

OPUS2

Manchester Arena Inquiry

Day 116

June 15, 2021

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Tuesday, 15 June 2021

1 (9.30 am)

2 SIR JOHN SAUNDERS: Good morning.

3 MR DE LA POER: Sir, good morning. Our first witness this
4 morning is Mr Butler. May he, sworn, please?

5 MR JONATHAN BUTLER (sworn)

6 Questions from MR DE LA POER

7 SIR JOHN SAUNDERS: Thank you, Mr Butler.

8 MR DE LA POER: Please state your full name.

9 A. Jonathan Peter Butler.

10 Q. Mr Butler, is it right that you have worked for NNAS
11 since 1981?

12 A. It is.

13 Q. In 2007 did you join the resilience team?

14 A. I did, yes.

15 Q. And at about that time did you become a TAC adviser?

16 A. I did, yes, shortly afterwards.

17 Q. We will come back to that as a term shortly.

18 In 2015 did you become a NILO?

19 A. Yes.

20 Q. That is a national inter-agency liaison officer?

21 A. Yes.

22 SIR JOHN SAUNDERS: Were they introduced at that stage?

23 Were they new or were they already in existence when you
24 became one?
25

1

1 A. They were already in existence but mainly in London. It
2 was a Met (overspeaking) ---

3 SIR JOHN SAUNDERS: So you were one of the first ones in
4 Manchester?

5 A. Yes, in Manchester, yes. We started rolling it in.

6 MR DE LA POER: Again, Mr Butler, we are just going to park
7 the NILO role, which we will introduce in greater detail
8 when we turn to the events of the night. But just
9 continuing with the potted history of your career with
10 NNAS, so far as it's relevant, as at the time of the
11 Manchester Arena attack, were you working as
12 a resilience manager?

13 A. I was, yes.

14 Q. I don't propose to take a lot of time over your
15 training. Let's see if we can deal with it in one
16 question but it may be there'll need to be a follow-up.
17 Bearing in mind your experience on the night, in May of
18 2017, do you think you were adequately trained for the
19 role that you undertook?

20 A. Yes, I do.

21 Q. One final facet of the introduction of you: in your
22 witness statement you identify that you are trained as
23 an Ambulance Intervention Team commander, AITC?

24 A. That's correct.

25 Q. When did you become qualified as an AITC?

2

1 A. January 2017.

2 Q. And what is the role, as you understood it, of an AITC?

3 A. The role of an AITC was --- when Ambulance Service staff
4 are actually involved in a ballistic ---type attack
5 environment, would be to liaise with the police, agree
6 the risk assessment, and then agree a way in which we
7 can move forward to treat patients and bring them out of
8 that area. It's about deployment of staff.

9 Q. I would like to just examine the flexibility around that
10 role and pose a number of scenarios for you.

11 You've described it as being relevant in
12 a ballistic ---type situation. Was there a requirement in
13 order to undertake the role of AITC that there were
14 confirmed gunshot wounds that were being dealt with?

15 A. No. It's --- it would be a discretion of whoever asked
16 you to actually attend for whatever reasoning they felt
17 that was pertinent to the job.

18 Q. Were you familiar in 2017 with the term Operation Plato?

19 A. Yes, I was.

20 Q. And what did you understand Operation Plato to be in
21 2017?

22 A. It's an operational name from the police that allows
23 their resources and all the agencies to actually
24 interact. So basically it's an operational name and
25 underneath it sits the method by which we would actually

3

1 deal with the incident.

2 Q. What was your understanding in 2017 about what the
3 catalyst for a declaration of Operation Plato would be?

4 A. A marauding terrorist firearms attack.

5 Q. So plainly we have a firearms element to that. In an
6 Operation Plato situation did you understand that an
7 AITC might have a role?

8 A. In an Operation Plato, the AITC definitely had a role.

9 Q. What about in other non-firearms forms of attack? So in
10 other words where it is a terrorist attack, there is no
11 confirmed shooting, but, and we will take the example of
12 the events of 22 May, a bomb has been detonated. Would
13 an AITC have a role in that situation?

14 A. Not primarily as in a ballistic. What the AITC could
15 bring to the table, and it's all about bringing certain
16 elements to the table, is the AITC has actually
17 undergone further training and liaison with the police
18 to understand when --- and more dynamic risk assessments
19 and more detailed to understand when to commit staff and
20 when not to commit staff.

21 SIR JOHN SAUNDERS: So where do you get your training about
22 Plato?

23 A. In-house within the Ambulance Service, but it's also as
24 part of when you do your AITC training, which is also
25 linked with GMP.

4

1 SIR JOHN SAUNDERS: So you do it with the police?
 2 A. Some parts of it, yes.
 3 SIR JOHN SAUNDERS: So you can get an Operation Plato when,
 4 say, there's been an explosion and people know or get to
 5 know that there are gunmen around who are shooting.
 6 Because of what happened in Mumbai and other places,
 7 once an explosion which is identified as a terrorist
 8 explosion, there will also be a possibility and
 9 a suspicion that there may be gunmen around who are
 10 going to follow up and provide a risk and perhaps shoot
 11 at people from the emergency services as they come in.
 12 So no actual knowledge, but a risk arises .
 13 A. I would say that's perfectly correct, and that's where
 14 on the night there's been an explosion, it was presumed
 15 terrorist because it was linked to nails, we know. At
 16 that point, certainly as a control manager, you would be
 17 thinking: what else is going to actually occur?
 18 SIR JOHN SAUNDERS: So an AITC commander would have a role
 19 there and a role, you say, in communicating with the
 20 police to ascertain where it is safe for the Ambulance
 21 Service to operate?
 22 A. Yes, and not only that, it's all about getting
 23 commanders to the scene as well. So even if the role of
 24 an AITC wasn't actually in play at that point in time,
 25 what the AITC can bring to the table is an extra

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1 commander to support the decision—making.
 2 MR DE LA POER: And where would the AITC locate themselves?
 3 A. At the forward command post.
 4 Q. So at the scene, at the FCP?
 5 A. Yes.
 6 Q. Thank you for that introduction, Mr Butler. We're going
 7 to come to a point in the evening which I'm sure you can
 8 readily identify in your own mind where we will return
 9 to the issue of AITC.
 10 Having concluded that short introduction of you,
 11 I would like to turn now to four background matters and
 12 just seek your assistance in relation to each of them.
 13 The first we will bring up on to screen so we know
 14 what we're looking at. Mr Lopez, {INQ014019/1}, please.
 15 This is a debrief report entitled:
 16 "Joint Emergency Services Airwave Communication
 17 Interoperability Test (June 2015)."
 18 And this is a report that I think you know something
 19 about, is that right, Mr Butler?
 20 A. It is, yes. It was jointly written and prepared by
 21 myself and Mr Steve Taylor.
 22 Q. So over the page {INQ014019/2}, please. We are not
 23 going to read the entire document in -- we can see in
 24 the box at the top that the date is 19 June 2015.
 25 I would just like to take your attention to the summary

6

1 and we will just read that into the record:
 2 "Overall, the initial test of the use of
 3 interoperability Talk Groups (TGs) as part of this
 4 testing regime was a success. As expected it
 5 highlighted some good practice that was already being
 6 undertaken within the north—west with weekly and monthly
 7 interoperability tests already being carried out.
 8 "There were a few issues which arose on the day and
 9 these are being addressed by the planning teams in the
 10 respective areas. It is envisaged that each
 11 organisation will take any individual learning/issues
 12 and deal with them at an organisational level."
 13 We will just take that down for a moment and speak
 14 a little bit more about this.
 15 What were the circumstances in which this report was
 16 being written?
 17 A. So we wanted to -- at the time, the Ambulance Service
 18 was given a remit from JESIP to actually look at and
 19 coordinate the Airwave tests. So each area, as in
 20 county, was actually undergoing their own tests,
 21 tri—service.
 22 And we wanted to ensure that this was embedded
 23 within our organisation and all the other organisations
 24 as well.
 25 Q. Before we go any further, I should remind you of what

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1 I'm sure you already know, which is we are not going to
 2 identify any specific Talk Group or radio channel by its
 3 identifier. So we will speak generally, if we may.
 4 Was this then, this debrief, internal to NWS or was
 5 it about NWS's interaction with other emergency service
 6 partners?
 7 A. Could you bring it up again for me?
 8 Q. Yes, of course. Do you need that INQ again? There we
 9 go.
 10 A. And the first page?
 11 Q. And the first page?
 12 A. Sorry, second page {INQ014019/2}. It was an internal
 13 NWS document.
 14 Q. So when you are speaking about the "testing regime going
 15 well", that is internal testing; is that right?
 16 A. Yes. But that would have then fed into the local
 17 resilience managers, feeding both into their partners
 18 and other agencies.
 19 Q. Were there tests being carried out in 2015 as between
 20 NWS and other emergency services?
 21 A. According to the document. Obviously it's quite
 22 a few -- a while ago.
 23 Q. It is.
 24 A. Testing, as far as I'm aware, had started to take place
 25 at that point.

8

1 Q. Would you have a look at another document now.
 2 {INQ014127/1}.

3 SIR JOHN SAUNDERS: Okay. I'm just trying to summarise what
 4 I think I have already been told about the
 5 communications and the tri-service ones. I may get this
 6 entirely wrong, so please forgive me.
 7 We know there were a number of different Airwaves
 8 which could be used as a tri-service system.

9 A. That's correct.

10 SIR JOHN SAUNDERS: But in order to do that, someone had to
 11 switch it on as and when required.

12 A. Not necessarily switch it on, but inform persons --

13 SIR JOHN SAUNDERS: Inform it was being used. So that
 14 information.

15 A. Yes.

16 SIR JOHN SAUNDERS: Since then, and it came into operation
 17 successfully just after, there is a constantly open
 18 channel or Airwave being used by all three services?

19 A. We've actually got two now.

20 SIR JOHN SAUNDERS: That's fine. I don't want you to go any
 21 further. We're talking about the first of those now?

22 A. Yes.

23 SIR JOHN SAUNDERS: Thank you.

24 MR DE LA POER: Thank you, sir.
 25 So, Mr Lopez, the next document is -- as you will

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1 see, we didn't need to go through all of the lines of
 2 this, but just to remind you about this document, it's
 3 headed "Interoperability Tests" and we can see that at
 4 the top of the table:
 5 "Operational, tactical, EOC DM and police
 6 initiator."

7 And there are comments about it. We can see dates
 8 in the left-hand column, and there are separate tables
 9 for each of the areas within the NWAS region.

10 In fact, we can see that your name appears at
 11 various points in the tests. Really, the first question
 12 about this document is: what is this recording, please?

13 A. This was a document I produced just solely to ensure
 14 that I had my own spreadsheet to know when the tests had
 15 taken place and by who.

16 Q. And what was the nature of the test that was being
 17 carried out?

18 A. So initiator would be the police, as you can see, and
 19 the police would then phone up the police -- sorry,
 20 correction, the fire and the ambulance controls and say,
 21 "We're about to do our weekly test or monthly test".
 22 The stipulation is actually only for a monthly test.
 23 It's quite important, because if you look at the
 24 Cheshire and the Merseyside, which you've got on screen
 25 now, it looks like it's a weekly test. It's not. It's

10

1 actually a monthly test, it's just that locally Cheshire
 2 and Merseyside decided they wanted to do it weekly.

3 Q. Yes. So the police initiator uses the telephone as
 4 opposed to the Airwave system to notify both NWAS and
 5 the Fire and Rescue Service that it intends to do
 6 a test?

7 A. Yes. So at that point the tactical commander on the
 8 day, whoever was on call, would then log on to the
 9 specific Talk Group and the police and fire would have
 10 a conversation between them. Basically, "Are you
 11 reading me?", "Yes, thank you very much".
 12 And also at the same time an operational level would
 13 also sign on to a different set of Talk Groups
 14 designated by the police.
 15 So on the interoperable Talk Groups there's one for
 16 tactical and there's three for operational at the time,
 17 and the police would determine which one of the three
 18 would be used because that way commanders didn't get
 19 used to using short dials, they have to actually
 20 navigate their own radios. That's what we were trying
 21 to do: embed use of the radio into interoperability --

22 SIR JOHN SAUNDERS: And in the phone call, the police would
 23 also inform the channel that is going to be used?

24 A. Yes.

25 SIR JOHN SAUNDERS: Thank you.

11

1 MR DE LA POER: So far as you were aware, was that by and
 2 large a successful demonstration on a regular basis that
 3 the three emergency services could speak to each other
 4 when they needed to?

5 A. At the time that is the test that was required by JESIP
 6 and the Airwave.

7 Q. Yes.

8 A. So it did demonstrate that the police tactical,
 9 ambulance tactical, all the tactical commanders and the
 10 operational commanders could actually communicate
 11 together when the Talk Group was initiated and known.

12 Q. For each of these tables we can see, if we go over the
 13 page {INQ014127/2} that, for example -- this is the
 14 bottom of the Merseyside table, three-quarters of the
 15 way down, that the last recorded test, which I think you
 16 are a participant in, is dated February 2017. Similarly
 17 for Cumbria, February 2017.

18 Did this testing regime that's being captured in
 19 this document cease in February 2017 or did it continue
 20 up to May 2017?

21 A. It's actually still continuing to this day.

22 Q. All right. So just so that anybody looking at this
 23 document understands it, this document was current to
 24 February 2017, but the testing regime continued up to
 25 and including, for our purposes, May 2017?

12

1 A. Yes. The control room have a pro forma that they fill
 2 in to say the testing has now taken place. This was
 3 really my spreadsheet for embedding, ensuring that for
 4 the first couple of years we have embedded that
 5 information.
 6 SIR JOHN SAUNDERS: Do all the Airwave groups at the
 7 tactical and the operational go through the control
 8 rooms?
 9 A. Sorry, could --
 10 SIR JOHN SAUNDERS: Well, I understood that the point of
 11 these Airwave groups actually connected up the control
 12 rooms so they knew what was going on, or is that
 13 something different again?
 14 A. Yes, you're right, but if you don't mind me explaining.
 15 SIR JOHN SAUNDERS: No, that's the reason for the question.
 16 A. The control rooms at this moment in time actually have
 17 an interoperability Talk Group open between themselves
 18 which they can just go on to at any point in time and
 19 all three services are listening and monitoring to it.
 20 SIR JOHN SAUNDERS: That's now?
 21 A. That's now. At the time that wasn't actually -- but the
 22 police could have phoned up at any point in time on this
 23 and say: please, could you go on to -- set your tactical
 24 and EOC -- the control rooms can also monitor that Talk
 25 Group to find out exactly what is occurring.

13

1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: I think we can take this document down, but
 3 you've described the situation now, a live Talk Group,
 4 24 hours a day, always monitored?
 5 A. Yes.
 6 Q. With or without the benefit of hindsight, it may seem
 7 that that is a perfectly obvious commonsensical
 8 arrangement to have. That wasn't the case before
 9 May 2017. Can you help with why this system, which
 10 involved the police having to telephone, to identify the
 11 channels, to make sure everybody was ready to dial in
 12 correctly, why was that system in place as opposed to
 13 what might be thought to be the much more
 14 straightforward reliable system of a constantly live
 15 channel?
 16 A. So Airwave, you appreciate you've got to go back
 17 a little bit further.
 18 Q. Yes.
 19 A. The police went on to Airwave first.
 20 Q. Yes.
 21 A. Then Fire Link, as it was, the Fire Service, and then
 22 the Ambulance Service nationally. Each service had
 23 their own what they call fleet map, which is basically
 24 all the radio Talk Groups.
 25 At the time, other than those three, obviously

14

1 whoever decided nationally that there wasn't going to be
 2 one -- we had got four Talk Groups and it was all about
 3 actually initiating those Talk Groups.
 4 In order for us now to actually get to the position
 5 where we're in now, one of the agencies has actually
 6 given up one of their own Talk Groups to allow that
 7 tri-service to take place.
 8 Q. So the position in the north--west was reflective of the
 9 national position as you understood it in May 2017?
 10 A. Yes.
 11 Q. And what I have described as the commonsense set-up
 12 simply was not the case for any service, as far as you
 13 were aware, before May 2017?
 14 A. Yes. There is a way by which control rooms can talk to
 15 each other, which are called the Hailing Talk Groups.
 16 Q. Yes, we have heard about those. But in terms of a live
 17 channel, constantly monitored, that is an innovation, if
 18 that's the right word, post May 2017?
 19 A. It is, yes.
 20 Q. Prior to that you've described for us the process by
 21 which it is initiated.
 22 I would like to move on it the second background
 23 topic which is an email dated 3 July 2015 and it arises
 24 from the HMIC inspection, {INQ014192/1}. This is an
 25 email from you, Mr Butler, dated 3 July 2015.

15

1 I appreciate again we are asking you to cast your mind
 2 back some way.
 3 We will pick out just a couple of points and not
 4 linger over this email for very long.
 5 Number 5:
 6 "Airwave interop. It was recognised that Merseyside
 7 had started the testing regime and it was commented on
 8 that locally we had implemented a weekly test to embed
 9 the systems quicker."
 10 Is that a reference back to the debrief that we have
 11 just looked at which was just a few weeks before this
 12 email?
 13 A. Yes, it also links into the radio test being done on
 14 a weekly basis rather than a monthly basis which was
 15 mandated.
 16 Q. And then a list of areas of improvement. This is you
 17 capturing what you understood HMIC were saying might be
 18 improved?
 19 A. Yes.
 20 Q. And we can see that:
 21 "Further work needed to embed JESIP at all levels
 22 within the organisation, that fire and police Control
 23 [this is the third one] although only separated by
 24 a door did not integrate fully on a day-to-day basis."
 25 So just help us with separated by a door?

16

1 A. This is on — I prepared an email relating to
 2 Merseyside.
 3 Q. So that's specific to Merseyside?
 4 A. Yes, I was the JESIP lead in delivery for Merseyside, so
 5 this is a Merseyside document/email and not linked to
 6 Manchester or any other county.
 7 Q. I think with that clarification, I don't need to linger
 8 any further on it, although obviously Merseyside formed
 9 part of NWAS and so there are some comments, would you
 10 agree, that are applicable — which are specific to NWAS
 11 which are applicable even though it was specific to
 12 Merseyside?
 13 A. Yes. But it's worth noting that JESIP did need to be
 14 embedded because JESIP had only just actually been
 15 introduced in the last 18 months prior to that. So yes,
 16 it was going to be an ongoing process at that point in
 17 time.
 18 Q. We will go come back to your role in delivering JESIP
 19 training in just a moment. So thank you very much
 20 indeed, Mr Lopez. You can take that down.
 21 The penultimate background topic to deal with is: is
 22 it right that you were involved in Exercise Winchester
 23 Accord?
 24 A. It is, yes.
 25 Q. That, as we know, took place in May of 2016. We're

17

1 going to just introduce your role in that through
 2 another document, {INQ013559/1}. This is, as it says on
 3 its face, the Exercise Winchester Accord planning
 4 document. If we go to {INQ013559/8}, please, we can see
 5 in the bottom half of the page under the heading
 6 "Facilitators /umpires", you are identified as one of the
 7 day 3 facilitators and the exercise coordinator?
 8 A. I planned for the day 3 part of the exercise.
 9 Q. If we go forward to {INQ013559/12}, day 3, I think, was
 10 11 May, as the top of that document indicates.
 11 If we can just pick out some times. At 11.30 am we
 12 can see that Mr Watson and you were.
 13 "... deployed to the forward command post at
 14 Red Bank and set up a multi-agency response as and when
 15 required in line with the [standard operating
 16 procedures] (reports to police facilitator)."
 17 I'll just pick out two more and then come back to
 18 what all of this meant in practice.
 19 At 15.15:
 20 "Jonathan Butler leaves site to brief NWAS AITC (PM)
 21 and HART."
 22 Then at 15.35 you are recorded as providing that
 23 briefing.
 24 Just provide us, please with a thumbnail sketch of
 25 what was going on day 3 and what was your role in all of

18

1 it?
 2 A. Day 3 was, as obviously you're aware, for some reasons
 3 I can't actually go into too much about,
 4 Winchester Accord and the events, but it was to exercise
 5 a specific part of the joint operating procedures.
 6 The first part, where you see myself and just
 7 Simon Watson, NWAS did not have any play, but they
 8 wanted a commander to set up and have that JESIP
 9 communications, although we didn't actually have any
 10 live play at that point.
 11 The PM — I went off-site to brief in the car park
 12 the teams coming on, just to tell them the situation,
 13 how it was developing in relation to — it's
 14 an incident, so there's lots of things going on, so just
 15 about safety and suchlike.
 16 Then later on in the night NWAS did play some part
 17 in the live exercise.
 18 Q. So you're embedded in the exercise as it takes place on
 19 day 3?
 20 A. Yes.
 21 Q. Did you have any role in the debrief process?
 22 A. I had a role in the debriefing process for the
 23 Merseyside element at Red Bank.
 24 Q. And insofar as it might apply broadly, so points
 25 uniquely specific to Merseyside perhaps we don't need to

19

1 deal with, was it your view that Exercise Winchester
 2 Accord had been a success so far as you could tell from
 3 your involvement?
 4 A. From my involvement in the Merseyside, yes, it had, but
 5 it was looking at very different aspects of the — at
 6 incident management than it was in the Trafford Centre.
 7 Very clear differences. Merseyside was more about
 8 hand-off procedures from MOD to NWAS and how we
 9 interacted with the medics, army medics, whereas
 10 Winchester Accord at the Trafford Centre was a very
 11 different scenario.
 12 Q. So would it be fair then to say that anything you know
 13 about the success of that Trafford Centre side of
 14 Winchester Accord is something not from your direct
 15 knowledge or involvement, but just as has been relayed
 16 to you by colleagues?
 17 A. Yes, that's correct.
 18 Q. We will leave it to those other who have already spoken
 19 about and who may yet speak about it to deal with that.
 20 The fourth and final background topic you have
 21 already adverted to, which is your role in delivering
 22 JESIP training. {INQ013918/1} will come up on your
 23 screen.
 24 This is a training delivery summary report dated
 25 2016. If we go over the page {INQ013918/2} we have the

20

1 executive summary. I'm not going to read all of that
 2 out. What I'll do is just take us, please, to
 3 {INQ013918/12}. If any of my questions require you to
 4 look at the detail of this, Mr Butler, you mustn't
 5 hesitate to say, but I suspect we will only need to deal
 6 with it in summary form, we can see that under the
 7 heading "JESIP instructor cohort", you are one of the
 8 two NAWAS instructors; is that correct?
 9 A. It is, yes.
 10 Q. And indeed at the very bottom of the page you are
 11 identified as the delivery lead?
 12 A. That is correct.
 13 Q. We will come back to JESIP at the conclusion of our
 14 review of your involvement on the night, but suffice it
 15 to say for now, Mr Butler, bearing in mind you were
 16 involved in the delivery of JESIP training to command
 17 and control personnel at NAWAS, albeit Merseyside, do you
 18 feel that you had in May of 2017 a very strong grasp of
 19 JESIP?
 20 A. Yes, I do.
 21 Q. All right. Thank you very much indeed, Mr Lopez.
 22 We're going to --
 23 SIR JOHN SAUNDERS: Are you coming back to the training or
 24 not?
 25 MR DE LA POER: To that training?

