COOPER: Would that be a convenient moment, sir?
 13 SIR JOHN SAUNDERS: Absolutely. I'm not tying you down.
 14 We've had a lot of estimates which actually just haven't
 15 happened today and I'm not blaming anyone for that, but
 16 just give me a rough idea, just for planning.
 17 MR COOPER: Absolutely. I'd say about half an hour, but
 18 I'll review it over the weekend, and, as often happens
 19 when that happens, it gets shorter. Let me give a worst
 20 case scenario of 30 minutes.
 21 SIR JOHN SAUNDERS: Thank you very much.
 22 I'm sorry to bring you back.
 23 A. That's okay.
 24 SIR JOHN SAUNDERS: 9.30 on Monday.
 25 (4.30 pm)

1 (The inquiry adjourned until 9.30 am
 2 on Monday, 5 July 2021)
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1 I N D E X

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