21

1 SIR JOHN SAUNDERS: Yes.
 2 MR DE LA POER: I wasn't proposing to, bearing in mind it
 3 was specific to Merseyside but, sir, I am sure if there
 4 are questions --
 5 SIR JOHN SAUNDERS: If you don't mind.
 6 Just help me: as far as you're concerned, was the
 7 JESIP training good that you delivered?
 8 A. As far as I'm aware, the feedback, as you can see from
 9 the report that's just gone in, the staff found it
 10 extremely useful and beneficial.
 11 SIR JOHN SAUNDERS: Do you think they got the principles?
 12 A. Yes, and if you speak to them word of mouth, you speak
 13 to our staff now, they will say the interaction on scene
 14 with other agencies has improved tremendously since
 15 those days. It is very much you seek out your partner
 16 agencies and you do that co-location to enable you to
 17 coordinate the whole JESIP principles.
 18 SIR JOHN SAUNDERS: So we have heard from quite a lot of
 19 Fire Service firefighters and ambulance staff that when
 20 they're dealing with an incident which perhaps is not
 21 a big incident like this, and there is just the two of
 22 them, they just automatically work together, so the
 23 JESIP principles.
 24 The evidence so far, and it may be you're going to
 25 say something different, is that JESIP didn't work on

22

1 22 May 2017, so the principles just didn't actually work
 2 in practice.
 3 So how do we improve the training or what do we do
 4 to make sure that when it comes to the real event,
 5 actually people do it?
 6 A. As far as I'm aware from looking at debriefs, yes,
 7 I obviously agree that JESIP didn't work well on the
 8 22nd.
 9 SIR JOHN SAUNDERS: I think you can say it didn't work at
 10 all. Perhaps that's an overstatement, all right. Later
 11 on it may have worked to some extent.
 12 A. Yes, but there were only two agencies out of the three.
 13 How it can be improved initially? I believe that
 14 was all about communications. That has been rectified
 15 now by the introduction of a tri-service Control Talk
 16 Group so all the control rooms can actually communicate
 17 at the time of an incident, even if it's just fire and
 18 ambulance: please be aware we have got an ongoing
 19 incident at such, further details to follow.
 20 So that tri-service communication has now been
 21 rectified, whereas previously it was about a phone call
 22 and keeping the phone open. Now it's -- radio is
 23 obviously immediate.
 24 SIR JOHN SAUNDERS: And that will solve all the problems?
 25 A. That will solve all of the communications issues

23

1 regarding who should report where and that initial
 2 METHANE and information message, yes.
 3 SIR JOHN SAUNDERS: Okay. But you do need co-location,
 4 don't you? However good -- or do you think you can do
 5 it all by radio?
 6 A. Co-location is not necessarily in person. This is what
 7 I always, when I'm delivering training, because if you
 8 think of the sheer geographics of NAWAS, you could have
 9 a tactical commander or an operational commander in,
 10 say, Cumbria, or if you bring it down to Manchester,
 11 somewhere up towards the Rochdale area and the incident
 12 is in central Manchester, you would expect that
 13 communication to take place prior to their arrival on
 14 scene.
 15 So co-location, in my mind, can actually be done on
 16 the radio because that is exactly the same as speaking.
 17 SIR JOHN SAUNDERS: So let's talk about the practicalities.
 18 If you don't mind --
 19 MR DE LA POER: Sir, absolutely not.
 20 SIR JOHN SAUNDERS: Right. Just looking at it objectively,
 21 I hope this is accurate, in order to work out whether
 22 paramedics could safely work in the City Room on the
 23 night, so ordinary paramedics, what was needed was for
 24 Dan Smith to speak to Inspector Smith, and
 25 Inspector Smith is in the City Room and Dan Smith is

24

1 downstairs and they just do not communicate. That's
 2 absolutely — it seems to me at the moment, and
 3 obviously I'm open to persuasion, it seems to me it was
 4 obviously necessary to get the right people in the right
 5 places at the right time and share the risk. How do you
 6 deal with that?
 7 A. That's exactly what JESIP is and it's exactly what all
 8 commanders together to have that shared situational
 9 awareness in order —
 10 SIR JOHN SAUNDERS: But how do you get it when one is up in
 11 the City Room and one is downstairs?
 12 A. Communications, "Please can you come down". It was such
 13 a dynamic and involved incident. I would have expected
 14 face to face would have been probably needed.
 15 SIR JOHN SAUNDERS: I'm sure it would have been needed.
 16 A. So it would have been a question of getting together
 17 physically. Communications could have taken place and
 18 said, "Please come down and we will have that meeting"
 19 —
 20 SIR JOHN SAUNDERS: Or please come up.
 21 A. Or please come up. I would suggest that down is
 22 probably better than up.
 23 SIR JOHN SAUNDERS: Maybe. We won't discuss that. Just
 24 some physical meeting?
 25 A. But yes, it has to be — it is a training issue

25

1 possibly. Well, not possibly, it is a training — but
 2 given the circumstances of the night, you can train and
 3 train and train and give everybody instruction, but it
 4 was such, on my understanding, a difficult and traumatic
 5 time.
 6 SIR JOHN SAUNDERS: I really do understand that and everyone
 7 understands it was a difficult and traumatic time but
 8 that's the point of the training.
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So I think, as the police have said,
 11 it's a muscle reaction and you do it automatically.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: And that's how it has got to be, hasn't
 14 it, if it's going to work.
 15 A. That's what we are trying to embed when we deliver the
 16 JESIP training at this moment in time and have done for
 17 a few years.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR DE LA POER: You have identified communication as one way
 20 in which the commanders might arrange to come together.
 21 Another, would you agree, picking up on the point of
 22 muscle memory and embedding it, is to instil them that
 23 one of their first thoughts must be: in one way or
 24 another I must find the other commanders and speak to
 25 them?

26

1 A. Yes, that's — that would be one of the key elements.
 2 Q. So that's two ways in which that co-location at a scene
 3 might occur.
 4 The training that you were delivering in 2016 to
 5 Merseyside, did that include either of those principles?
 6 A. Yes. Both.
 7 Q. Now, obviously that related to the Merseyside people who
 8 received that, but was the training that you were
 9 delivering consistent with the training that was being
 10 delivered across NWAS?
 11 A. For the first 3 years of JESIP, we were actually given
 12 a training package from the College of Policing and from
 13 JESIP. Subsequent to those 3 years, we've been able to
 14 adapt it to meet our own needs in relation to — we have
 15 more exercises relating to specific risks on the risk
 16 register. But at the time, for the first 3 years, which
 17 would have been the case here, prior to this, it was
 18 a mandated course from — from JESIP.
 19 Q. So those in Greater Manchester will have received the
 20 same training that you were delivering in Merseyside?
 21 A. Yes, that's correct.
 22 Q. On one view of the evidence those two ways in which
 23 co-location might be achieved, which were part of the
 24 training package, did not translate into action on the
 25 night?

27

1 A. Yes.
 2 Q. Knowing the training as you do, having delivered it, can
 3 you identify why that might have been the case? Is it
 4 simply that no training can prepare for that or have the
 5 subsequent improvements identified where the weakness
 6 may have lain?
 7 A. You mentioned my role as a TAC AD, tactical adviser.
 8 I think as a commander, you arrive on scene, you're
 9 immediately faced with whatever incident it is, and your
 10 mind is just taking on so much information.
 11 The idea of the TAC AD is to actually step back and
 12 to actually give advice and be that person behind the
 13 scenes just looking at policies, procedures, and how to
 14 move forward, and giving that advice, because the
 15 commanders, as you said about muscle memory,
 16 automatically go into: right, I need to do this, I need
 17 to do this, I need to do this. The tactical adviser is
 18 there to go: okay, boss, you want to do that, just be
 19 aware if you do did that, the implications are this and
 20 this, can I suggest this, this and this, however, this
 21 is an option. That's what the TAC AD does.
 22 SIR JOHN SAUNDERS: So had there been a TAC AD at the scene
 23 that night, he would have been saying that sort of thing
 24 to Dan Smith?
 25 A. Yes.

28

1 SIR JOHN SAUNDERS: But there wasn't?
 2 A. Correct.
 3 MR DE LA POER: Similarly, I think you have identified that
 4 sort of standoff role was something that an AITC might
 5 provide in the circumstances of 22 May 2017.
 6 A. The AITC has further training, not the same as a TAC AD
 7 because a TAC AD does lots of other instances, chemical,
 8 but does have that further awareness which would have
 9 been an advantage, yes.
 10 SIR JOHN SAUNDERS: And he would have been key in saying --
 11 part of his role would be saying: we need to speak to
 12 the police about where it is safe for us to be?
 13 A. Correct.
 14 MR DE LA POER: The role is described as a tactical adviser
 15 which suggests by the name that the advice was being
 16 given to the tactical commander. We are going to come
 17 now to looking at the tactical adviser role, but is that
 18 the person that the tactical adviser speaks to, as you
 19 understand it, or does the operational commander get the
 20 benefit of a tactical adviser as well?
 21 A. The operational commander can liaise with a tactical.
 22 So we often speak at incidents where there is no
 23 tactical, at smaller incidents, and we will speak
 24 directly with the operational commander. But we also
 25 offer advice to the control room as well and to other

29

1 agencies.
 2 Q. Let's have a look at what the action card describes as
 3 the role, as this was the role that you played on the
 4 night. {INQ013422/27}, please.
 5 The first question that I have about this is in the
 6 title of the role, "Ambulance tactical adviser/NILO".
 7 I said that I would come back to this.
 8 A plain reading of that might lead someone to think
 9 that one part of this role is giving internal advice to
 10 the tactical commander and, as you have told us, if we
 11 go to the top, please, so we can see the title of the
 12 card, so that's the "ambulance tactical adviser" on
 13 a plain reading, internal, to the commander. And then
 14 the NILO, which we have understood is a liaison role
 15 outwardly facing to our agencies.
 16 A. Quite correct.
 17 Q. Is there any particular reason that you are aware of why
 18 both of these roles are embodied in one person?
 19 A. Their work regarding the NILO can actually go into the
 20 TAC ADs, but the NILO will get information regarding an
 21 incident, maybe pre-planned, by one of the agencies and
 22 will then go on to advise on the tactical side of it to
 23 the tactical adviser what options we have. But the
 24 information in from the NILO then actually leads on to
 25 the advice.

30

1 So could there be two different people? Yes, they
 2 could, but they would have to be so joined at the hip,
 3 I don't think that would actually work. I think both
 4 are relevant as one person.
 5 Q. So the way that NWS structures it, and this is
 6 an action card handed down by NARU, so it's national
 7 level as I understand it, the two roles are so
 8 intertwined and complementary that one person seeks to
 9 do both?
 10 A. Yes, and they are actually all done from the resilience
 11 team as well, the TAC ADs and the NILO all stem from the
 12 resilience team.
 13 Q. I think we should also be clear that, as we will see in
 14 a moment, NWS operated a system where there was more
 15 than one TAC adviser/NILO, so although we are talking
 16 about this role being undertaken by one person, in fact
 17 this joint role could be undertaken by more than one
 18 person as necessary?
 19 A. Yes, as you can see from action 2 of the action card.
 20 Q. Exactly.
 21 A. Point 2.
 22 Q. So let's have a look at what the action card says. The
 23 first item is to start an incident log. You had an
 24 incident log that night; is that correct?
 25 A. I did, yes.

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1 Q. We will come back to have a look at the mechanics of
 2 that in just a moment.
 3 Number 2. As you correctly identify, the first
 4 possible action is to activate second tactical adviser.
 5 A. That's correct.
 6 Q. We can then see:
 7 "Ensure that appropriate commanders have been
 8 notified and that appropriate resources/medical supplies
 9 has been mobilised.
 10 "Confirm the incident is being managed on the
 11 relevant Airwave Talk Group.
 12 "Ensure relevant trust policies and plans have been
 13 initiated and actioned.
 14 "Ensure that relevant partner agencies have been
 15 notified in accordance with action card 21 (EOC duty
 16 control manager)."
 17 So that's item 2. Item 3:
 18 "Establish contact with the ambulance incident
 19 commander and mobilise to the most appropriate location
 20 to support the command team."
 21 Did you understand the ambulance incident commander
 22 to be the tactical or the operational commander?
 23 A. Tactical.
 24 Q. And finally, I'm being selective here, number 5:
 25 "Provide the NWS command team with

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1 specialist / specific advice to support the management of
 2 the incident.”
 3 Which includes:
 4 “The latest intelligence /information from
 5 inter—agency liaison officers from other agencies; the
 6 requirements of the major incident response plan; and
 7 any site/event—specific plans.
 8 “The elements of...”
 9 You will have to tell us what that acronym is, if
 10 you can.
 11 A. “Elements of CSCATTT.”
 12 So it’s command and control, safety, communication,
 13 assessment, triage, treatment and transfer.
 14 Q. “... and ensure its implementation; requirements of
 15 specific NWS policies and procedures; and the
 16 specialist requirements of hazmat/ CBRNE incidents.”
 17 So those are the only ones I want to look at here,
 18 but did this action card, which I’m sure you had
 19 familiarity with before the night, accord with your
 20 understanding of your role on the night?
 21 A. Yes.
 22 Q. Thank you very much indeed, Mr Lopez.
 23 As we will come to, Mr Taylor, who also played this
 24 role, did it apply equally to him as you understood?
 25 A. It did, yes.

33

1 Q. So let’s look at your role on the night of the 22nd. We
 2 are not going to look at everything that you did that
 3 night and into the next day, but is it right to say that
 4 when you first became aware of the incident, you were in
 5 bed?
 6 A. I was, yes, asleep.
 7 Q. But you were on call in the sense that you were
 8 available to be contacted if you were required?
 9 A. Yes, I was on call 24/7.
 10 Q. Let’s have a look at your log. {INQ014796/1}. We will
 11 just bring up page 1 first so that everyone can see the
 12 nature of this document. This, as we can see, is your
 13 decision log; is that right?
 14 A. It is, yes.
 15 Q. {INQ014796/3}, please, Mr Lopez.
 16 We can see that the — if we look at the titles of
 17 each of the columns, the largest has:
 18 “Detail of decision (D), rationale (R), action (A).”
 19 I’m sure they speak for themselves, but are you
 20 trained to identify the type of behaviour that you are
 21 engaging in and separate them out using the D, R and A
 22 letters?
 23 A. Yes, we are. It has been, and I think it’s been pointed
 24 out, that our — certainly mine, looking at it
 25 subsequently, yes, it could be well improved. I think

34

1 NWS has tried to improve that and we now have a cadre
 2 of 57 on—call volunteers to come in on a cascade system
 3 to actually offer that support and loggists who are
 4 specifically loggists and we actually have 52 trained
 5 now within the control rooms to supplement the on—call
 6 loggists as well.
 7 Q. You were at home. So you didn’t have access to
 8 a loggist when you were first contacted about it. We
 9 can see the first entry is 22.50. We’ve got an R
 10 identified, and then:
 11 “Call from GM EOC, reference to an explosion/bomb
 12 with gunfire at Manchester Arena and was...”
 13 What is that next word?
 14 A. “About.”
 15 Q. “... about to mobilise to scene.”
 16 A. “Asked.”
 17 Q. Thank you very much.
 18 SIR JOHN SAUNDERS: I was just about to say that the writing
 19 looks awfully neat. That doesn’t mean it’s legible but
 20 it’s awfully neat. Were you doing it at the time?
 21 A. No.
 22 SIR JOHN SAUNDERS: You made notes?
 23 A. I made a few sort of very basic notes. This was
 24 written, as far as I can recall, about 3 o’clock the
 25 following afternoon. I went home at 8, slept for

35

1 a couple of hours and then got up and wrote the notes.
 2 MR DE LA POER: Within NWS, if we go back to the first
 3 page, I think there is a marker on the bottom of the
 4 page which indicates — yes, we can see there in white
 5 text that there is an expectation that this log will be
 6 returned within 72 hours of the incident stand—down.
 7 A. Yes.
 8 Q. So there wasn’t an expectation in May of 2017 that you
 9 would create this log contemporaneously?
 10 A. No, you would use your pocketbook if required.
 11 SIR JOHN SAUNDERS: Did you send — you said you made some
 12 notes at the time. Did you pass them — send them in as
 13 well?
 14 A. So when I was in — initially informed of the incident,
 15 my notes were — I was literally — I informed
 16 Steve Taylor could he do the TAC AD bit while I was
 17 driving to scene, because you can’t actually follow
 18 an action card while you are driving on blue lights. So
 19 that was simply it until I got to the arena at 12.10.
 20 SIR JOHN SAUNDERS: Okay.
 21 A. There’s nothing other than driving.
 22 SIR JOHN SAUNDERS: Right.
 23 MR DE LA POER: What we are going to do now is just have
 24 a look at that notification transcript.
 25 Mr Lopez, {INQ015355T/1}.

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1 We can see from the top, before we crop in, that
 2 this is a short call, 1 minute and 51 seconds, timed at
 3 22.49. If we just crop in so we can see the text of the
 4 call, please, we are not going to read it all out. I'll
 5 seek to summarise it and you I hope can read along to
 6 confirm it's accurate.
 7 We can see that you identify yourself and are
 8 informed that had a bomb has gone off; is that right?
 9 A. It is, yes.
 10 Q. You inform that you are one of the on-call TAC advisers,
 11 together with Steve Taylor?
 12 A. Correct.
 13 Q. And they say:
 14 "Can I get you going to this incident, please?"
 15 To which you reply:
 16 "Certainly."
 17 You seek some further information; is that right?
 18 A. Yes.
 19 Q. And then if we go over the page you say at the top:
 20 "I'll get hold of Steve as well."
 21 Would it ordinarily be the case that the EOC would
 22 contact the TAC advisers?
 23 A. EOC would contact the initial TAC adviser. Then the
 24 subsequent, if required, would be contacted by the
 25 TAC — the first initiating TAC adviser. Otherwise the

37

1 controls wouldn't know whether the second one was
 2 needed, so it would have to be the choice of the initial
 3 TAC adviser.
 4 Q. Thank you very much indeed. So we can take that down.
 5 We can see there, hopefully plainly, that you didn't
 6 know about the incident before 22.49; is that right?
 7 A. That's quite correct.
 8 Q. And that what you said you would do immediately after
 9 you'd concluded that call, which would have been about
 10 22.51, is that you would contact Steve Taylor?
 11 A. Correct.
 12 Q. Did you do that?
 13 A. Yes.
 14 Q. And when you spoke to him, was he aware of the incident?
 15 A. No.
 16 SIR JOHN SAUNDERS: Were you driving by then?
 17 A. No, I was still at home.
 18 MR DE LA POER: You had been instructed in the call by the
 19 EOC to go to the scene; is that right?
 20 A. Correct.
 21 Q. Did you discuss with Mr Taylor where you would deploy
 22 to?
 23 A. I informed Steve that I'd been asked to go to the scene.
 24 I'm not sure whether it's because I'm AITC and, as we
 25 mentioned earlier, it's a question of not necessarily

38

1 what's happened, but what potentially could happen.
 2 So I mobilised to scene and I asked Steve to follow
 3 the TAC AD support from home — well, can he just follow
 4 it, which I assumed would be from home.
 5 Q. So he was stepping into your shoes for the period of
 6 your journey at the very least?
 7 A. Yes.
 8 Q. You said that you asked him to play the TAC AD role, the
 9 tactical adviser role. Did that come packaged up with
 10 the NILO role?
 11 A. Yes.
 12 Q. So you weren't just asking him to act as a tactical
 13 adviser. You were saying: I need you to do both the
 14 tactical adviser and the NILO role?
 15 A. Quite correct.
 16 Q. Did you have with you equipment that had been issued to
 17 you by NWSA?
 18 A. I did, yes.
 19 Q. And did that equipment include your MTF kit?
 20 A. It did, yes.
 21 Q. So you had PPE that would have given you some protection
 22 in a Plato warm zone?
 23 A. In — yes.
 24 Q. I don't want to know exactly where you were living at
 25 the time, but what was the approximate journey time at

39

1 that time of night between where you were living and the
 2 Manchester Arena?
 3 A. I left home, I would say — at the time of night, maybe
 4 40/45 minutes. I used to live in Manchester, so I know
 5 how long it takes. So possibly 40, maybe 45, at that
 6 time of night.
 7 Q. So you might have been able to arrive at the arena some
 8 time shortly after 11.30?
 9 A. I actually — no, because you've got to appreciate I was
 10 in bed.
 11 Q. Yes.
 12 A. I had to get dressed and then move out of the house.
 13 SIR JOHN SAUNDERS: And make the phone call.
 14 A. And make the phone call. So I wouldn't imagine I would
 15 have left much before 11 o'clock — well, I don't think
 16 I would have left before 11 o'clock. I'm not sure what
 17 time but what I do know is I was approaching Salford
 18 Crescent at around about 11.47 and I was told to go to
 19 GMP headquarters.
 20 At that point I said, "I'm nearly there, are you
 21 sure you want me to go?", and I carried on going, and
 22 then I got the confirmation, "Yes, please go to GMP".
 23 Q. We will come to that in a moment. There is another call
 24 that I just want to deal with you with, and again we
 25 perhaps can time whether you've left the house by the

40

1 time you receive this call.
 2 {INQ015507T/1}. This is a call timed at
 3 22.56 hours. It's rather longer. If you can please
 4 just turn to {INQ015507T/2}.

5 You'll see -- towards the top of that page you will
 6 see that:
 7 "TA: Hi Jon."
 8 And then following:
 9 "John, it's Joe from Control."
 10 "Right."
 11 Is this a transcript -- I can see you appear
 12 (overspeaking)?

13 A. Yes.
 14 Q. Is this bringing it back?
 15 A. It is, yes. I received that whilst being still at home.
 16 Q. You were still at home, and what we can see you saying
 17 is:
 18 "Right Steve Taylor is going... and he is going to
 19 help you with make sure command structure and all that
 20 side of it while I'm going to make my way."
 21 So the language suggests that you are yet to leave,
 22 but you have plainly spoken to Mr Taylor by this point?
 23 A. Yes.
 24 Q. There is then mention of SORT. Do you see that?
 25 A. Yes, somebody from the SORT team.

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1 SIR JOHN SAUNDERS: This relates to someone who is ringing
 2 in offering to come in, a member of the SORT team?
 3 A. Yes. It wasn't actually to me.
 4 MR DE LA POER: If we then go over the page {INQ015507T/3}
 5 the answer at the top is in response to your question,
 6 "Who is Silver?" You are told it's Annemarie Rooney.
 7 You ask a question:
 8 "Have you got a Talk Group designated?"
 9 Is that a reference to an internal NWS Talk Group
 10 for a tri-service Talk Group?
 11 A. At that time it would have been the NWS Talk Group.
 12 Q. Why would it only -- why would it have been the NWS
 13 Talk Group as opposed to looking for interoperability?
 14 A. Steve was going to be dealing with that. I wanted
 15 situational awareness of what was actually occurring at
 16 scene from an NWS point of view. The interoperability
 17 Talk Group may have given me some indication of what was
 18 transpiring on the wider, but I wanted that shared
 19 situational awareness of what was actually happening on
 20 the ground from an NWS point of view, because that's
 21 where I was actually going.
 22 Q. And then we can see that you are given Hunts Bank as the
 23 RVP.
 24 SIR JOHN SAUNDERS: But you are told it hasn't been set up
 25 yet; is that right?

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1 MR DE LA POER: That is what it says initially, and then you
 2 say:
 3 "No, it's all right. Hunt Back bridge, you say?"
 4 "We are trying to find that RVP."
 5 "I'm just trying to find it in Manchester."
 6 "Hunts Bank."
 7 "Hunts Bank, that'll be right. Okay, sorry about
 8 that."
 9 A. I used to work in Manchester and when they said Hunts
 10 Bank I was a little bit thrown at the very beginning and
 11 then it all came back once I had Googled it as to where
 12 it was.
 13 Q. Thank you very much, Mr Lopez.
 14 At the conclusion of this call did you intend to
 15 travel directly to Hunts Bank at the -- just outside the
 16 arena?
 17 A. Yes.
 18 Q. You have mentioned some other calls that you had while
 19 you were en route, in particular by reference to Salford
 20 Crescent. Did you speak to Mr Taylor whilst you were
 21 travelling?
 22 A. Yes, I did.
 23 Q. And how many times do you think you spoke to him in the
 24 course of your journey?
 25 A. I would suggest certainly two, there may have been

43

1 a third. I don't recall.
 2 Q. In the course of those conversations with Mr Taylor was
 3 there any discussion about where you might go?
 4 A. Yes. Certainly when I was at Salford Crescent, I was
 5 asked then to go to GMP, but as you will appreciate,
 6 where Salford Crescent is in relation to GMP
 7 headquarters, the actual route would take you up to the
 8 arena where the old Boddington's factory would have
 9 been -- sorry, I don't know the actual road. I'll have
 10 to look. So I carried on down there and then turned
 11 left at the lights when I was confirmed that they
 12 definitely wanted me to go to GMP headquarters.
 13 SIR JOHN SAUNDERS: So how far were you away from the arena
 14 at the time you were told to go to police headquarters?
 15 A. Initially Salford Crescent.
 16 SIR JOHN SAUNDERS: I'm really sorry. When you are at
 17 Salford Crescent, how long in travelling time?
 18 A. Two minutes, 1.5 minutes. And then he came back to me
 19 and at that point I was at the lights at the bottom of
 20 the arena, literally the corner of the arena.
 21 SIR JOHN SAUNDERS: Yes.
 22 MR DE LA POER: So that was about 22.47 (sic), did you say?
 23 A. I would say 22.47/22.50, something in those region.
 24 Q. Thank you very much. As the words escaped my lips,
 25 thank you very much, Ms Roberts, 23.47.

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1 In the course of the conversation that you had with
 2 Mr Taylor while you were travelling, was the fact that
 3 you had AITC training mentioned?
 4 A. No, that I — I mentioned that to Steve, as far as I'm
 5 aware, on the initial call. I said, "I have been asked
 6 to go to scene, I'm an AITC", which I know Steve
 7 wasn't —
 8 Q. Right.
 9 A. — so I've got further capabilities and training in
 10 relation to terrorist — style incidents.
 11 Q. Is that something he would have known in any event?
 12 A. Yes, I work very closely with Steve and we know who is
 13 AITC trained because at the time the cadre wasn't that
 14 large.
 15 Q. When you were told that you were no longer directed to
 16 scene, did you discuss the rationale behind that or just
 17 simply accept what Mr Taylor was saying to you and
 18 change your intended distinction?
 19 A. I said, "Are you sure because I'm AITC trained", and at
 20 that point, "No, Annemarie would like you up at GMP
 21 headquarters". So off I went to GMP headquarters.
 22 Q. We are going to look at one more piece of transcript
 23 before we —
 24 SIR JOHN SAUNDERS: Is that your phone or someone else's?
 25 There's a phone going. Don't worry. I'm not being

45

1 accusing about it. Just you were looking vaguely
 2 surprised.
 3 A. No, it could have been me with my top. I do apologise.
 4 SIR JOHN SAUNDERS: That's all right. It makes a noise,
 5 does it?
 6 A. Sometimes is it clicks.
 7 SIR JOHN SAUNDERS: Don't worry. Forget all that.
 8 MR DE LA POER: {INQ034311/1}, please.
 9 Your call sign on the night was 0993; is that right?
 10 A. Yes, it was.
 11 Q. So this is a broadcast from you to Annemarie Rooney; is
 12 that right?
 13 A. Yes.
 14 Q. It's timed at shortly before midnight. You broadcast
 15 that you were in the city centre and you ask her:
 16 "Do you want me to come up to GMP or do you want me
 17 to assist at the scene?"
 18 And you are asked to come to Central Park and then
 19 tactical TCG, and then you say you're on your way.
 20 A. Yes, I would imagine, looking at the times and the times
 21 I mentioned earlier, that would have been when I was on
 22 the corner of the arena and...
 23 Q. So the conversations you have told us about with
 24 Mr Taylor, did they occur before this or after it?
 25 A. Before.

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1 Q. So you had already been told by him that Ms Rooney
 2 wanted you to go to Silver?
 3 A. Yes, I did. I still carried on that same route because
 4 that is actually the route to GMP headquarters. So
 5 I didn't deviate; it was just I carried on along that
 6 same route.
 7 Q. I think it took you from the time of this call about
 8 another 20 minutes to arrive at GMP HQ?
 9 A. Less than that. It's because when you park at GMP,
 10 you've then got a long walk up to the room. So it would
 11 have been less than that. I arrived in the room at
 12 around about 10 past.
 13 Q. Thank you very much indeed, Mr Lopez. We can take that
 14 down.
 15 So you are in the Silver room at GMP headquarters
 16 and you indicate in your statement that shortly after
 17 you arrived Mr Barnes arrived?
 18 A. He did, yes.
 19 Q. Whilst you were in the Silver room you spoke to
 20 Mick Lawlor from GMFRS?
 21 A. Yes. I spoke with Mick.
 22 Q. And I think you also at one point spoke to the police
 23 Silver commander?
 24 A. Yes, Mr Hill.
 25 Q. Mr Hill.

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1 At the point that you had arrived in the Silver room
 2 at GMP, did you understand that Operation Plato had been
 3 declared?
 4 A. Not when I arrived. To the best of my recollection,
 5 obviously, I overheard somebody mention Plato. Myself,
 6 Annemarie and Mick Lawlor went over to Mr Hill and said,
 7 you know, have we just — at that point he said, "Yes,
 8 it is a Plato, it was declared at — very shortly after
 9 the incident occurred". That was unknown to us. It
 10 didn't make any difference to us because actually —
 11 we'd actually already moved all the patients down from
 12 the City Room and were on the foyer, and actually
 13 dealing with the casualty clearing station —
 14 Q. I'm sorry to interrupt, but when you say it didn't make
 15 any difference to you, do you mean that at the point you
 16 were told, after midnight, it didn't make any
 17 difference?
 18 A. Yes, it did. That's correct.
 19 SIR JOHN SAUNDERS: Okay. In your understanding of
 20 a declaration of Plato, does there have to be
 21 a confirmed shooter or not?
 22 A. So only the police can actually declare Plato.
 23 SIR JOHN SAUNDERS: But what it means to you is quite
 24 important.
 25 A. Yes. It would be a declared shooter, confirmed shooter.

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1 SIR JOHN SAUNDERS: Confirmed shooter. You had actually --
 2 on the original phone call, you had been told that there
 3 was a shooter.
 4 A. On the initial call I had been told it was a bomb, query
 5 nail. My log is incorrect because I have written it
 6 later.
 7 SIR JOHN SAUNDERS: Later?
 8 A. My mind must have wandered and I put in -- because
 9 obviously there was question marks over whether or not
 10 there was any shooting.
 11 SIR JOHN SAUNDERS: Right. Now, the police interpretation
 12 is rather different. So the police interpretation is:
 13 declare Operation Plato because there may be an active
 14 shooter. That's not your understanding of it?
 15 A. If the police have intelligence to assume, then yes,
 16 I would say the police are right as they have got the
 17 intelligence to say there could be a Plato incident.
 18 SIR JOHN SAUNDERS: Did you understand it that way at the
 19 time?
 20 A. Personally, I would have gone with -- if it's a Plato
 21 incident, it's yes or no. So no, I wouldn't have
 22 thought it was discretionary.
 23 SIR JOHN SAUNDERS: And the other thing the police would say
 24 or do say is Operation Plato, it's not just relating to
 25 one particular building, it's applying to an area

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1 because the other shooters can appear anywhere in an
 2 area. And therefore although it may be that the arena
 3 is clear of a shooter and they've done all the checks,
 4 they wouldn't necessarily get rid of Plato or cancel it,
 5 or whatever you want to call it, because there may be
 6 someone else there and they need the resources.
 7 A. Yes, I would agree with that. It's not just specific to
 8 one building because it's a marauding situation.
 9 SIR JOHN SAUNDERS: But what is critical to you is whether
 10 they have declared any part of the arena to be a red --
 11 a hot zone and it still is a hot zone. Everyone seems
 12 to be concerned with the declaration of Plato rather
 13 than with the concern of whether it's actually safe for
 14 you to be in parts of the -- all parts of the arena.
 15 A. Yes, that's correct. It's -- with Plato, you come
 16 across the hot/warm zones.
 17 SIR JOHN SAUNDERS: Which means something different from
 18 your plan, which is another confusion. But what I'm
 19 saying is you shouldn't be really concerned with
 20 necessarily just with the declaration of Plato. It's:
 21 are there any hot zones in the area that you may wish to
 22 operate? Isn't that the critical point for you?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: And did you understand or was that
 25 generally the understanding of the Ambulance Service at

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1 the time?
 2 A. I would say so, yes.
 3 SIR JOHN SAUNDERS: You would? Okay. So you would have
 4 been concerned with -- when you heard that Plato had
 5 been declared at this rather late stage, would you be
 6 saying: well, are there any hot zones actually in the
 7 arena?
 8 A. I actually -- Annemarie and myself, and I think
 9 Mick Lawlor, actually asked, "Is there any danger of any
 10 firearms incidents?", and the answer was no.
 11 SIR JOHN SAUNDERS: Okay, thank you.
 12 MR DE LA POER: Following the incident you prepared
 13 a document which is entitled "Personal thoughts and
 14 observations"; is that correct?
 15 A. It is, yes. I wrote it as soon as I got up -- woke up
 16 on the following day.
 17 Q. It's timed at 13.40 hours on 23 May?
 18 A. Yes.
 19 Q. Why did you prepare that?
 20 A. I just wanted to get my own thoughts of the incident
 21 down on paper to weigh -- just to actually try and
 22 express my own feelings on the matter.
 23 SIR JOHN SAUNDERS: It's a really good idea. Was anyone
 24 making any suggestions in NWSA that you should be doing
 25 that?

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1 A. No, not at all.
 2 MR DE LA POER: I'm just going to pick out some matters in
 3 it. We can bring it up on screen if we need to but
 4 I will just I'll try and read fully parts of what you
 5 have put.
 6 What you say about your arrival is this:
 7 "On arrival at the TCG at 00.10 my first impression
 8 was that Annemarie Rooney needed a few minutes to take
 9 a breath as she was going from one phone call to
 10 another. It took about 15 minutes for me to get
 11 a briefing and in this time Neil Barnes arrived."
 12 A. That's correct.
 13 Q. When you arrived what was your impression about how
 14 Annemarie Rooney was coping with her role as tactical
 15 commander?
 16 A. I thought she was extremely busy because she was going
 17 from one phone call to a second phone call. Once I got
 18 the briefing, my impression was she'd got a very good
 19 handle on the situation. I sat down with her. She
 20 briefed me. We went through her action card, just to
 21 make sure -- which is my role, just to make sure, so
 22 I always have an action card.
 23 We made sure that actually she'd done everything she
 24 was meant to do, and my impression was she had a very
 25 good handle on the incident.

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- 1 Q. You also say in this document that:
 2 "Steve Hynes [and I'm quoting here] hampered the
 3 normal chain of command that had been agreed for this
 4 incident and Annemarie Rooney was always playing
 5 catch-up to the scene."
 6 A. So by that what I was meaning was normal -- according to
 7 the major incident plan, as you are aware, it goes
 8 operational, tactical, strategic, and the tactical is
 9 making the tactical plan and actually directing.
 10 When Steve arrived on the scene some of that was
 11 taken away from Annemarie because a lot of decisions
 12 were being made on scene.
 13 I also say in the statement I do not believe it
 14 hampered and affected any form of patient care,
 15 and I actually believe that NWSA should take a more
 16 pragmatic approach to scene management, and by that,
 17 just to clarify my own personal thoughts are that Fire
 18 Service tactical goes on scene and sometimes it would
 19 be, because we are mobile, we sometimes quite often get
 20 tactical commanders arriving at an operational scene.
 21 So why not set up tactical alongside the Fire Service
 22 tactical and have -- yes, we have got our own procedure,
 23 which is the ideal, but let's have some options just in
 24 case and take a more pragmatic approach to it and adapt.
 25 Q. Let's just build on that answer if I may. I was going

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- 1 on to read and I will read:
 2 "On saying this, it appeared to work well on the
 3 scene from what information I gathered. I think NWSA
 4 should think hard about changing its rigid approach to
 5 C2 and if a senior manager goes to scene and takes over
 6 command, a fallback could be similar to that of the
 7 FRS."
 8 Is that capturing in part what you have just told us
 9 about the need for flexibility?
 10 A. Yes, C2 is command and control.
 11 Q. And as we know, Annemarie Rooney went to the force
 12 headquarters of GMP. With the benefit of hindsight, do
 13 you think that was the right place for the Silver
 14 commander to go for NWSA?
 15 A. At the time, yes, because we co-locate with the police
 16 and that is where the police were setting up their
 17 Silver Control. Fire Brigade would have had the
 18 tactical on scene, but it would have sent a tactical
 19 liaison to act as the go-between/liaison between the
 20 scene and the other agencies into that GMP headquarters.
 21 So, yes, Annemarie was at the right place at the right
 22 time.
 23 Q. I think you have said that NWSA, for the future, might
 24 consider adopting the same model as the Fire and Rescue
 25 Service?

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- 1 A. If the situation arises. TCGs are run differently in
 2 many counties. Not all counties have tactical groups
 3 actually at police HQ. Some have localised TCGs and
 4 utilise fire stations or police stations nearer to the
 5 scene.
 6 So it's a very different -- you've got to take it in
 7 context. Each area is very different. GMP have their
 8 tactical at GMP headquarters, so therefore it was the
 9 right place for Annemarie to go.
 10 Q. You say the GMP have their tactical at headquarters.
 11 There exists a question that the inquiry is exploring as
 12 to whether or not a Silver command commander should have
 13 gone from GMP to the scene to command the unarmed
 14 assets. If it were the case that GMP was sending
 15 a Silver commander to the scene, should NWSA also be
 16 doing the same or do you think that still the force
 17 headquarters is the best place for them to go?
 18 A. No, we need to co-locate with the appropriate person.
 19 So police, fire, we would co-locate with them. If the
 20 police Silver went to scene, we need to go to scene to
 21 have that joint understanding together.
 22 Q. Further aspects, just one or two to pick out from your
 23 personal reflection document.
 24 You say that you didn't feel that there was a shared
 25 situational awareness about the incident amongst the

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- 1 agencies present in the TCG.
 2 A. Yes. I'd spoken to Mick and shortly after getting there
 3 I became aware that the Fire Service weren't on scene,
 4 but there was no ballistic presence. So I wasn't quite
 5 sure why. So therefore there is that -- not that shared
 6 situational awareness which was quite evident.
 7 SIR JOHN SAUNDERS: Also the Ambulance Service didn't know
 8 that Plato had been declared --
 9 A. Yes.
 10 SIR JOHN SAUNDERS: -- until a late stage, so there wasn't
 11 much situational awareness about that either.
 12 A. No.
 13 MR DE LA POER: You go on to say:
 14 "The multi-agency approach and interaction within
 15 the TCG appeared to work but I realise my current work
 16 environment means that all responders are closer as are
 17 officers are next door to each other."
 18 Is that a reference to Merseyside?
 19 A. Yes, in Merseyside I work within the police contingency
 20 planning and Fire Service -- well, at the time, I have
 21 actually moved since. All the contingency planning for
 22 police, fire, and the local resilience forum all work in
 23 one single office. Consequently, everybody knows
 24 everybody, there's a very good working relationship, the
 25 Silver room is actually next door to us.

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1 Obviously Manchester is a much, much bigger area,
2 and I don't think that would necessarily work. I think
3 you've got to take each area individually. One size
4 does not fit all.

5 Q. Just the phrase that you used:

6 "The multi-agency approach and interaction within
7 the TCG appeared poor."

8 A. So what I would have expected to see would be the
9 tactical commanders being taken to one side, whether it
10 be in a meeting room or just to one side, and having
11 that shared situational awareness. A joint decision
12 model, going round a joint decision model, getting all
13 of that information out.

14 Personally, I don't think I saw much of that. I saw
15 the police commander stand up and just literally go
16 round the room from where we were sat.

17 So no, I don't think there was that fantastic normal
18 interaction. However, I would say that certainly when
19 I got there -- and I know Annemarie had had a couple of
20 conversations with the police, so some -- so
21 communications had taken place. Obviously I wasn't
22 there, so I can't comment on what the nature of that
23 was, but once I got there, once I got the briefing, we'd
24 started actually moving patients off the scene, so those
25 meetings weren't as relevant to my organisation.

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1 SIR JOHN SAUNDERS: I think she had been asking for a
2 meeting for some time and it didn't happen until 2.30 or
3 thereabouts, that's an approximate time.

4 A. But we'd actually started moving patients off scene.

5 SIR JOHN SAUNDERS: So it's all over, really? The incident,
6 of course there's forward planning and things like that
7 to do, to make sure that business as usual operates.

8 A. Yes.

9 MR DE LA POER: One final part of your reflections document
10 is you say of yourself:

11 "I felt like a spare part as advice was not needed
12 in the TCG due to decisions being made at the screen."

13 A. Yes, because I'm there to support Annemarie and I know
14 conversations were taking place between fire and
15 ambulance on scene.

16 But, again, what I would say is at this the time
17 I had actually got there, all the patients were down
18 from the City Room, as you know, for some time -- and
19 had actually started, by the time of the briefing,
20 started to move off scene.

21 So any advice, if you want, wasn't going to be as
22 important because we'd actually dealt with the scene and
23 were dealing with the patients.

24 There was subsequently a couple of conversations
25 which I dealt with off on my side which was relating to

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1 patients on coaches and suchlike, but other than that,
2 Annemarie's part had taken all of the decision-making
3 already. There was a few things going on on scene, but
4 that's what I'm saying in relation to -- I was not that
5 much use, but I'm not just there to offer the tactical
6 advice and the liaison. I'm also there as an extra
7 person for Annemarie, as support.

8 SIR JOHN SAUNDERS: All right, but clearly your view is, and
9 you are not really disguising it, that you think you
10 would have been much better off at scene.

11 A. On this particular incident --

12 SIR JOHN SAUNDERS: Okay.

13 A. -- I think I may have -- looking at the timeline, if we
14 look at the timeline, probably not because all the
15 patients were actually down from the City Room at that
16 point, and the interaction and the liaison, some of it
17 would have already taken place.

18 So normally --

19 SIR JOHN SAUNDERS: But getting the ambulances there,
20 getting the hospital dispersal to work right, a very
21 important part of the whole organisation still had to
22 happen.

23 A. Yes, but the dispersal plan is linked to the casualty
24 clearing station and the medics on scene.

25 SIR JOHN SAUNDERS: Okay. We will come back to that in

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1 a minute, if we may. But the position is that there is
2 Mr Taylor who also has the same job as you. He is
3 operating from home on the phone. Is there any reason
4 why a tactical adviser shouldn't be advising
5 Annemarie Rooney from home on the phone?

6 A. No.

7 SIR JOHN SAUNDERS: So what is he doing while you're in the
8 Silver command room?

9 A. I remember Steve -- there were two of us on duty for the
10 whole of the north-west, so business has to go on. Once
11 I had arrived on scene, I would imagine Steve then took
12 a step back because he is the only person on call for
13 the rest of the north-west.

14 MR DE LA POER: We should bear that in mind and Mr Taylor in
15 mind when we hear the answer to the next question.

16 Up until 00.10, when you arrived, did you give any
17 tactical advice?

18 A. No.

19 Q. Up until 12.10 when you arrived, did you undertake any
20 of the role of the NILO?

21 A. No.

22 Q. We will hear from Mr Taylor later this morning, but your
23 plan had been, as I understand it, that he do all of
24 that whilst you were concentrating on driving safely to
25 get to where you needed to get to?

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1 A. Correct.
 2 Q. I would just like to conclude, insofar as we haven't
 3 dealt with it already, with JESIP. We have looked at
 4 communication and you have told us candidly that
 5 communication didn't work well so far as the
 6 interoperability radio conversation is concerned.
 7 Co-location at the scene. I think it's your view
 8 that that didn't work well either, certainly not in the
 9 first hour or so; is that fair?
 10 A. That's fair because only two agencies out of three were
 11 actually there.
 12 Q. There were only two agencies and there was no
 13 co-location of the two commanders in that period?
 14 A. Yes.
 15 Q. One of the ways in which JESIP seeks to achieve
 16 co-location is through a forward command post.
 17 Different people have given different views about the
 18 practicalities of establishing a forward command post
 19 within the timeline of an unfolding incident.
 20 You were a JESIP trainer before this?
 21 A. Yes.
 22 Q. What was the expectation in May 2017 about the speed at
 23 which a forward command post would be established?
 24 A. So if I take you to a normal incident, whether it be
 25 whichever, you immediately get mobilised to an RVP,

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1 rendezvous point. So all the resources from the
 2 agencies go to the rendezvous point. As soon as you've
 3 got that initial resource on scene, you will then --
 4 whichever would then look at setting up an FCP near to
 5 the scene, in a safe environment but as close to the
 6 scene as practically possible.
 7 So FCPs could be set up dependent on the person that
 8 actually arrives saying, "I'm now the command post,
 9 everybody come to me". It could be within minutes or it
 10 could be half an hour down the line. But it could be
 11 within minutes.
 12 If you think of our major incident plan, which
 13 I know you've extensively researched, the first
 14 ambulance on scene gets to the scene, parks up and
 15 leaves the blue lights up.
 16 That essentially is our command post. And when the
 17 Fire Brigade locate, whoever is first, and we all locate
 18 and the first vehicles have their blue lights on, that
 19 is the FCP, the initial FCP.
 20 The FCP can move as the situation develops, but
 21 initially it has to be set up by somebody. It could be
 22 5 minutes, it could be half an hour, it depends on the
 23 incident.
 24 SIR JOHN SAUNDERS: Would the other services know that if
 25 they see an ambulance there with the lights still on and

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1 parked --
 2 A. And that is --
 3 SIR JOHN SAUNDERS: -- that's the forward command post?
 4 A. That is standard, that the first vehicle arriving at
 5 scene would stick the lights on and leave them on.
 6 However, in this incident there were other agencies
 7 on scene. So --
 8 SIR JOHN SAUNDERS: Do they do the same thing? How do you
 9 know -- if you're there after the police.
 10 A. You would look for the tabards. If there was no blue
 11 lights on, you would look for the tabards. You might go
 12 to the blue lights and say, "Excuse me, who is their
 13 commander", and they would say, "Over there", apologies,
 14 "Over there", and in which case you would go and look
 15 for the tabard. Tabards may seem very simple --
 16 SIR JOHN SAUNDERS: No, no, they are a great idea, provided
 17 the tabard-wearer isn't doing something else, which is
 18 what happened here.
 19 A. Right.
 20 SIR JOHN SAUNDERS: Okay.
 21 MR DE LA POER: From the evidence the inquiry has heard so
 22 far, something resembling an FCP was not established
 23 within the first hour.
 24 Bearing in mind your experience as a JESIP trainer,
 25 and what you know about how the attack unfolded, would

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1 that in training be described as an acceptable state of
 2 affairs or would the training be delivered on the basis
 3 of really, notwithstanding all of the pressures that
 4 everybody was under, an FCP is so important, it really
 5 needed to have been established within that first hour?
 6 A. The FCP is very important. You would expect a commander
 7 to go on scene, to have that link in with their own
 8 staff first, find out what the situation was, and then
 9 call other agencies together and have that -- they call
 10 it over the bonnet, have that FCP, that discussion to as
 11 to where to move forward and how they were going to
 12 conclude the incident to a satisfactory manner.
 13 Q. So even though this was an enormously challenging scene,
 14 have I understood your evidence to be that nonetheless
 15 the FCP is so important that it needs to be prioritised
 16 and established within that first hour?
 17 A. My own opinion is, yes, the FCP is very important to get
 18 that shared situational awareness between all agencies.
 19 SIR JOHN SAUNDERS: And the shared situational awareness,
 20 the critical part of that is a joint assessment of risk?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: So in this situation we have the unarmed
 23 uniformed police officers who consider it safe enough to
 24 work in the City Room and on the overbridge. We have
 25 NWAS who do not consider it safe enough for their

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1 unarmed, other than specialist, teams to work in the
 2 City Room or on the overbridge. And we have the Fire
 3 Service who didn't consider it safe enough to work in
 4 the place where the CCS was.
 5 So we have completely different ideas of situational
 6 risk. How do you cope with that in your training? How
 7 do you train them to deal with that?
 8 A. Get commanders together, go round the decision-making
 9 cycle, and have that shared situational awareness
 10 because without that joint understanding of risk and
 11 that situational awareness, you're not going to get
 12 a cohesive environment to work in. Everybody is going
 13 to be off in their own little silos working to their own
 14 ideas. That's why you need to get together.
 15 SIR JOHN SAUNDERS: So even when we did have a forward
 16 command post, even when we did have commanders talking
 17 together, the Fire Service still had a different idea of
 18 what the risk assessment should be. So how does that
 19 work?
 20 A. The risk assessment to each agency --- you will have an
 21 overall risk assessment which will be based on the
 22 actual incident, and that will be overarching, but each
 23 individual agency may have their own specific risks due
 24 to the fact --- if you think of a chemical risk, the fact
 25 police ---

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1 SIR JOHN SAUNDERS: I don't think we are in that scenario.
 2 I can well understand that there may be different risks
 3 to different people in different situations but that's
 4 not the situation here, I think, but we'll obviously
 5 determine that.
 6 But the Ambulance Service are working on the station
 7 concourse, they've got lots of patients there, and the
 8 initial response of the fire commander is: no, we can't
 9 have firefighters working there.
 10 A. That is just poor communication, shared situational
 11 awareness. I know I keep on saying this, but shared
 12 situational awareness is key. You have to have people
 13 talking and communicating together to enable us to
 14 understand what's actually occurring.
 15 SIR JOHN SAUNDERS: But you can talk for as long as you
 16 like, but that doesn't mean you necessarily agree. So
 17 what happens if you don't agree?
 18 A. The JOPs do allow for two agencies to move forward if
 19 one doesn't. The JOPs quite clearly state that you
 20 don't need all three agencies present and agreeing to
 21 move forward. Otherwise, you would end up with
 22 a situation where you would be reaching an impasse and
 23 nobody would actually go forward. But the JOPs do allow
 24 for that.
 25 MR DE LA POER: Unless you have any more questions at this

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1 stage, that concludes the questions I want to ask.
 2 SIR JOHN SAUNDERS: I do have a couple for you to help me.
 3 A. Okay.
 4 SIR JOHN SAUNDERS: So when you got to the Silver command
 5 suite, you went through with Annemarie Rooney what had
 6 happened, and as far as you were concerned, everything
 7 was fine?
 8 A. As far as I was aware, Annemarie had actioned all of
 9 her ---
 10 SIR JOHN SAUNDERS: So let's look at the problems which can
 11 be identified, whether they were problems or whether
 12 they are explicable is another matter, but that some
 13 people believe happened on the night.
 14 First of all, the fact that insufficient paramedics,
 15 ordinary paramedics, went into the City Room. What had
 16 happened about that in the control room? That overall
 17 problem, what had been done about it that satisfied you
 18 that everything that could have been done had been done?
 19 A. So I looked at what was happening to me at that time in
 20 relating --- that had already happened. We'd got
 21 everybody down. So it's not right at that time of the
 22 incident to start going over something that's just
 23 happened.
 24 SIR JOHN SAUNDERS: That's fair enough. That I understand.
 25 So had they all been moved off to hospital by then?

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1 A. No. By the time I got to the briefing, we'd started
 2 moving patients off.
 3 SIR JOHN SAUNDERS: Right. There could be an argument that
 4 the hospital dispersal plan was actually activated
 5 rather late in the day. Was that something that you
 6 thought of as a tactical adviser?
 7 A. No, because once we receive a call saying "mass casualty
 8 incident" and NHS England are aware, then we notify all
 9 of the local receiving hospitals. We also notify all of
 10 the wider receiving hospitals, and if they're aware that
 11 there's a bomb and a mass casualty incident, I would
 12 suspect that they already know they are going to get
 13 casualties, but that is where NHS England as well ties
 14 into us.
 15 SIR JOHN SAUNDERS: So the mass casualty dispersal plan was
 16 still in draft at the time?
 17 A. Yes, but it was able to be worked.
 18 SIR JOHN SAUNDERS: But it was activated?
 19 A. It was a working draft.
 20 SIR JOHN SAUNDERS: But the query is whether it was
 21 activated soon enough.
 22 A. Yes. I'm not quite sure ---
 23 SIR JOHN SAUNDERS: So you think it happens automatically?
 24 A. It happens automatically, and the first time you're
 25 going to move somebody off scene, you're going to --- you

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1 have to have looked at that to find out where to move
 2 the patients.
 3 SIR JOHN SAUNDERS: Right. But we've heard about
 4 conversations going on between Annemarie Rooney, when
 5 she's asked about the plan, how many go where. She then
 6 goes and looks it up. She then rings back to the CCS or
 7 Dan Smith to tell them how many go to each hospital
 8 under the plan, which all happens, it may be -- we will
 9 have to see -- fairly late in the day.
 10 The loading officer needs to know these things
 11 before he can send anybody off, how many can he send to
 12 this hospital, how many can he send to that
 13 hospital, as I understand it.
 14 A. Yes, that's correct. What I would say is it's the
 15 medics in there that are still dealing with the
 16 patients. So you've got a situation where until the
 17 patients have been assessed for their injuries and
 18 specific requirements, because you've got specialities
 19 within that dispersal plan. Not all hospitals are
 20 equal, if you pardon the expression. Some have
 21 specialities, some are trauma centres, some are trauma
 22 units. So until you've got all of that information --
 23 SIR JOHN SAUNDERS: Well, actually I think the information
 24 which goes back from Annemarie Rooney to Dan Smith, who
 25 gives it to the loading officer, is X P1s to that

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1 hospital, X P1s to another hospital. I don't think it
 2 actually -- I don't think she was dealing with
 3 specifying the particular specialities.
 4 A. The clinicians on scene will know that neuro goes to
 5 certain hospitals, burns go to a certain hospital. That
 6 is common knowledge. So they would be targeting
 7 patients, sending the kiddies to the Royal Manchester
 8 Children's. It would be happening. It may not
 9 necessarily -- but the latest trauma -- dispersal plans,
 10 which are now not far off, certainly regional, actually
 11 specify specialities in them as well.
 12 SIR JOHN SAUNDERS: There may be now but -- and they may
 13 have done at the time, but not what Annemarie Rooney was
 14 conveying to Dan Smith because we've seen the
 15 transcripts of what was being said.
 16 A. I would have expected Dan Smith to know, as a consultant
 17 paramedic, where the specialities were and if he'd got
 18 two P1s, one with a head injury and one not with a head
 19 injury, he would have sent the head injury through to
 20 Salford.
 21 SIR JOHN SAUNDERS: Right. Now, the other thing they were
 22 having to do was wait for further ambulances to come
 23 actually to the scene because they'd got some -- people
 24 had come off ambulances in order to help look after the
 25 patients in the CCS so those ambulances couldn't be

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1 used, as I understand it.
 2 Was that going smoothly when you arrived and were --
 3 was there a regular flow of ambulances?
 4 A. I was informed that we'd got enough resources to deal
 5 with the incident and we'd got a steady flow of
 6 ambulances. In fact we --
 7 SIR JOHN SAUNDERS: Who told you that? Annemarie Rooney?
 8 A. Annemarie.
 9 SIR JOHN SAUNDERS: Okay. Right. Thank you very much.
 10 MR DE LA POER: Would now be a convenient moment to take
 11 a 15-minute break?
 12 SIR JOHN SAUNDERS: Yes. Thank you.
 13 (11.05 am)
 14 (A short break)
 15 (11.23 am)
 16 MR DE LA POER: Sir, if I may turn now to the core
 17 participants with permission under Rule 10. First,
 18 Mr Horwell QC please on behalf of Greater Manchester
 19 Police.
 20 Questions from MR HORWELL
 21 MR HORWELL: Thank you, sir.
 22 Mr Butler?
 23 A. Speaking.
 24 Q. There's reverberation my end. Is there at your end,
 25 sir?

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1 SIR JOHN SAUNDERS: No.
 2 MR HORWELL: It's now stopped. Thank you.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR HORWELL: Mr Butler, there's a schedule which I know is
 5 on your list of documents and I hope you have seen it.
 6 If it could be put on the screen, please, {INQ041227/1}.
 7 Mr Butler, you've seen that document and you are
 8 familiar with it, I hope.
 9 A. Yes.
 10 Q. And it shows -- the first Talk Group we can ignore
 11 because it's for police forces only. But the second
 12 Talk Group, the multi-agency Hailing Talk Group, that is
 13 something with which you were familiar?
 14 A. Yes, this document actually relates to the police. It's
 15 not specifically for the police this because it's
 16 a police Hailing Talk Group and it's a police document,
 17 not a multi-agency document.
 18 Q. Mr Butler, that's why I asked you to ignore the first on
 19 the list. That's for police forces only. But the
 20 second Talk Group on the list, the multi-agency Hailing
 21 Talk Group, that is something with which you were
 22 familiar?
 23 A. Yes.
 24 Q. And it is referred to in your debrief document of 2015
 25 and, as you can see from this schedule, it is a Talk

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1 Group that is monitored 24 hours a day by GMP.
 2 A. Correct.
 3 Q. And you knew that at the time?
 4 A. Yes.
 5 Q. And you would have expected all emergency services to
 6 have been aware of the multi-agency Hailing Talk Group?
 7 A. It's a multi-agency Hailing Talk Group, so if you want
 8 to speak to the police. So the Ambulance Service has
 9 their own Hailing group and the Fire Service have
 10 theirs. So if we want to speak to the police we would
 11 drop on that Talk Group to say, "Hello, police". If
 12 they needed the Ambulance Service, vice versa, they
 13 would speak to us on our Hailing Talk Group.
 14 Q. They would do likewise. So if either the Ambulance
 15 Service or the Fire Service needed to speak to the
 16 police, this is one convenient and easy way of doing so?
 17 A. Yes. Control room to control room, yes.
 18 Q. And then the other two entries on that schedule --
 19 unfortunately, as you know, we cannot refer to the
 20 channel numbers, but there is --
 21 SIR JOHN SAUNDERS: Mr Horwell, I'm really sorry. Do you
 22 mind if I interrupt you, just to go back to the
 23 multi-agency so I fully understand it.
 24 MR HORWELL: No, of course not.
 25 SIR JOHN SAUNDERS: So we know from evidence we heard

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1 yesterday, or we heard this evidence, that
 2 Annemarie Rooney tried to get hold of the FDO and said
 3 she couldn't.
 4 Could she then have used this multi-agency Hailing
 5 Talk Group in order to try and get through that way?
 6 A. She could, but it's not necessarily common knowledge
 7 that. That's a mainly a Hailing Talk Group for control
 8 room to control room.
 9 SIR JOHN SAUNDERS: I don't understand that. Why would
 10 control rooms who need to make contact not know of all
 11 the possible ways of doing so?
 12 A. It is -- the operational and tactical are known to
 13 operational and tactical staff. The Hailing Talk Group
 14 is mainly for control room to, say, NWS control room or
 15 whoever -- I say mainly, but certainly if I'm trying to
 16 get hold of the police, in that case, give them a call.
 17 But it was usually control room to control room.
 18 SIR JOHN SAUNDERS: So if Annemarie Rooney had -- if she
 19 didn't know it, if she'd said -- got hold of her control
 20 room and said, "I need to speak to the FDO, can you try
 21 and do it?", they would have known what to try and do?
 22 A. Yes, they would have spoken to the control room. The
 23 control room would probably have said go on to the
 24 bottom one on here, as it happens.
 25 SIR JOHN SAUNDERS: Okay. Right. Okay. Thank you,

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1 Mr Horwell.
 2 MR HORWELL: The other two references on that schedule,
 3 there's operational multi-agency Talk Groups 1, 2 and 3,
 4 and a tactical multi-agency Talk Group. The channel
 5 designations have been redacted but you are familiar
 6 with those channels as well?
 7 A. I am, yes.
 8 Q. Mr Butler, it is clear that from what you have said,
 9 I don't know whether you saw the evidence of
 10 Laura Lewis, the GMP Airwave expert?
 11 A. No, I didn't. I do know Laura, but I didn't see her
 12 evidence.
 13 Q. But the common ground is this: once an Airwave Talk
 14 Group has been identified and communicated to the
 15 operations rooms, there can be tri-service communication
 16 between the operations rooms?
 17 A. Could you just mind repeating what you just said then?
 18 Q. Once a Talk Group has been identified, for example one
 19 of the operational multi-agency Talk Groups, once each
 20 operations room knows which the Talk Group is, there can
 21 plainly be tri-service communication between the
 22 operations rooms?
 23 A. Quite correct.
 24 Q. These are Talk Groups that are familiar with each
 25 operations room in your experience?

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1 A. Yes.
 2 Q. Mr Butler, I am going to ask you for some help, please,
 3 in relation to a document that you have been asked
 4 about, {INQ014127/3}.
 5 It's the lower section which refers to Greater
 6 Manchester.
 7 I don't know whether you can see that clearly,
 8 Mr Butler, or not. You can?
 9 A. Yes, I can. Yes.
 10 Q. Now, we have -- if that could remain on the screen for
 11 you, please. We have heard evidence, Mr Butler, and
 12 I want to see where that evidence becomes relevant to
 13 the evidence that you can give the chairman. We have
 14 heard evidence that there began a series of tests for
 15 the operational multi-agency Talk Groups that started
 16 with the GMP control room. They initiated the test
 17 between the three services, and that eventually the GMP
 18 control room at Manchester Airport took over to initiate
 19 those tests. And we have heard that the tests, either
 20 at the start or soon afterwards, became weekly.
 21 I just want to ask you whether the tests that are
 22 set out on your schedule are those same tests or not.
 23 I suggest they must be but I want your evidence, please.
 24 A. The table from the Greater Manchester area was not
 25 supplied by myself and I have no information on whether

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1 or not. I can only assume that it is the same tests
 2 because I'm only aware of the tests that took place.
 3 But I used to work in Merseyside and Cheshire, so I can
 4 give you lots of information on that area.
 5 Q. Well, Mr Butler, let me stop you there. It's your
 6 evidence that we want and if you can't give direct
 7 evidence on that, then I'll move away.
 8 The debrief report that you have been asked about,
 9 and if that could be put up just to remind you, please,
 10 at {INQ014019/1}. I'm sure you're familiar with this
 11 document. If we can go to the second page
 12 {INQ014019/2}, please. It's the centre of that page.
 13 There's a paragraph beginning:
 14 "Nationally, the NHS ambulance trusts have been
 15 asked to coordinate the testing programme."
 16 Which channels, as far as you were aware, were used
 17 in the testing programmes for Manchester? Again,
 18 Mr Butler, if you aren't able to say, then obviously you
 19 will say so.
 20 A. It's the tactical and operational which are the bottom
 21 two boxes on the sheet which was on earlier.
 22 Q. That's what I was expecting you to say and thank you for
 23 that answer.
 24 If we can go to {INQ014019/3} of that document, the
 25 upper section of it, please. It's the third bullet

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1 point down at the top of the page:
 2 "All agencies to check their availability of the
 3 other services' sharers Hailing Talk Groups within their
 4 organisational fleet maps and to agree a process of
 5 normal working."
 6 That's a reference, Mr Butler, is it not, to each of
 7 the emergency services being familiar with the Hailing
 8 Talk Groups of the other emergency services?
 9 A. It is, but not all the sharers Hailing Talk Groups are
 10 actually on all of the ICCS of the emergency services we
 11 found out. So some police forces and some fire did not
 12 have all of the ambulance Talk Groups or sharers Hailing
 13 Talk Groups and so on.
 14 So it was — the bullet point was basically to go
 15 away to resilience managers, go away, check with your
 16 partners that everybody can communicate and all three
 17 sharers Hailing Talk Groups from the organisations were
 18 readily available.
 19 If that wasn't the case, then you could actually
 20 apply to Airwave to get that put on at the next upgrade
 21 of the ICCS.
 22 Q. Mr Butler, that's very helpful. What you are saying is
 23 that if there was a problem with one emergency service
 24 contacting another on the Hailing Talk Group, find out
 25 if there's a problem and put it right?

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1 A. Correct.
 2 Q. And this document is dated 2 June 2015?
 3 A. Yes.
 4 MR HORWELL: Mr Butler, thank you. That's all I ask.
 5 SIR JOHN SAUNDERS: Just before we move on, just — it does
 6 seem quite surprising to me that Annemarie Rooney would
 7 not have any knowledge of the police Talk Group. Is
 8 there no one in Silver who would know that?
 9 A. The control rooms would know —
 10 SIR JOHN SAUNDERS: Right.
 11 A. — that there's a Hailing Talk Group between the
 12 emergency services. The tactical advisers would know.
 13 SIR JOHN SAUNDERS: Okay.
 14 A. At that point in time we only had actually one Airwave
 15 TAC adviser in NNAS. That has now changed and we now
 16 have upwards of over ten now, just specific Airwave
 17 capacity — looking at and the use of Talk Groups
 18 tactical advisers.
 19 SIR JOHN SAUNDERS: Shouldn't all commanders have had that
 20 information?
 21 A. No, I think you can end up with a situation of overload,
 22 and commanders that can't speak to the police, why would
 23 you expect them to go to their control rooms and say:
 24 excuse me, I'm trying to get hold of the police, can you
 25 assist?

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1 It isn't — it is their day job, dealing with
 2 emergencies like this, but it isn't also — and the
 3 majority of calls and incidents are not of this nature,
 4 do not require — and that is the reason why you need
 5 that specialist help and information from the control
 6 rooms to support — otherwise people would just get so
 7 much information, they would have to write it all down,
 8 and then you lose that area of speciality.
 9 SIR JOHN SAUNDERS: Thank you. Thank you, Mr Horwell.
 10 MR HORWELL: Thank you, sir.
 11 MR DE LA POER: Next then can I ask Mr Welch, who is taking
 12 the lead on behalf of the bereaved families.
 13 Questions from MR WELCH
 14 MR WELCH: Thank you, sir.
 15 Mr Butler, firstly, I would just like to ask you to
 16 clarify or confirm some information in relation to your
 17 role as the TAC adviser/NILO, and a document that might
 18 assist us all. Mr Lopez, this is {INQ023556/1}, please.
 19 This, as the title says, is the "Incident deployment
 20 guidance including on call".
 21 Mr Butler, is this a document (inaudible: no audio).
 22 A. Yes, sir, I actually wrote it.
 23 SIR JOHN SAUNDERS: Mr Welch, you've actually frozen. We
 24 will get some information whether I need to rise to get
 25 Mr Welch back.

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1 (Pause)
 2 SIR JOHN SAUNDERS: At least you anticipated the rest of the
 3 question. Whether he got the answer or not, I don't
 4 know, that you wrote it.
 5 (Pause)
 6 MR DE LA POER: I think Mr Welch is doing his best to
 7 rejoin. I think the connection dropped out for just
 8 a minute. If you bear with us just a couple of minutes,
 9 he may be back.
 10 SIR JOHN SAUNDERS: I hope it's better than "may be back".
 11 (Pause)
 12 SIR JOHN SAUNDERS: If I leave the room, at least it allows
 13 everyone to talk. But I won't go far away.
 14 MR DE LA POER: Thank you, sir.
 15 (11.40 am)
 16 (A short break)
 17 (11.41 am)
 18 SIR JOHN SAUNDERS: Could we have the document back, please.
 19 Mr Welch, did you hear the answer?
 20 MR WELCH: I didn't, sir, I'm afraid. I got as far as this
 21 is (overspeaking) —
 22 SIR JOHN SAUNDERS: The answer was that he did know it
 23 because he wrote it.
 24 MR WELCH: Ah, that will help.
 25 Can we go to {INQ023556/13}, please.

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1 If, Mr Lopez, you can go to about a third of the way
 2 down, where it says "Deployment criteria" and "Core
 3 role", and we will see what I would suggest, Mr Butler,
 4 is a good description of the role of the NILO/TAC
 5 adviser. Starting there where we see core role:
 6 "Provide advice during an incident in relation to
 7 tactics, options and specialist assets for both the
 8 Ambulance Services and multi-agency partners"; yes?
 9 A. Yes.
 10 Q. And then above "deployment criteria":
 11 "To be available on the telephone and/or to deploy
 12 to support strategic, tactical, operational commanders
 13 or where appropriate to advise the EOC"; yes?
 14 A. Yes.
 15 Q. Mr Lopez, that can now be taken down, thank you.
 16 So on that description, although the title is
 17 tactical adviser, it's correct, isn't it, that the role
 18 is wider in that you're providing support to the command
 19 team, aren't you, at all three levels?
 20 A. Yes, that's correct.
 21 Q. And indeed, when one looks at the action card you can
 22 see that the actions there specifically refer to
 23 providing support to the command team, don't they?
 24 A. They do, yes.
 25 Q. When you had been contacted by the EOC and asked to go

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1 to the arena, I would be correct in assuming that your
 2 understanding was that you were being deployed as the
 3 tactical adviser/NILO, wasn't it?
 4 A. It was, yes. Because the TAC AD — tactical advisers
 5 can actually deploy to scene, to the control rooms or to
 6 the headquarters to a TCG or SCG. They can deploy to
 7 any one of those areas.
 8 Q. That is very much implied, isn't it, in the incident
 9 on-call guidance?
 10 If we could go to the action card, please, action
 11 card 14, which, Mr Lopez, is {INQ013422/27}.
 12 Now, if we could go to item 3, which is halfway down
 13 the page. Mr de la Poer referred you to this:
 14 "Establish contact with the ambulance incident
 15 commander and mobilise to the most appropriate location
 16 to support the command team."
 17 A few things from that. When you had the
 18 conversation with Mr Taylor and it was decided that you
 19 should go to the arena, did you know at that stage who
 20 the strategic, tactical and operational commanders were?
 21 A. When I was actually asked to go to scene, I got that
 22 information from the control room and the control room
 23 would automatically just mobilise somebody to the scene,
 24 to the TCG. At that point, as far as I'm aware, looking
 25 back at my notes and what is evidenced in the

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1 transcript, I didn't know at that point — at that first
 2 initial call who was. I found out on the second call
 3 that it was Annemarie.
 4 Q. When you were having this discussion with Mr Taylor,
 5 having been told by the EOC to go to the scene, was
 6 there any discussion as to whether that was the most
 7 appropriate place for you as one of the tactical
 8 advisers to go to?
 9 A. So the most appropriate location, if you think of — you
 10 are looking at it now, if you don't mind me saying, at
 11 a wider spread with looking at minute to minutes, maybe
 12 a few more minutes into the job, into the incident.
 13 Control do all the initial actions for mobilisation and
 14 subsequent to that then you find out where — what's
 15 actually occurring, because if you wait to clarify all
 16 the command structure, where exactly you're going,
 17 I would still been in the house maybe 10 minutes longer
 18 than it took me to actually get out.
 19 So it's a question of: I'm asked to go to scene,
 20 I go to scene, I set up the processes in the background
 21 to support that decision, and off I go.
 22 SIR JOHN SAUNDERS: So this is from someone from EOC who is
 23 deciding where you go?
 24 A. Initial deployment.
 25 SIR JOHN SAUNDERS: And who would it be?

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1 A. It would be the duty manager or performance manager in
2 those days.

3 SIR JOHN SAUNDERS: And the duty manager would have
4 reasonable seniority and would understand these things
5 fairly well?

6 A. A duty manager is the manager of the day-to-day running
7 of incidents within the NWAS and has full knowledge of
8 the major incident plan.

9 SIR JOHN SAUNDERS: So he or she would make a positive
10 decision in this case that it was either better for you
11 to go to scene or to go to the Silver commander?

12 A. Yes, which is quite reasonable.

13 SIR JOHN SAUNDERS: Mr Welch.

14 MR WELCH: I'm not suggesting it was not a reasonable
15 decision, I'm just trying to explore what the
16 considerations were at the time.

17 Did you and Mr Taylor discuss trying to contact the
18 strategic commander — sorry, the tactical commander and
19 find out where she would want you to go?

20 A. The distance I have to travel to the arena would have
21 meant it wouldn't have made any difference because my
22 route would have been exactly the same. It wouldn't
23 matter where I was going in terms of GMP headquarters or
24 to the actual arena site. So no, I didn't have that
25 conversation with Steve. I had been mobilised to the

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1 scene and Steve was going to then initiate all the calls
2 and support and at that point, if I needed to move, he
3 would have informed me, as he did.

4 Q. That was much later though, about 11.45, wasn't it?

5 A. Yes.

6 Q. I don't know if you heard the evidence that had been
7 read in relation to Ms Rooney yesterday. Did you listen
8 to that?

9 A. I listened to part of it. I didn't listen to all of it.

10 Q. Okay. There was a recording of a telephone —
11 communication between Ms Rooney and the EOC at 22.56
12 that lasted for 6 minutes, and during that call she
13 twice mentioned that you were making your way to the
14 TCG. Were you aware of that?

15 A. No, I was mobilising to scene.

16 Q. That's only about 7 minutes after you had been informed
17 of the attack at the arena. It's, of course, contrary
18 to what you were doing.

19 A. Yes, I was — it's — I had been asked to mobilise to
20 scene, so I was mobilising to scene.

21 Q. I ask you this simply because I can't ask her, and
22 please don't think I'm being unfair, but do you know
23 where she would have got that information from?

24 A. I — no, I don't, other than the fact that TAC ADs
25 primarily — we even talked about they can go to any of

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1 the command structure. She would probably expect one to
2 go to her, and as I was mobilised, I think she would
3 have expected me to be going to her.

4 So maybe a slight breakdown in communication with
5 Control who had already mobilised me, and if Control had
6 already said to Annemarie, "We have mobilised Jon", then
7 there may be a slight breakdown in communication there
8 as to where I was going. But this was actually
9 clarified before or on my approach to Manchester. So it
10 didn't delay me going to GMP headquarters and it didn't
11 delay my route to the scene either.

12 Q. Can I ask you this, and I don't want you to reveal
13 precise locations, but you at the time were living
14 outside of Greater Manchester, weren't you? You said
15 that you were 45 minutes away. Is that right?

16 A. Yes.

17 Q. Mr Taylor lived in Manchester, didn't he, on this —
18 within Greater Manchester?

19 A. Within Greater Manchester, yes.

20 Q. Was there any discussion about, given where the attack
21 had happened and given, it seems, there was an
22 importance of getting one of the tactical advisers to
23 the scene, was there any discussion about whether it
24 would be better for Mr Taylor, who was much closer, to
25 deploy straight to the scene instead of you?

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1 A. When I spoke to Steve, I mentioned about myself being
2 AITC trained, whereas Steve wasn't. So as mentioned
3 earlier, it's a question of I have more tools and more
4 experience, more training in certain elements of the
5 role. Well, it's actually a different role, as AITC.
6 So I have a greater knowledge with the police and
7 understanding of the risks involved in how teams move
8 forward. So it would have been more appropriate for me
9 to deal with that on scene than Steve in that
10 environment at that time.

11 Q. We will come back to that towards the end in terms of
12 who got there first and what would have been most
13 appropriate.

14 But can I just ask you this and turn to what
15 happened with the redeployment of you to police
16 headquarters. It seems to have occurred at about 23.45.
17 You received the first call when you were at Salford
18 Crescent; that's right, isn't it?

19 A. Approximately Salford Crescent, I seem to remember, yes.

20 Q. A couple of minutes from the arena. And then you keep
21 going towards the arena and you'd asked Mr Taylor to
22 check whether that was the right thing to do; yes?

23 A. Yes, so if you come down Salford Crescent, you go to the
24 set of lights, I am not sure of the road, but it's like
25 the ring road round, and you turn left. You head up

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1 towards north Manchester. You get to the old lights,
 2 the lights at the bottom of the arena, and you would
 3 turn left to go to north Manchester, towards GMP
 4 headquarters. So therefore the route is exactly the
 5 same route that you would take whether you're going to
 6 the arena or to GMP at that point.

7 Q. I understand that. But in terms of the sequence of
 8 events, he asked — he tells you to go to GMP
 9 headquarters and you query it. You ask him to
 10 effectively speak to Annemarie and you yourself speak to
 11 Annemarie Rooney at some stage asking if that is right.

12 Taking a step back, do you agree that rather looks
 13 like you thought this probably wasn't the best decision
 14 at the time, given your AITC training and given the fact
 15 that you were actually at the outer cordon to the arena?

16 A. At the time I queried it, but when I got to GMP it was
 17 very evident that my speciality, if you can use that
 18 word, wouldn't have been actually needed on scene
 19 because all the patients had actually come down from the
 20 City Room and were being treated in the casualty
 21 clearing station. So there would have been no need at
 22 that point for my speciality to be actually used at the
 23 scene.

24 So once I had got to GMP headquarters it was quite
 25 understandable as to the rationale for me to go to GMP

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1 and not to scene.

2 Q. But as a tactical adviser who is providing advice, not
 3 just to the tactical commander, but also to the command
 4 team, including the operational commander, you could
 5 have probably been within the concourse or around the
 6 concourse of the arena at approximately 11.50, couldn't
 7 you?

8 A. Possibly, yes. But I'm not a clinician. All the
 9 patients were down. If you think of it in
 10 a chronological order, all the patients were down on to
 11 the concourse and being treated by the medics actually
 12 in that environment.

13 So what benefit — yes, I could have been a benefit,
 14 but I might have been a greater benefit to go to
 15 Annemarie, which is the reason why — and it's not my
 16 job to second-guess what — and the reasons why. If
 17 I continue to second-guess, I would end up doing my own
 18 decision and we wouldn't have a chain of command.

19 Q. I understand that.

20 SIR JOHN SAUNDERS: Mr Welch, if I can just — if you
 21 were — your greatest use in this whole thing would have
 22 been in the first hour?

23 A. Yes.

24 SIR JOHN SAUNDERS: But you're inevitably never going to get
 25 there in the first hour, are you?

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1 A. The TAC advisers are limited as to obviously
 2 geographics. It doesn't matter how many you have,
 3 you're always going to have a running time to the scene.

4 SIR JOHN SAUNDERS: But can I just know how often are you on
 5 call or were you on call at the time, which is the
 6 relevant thing?

7 A. One in 6 days.

8 SIR JOHN SAUNDERS: And not a consecutive period, you had
 9 one period and then 5 days off?

10 A. Five days off on call. Remember, it's part of my normal
 11 work. So I do my normal work during the day and then
 12 one in six after that.

13 SIR JOHN SAUNDERS: Right. But the only way — the best use
 14 that is going to be made of your talents is either by
 15 you actually making phone communication or radio
 16 communication with people at the scene or at Silver
 17 Control or some way where you can get to the scene
 18 quicker.

19 A. The majority of my work is actually done on the phone.
 20 So when I'm doing my normal on-call duties, I very
 21 rarely am asked to go to the scene, but it can happen.
 22 The majority of the work is actually on the phone.

23 SIR JOHN SAUNDERS: Would it have been better had you been
 24 able to do it on the phone on this occasion rather than
 25 coming in?

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1 A. No, because we had Mr Taylor on the phone and he's
 2 exactly the same as myself in regards to the TAC AD and
 3 NILO.

4 SIR JOHN SAUNDERS: Okay. Thank you, Mr Welch.

5 MR WELCH: Thank you, sir.

6 Can I ask you this in terms of what happened when
 7 you got to GMP headquarters? It relates firstly to the
 8 tactical plan.

9 In your statement at paragraph 18 you say:
 10 "With respect to the tactical plan I was fairly
 11 reassured that Annemarie had developed her tactics prior
 12 to my arrival, particularly given that we were nearly
 13 2 hours into the incident."

14 Then you gave her, didn't you, the generic tactical
 15 plan which is a one-page document. Is that what
 16 happened?

17 A. As far as I can remember, yes, but Annemarie already had
 18 a tactical plan. Given the fact I'd arrived at the time
 19 that I did, and that all the patients were down from the
 20 City Room, and that we'd started moving patients away
 21 from the actual scene in that time frame, it would be —
 22 and Annemarie explained to me what she'd actually done,
 23 what she'd set up, and I was reassured that actually
 24 she'd done all of her actions according with the action
 25 card and she had set up processes on scene via the

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1 operational commander to actually deliver the outcome
2 required.

3 Q. Did she say what her tactical plan was?

4 A. She — she mentioned about the triage, the casualty
5 clearing station, if that's what you mean, regarding
6 staff deployed, and then the setting up of a casualty
7 clearing station. At that point in time setting up the
8 functional roles, the loading officer and suchlike, is
9 part of that operation as well, but you would leave that
10 to the operational commander to deal with.

11 Q. I understand that.

12 A. The tactical commander decides on the plan of action and
13 the operational commander actually delivers that plan
14 based on the surroundings and what they've got available
15 to them.

16 SIR JOHN SAUNDERS: Okay. I think one of the things — we
17 can check if necessary — that the tactical commander
18 has to do or is specifically mentioned in relation to
19 particular roles is checking there's a safety officer.

20 A. The safety officer — there is an action card for the
21 safety officer, yes.

22 SIR JOHN SAUNDERS: But there is also within — the tactical
23 commander, I think he or she is meant to check, of all
24 the functions, has to check there's a safety officer.
25 We know there was no safety officer. Why is the

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1 safety officer so important?

2 A. Safety officer is there to brief staff as well. It's
3 not necessarily what you might think of as safety. It's
4 looking at risk assessment and such as you might — but
5 it's also about briefing and giving our staff the
6 understanding of where to commit, what to do. So it's
7 about the whole holistic view.

8 SIR JOHN SAUNDERS: So the same sort of thing you would do
9 as an AIT commander on this particular scene?

10 A. No, because it would be understanding the risks involved
11 and briefing the staff. The AITC would actually say,
12 "This is the limit of exploitation in relation to that
13 hot zone working".

14 SIR JOHN SAUNDERS: Okay.

15 A. So there's a very different — the safety officer looks
16 at the generic and overall risks and briefs the staff
17 and ensures their welfare, whereas the AITC is
18 a specific role to moving forward into the hot zone.

19 SIR JOHN SAUNDERS: Where it's safe to be, okay.
20 Thank you, Mr Welch.

21 MR WELCH: Thank you, sir.
22 I would just like, finally on this tactical plan
23 point, to explore in a little bit more detail how this
24 happened, this interaction.
25 Ms Rooney tells you what she's done up to that time

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1 when you get there, and it's about 12.10; is that right?

2 A. Yes. I got there. Had a briefing from Annemarie. We
3 sat down next to each other, because that's the way the
4 layout is. We went through what was in place at this
5 point in time in relation to patient care, and I was
6 satisfied that we'd got to the position we were and we
7 were dealing with the incident satisfactorily at that
8 point.

9 Q. And then —

10 SIR JOHN SAUNDERS: Is there a record of that conversation
11 in your incident log?

12 A. I am not sure.

13 SIR JOHN SAUNDERS: Okay. Well, someone can check. We'll
14 check on that, Mr Welch, while you're carrying on.

15 MR WELCH: Thank you, sir.
16 So you had this conversation, and then do you
17 produce this generic tactical plan and say, "Ms Rooney,
18 have you done X, Y and Z?", or did you just look at it,
19 as seems to be suggested in your witness statement, and
20 hand it to her, assuming that she's done it all?

21 A. No. Whenever I go to a TCG and work with a tactical
22 commander, I say, "Have you developed your tactical
23 plan?", yes, no, "I've got a generic one here if you
24 require it", which wasn't the case, wasn't needed. So
25 I always have spare copies in my bag to produce and to

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1 guide the tactical commanders.

2 Q. New topic in relation to what happened at the TCG which
3 is in relation to Operation Plato, please.
4 This is paragraphs 19 and 20 of your witness
5 statement, and hopefully you have that in front of you,
6 the statement which is {INQ029151/4} and it's page 4 —

7 A. Yes.

8 Q. I'm going to read this, if I can, and just ask you to
9 confirm it:
10 "At approximately 00.18 I recall overhearing
11 somebody within the room mention the word Plato.
12 I asked Mick Lawlor if he was aware of whether this was
13 an Operation Plato incident to which he confirmed he was
14 not. As a result, the GMP tactical commander was asked
15 to confirm the position and he advised that whilst this
16 was not a firearms incident, the police had declared
17 Plato at 22.47 and were continuing to treat it as such."
18 Paragraph 20:
19 "On considering this information, I was not
20 concerned that the declaration of Operation Plato
21 changed anything from an NWSA perspective as whilst GMP
22 were treating the incident as Plato, we were also aware
23 that this was not a firearms incident. GMP had in fact
24 confirmed that to us. As a result, I was not concerned
25 that the NWSA tactical plan required any revision. As

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1 a result of this new information, Annemarie and I did
2 not discuss this any further."

3 A couple of issues arising from that, if I can.
4 Firstly, do you recall who it was that told you that
5 Operation Plato had been declared and that GMP were --
6 who you overheard say it had been declared?

7 A. I can't remember how the overhearing, but I did hear the
8 word Plato, but it was Superintendent Chris Hill who we
9 discussed regarding the Plato and he informed us it
10 wasn't a firearms incident, although they were still
11 calling it Plato.

12 Q. Did that strike you as slightly contradictory with your
13 understanding of Plato, that this had been declared as
14 Plato and was continuing to be treated as a Plato
15 incident but there were no firearms?

16 A. I understand that Operation Plato also brings other
17 things to the table from the police perspective, so
18 I just assumed that it was something to do with the
19 police operations. It has been recognised that
20 Operation Plato, as it stood at that point in time, as
21 being an MTFA incident, has now been altered to an MTA
22 incident, taking out the word "firearms". Now it's
23 marauding terrorist attack followed by firearms, knife,
24 vehicle, as such, because Plato brings things to the
25 party from their perspective which don't necessarily fit

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1 into the patient care element.

2 SIR JOHN SAUNDERS: Okay. I think we do all understand that
3 from other evidence we have had, but just tell me about
4 this: we have heard that after the initial attack at the
5 arena there were other rumours of other attacks taking
6 place at other hospitals and things like that, and the
7 police were obviously concerned still that things may be
8 going on, because they still have Plato. Wouldn't you
9 actually need to broadcast over NWAS that Plato had been
10 declared, because if they got someone to another
11 incident wherever, wouldn't they need to know that Plato
12 was in operation?

13 A. We informed the strategic commander and -- bear with
14 me -- yes, it would be helpful. However, it was very
15 clear, quickly clear on the Oldham that -- incident at
16 Oldham that it was not a firearms incident, and that was
17 very quick into the job.

18 So no, we didn't because the police had assured us
19 that it wasn't a firearms incident, and they weren't
20 treating it as such. So therefore the Plato was null
21 and void, but I appreciate that there were other rumours
22 regarding Oldham.

23 SIR JOHN SAUNDERS: So we had a Plato but you were regarding
24 it as null and avoid?

25 A. I wouldn't say null and void.

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1 SIR JOHN SAUNDERS: Well, you just did actually, which is
2 why I used the words.

3 A. The Plato itself was regarding the Manchester Arena,
4 which is what we were dealing with, and you appreciate
5 the tactical commander is dealing with the arena, we are
6 told that the arena, it is not a Plato incident. We
7 then informed the strategic and scene of that situation.

8 SIR JOHN SAUNDERS: Okay. Right.

9 MR WELCH: So just to be clear -- thank you, sir.
10 Just to be clear, you were told in terms then that:
11 this is Operation Plato, it's continuing as Operation
12 Plato, but not Operation Plato as far as the arena is
13 concerned?

14 A. We were told that Operation Plato had been instigated
15 but there was no firearms involvement at the arena.

16 Q. Were you told anything in relation to the zones that the
17 police considered there were at the arena having
18 declared Operation Plato?

19 A. Given the time that we found out that Operation Plato
20 had been declared was nearly an hour after all the
21 patients were in -- just short of an hour afterwards --
22 all the patients were actually in the casualty clearing
23 station at that point, so regarding zoning and the
24 City Room and such, that was not a factor because we'd
25 actually already been in to the City Room and we'd moved

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1 all the patients out. That would have been a factor if
2 we'd known that Plato had been declared earlier and that
3 would have played a part. But once we'd moved all the
4 patients out from the City Room, which was effectively
5 a hot zone, if you think of Plato, then it's -- we're
6 already working outside of that zone.

7 Q. Did you know all this at the time? Did you know, for
8 example, where the various zones -- what the police
9 considered to be the various zones and what was hot,
10 what was cold and what was warm? Was that something
11 that you knew at the time or is that just something
12 you've learned since?

13 A. So it wasn't a Plato. So when I got there and had
14 a briefing, it wasn't a Plato. So we didn't have a hot
15 and warm as such, we had an inner and an outer. You've
16 got to appreciate that hot relates to, warm relates to
17 either an MTFA type scenario or a chemical type
18 incident. Other than that, it's an inner or outer
19 cordon. It is general terms and national terms for
20 actually dealing with this type of scenario.

21 Sorry to -- if you go back, all the patients were
22 down from the City Room. So you could call it whatever
23 zone you wanted at 12.30. It didn't affect NWAS because
24 we'd already moved all of the patients out of that area
25 and were now dealing with the patients in the casualty

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1 clearing station.

2 Q. This information comes to you about 8 minutes into your
3 attendance at the SCG — at the TCG, didn't it?

4 A. Approximately, yes. And at the same time I was told we
5 had started to move patients off-site. So again the
6 zoning isn't necessarily — in the City Room isn't
7 necessarily affecting how we actually deliver our
8 patient care.

9 Q. This is not something you discussed, of course, with the
10 tactical commander because, according to the statement,
11 you didn't discuss it at all any further?

12 A. I'm not quite sure what you're trying to get at. Could
13 you rephrase the question?

14 Q. These decisions and what the effect of Operation Plato
15 was and how it might impact upon what was going to
16 happen over the course of the next 3 hours, that's not
17 something you discussed with Annemarie Rooney, is it?

18 A. Yes. Now you have put it that way, yes, we did discuss
19 it and we decided that actually it didn't affect our
20 operations one iota in relation to the arena because
21 we'd cleared the City Room of the casualties and we
22 moved downstairs to the casualty clearing station and we
23 were moving off — and not only that, we were told also
24 it wasn't a firearms incident. So Plato from the police
25 perspective might have been — we assumed that — but

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1 for other reasons and Plato does, as I mentioned
2 earlier, bring in other elements to the police
3 operation, not to the Ambulance Service. So we'd moved
4 the patients down. We were into the casualty clearing
5 station. We'd started moving everybody off. The fact
6 that the police said it was Plato and that there was no
7 firearms actually didn't make any difference to us and
8 how we were working and treating the patients because
9 we'd already done the hot zone working, as it would have
10 been if it was a Plato, inner cordon working, and we'd
11 moved downstairs to the actual concourse.

12 Q. (Overspeaking) —

13 A. Sorry, I interrupted you —

14 SIR JOHN SAUNDERS: I think we have got the point. Carry
15 on, Mr Welch.

16 MR WELCH: The only — the final question on this topic, and
17 it's a very brief one: did you think it would have been
18 appropriate to tell the operational commander of this
19 information straight away?

20 A. We did. Annemarie spoke to — I can't remember who she
21 spoke to, but she spoke with somebody —

22 Q. Mr Hynes?

23 A. It might have been Mr Hynes or it might have been
24 Derek Poland. Explained that it was Operation Plato,
25 but it wasn't a firearms incident, and it was discussed

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1 with them that it wouldn't make any difference. Again,
2 same conversation, we'd moved people down, we'd started
3 moving them off, and it wasn't a firearms incident which
4 had been confirmed by the police.

5 Q. Can I move on to a new topic, please, which is a very
6 brief one, which relates to your log.

7 Mr Lopez, {INQ014796/2}, please. It's right at the
8 bottom, please. We can see the entry there,
9 "Derek Poland". This is the role allocation list of the
10 log that you filled in. Derek Poland there is listed in
11 additional roles as being operational support.

12 Could you please help us with where you got the
13 information from that Mr Poland was acting as
14 operational support?

15 A. Annemarie told me that Derek was working alongside
16 Steve Hynes and I spoke with Derek a couple of times on
17 the phone.

18 Q. What do you understand operational support to mean?

19 A. So you — as an operational commander, when faced with,
20 as you can appreciate what was probably happening at the
21 arena at that point, you can actually have too many
22 strands of information coming in, competing demands. So
23 what you need is somebody to support you. It might just
24 be taking the phone away, which is the reason why I was
25 speaking to Derek and not necessarily Steve, to offer

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1 general support, phone, radio, being delegated tasks to
2 go and tell somebody to do something. You would need
3 that support. Otherwise, it's just system overload and
4 you would go — you wouldn't be able to actually
5 function. There's too many strands of information and
6 actions to complete. So we always try to provide an
7 operational support, and it's part of our predetermined
8 attendance, at least one operational commander to the
9 incident to support the incident.

10 Q. Thank you. Final topic if I can, which is your actions
11 in the TCG after you got there.

12 I can be brief really in summarising what happens,
13 but if I can first ask that Mr Lopez bring up the
14 debrief questionnaire that you completed, which is
15 {INQ022376/19}.

16 This debrief document, the chair has seen a number
17 of debrief documents before, and this is the same
18 format. If we went to {INQ022376/17} we would see the
19 first page, but it was completed some weeks after, but
20 it was based on the notes that you did the next day,
21 wasn't it?

22 A. It was, yes.

23 Q. And in fairness to you, you fleshed it out a bit in
24 certain sections in order for it to be more compatible
25 with what was being asked in the debrief document;

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1 that's right, isn't it?
 2 A. My thought process in actually writing it at this point
 3 in time, I couldn't tell you that was my reasoning. All
 4 I can say is I wrote the debrief document in a format
 5 that could be understood.
 6 Q. Thank you. If we look at {INQ022376/19}, number 3:
 7 "From your own perspective, what aspects did not go
 8 well and needs further development?"
 9 I apologise for concentrating on what went wrong.
 10 I'm sure you will understand the reasons for that,
 11 Mr Butler. But if we go down halfway to the page:
 12 "All decisions appeared to be led by the scene.
 13 Steve Hynes had taken the role of NWAS operational
 14 commander and my own thoughts are that this hampered the
 15 normal chain of command."
 16 And that's what you put there, isn't it?
 17 A. It is, yes.
 18 Q. And in fairness to you, what you do go on to say is
 19 that:
 20 "It did appear to work well at the scene, although
 21 NWAS should think hard about changing its rigid approach
 22 to command and control, and if a senior manager goes to
 23 the scene and takes command, a fallback position could
 24 be similar to FRS."
 25 We heard a little bit about that what you were

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1 answering questions from Mr de la Poer; yes?
 2 A. Yes.
 3 Q. Moving on if I can, most of these matters you have been
 4 through in relation to Mr de la Poer's questions, so I'm
 5 not going to go through all of them. They speak for
 6 themselves.
 7 What I would like to go to is section 5 which is on
 8 {INQ022376/21}. The question there was:
 9 "What are the most important things that you have
 10 learned in your role?"
 11 And you say:
 12 "Turning up at TCG..."
 13 Sorry:
 14 "Turning up at TCG 90 minutes after the incident
 15 like this has started is near pointless as a TAC AD
 16 because all decisions had been made before you get
 17 there."
 18 But you do say:
 19 "However, if it's for general support, that's okay
 20 as the tactical commander does need support if even if
 21 it is just to source info and answer phones."
 22 So looking at that matter that you said was one of
 23 the most important things that you learned on the entire
 24 night, how could that be improved, please?
 25 A. You could increase the NILO capability within NWAS,

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1 having a third NILO on could assist. Cut down the
 2 running times to — but the problem is we're a regional
 3 organisation and we service all the ways from the
 4 Cumbria borders with Scotland down to the Staffordshire
 5 border. So even if you had four NILOs on, there still
 6 could be some considerable running time.
 7 However, an extra NILO maybe would assist and
 8 certainly might cut down some running times.
 9 I did put "actually near pointless", but, however,
 10 the phone calls were still being made. The TAC advice
 11 was still being given by Mr Taylor. So actually going
 12 to the TCG in this scenario, and it is in this scenario,
 13 all the decisions had been made.
 14 If it had been a different type of scenario and
 15 a longer-lasting scenario, more protracted, as quite
 16 often they are, in the normal course of events, if it
 17 had been a controlled major incident hazard site or
 18 something like that, where you've got a release of
 19 a substance accidentally over the fence line, if you
 20 want, into the wider population, that could go on for
 21 hours.
 22 So yes, in this type of scenario it was very
 23 dynamic, patients were treated and moved down, but in
 24 other scenarios, turning up 2 hours into the job may be
 25 actually of benefit.

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1 SIR JOHN SAUNDERS: Okay. We are all getting used to doing
 2 many more things remotely at the moment, as you are
 3 being cross-examined at the moment remotely. Is that
 4 a possible solution for dealing with it?
 5 A. For phone calls, I think, it would be sufficient. Your
 6 problem is with this, we've already had the line go,
 7 freeze once, we've had the line go dead, so we have got
 8 to make sure we have got robust mechanisms in place if
 9 we're going to use video conferencing. Phone calls,
 10 yes, possibly. We are looking at body-worn cameras. We
 11 have got a trial going on in NWAS, in which case those
 12 feeds could actually support some decision-making.
 13 So we are developing the idea of video conferencing
 14 and video feeds, but at this point in time I think phone
 15 calls at the time were probably the best option.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR WELCH: Can I ask you this: in relation to what happened
 18 at the TCG after you got there, it's correct, isn't it,
 19 that really the decisions were all being made at the
 20 scene and, as you say in that debrief document,
 21 Ms Rooney was being bypassed, wasn't she?
 22 A. Bypassed? I don't think I mentioned the word bypassed.
 23 All I did say was she was maybe out of the loop because
 24 some decisions were being made on scene and some
 25 conversations were being had on scene.

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1 I don't think that necessarily had a detriment to
 2 the actual patient care, and that's where NWS comes
 3 into it, patient care, because decisions were being made
 4 appropriate to patient care.
 5 The fact that the normal chain of command, as in
 6 operational on scene, tactical at the tactical
 7 coordinating centre, strategic at the strategic
 8 coordinating centre -- I think and I have said that
 9 I think NWS needs to be a bit more pragmatic and adapt
 10 based on the scenario it's actually faced with.
 11 Q. (Overspeaking) --
 12 SIR JOHN SAUNDERS: Okay. Ultimately I'm going to have to
 13 make some sort of decision about whether patient care
 14 was looked after in the best way. What you have
 15 actually excluded from all of your considerations,
 16 because you arrived so late, is actually the speed at
 17 which everything was done: should they have been got out
 18 of the City Room quicker, should they have been got to
 19 hospital quicker, should everything have been speeded
 20 up? And presumably speed is quite important to patient
 21 care.
 22 A. It is. Having looked at the timeline, I think given
 23 that we entered the City Room round about 10.50 -- would
 24 that be about right on the time frame?
 25 SIR JOHN SAUNDERS: Yes.

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1 A. And the fact that we'd got everybody down from the
 2 City Room by 23 -- my notes -- 23.40, that in some
 3 respects is quite a quick affair in relation to getting
 4 patients down because you're going to send up patients
 5 to -- staff to triage, you're going to triage, and you
 6 then you've got to move.
 7 SIR JOHN SAUNDERS: We don't want to go through it all, but
 8 the fact of the matter, very few people, it could be
 9 said, were doing the triage. If you had more people to
 10 triage, it might have been quicker. If you've got more
 11 people up there to move people on stretchers it might
 12 have been quicker.
 13 Perhaps you have followed things going on in the
 14 inquiry that we have been looking at -- because the
 15 public perception is that perhaps it wasn't done as
 16 quickly as it might be.
 17 A. I -- well, like yourself -- not like yourself, I have
 18 been looking at it from one point of view, and I see we
 19 have got a duty of care to the patients in the
 20 City Room, but the patients have already started to come
 21 down the stairs and be carried down the stairs. We've
 22 also got a duty of care to those patients. We have also
 23 got a duty of care for when the patients are moved from
 24 the City Room down, further patients, to actually set up
 25 the casualty clearing.

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1 So if we deploy all of the staff into the City Room,
 2 when they come out of the City Room and go down, we
 3 haven't got a casualty clearing station in which case
 4 they are not going to get treated to a benefit -- the
 5 greater benefit.
 6 So triage teams moving patients down, but would
 7 we -- you say, I think it's quite reasonable time-wise.
 8 If you think of -- there's a police training called
 9 Operation Argus where we go round and we actually speak
 10 to events centres and tell them -- we tell them in that,
 11 and have done since pre this -- that they don't expect
 12 to have any resources for maybe up to 30 minutes on
 13 scene because, dependent on the scenario, if it is
 14 an MTF, this wasn't, it was a bomb, it might take
 15 a little bit of time or for resources to get there. We
 16 were very lucky because we had an AP very close to the
 17 scene, okay, who was able to feed that information back
 18 to enable us to move forward pretty quick.
 19 If it was a normal response to a 999 call, dependent
 20 on the availability of vehicles at that point in time,
 21 we might have been 5/10/15 minutes. So that delay and
 22 then them sending back a METHANE message for further
 23 resources to move in, that's why I say I think the time
 24 to get everybody down from the City Room was pretty good
 25 in relation to how it could have transpired if we didn't

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1 have the resources available.
 2 And it all depends on 999 calls in and around the
 3 area as well.
 4 SIR JOHN SAUNDERS: Okay. Of course I'm looking at the
 5 situation as it transpired on that night and whether
 6 things could have been done quicker in the circumstances
 7 that then existed, rather than saying: we did pretty
 8 well, bearing in mind what could have happened and it
 9 could have been much worse.
 10 A. I think looking at the time to get patients down and
 11 treated in the casualty clearing station, the last
 12 patient -- the majority of the others were down well
 13 before that, and you look how many patients came down,
 14 that's not far off one a minute.
 15 That's -- in my mind, to get one a minute downstairs
 16 into a casualty clearing station is -- is reasonable
 17 going.
 18 SIR JOHN SAUNDERS: And clearly the police and other people
 19 who helped are to be congratulated on doing that.
 20 A. Yes, they should, and the public. Everybody that
 21 actually helped that and assisted in that.
 22 SIR JOHN SAUNDERS: Mr Welch.
 23 MR WELCH: Just a few minor, very short issues arising from
 24 the debrief.
 25 The second most important thing that you said that

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1 you had learned in your role was the need to challenge
2 senior managers.

3 When you put that, given your experience, which is
4 clearly undoubted, and your knowledge of procedures, are
5 you able to say what managers you were thinking of and
6 what you should have challenged them on?

7 A. Yes. I'll be honest, I --- as you would expect, I was
8 meaning Mr Hynes at some point, but then I quickly
9 decided, no, it was all going okay on scene regarding to
10 patient care. It was mainly towards strategic because
11 I'd been asked to do a couple of jobs by strategic,
12 which I had given the answer, to but was still asked to
13 go over and actually check with the police, and I to my
14 mind needed to say, "No, I have given you my answer,
15 I don't need to go over, use my expertise and my
16 knowledge, that is the answer".

17 Q. In relation to Mr Hynes, picking up on question 6:
18 "What would be your key recommendations for the
19 planning of such an incident?"

20 And you put:

21 "A more flexible approach to command and control as
22 senior managers do have a tendency to turn up on scene
23 and start running things."

24 Is that precisely what happened with Mr Hynes? It
25 can create problems.

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1 A. Yes, it's exactly what happened on the scene. The major
2 incident plan clearly states, as it did then, and it
3 still states now, managers should not self-deploy to
4 incidents. They should only deploy when requested to
5 attend.

6 We are a mobile service and some of our senior
7 managers are out and about, our sector managers.
8 They're on radio, they have pagers, they are listening
9 to the jobs, seeing the jobs coming in by pager. So
10 they do have a tendency to come across jobs, but you
11 wouldn't expect, if we had a senior manager in and
12 around an area, for them not to go and assist, because
13 that way we wouldn't be fulfilling our duty of care to
14 each patient and each 999 call.

15 So you have to trade off between, yes, we don't want
16 them to self-deploy to incidents. However, if they're
17 in the local area, then yes, maybe they should, and then
18 they should inform Control. That message will come on
19 the pager and they are a few minutes away.

20 So I think there's a trade-off, but no senior
21 manager, no manager should self-deploy to an incident.

22 Q. Final question. I'm aware that there's a halo
23 developing here.

24 What do you think, if anything, could have been done
25 better or should have been done better in relation to

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1 your actions as a NILO on the night?

2 A. My actions, I think --- if it's already --- it's
3 appreciated it's looking in hindsight, and not ---

4 Q. Of course.

5 A. --- not knowing now what we knew then, then maybe Steve
6 going to scene, but Steve would have only been on scene
7 probably, I reckon, about 20 minutes, 25 minutes before
8 me, maybe 20. Again, all the patients would have been
9 down from the City Room and actually in the casualty
10 clearing because that happened quite speedily, one
11 a minute coming down.

12 So Steve going to scene. The one thing that we
13 could have done, but we weren't on scene and even Steve
14 wouldn't have been on scene would have been to get that
15 tri-service up and running quicker, and the realisation
16 that there wasn't tri-service on scene. When I was told
17 by Mr Lawlor that the Fire Service weren't on scene,
18 I was surprised that they weren't on scene.

19 So that's my main takeout of this, to make sure all
20 services. But we've solved that now because we've
21 actually got the inter-Control Talk Group which enables
22 us to communicate. So that has actually been rectified
23 by that introduction.

24 MR WELCH: Mr Butler, thank you very much for answering my
25 questions. Thank you for your actions on the night on

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1 behalf of the families I represent.

2 A. Thank you.

3 SIR JOHN SAUNDERS: Thank you, Mr Welch.

4 MR DE LA POER: Finally, can I turn to Ms Roberts QC to see
5 if she has any questions. I see she does not. That
6 concludes Mr Butler's evidence.

7 SIR JOHN SAUNDERS: Thank you, Mr Butler, for your evidence
8 and for your insight and for your knowledge of how the
9 situation should and could work. Thank you.

10 MR DE LA POER: Can I ask you to rise just briefly. I think
11 that there will be sufficient time to make a start on
12 Mr Taylor. I just need to speak to him before he gives
13 his evidence.

14 SIR JOHN SAUNDERS: Thank you.

15 (12.31 pm)

(A short break)

17 (12.39 pm)

18 MR DE LA POER: Sir, our next witness joining us in the
19 witness box is Mr Taylor. I wonder, if he feels
20 comfortable, if he could remove his mask and he can then
21 be sworn.

22 MR STEPHEN TAYLOR (sworn)

23 Questions from MR DE LA POER

24 MR DE LA POER: Mr Taylor, as I have already said to you
25 before you came in, we will, you and I, make a start on

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1 your evidence between us before lunch, and then I think
 2 it will be at about 1 o'clock that I will invite the
 3 chairman to consider taking a break. So let's begin
 4 with that now.
 5 Did you — forgive me. We will start with your full
 6 name in fact?
 7 A. It's Stephen.
 8 Q. Stephen Taylor?
 9 A. Yes.
 10 Q. Mr Taylor, did you join NWAS in 1981?
 11 A. I did, yes.
 12 Q. And in 2007 did you qualify as a tactical adviser?
 13 A. Yes. I did a course after I started, but yes, that was
 14 part of my role.
 15 Q. In 2010 did you become a NILO?
 16 A. Yes.
 17 Q. We've heard from Mr Butler that he became a NILO in 2015
 18 and he was one of the first. You preceded him by
 19 5 years. Does that timeline fit with your recollection?
 20 You appear nonplussed by that?
 21 A. I thought it was 2010, my course.
 22 Q. At all events, you had been a NILO for some time before
 23 May of 2017?
 24 A. Yes.
 25 Q. And is it right that the role that you played on the

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1 night of 22 May 2017 was that of the NWAS tactical
 2 adviser and NILO together with Mr Butler?
 3 A. Yes, it was, yes.
 4 Q. I'm going to deal with your training in the same way
 5 that I dealt with Mr Butler's training. One question
 6 and we will see if there needs to be any follow-up.
 7 Bearing in mind what you were required to do on the
 8 night of 22 May 2017, was your training adequate for
 9 those duties?
 10 A. I would say so, yes. Yes, very difficult in terms of
 11 the nature of the incident, obviously, but yes, quite
 12 confident with the training and luckily I was involved
 13 in an exercise just a few weeks earlier as well.
 14 Q. What exercise was that?
 15 A. I think that was Exercise Elsa, if I remember rightly.
 16 Q. Did that give you any particular additional information
 17 that was helpful to you on the night?
 18 A. Yes. It was a multi-agency exercise that involved
 19 utilising the mass casualty dispersal plan which
 20 obviously was used on the night. So I think part of
 21 that — part of that sort of learning from that exercise
 22 was the fact that we used it on the night, and it's
 23 probably the first thing that came into our heads in
 24 terms of managing the patients, really.
 25 Q. I think that that plan wasn't activated until some way

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1 into the incident; is that correct?
 2 A. Yes.
 3 Q. So we will come to that when we reach the chronology.
 4 I would like to look with you at the records that
 5 you have created of the incident. We will bring them up
 6 each in turn. But before we do that, I would like to
 7 take you to the third of those records which is your
 8 witness statement. Do you have a copy in front of you?
 9 A. Yes, I have.
 10 Q. Could I invite you, please, because you say something
 11 relevant in relation to your note-taking on the night at
 12 paragraph 33, so we should consider these documents with
 13 this comment. Paragraph 33, it's on page 7.
 14 A. Yes.
 15 Q. So this statement was made by you in the December of
 16 2019?
 17 A. Yes.
 18 Q. We will look at the circumstances of the statement in
 19 a moment, but what you say at paragraph 13 is:
 20 "Having had an opportunity to reflect on my
 21 involvement with this incident, I know that not all of
 22 the calls I made have been recorded within my incident
 23 decision log. While some of these calls were made in an
 24 attempt to gather information and therefore not strictly
 25 calls that would require logging as action, rationale or

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1 decision, I accept on reflection that it would have been
 2 good practice to record the content of these
 3 conversations within my log. To assist me in achieving
 4 a more comprehensive log of my involvement with this
 5 incident it would have been helpful for me to have
 6 utilised a dictaphone such that I could listen back to
 7 the recordings in order to inform the completion of my
 8 incident decision log. This is a practice I will take
 9 forward with me should I be involved in a future
 10 incident."
 11 A. Yes.
 12 Q. So as at December 2019 that was one of the reflections
 13 that you had about part of the way in which you
 14 performed your role on the night?
 15 A. Yes.
 16 Q. So with that reflection in mind, let's just identify
 17 those records.
 18 The first is {INQ029153/1}. It's going to come up
 19 on the screen in front of you, Mr Taylor. You don't
 20 need to worry about turning anything up.
 21 If we move through it, Mr Lopez, we see page 1
 22 there. We can go to page 2 and then page 3
 23 {INQ029153/2-3}. Thank you very much indeed.
 24 You can take that down, Mr Lopez. Do you recognise
 25 that?

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1 A. I do, yes.
 2 Q. Is that your handwriting?
 3 A. It is, yes.
 4 Q. Are those notes that you made?
 5 A. Yes, they are, yes.
 6 Q. We will come to the circumstances of the making of those
 7 notes in just a moment. Next {INQ029154/1}, please,
 8 Mr Lopez. This document is in a form that Mr Butler has
 9 already introduced to us. If we go over to
 10 {INQ029154/3} of the document, this is your incident
 11 decision log; is that right?
 12 A. Yes.
 13 Q. And is that the document that you were referring to in
 14 paragraph 33 of your witness statement?
 15 A. Yes, it was, yes.
 16 Q. And again, if we just move through this, we'll come and
 17 look at the detail of all of these. We're just
 18 introducing the documents for the time being, Mr Taylor.
 19 So thank you very much, Mr Lopez, {INQ029154/4}, and
 20 over the page at {INQ029154/5}. And we can see by this
 21 stage of the incident the decision that you are
 22 recording at the bottom is timed at 01.45. So that's as
 23 far as we need to go for the purposes of introduction of
 24 this document. Thank you very much indeed, Mr Lopez.
 25 Then finally we have already mentioned and referred

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1 to your witness statement dated 18 December 2019?
 2 A. Yes.
 3 Q. What you say in your witness statement about that
 4 document, paragraph 9 — if you just follow along as
 5 I read it out on page 2:
 6 "This statement has been produced following an
 7 in-person meeting with the NAWAS legal team on Thursday,
 8 28 November 2019, and the contents are based on my
 9 personal recollection of events and review of specific
 10 documents outlining my involvement with this incident.
 11 I will reference these documents by referencing their
 12 individual INQ numbers within the body of this
 13 statement."
 14 Does that accurately capture the process by which
 15 you arrived at this witness statement?
 16 A. It is, yes.
 17 Q. Were two of the documents that you considered when
 18 creating the statement the notes that we've identified
 19 and the incident decision log?
 20 A. Yes, yes.
 21 Q. And we will look at the detail in due course, but is it
 22 fair to say that the contents of the statement which you
 23 have attested to at the end broadly follows the content
 24 of your notes and log?
 25 A. Yes, yes. I think — if I'm brutally honest, I think

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1 there were some time inaccuracies, certainly in the
 2 first hour, just through the number of phone calls I was
 3 making and the sort of efforts I was making at the time
 4 for the — for the first 45 minutes, it was a bit
 5 frantic. That's probably the reason that some of the
 6 call times may well be inaccurate and conflicting.
 7 Q. We are going to have a look at all of that. As you
 8 appreciate, it's important that we get as solid
 9 a timeline as we possibly can. And it may be with that
 10 observation that we will move faster through this
 11 section of your evidence.
 12 But just taking each of those first two handwritten
 13 documents in turn, the notes that you made on the night,
 14 describe to us the circumstances in which you were
 15 creating those.
 16 A. Yes. I think a lot of it was — it was post having made
 17 the phone calls because I was making numerous calls, so
 18 I was having to sort of revisit with my memory, if you
 19 like, to document what had been said in them calls. It
 20 was difficult to try and take the — try and take notes
 21 while still making calls and I was getting calls back on
 22 my phone as well at the time.
 23 So it was quite difficult. I was playing catch-up,
 24 if I'm honest with it, if I'm brutally honest.
 25 Q. We will look at the circumstances in which you created

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1 them, but I suppose what we might distil from that last
 2 answer is the notes we were looking at, you were making
 3 on the night?
 4 A. Yes.
 5 Q. So they were created while the incident was going?
 6 A. Yes, and I sort of tidied up the log a little bit later
 7 into the morning, probably.
 8 Q. And we need to be absolutely clear about this: on the
 9 face of the log in its own terms, NAWAS is expecting that
 10 to be returned within 72 hours, isn't it?
 11 A. Yes.
 12 Q. But the notes themselves, was it the case that you had
 13 a piece of paper beside you and you were writing them as
 14 you were going to a certain extent?
 15 A. Yes.
 16 Q. Although I think you have indicated that you were
 17 playing catch-up as well?
 18 A. Yes, I was, yes.
 19 Q. All right. Well, let's just — you will appreciate that
 20 there are a number of matters within your notes that we
 21 need to establish the accuracy of, which is why I have
 22 given the opportunity to just introduce those documents
 23 as I have.
 24 We're going to begin by having a look at the notes
 25 that you made, {INQ029153/1}. Between us, Mr Taylor, we

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1 can establish how much they represent a reliable record
 2 of what happened on the night.
 3 A. Mm—hm.
 4 Q. We can see that your first note is at 22.43 in which you
 5 identify you received a call from J Butler. Is that
 6 Jon Butler?
 7 A. Yes, it's Jon.
 8 Q. And was Mr Butler the first person that you heard about
 9 the incident from?
 10 A. Yes, other than a relative actually. But yes, yes.
 11 Q. So you have timed that at 22.43 in your note. If we
 12 just look at how this works in practice — if we then
 13 just take that down, Mr Lopez. We're going to do this
 14 once, I hope, so we don't need to keep jumping back and
 15 forth. But if we look at page 3 of your decision log,
 16 {INQ029154/3}, we can see that you have timed this
 17 decision log at 22.42.
 18 A. Yes.
 19 Q. Do you see that?
 20 A. Yes.
 21 Q. All right. We are not going to keep doing this,
 22 although we will look at both of these documents.
 23 Thank you, Mr Lopez.
 24 Now, the inquiry heard evidence this morning,
 25 including considering a transcript which itself was

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1 timestamped, that Mr Butler learned of the incident at
 2 22.49.
 3 A. Yes.
 4 Q. And his evidence was that he then spoke to you, meaning
 5 that that conversation took place at 22.50 or
 6 thereabouts?
 7 A. All right.
 8 Q. Obviously you can only speak for yourself, but knowing
 9 the notes and the way in which they were created, do you
 10 think that it might be possible at least that that time
 11 of 22.43 is inaccurate?
 12 A. Yes. Yes. Yes. I would say it is possible, yes.
 13 Q. As we can see, therefore, that timing in your incident
 14 log is also wrong?
 15 A. Yes, with I — yes.
 16 Q. And in fact we can turn it up if you like, but within
 17 your statement you also record the same time?
 18 A. Yes.
 19 Q. All right. So next we're going to look at your notes
 20 again and look at 22.47. So, Mr Lopez, {INQ029153/1}.
 21 Your next note indicates at 22.47:
 22 "Monitored Airwave. Resources and commanders on
 23 scene. METHANE MI declared. RVPs given, possible mass
 24 casualty incident. (A) [which is an action, is it?] —
 25 casualty dispersal plan. AM Rooney? Yes."

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1 Now, the first obvious points. The timing of that
 2 one must be wrong as well, mustn't it, because in fact
 3 you didn't learn of the incident until 3 minutes later?
 4 A. Yes, and I think that's where I'm saying that there was
 5 consistent sort of just inaccuracies with the timings,
 6 really.
 7 Q. Absolutely. Now, perhaps a curious coincidence is that
 8 at 22.46 there is a METHANE message broadcast by
 9 Paddy Ennis.
 10 A. Yes.
 11 Q. Bearing in mind that it would appear that you didn't
 12 hear about the incident until 22.50, it would be right
 13 to conclude that you didn't hear Paddy Ennis' METHANE at
 14 22.46?
 15 A. I did hear a METHANE, yes, because I had turned my radio
 16 on, so I did hear a METHANE.
 17 Q. Did you hear it from Paddy Ennis?
 18 A. I wasn't aware at the time it was Paddy, but post event
 19 I realised it was Paddy during the debrief, yes.
 20 Q. You see, and it may be that there is another METHANE
 21 from Paddy Ennis that we can look at, but we know that
 22 there was something which had the component parts of
 23 a METHANE message by Dan Smith at 23.23.
 24 A. Yes.
 25 Q. Might that have been the METHANE that you heard?

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1 A. Possibly. Looking at the timeline, possibly, yes.
 2 Q. Again, if — and Ms Roberts, who is listening to this,
 3 and supported by an excellent team at NWSA, I have no
 4 doubt will help me if I've got any of this wrong, and we
 5 are just trying to explore this together, Mr Taylor.
 6 But it would appear that the 22.47 METHANE is not
 7 Paddy Ennis at 22.46, is it, because at that time you
 8 didn't know about the incident?
 9 A. No, as I say it's definitely inaccurate in terms of the
 10 timing. I think for my benefit it was more reassurance
 11 that the METHANE had been given, and I'm pretty sure
 12 I have wrote that down just to remind myself afterwards
 13 that the METHANE was given as part of our action cards
 14 that we utilise.
 15 Q. I understand, and similarly, if we look at the entry:
 16 "Commanders on scene."
 17 In fact, we know that Dan Smith, who was the
 18 operational commander for the night, doesn't get there
 19 until just before 11 o'clock. So again that might be
 20 another indicator that the time is wrong.
 21 A. Yes. I did have a conversation with the Control manager
 22 who did inform me there was two commanders, qualified
 23 commanders, mobilising at the time.
 24 Q. Again, we are just feeling our way through this,
 25 Mr Taylor. It's important because the next entry there

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1 has potentially very important information in and it's
 2 important that we get to the bottom of that as best that
 3 we can.
 4 A. Yes.
 5 Q. Your note indicates that at 22.50:
 6 "Discussed with FDO (Dale Sexton). Confirmed NWSA
 7 strategic/tactical commanders deploy to GMP HQ. AM
 8 Rooney/N Barnes contacted and confirmed. Intel/info
 9 from FDO --- no intel re secondary devices or active
 10 shooters. [Question mark] witnessed suicide bomber ---
 11 10.31 approximate explosion --- Annemarie aware at HQ."
 12 A. Yes.
 13 Q. All right. So from the point of view of the issues that
 14 the inquiry is exploring, this is a potentially
 15 important entry, which is why we are taking this nice
 16 and slowly, Mr Taylor.
 17 A. Yes.
 18 Q. If we have a look at your decision log, which, Mr Lopez,
 19 is at {INQ029154/3}, we can see at the bottom there that
 20 that entry has translated into your decision log as
 21 an action at 22.50, contacting GMP FDO Inspector Dale
 22 Sexton, and there's a rationale recorded beneath it, but
 23 if we turn over the page {INQ029154/4}, 22.51:
 24 "Action: confirmed with tactical commander (AMR) and
 25 strategic commander, Neil Barnes, that FDO requested

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1 presence at GMP command module --- advised to attend."
 2 So what we see here, Mr Taylor, on the face of your
 3 records, is that, as it's recorded, 10.50, you have
 4 spoken to Dale Sexton and that he has given you
 5 particular information, and then in the next minute you
 6 have contacted both the Silver and Gold commanders from
 7 NWSA, telling them both to go to GMP HQ.
 8 A. Mm--hm.
 9 Q. All right? Would you agree that is what the records
 10 indicate?
 11 A. That's what the records indicate. I think afterwards
 12 I did learn that it wasn't actually the FDO I was
 13 speaking to on the night.
 14 Q. We're going to just take this in stages and just try and
 15 identify what we can about these notes.
 16 So we're going to have a look at a transcript now of
 17 a conversation that you had at 23.07, just to see if we
 18 can refresh your memory. I know you have had a chance
 19 to see this previously. {INQ015347T/1}.
 20 If you can just read along in your mind and I'll see
 21 if I can summarise this so that everybody doesn't have
 22 to read it all. This is a conversation recorded between
 23 you and someone identified as Chloe, and we can see that
 24 you say that you've tried "ringing CM now". What is CM?
 25 A. I think it was GM, not CM. I think that's a typo.

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1 Q. We do see that typo elsewhere, so that's:
 2 "I have tried ringing [GM] in Control. We have got
 3 Jon Butler responding towards Manchester. I am sort of
 4 staying on the phone, making sure things are going ---
 5 hopefully the command structure's there and trying to
 6 get [some] info. Have we initiated Plato cards?"
 7 We can see four entries up from the bottom, what you
 8 say is:
 9 "Right okay --- erm, no other intelligence from the
 10 police at all because they all are obviously really,
 11 really up to their neck in it in Control."
 12 To which Chloe responds:
 13 "Yes, absolutely."
 14 So that's you asking Control whether they have
 15 intelligence from the police; do you see that?
 16 A. Yes.
 17 Q. And then if we go over to {INQ015347T/2}, we can see
 18 again, just if you scan through to about halfway down
 19 the page, you say:
 20 "Right, I just need to know where Annemarie Rooney
 21 needs to go at Silver. Really I am assuming she will
 22 need to go to Central, the GMP headquarters I would have
 23 thought."
 24 A. Yes.
 25 Q. You go on to say that:

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1 "I just can't get through to the GMP at the moment."
 2 A. Yes.
 3 Q. So if we take that down, can we agree, Mr Taylor, that
 4 at the point of this call, 23.07, you don't seem yet to
 5 have managed to speak to GMP to find out the information
 6 that you have recorded in that note?
 7 A. (Overspeaking).
 8 Q. In fact, we can look at it if we need to, but one of the
 9 questions you ask is who is Gold. So even at 23.07, you
 10 didn't know that it was Mr Barnes?
 11 A. Yes.
 12 Q. So your note is wrong by at least 17 minutes on that
 13 time?
 14 A. Yes, and I accept that.
 15 Q. {INQ015055T/1}. This is a call at 23.22, a very short
 16 call timed at 23.22. Is that your call sign, 1969?
 17 A. It is, yes.
 18 Q. You say:
 19 "Yeah, thanks, I'm sorry. I just --- have we got
 20 a major incident channel opened up for this? And I just
 21 wondered have done a Hailing group call to GMP? We are
 22 struggling to get hold of them just in terms of where he
 23 wants us from a command structure point of view."
 24 Then you go on to say:
 25 "Yeah, thanks for that. Is there any chance we can

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1 do a Hailing channel call to GMP? I know
 2 Annemarie Rooney arrived at the TCG there, I was just
 3 wondering whether Neil Barnes is responding to anywhere.
 4 I think he's code 1 call."
 5 A. Yes (overspeaking).
 6 Q. Similarly, Mr Taylor, does it appear that you still
 7 haven't got through to GMP at that point?
 8 A. Yes, it was a few minutes later, wasn't it? Yes.
 9 Q. So that's 32 minutes of difference we have got. One
 10 more to look at: {INQ032953T/1}. This is
 11 a conversation, the second of two which happened in very
 12 quick succession, the first of which Mr Smith simply
 13 acknowledges. You say -- this is 23.31:
 14 "Yeah, apologies Dan. I've got Derek Poland and
 15 Matt Calderbank going to scene. Just to confirm, Dan,
 16 I'm sure it already has happened, just a METHANE message
 17 to Control. Hopefully you are aware Annemarie Rooney is
 18 at the TCG or hopefully at TCG at GMP. I'm just trying
 19 to find out, it's difficult, just where our Gold needs
 20 to go, which is Neil Barnes. I'm assuming we are going
 21 to have an SCG for this over at Central Park."
 22 A. Yes.
 23 Q. Again bearing in mind the content of your note, that
 24 call that you have timed at 22.50, it still hasn't yet
 25 taken place; is that right?

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1 A. Yes, that's my understanding of it now since look at the
 2 beginning transcripts.
 3 Q. We can take that down.
 4 So you will appreciate, Mr Taylor, that we have
 5 looked at the information that we've got. That
 6 information includes a dictaphone that Inspector Sexton
 7 switched on at 22.46, so before you were notified of the
 8 incident.
 9 A. Yes.
 10 Q. We have done our best to see if we can identify contact
 11 between you and him, and I think you have already
 12 recognised that you didn't speak to him.
 13 A. Yes, I think it was because I was making numerous calls
 14 to get through, once I did get through, I remember the
 15 term, it is the FDO's line, and probably that's why
 16 I assumed it was Mr Sexton at the time.
 17 Q. You say in your witness statement you had two telephone
 18 numbers. Was that the FDO line and the FDS line?
 19 A. I think it is in my phone as a team leader's phone or
 20 a comms team leader's phone.
 21 Q. Those were two of the numbers you were trying?
 22 A. Yes.
 23 Q. But it was the FDO line that you got through to; is that
 24 right?
 25 A. I was assuming so, or whether it had switched to another

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1 line and I was put through to another line, because
 2 obviously post the incident it's quite obvious it wasn't
 3 the FDO that I was speaking to.
 4 Q. Well, just before we break we're going to just play
 5 a very short section of what may be the call that you
 6 are referring to and I just want to work through this
 7 very carefully.
 8 So far as the FDO line is concerned, and the good
 9 offices of people more than just myself, this is the
 10 first call that we think we can identify with you
 11 involved in.
 12 A. Yes.
 13 Q. I can see that you are nodding and I think it will
 14 accord with your own expectation now you have had
 15 a chance to look at it?
 16 A. Yes.
 17 Q. Mr Lopez, we are -- and sir, with your leave, just play
 18 a 2.5-minute call just before we break.
 19 SIR JOHN SAUNDERS: Of course. Is that a problem with
 20 anybody? Thank you.
 21 MR DE LA POER: Then I'll have a few questions to ask you
 22 about it after lunch.
 23 Mr Lopez, {INQ018835A/1} and if we can have the
 24 corresponding transcript. In terms of the audio, as
 25 I have told you already, Mr Lopez, we're starting at

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1 05.04, and in terms of the transcript we will be
 2 starting at {INQ018835T/2}.
 3 Just so that everybody understands, this is at
 4 approximately 23.33. All right?
 5 It's exactly the centre of the page that we are
 6 looking at to follow.
 7 (Pause)
 8 5:04, thank you.
 9 (Pause)
 10 I think we're nearly there.
 11 (Pause)
 12 (Recording played)
 13 MR DE LA POER: Just before I invite the chairman to break,
 14 Mr Taylor, is that the conversation that you had
 15 recorded and timed at 22.50?
 16 A. Yes, it is. Yes. It's inaccurate, yes, no doubt.
 17 MR DE LA POER: Well, I'll have some more questions for you
 18 about that and other parts of your involvement on the
 19 night, but, sir, would that be a convenient moment?
 20 SIR JOHN SAUNDERS: Yes, okay. Break for an hour. Thank
 21 you.
 22 (1.10 pm)
 23 (The lunch adjournment)
 24 (2.10 pm)
 25 MR DE LA POER: Mr Taylor, we'd reached the point at which

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1 you had told us that the call you had with Mr Myerscough
 2 timed at about 23.33 was the call that you are recording
 3 inaccurately, as you accept, at 22.50. We're going to
 4 look at the notes and what you record as having been the
 5 content of that, so we're going to go beyond the time.
 6 Mr Lopez, {INQ029153/1}. We are looking at your
 7 notes and what you say in those notes is:
 8 "Discussed with FDO Dale Sexton."
 9 I think you accept that that is inaccurate in the
 10 sense that you, whilst you were speaking on the FDO
 11 line, it wasn't Dale Sexton you were speaking to. In
 12 fact, do you agree that Mr Myerscough identified
 13 himself?
 14 A. Yes, he did. I did hear this in the transcript.
 15 I think it was just whilst I was trying to think in my
 16 own head who to call next or — or I have probably not
 17 heard that fully.
 18 Q. Did you have a record on the night before the incident
 19 of who the FDO was?
 20 A. No, but I did overhear it in a call at some point that
 21 it was Dale Sexton. I think that might have been a call
 22 into the control room at police headquarters. I'm not
 23 100% sure, but that's where I am thinking I heard it
 24 from.
 25 Q. "Confirmed NAWAS strategic/tactical commanders deployed

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1 to GMP HQ."
 2 Now while that is true of the strategic commander,
 3 it isn't right that in that call you were told to deploy
 4 the tactical commander to GMP HQ because Ms Rooney was
 5 already there, wasn't she?
 6 A. Yes. I spoke to her actually en route, yes. I think
 7 she had just arrived or she was just around the corner
 8 from GMP HQ.
 9 Q. "AM Rooney/N Barnes contacted and confirmed."
 10 We looked at this already, but in fact you didn't
 11 confirm with Annemarie Rooney as a result of the
 12 telephone call with Mr Myerscough that she needed to go
 13 to GMP. So that note is inaccurate; is that right?
 14 A. I did ask — I know I did ask do you want both tactical
 15 and strategic commanders to go to the GMP HQ.
 16 Q. What we saw with your conversation with Mr Myerscough is
 17 that you knew that Annemarie Rooney was already at GMP
 18 HQ at that point.
 19 A. Yes, and she was responding towards GMP HQ.
 20 Q. We can have a look at it if you wish, but I think what
 21 you say to Mr Myerscough is, "She's already with you".
 22 A. Yes.
 23 Q. But it's also right that — did you contact Mr Barnes
 24 immediately after this call?
 25 A. It was at some point afterwards, yes. Yes.

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1 Q. All right. Then we've got this:
 2 "Intel/info from FDO. No intel re secondary
 3 device."
 4 We didn't hear that in the call with Mr Myerscough,
 5 did we?
 6 A. No. Which shocked me a little bit because I certainly
 7 asked the question just in terms of potentially an
 8 Operation Plato, a declaration as well.
 9 Q. Again, we didn't hear Mr Myerscough give you any
 10 information about whether there was intelligence about
 11 active shooters either.
 12 A. No, not on this transcript, no.
 13 Q. Nor did he say that it was a witnessed suicide bomber?
 14 A. I'm wondering whether I got the call from — actually
 15 from GMP HQ, whether I was told that over the phone.
 16 But I definitely — I definitely asked the question.
 17 It's just whether it came from GMP HQ rather than —
 18 Q. Well, it's — you will appreciate, and we will come in
 19 a moment to just explore why such notes are important,
 20 but on the face of this, what it indicates is that you
 21 were being given clear information by the force duty
 22 officer, that is what the note records, and in fact not
 23 only do we see, do you agree, Mr Taylor, that the time
 24 is wrong, but the content that's being ascribed to the
 25 FDO or the person who answers the FDO line is also

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1 wrong; do you agree?
 2 A. Yes, but I definitely asked the question was Plato was
 3 on my mind. So whether that's from GMP HQ rather than
 4 the FDO, but yes, if that's — the fact it's not on the
 5 recording suggests that, doesn't it?
 6 Q. When you say it came from GMP HQ, are you suggesting
 7 that a police officer or a member of police staff phoned
 8 you from HQ?
 9 A. No. I have made a call to GMP HQ to get
 10 Annemarie Rooney in the building, and I'm wondering
 11 whether it was on that call that I may well have asked
 12 that question because I was obviously struggling with
 13 the FDO as well at the time.
 14 Q. Right. And who was it that you spoke to when you made
 15 that call to force HQ?
 16 A. I'm not sure. I made it on a landline call, I think, to
 17 our own telephone — our own switch telephone we have in
 18 there, if that makes sense. I'm pretty sure I did.
 19 Q. Plainly the force duty officer is in a unique position
 20 to be able to give the best information; do you agree?
 21 A. Yes. Yes.
 22 Q. And so this is information that you have ascribed to the
 23 person in that role, whereas I think that even if it
 24 came from force HQ, you would be bound to agree that
 25 that wasn't the person in the same position of authority

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1 that the FDO was?
 2 A. Yes. I have looked through my notes previously and
 3 I can't find out where the information came from. But
 4 it was -- it was a question I asked. I know I did. But
 5 it's just -- it's just not there on the transcript.
 6 Q. We are now going to just have a look at how this
 7 translated into your log.
 8 Mr Lopez, {INQ029154/3}.
 9 We don't need to rehearse the parts which have just
 10 been translated straight across, such as the witnessed
 11 suicide bomber, but if we go over the page to
 12 {INQ029154/4}, your action there:
 13 "Confirmed with tactical commander and strategic
 14 commander."
 15 That's again taken from your notes and we have
 16 looked at that.
 17 We can see that at 22.52 you repeat the information
 18 that you have ascribed in your notes as being given to
 19 you at 22.50.
 20 A. Yes.
 21 Q. You can then see at 22.58 you have -- forgive me. You
 22 say:
 23 "Information from FDO..."
 24 This is 22.52. I passed over this, and this may be
 25 important:

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1 "Information from FDO at this stage. No secondary
 2 devices or active shooting. Tactical commander made
 3 aware."
 4 Now, on the face of that note, that potentially very
 5 important information from that very important source,
 6 the FDO, your record indicates that you had communicated
 7 that before 11 o'clock to the NWAS tactical commander.
 8 Do you agree that's the effect of your decision log?
 9 A. Yes, that's the inaccuracy of the timing, yes. Yes.
 10 Q. Well, it's not just merely a matter of a minute or two.
 11 I mean, we have established that in the call with
 12 Mr Myerscough, which was at 23.33, that information
 13 wasn't relayed to you.
 14 A. Yes.
 15 Q. I think you have suggested that there may have been
 16 another call with someone other than the FDO at some
 17 point who was to let Ms Rooney into the building. It
 18 must have been about 11.10/11.15?
 19 A. Roughly that time, yes.
 20 Q. So again we are not just a minute or two out in that
 21 information, but rather more than that; would you agree?
 22 A. Yes, admittedly, yes.
 23 Q. And then we can look at 22.58:
 24 "Discussion with FDO."
 25 And this is a rationale, so this isn't an action:

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1 "To, if requested or required, can an
 2 interoperability channel be nominated."
 3 So that is a reference to -- I think you would agree
 4 is your conversation actually at 23.33 because we see
 5 that's where you raise interoperability with
 6 Mr Myerscough.
 7 A. Yes.
 8 Q. But then the action that that prompts is:
 9 "Contacted EOC, duty manager Ann Comrie, regarding
 10 FDO discussion."
 11 Now, I'm not for a moment suggesting that you didn't
 12 contact the EOC or, as we have seen in other calls,
 13 mention the interoperability channel, but the way your
 14 notes read is the sequence was you raised it with the
 15 FDO and then, arising from that conversation, you spoke
 16 to the EOC. But that just can't be right, can it?
 17 A. No, not in that order by the looks of it, no, no.
 18 Q. Do you agree that the information that we've just looked
 19 at, having started its life in notes, having been
 20 interpreted into this decision log, then ends up with
 21 a witness statement which you signed, which you
 22 submitted to the inquiry?
 23 A. Yes. Admittedly there was inaccuracies around the
 24 timings. I know I had the conversation with the control
 25 manager and I definitely asked the question about the

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1 active shooter scenario.
 2 Q. But even if you did ask that question, Mr Taylor, isn't
 3 the source of the information absolutely vitally
 4 important?
 5 A. Yes, of course, yes.
 6 Q. If it is a member of desk staff at force HQ, that's one
 7 thing?
 8 A. Yes.
 9 Q. If it's the Gold commander, that's another.
 10 A. Yes.
 11 Q. And there are a number of gradations of reliability in
 12 between.
 13 A. Yes. Yes, I agree, and I think later on I was actually
 14 saying, I think, when -- when we were aware that
 15 Operation Plato had been declared, that get that -- you
 16 know, get that confirmed from the right source at
 17 a later point just in case it actually made any
 18 difference to our response to the incident, but that was
 19 very much later on in the incident.
 20 Q. Before we move away from those, we just need to --
 21 because note-taking, record-keeping and as you yourself
 22 acknowledged, the possibility of a dictaphone are
 23 matters that have featured a number of times during
 24 chapter 10 --
 25 SIR JOHN SAUNDERS: Just let me take over for a moment. You

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1 will understand that in trying to set out and find out
 2 what happened and why it happened, clearly accuracy from
 3 the witnesses is very important.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Of course from your point of view when
 6 you made your witness statement, a long time later,
 7 you've relied on the accuracy of these documents, as
 8 I understand it.
 9 A. Yes.
 10 SIR JOHN SAUNDERS: And it is being pointed out to you now
 11 that it can't be right.
 12 A. Mm—hm.
 13 SIR JOHN SAUNDERS: And I rather gather from how you started
 14 that you knew before you came in the witness box that
 15 this can't be right.
 16 A. Admittedly, (overspeaking) —
 17 SIR JOHN SAUNDERS: So you had been through it all at some
 18 stage with a little help, but you didn't do that sort of
 19 going through the material before you made your witness
 20 statement or did you?
 21 A. No, probably not. I just submitted what I have wrote at
 22 the time to be fair, yes. Yes.
 23 SIR JOHN SAUNDERS: Let's just go back to the notes, sorry.
 24 Sorry, I don't have —
 25 MR DE LA POER: That is {INQ029153/1}.

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1 SIR JOHN SAUNDERS: Those are the notes. You can't be
 2 writing them contemporaneously, can you?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Can you?
 5 A. I think — I think part of the problem I had on the
 6 night —
 7 SIR JOHN SAUNDERS: You've got a pretty inaccurate watch if
 8 you were writing them contemporaneously.
 9 A. Yes. I think part of the problem I had on the night was
 10 I was making lots of phone calls in between and trying
 11 to —
 12 SIR JOHN SAUNDERS: Can I just stop you. I'm sure there are
 13 lots of good reasons why it can be inaccurate, but
 14 I need to know whether I can place any reliance on any
 15 of these times or not. Do you understand?
 16 A. Some sometimes are inaccurate, sir.
 17 SIR JOHN SAUNDERS: So at what stage did you make these
 18 notes? Just try and think back. At what stage did you
 19 do it? And are these the original notes you made or are
 20 they copied from them?
 21 A. No, they are the original notes I made and I think the
 22 problem I had was that I was going back, probably for
 23 some of the timings, where I have — from the start of
 24 the calls to the FDO, I think, were — were me sort of
 25 writing down that I was actually going to make that call

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1 to the FDO but didn't get through until a later point,
 2 and I think that's where they have become inaccurate on
 3 the record, yes, in terms of the times.
 4 SIR JOHN SAUNDERS: You must have been writing them up a lot
 5 later.
 6 A. I was catching up without a doubt, yes.
 7 SIR JOHN SAUNDERS: But how long later?
 8 A. Probably a few hours into the evening.
 9 SIR JOHN SAUNDERS: A few hours?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: So the chance of any of the times being
 12 correct is pretty minimal?
 13 A. Yes. I was concerned about them afterwards, yes, in
 14 terms of the times.
 15 SIR JOHN SAUNDERS: Did you put in your statement, "I'm
 16 concerned about whether the times are accurate"? Did
 17 you say, "These are only rough times, they may be
 18 wrong"?
 19 A. Not — not overall, I don't think, no, in this
 20 statement. I don't think I have put it in there as
 21 appertaining to everything, I don't think.
 22 SIR JOHN SAUNDERS: It's not just for an inquiry like this.
 23 It's other people who are looking at the events
 24 afterwards, who are trying to see whether any
 25 improvements can be made, they will look at your notes

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1 of what happened, and they will need to know whether
 2 they are accurate, and you are saying — you must have
 3 known at the time that the timings may not have been
 4 accurate.
 5 A. I knew afterwards, yes.
 6 SIR JOHN SAUNDERS: I just wonder why you didn't tell
 7 anybody that.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: You made a statement saying it's all
 10 true.
 11 A. Yes.
 12 SIR JOHN SAUNDERS: I'm not saying you're deliberately
 13 perjuring yourself or anything like that, but you're
 14 confirming that the facts were true to the best of your
 15 knowledge and belief.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Were they true to the best of your
 18 knowledge and belief when you made that statement?
 19 A. Yes, they were, sir, yes.
 20 SIR JOHN SAUNDERS: So by the time you made this statement
 21 you thought all those timings were correct, did you?
 22 A. Yes, I think looking back at it, perhaps the last
 23 paragraph in my statement doesn't cover it all, but it
 24 was — it was obvious to me that there was some
 25 inaccuracies there.

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1 SIR JOHN SAUNDERS: Okay. I mean, you don't in that -- you
 2 do say there are other calls that you haven't noted.
 3 A. Yes, yes.
 4 SIR JOHN SAUNDERS: But you don't actually say your log is
 5 completely inaccurate, which is what you're really
 6 agreeing with now --
 7 A. No, I haven't placed that --
 8 SIR JOHN SAUNDERS: -- both as to timing and as to content.
 9 A. No, I haven't placed that on the record, no.
 10 SIR JOHN SAUNDERS: Right.
 11 MR DE LA POER: Did I understand one of your earlier answers
 12 was that before you came to give evidence today, when
 13 you had a chance to refresh your recollection from more
 14 documents than you had available to you when you made
 15 your statement, that it struck you that your log was
 16 wrong? That you realised that before you walked into
 17 the witness box today?
 18 A. Yes, I knew there was inaccuracies.
 19 SIR JOHN SAUNDERS: I expect someone pointed it out to you
 20 when going through the document.
 21 A. Yes, of course.
 22 MR DE LA POER: Did you yourself take any steps to try and
 23 make clear to anyone who might be reading that, perhaps
 24 a further statement or anything else that --
 25 A. I have with our legal team in terms of the timeline.

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1 Q. I don't want to go into that. All right.
 2 We will leave it there other than this, and I think
 3 it's --
 4 A. I have looked at it.
 5 Q. In fairness to Mr Barnes, it's important that
 6 I acknowledge this. Did you see Mr Barnes' evidence
 7 yesterday?
 8 A. I saw some of it, yes, sir.
 9 Q. Did you see the part of his evidence when Mr Gozem QC
 10 put your notes to him? Did you see that?
 11 A. No, I didn't, actually, no.
 12 Q. Your notes were characterised as being chronological
 13 notes, as Mr Gozem put it, and Mr Barnes was -- his
 14 recollection was challenged by reference to your notes.
 15 A. Right.
 16 Q. And perhaps I'm sure you will accept that that is
 17 a perhaps obvious real-world example of where
 18 inaccuracies in these notes, which are not publicly
 19 identified, can have ramifications?
 20 A. Yes, sir. Yes.
 21 Q. Before we move away from the notes, one final point,
 22 just so that we can understand exactly the position you
 23 were in.
 24 You were at home; is that right?
 25 A. Yes, sir, yes.

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1 Q. You had been woken from sleep --
 2 A. Yes.
 3 Q. -- by your colleague, Mr Butler?
 4 A. Yes.
 5 Q. You had decided not to go to scene; is that right?
 6 A. Yes, we had the discussion about how to manage the
 7 incident because I know John was about to go mobile. It
 8 sounded like he was on his car phone, actually, but he
 9 was about to go mobile. So I was thinking of the wider
 10 picture and getting some intelligence and information
 11 for -- while John was mobilising seemed to be -- that's
 12 generally one of my first actions, to try to contact the
 13 FDO and gather some information --
 14 Q. If I may just focus on the circumstances you were in.
 15 I promise you we will come to your actions on the night.
 16 So you're at home. Do you have access to an
 17 Airwaves radio?
 18 A. Yes.
 19 Q. Do you have access to a quiet place that you can sit in?
 20 A. Yes. Yes.
 21 Q. And you have your mobile telephone as well?
 22 A. Yes, sir. Yes.
 23 Q. Do you have access to the incident log?
 24 A. No, I didn't on the night, no. I was -- not in that
 25 first 45/50 minutes. I was very much on the phone,

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1 really.
 2 Q. You had access to writing materials?
 3 A. Yes.
 4 Q. And so do you agree that, unlike some of your colleagues
 5 who were at the scene, for example, you are not
 6 distracted by the distressing sight of casualties or
 7 your other colleagues who were at Silver Control who may
 8 have people approaching them and vying for their
 9 attention, or indeed your colleague, Mr Butler, who is
 10 having to concentrate on driving? You are in a good
 11 position, do you agree, to carry out --
 12 A. That was my rationale, really, on the evening that
 13 I will do, like, the legwork to try and get that
 14 intelligence and information, try and make sure as part
 15 of my own action card that -- part of our action cards
 16 is about a clear command structure and where that goes,
 17 and I have experience of -- albeit, I work in a company
 18 in Lancashire as my day role, if you like, I have
 19 experience of testing and exercising and incidents in
 20 Greater Manchester, so I do know how that force command
 21 module works. It was just making it clear that that was
 22 the best place to give advice to the tactical and
 23 strategic commander to go to.
 24 Q. And I think you have candidly accepted that the notes
 25 that you did in fact make fell some way short in terms

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1 of accuracy; is that a fair --
 2 A. Yes, I think that first 45 minutes for me was hectic in
 3 terms of ringing and calling, yes.
 4 Q. At the time that you were making the notes, did you
 5 understand that they would form an important part of the
 6 materials arising from this incident?
 7 A. Yes, of course. Yes, sir. Yes.
 8 Q. So bearing in mind that despite the fact that you were
 9 in those conditions that you were, and bearing in mind
 10 that you appreciated they weren't (sic) important, when
 11 we look at lessons for the future and how this might be
 12 done better, what is it that you identify as resulting
 13 in the fact that you were not able to keep an accurate
 14 record of what you were doing?
 15 A. I think if I'd have used the digital voice recorder,
 16 that would have really helped me, to be fair. I think
 17 there was an element of certainly with myself being
 18 awoken to the incident as well, I think there was an
 19 element of: get the calls made, let's get the
 20 information. I wasn't too sure where we were up to on
 21 scene, how many vehicles we had deployed or managers
 22 available at the time, and I really just was trying to
 23 get some actions from the action card done, but also
 24 trying to just make it -- give myself some reassurance
 25 and probably some empowerment to our resources on scene

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1 that either there wasn't a Plato there or an Operation
 2 Plato and the fact that any resources going in there as
 3 well as -- as well as worried about the potential
 4 secondary devices, I was probably worried as well would
 5 that -- was there anything going to hinder us actually
 6 deploying into scene with our staff as well.
 7 Q. We are going to have a look now, insofar as we need to
 8 and we haven't covered it with other calls, just run
 9 through chronologically a number of the actions focusing
 10 upon the period of time before Mr Butler arrived at
 11 Silver Control, which was at 12.10.
 12 You have already agreed that contact with Mr Butler
 13 took place at 22.50?
 14 A. Yes.
 15 Q. And in that conversation it was agreed that he would go
 16 to the scene; is that correct?
 17 A. I think Jon actually said that he was making his way to
 18 the scene, and then after the conversation about where
 19 the command structure was, we did have that discussion
 20 whether he goes to scene or -- I was conscious --
 21 Q. I'm so sorry to interrupt. Was that later in the
 22 evening? Is that a subsequent conversation or is it
 23 part of the first conversation?
 24 A. Jon was midway driving, probably towards Salford at the
 25 time, I would have thought.

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1 Q. We are going to come to that in the chronology. I just
 2 focusing on the first conversation.
 3 A. The first conversation was -- I basically said, "Have
 4 you made any phone calls, have you got any
 5 intelligence /information?" And the answer was, "No, I'm
 6 deploying to scene at the time", which --
 7 SIR JOHN SAUNDERS: His evidence has been that actually he
 8 rang you before he left home. So although you have
 9 recorded the first conversation as being when he is
 10 mobile --
 11 A. Yes, I believe so, yes. But I understood him to be
 12 mobile at the time. And I just -- I'm -- in the
 13 conversation it was, "Well, if your mobile keeps going,
 14 I'll make the calls".
 15 MR DE LA POER: And the upshot of it was that you would
 16 perform the role of TAC adviser/NILO whilst he is
 17 travelling and not able to discharge those duties; is
 18 that correct?
 19 A. Yes, sir. Yes, sir. Yes.
 20 Q. Did he mention to you in that first call that he was
 21 AITC trained?
 22 A. Yes, he stated he did, but I didn't recall it at the
 23 time, but I did know Jon was AITC trained, yes, yes.
 24 SIR JOHN SAUNDERS: I understand you've seen his evidence
 25 and you may well say, well, I don't remember it, but he

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1 may well have said it, but it's your recollection that
 2 matters.
 3 A. Yes. Yes. I think I was concentrating on the fact that
 4 knowing Jon was going mobile or was mobile, my main
 5 point of concern was to get some information for the
 6 commanders down at the front end of the scene and
 7 I think the conversation with Jon was more about just
 8 make your way and we will have that discussion later.
 9 MR DE LA POER: I don't want to know where you were living
 10 at the time, Mr Taylor, but am I right that
 11 geographically speaking you were closer to the scene
 12 than Mr Butler?
 13 A. Yes, I am, in terms of address.
 14 Q. Was there any conversation between you about the fact --
 15 in that first call, "Look, Jon, I can get there quicker
 16 than you"?
 17 A. No, there was not because my understanding was Jon was
 18 mobile. So as -- I think normally my first port of call
 19 for any incident is to try and get hold of the force
 20 duty officer and try and get that information. But my
 21 understanding was Jon was mobile or ready for mobile and
 22 it did sound like a car phone at the time, to be honest.
 23 But -- yes, that was my intention, anyway, just to do
 24 that NILO work, if you like, and get some more
 25 intelligence /information and try and get that command

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1 structure clear, that it was happening as well or try
 2 and advise that command structure.
 3 Q. I'm going to come back to Annemarie Rooney in due
 4 course, and I hope it isn't artificial for me to extract
 5 her and your conversations from the chronology. But if
 6 we just recap the transcripts that you and I have looked
 7 at, we don't need to bring them up. At 23.07, so about
 8 17 minutes later, there is that audio involving you
 9 speaking and the issue of Plato being mentioned and the
 10 fact that you were saying, "I have tried to get through
 11 to the FDO", or words to that effect; all right?
 12 A. Yes. Mm—hm.
 13 Q. 23.22, we have looked at that transcript already as
 14 well. That is where you are speaking internally within
 15 NWSA about the major incident channel and Hailing.
 16 A. Yes.
 17 Q. We then have 23.30, the first of your audio calls with
 18 Mr Smith. The second one is at 23.30, where you mention
 19 Gold to him. Do you recall looking at that this
 20 morning?
 21 A. Yes.
 22 Q. Then at 23.33 you get through to the force duty
 23 officer's line. You speak to Mr Myerscough.
 24 That is as far as I want to take it. I think that
 25 I should acknowledge that there is another call with

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1 Peter Mulcahy, if I pronounce that correctly, at 00.02.
 2 But my focus is just going to be on that first hour.
 3 So we have already looked at all of those calls
 4 already. I don't need to go over them, Mr Taylor.
 5 I want to just turn and focus, firstly, on what
 6 efforts you made between 22.50 and 23.33 to get through
 7 to the force duty officer.
 8 A. I made numerous phone calls, really, and I knew I had
 9 two lines on my phone as well. Then, I think in between
 10 times, I probably spoke to Jon once or twice as well,
 11 Jon Butler once or twice.
 12 Q. We will come to Mr Butler and we have got Ms Rooney as
 13 well. But in terms of your efforts to contact the force
 14 duty officer, was it the case that when you rang those
 15 numbers they were engaged or were you put on hold? What
 16 was the —
 17 A. I think they were engaged. I think it was the engaged
 18 tone, if I remember. Yes.
 19 Q. And did you consider whether there might be any other
 20 means to contact the force duty officer?
 21 A. Yes, I mean, there was always the Hailing channel
 22 possibility as well of utilising that as well.
 23 Q. Did the use of that occur to you on the night?
 24 A. To advise EOC, the control room manager, yes. Yes.
 25 Q. And did you do that?

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1 A. I did do, yes. I did advise and just said, do we need
 2 one, to the FDO as well. But I think I had reassurance
 3 that we had our tactical commander then or almost there
 4 at GMP headquarters.
 5 SIR JOHN SAUNDERS: Okay, I'm really sorry. I just want to
 6 focus on the question.
 7 The question is when you can't get through to the
 8 FDO by using the direct line, do you ring your Control
 9 and say, "Would you use the Hailing channel to try and
 10 get me through to the FDO, please"? Did that happen?
 11 A. Yes, I did have that as a consideration, yes.
 12 Q. And that consideration, did you stay it to the — to
 13 your Control?
 14 A. Yes, but I think the major incident command suite was
 15 still being set up at that time. But yes, I did
 16 (overspeaking) manager.
 17 SIR JOHN SAUNDERS: What has that got to do with it? It is
 18 your control you're going to get through to. So setting
 19 up the suite has nothing to do with it, does it? So did
 20 you speak to them and ask them to do and did they just
 21 disregard your request?
 22 A. I've given it as advice to do that, yes, I'm sure I did.
 23 SIR JOHN SAUNDERS: I'm sorry, you say it's advice. I'm
 24 really sorry to tie you down, but it's really a bit
 25 important.

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1 So you're not advising them, you're asking them to
 2 do it on your behalf because you want to speak to the
 3 FDO and it's important that you do.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: So do you say to the control room,
 6 "Please use the Hailing channel, get me through to the
 7 FDO"?
 8 A. Not that wording, no, sir.
 9 SIR JOHN SAUNDERS: In what wording did you stay it then if
 10 not that wording?
 11 A. I think it was a consideration: can we make a Hailing
 12 call.
 13 SIR JOHN SAUNDERS: You said to the control room, "Can we
 14 make a Hailing call"?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: And they said?
 17 A. I think on the night — I think there was a lot of —
 18 obviously it was quite frantic in the control room, and
 19 I think she may well not have understood what I was
 20 trying to get at, really, I think, and —
 21 SIR JOHN SAUNDERS: How do you know that?
 22 A. I know. I'm making assumptions.
 23 SIR JOHN SAUNDERS: How do you know she didn't understand
 24 what you were saying?
 25 A. It could have been more forceful, yes, I agree. It

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1 could have been, "Let's use the Hailing channel".
 2 SIR JOHN SAUNDERS: But you did say it and they disregarded
 3 it is what you're saying are you?
 4 A. Yes, as a consideration. But I think at the back of my
 5 head as well, I did know Annemarie Rooney, the tactical
 6 commander was at GMP. I was very much more reassured
 7 then that they was face to face — with contact as well.
 8 SIR JOHN SAUNDERS: With the FDO?
 9 A. Not with the FDO, but with the command team at GMP.
 10 MR DE LA POER: Could you help us with at what point you
 11 said this to your emergency control room? Was it in the
 12 course of the transcript that we looked at at 23.07?
 13 A. Yes.
 14 Q. Shall we bring that up. {INQ015347T/1}.
 15 A. The 23.22 one, I think it was.
 16 Q. I'm sorry. That's a different one. I'm sorry, Mr Lopez
 17 {INQ015055/1}. Just a short call, so we can crop right
 18 in to see the text. You just draw our attention to...
 19 (Pause)
 20 Have you had a chance to refresh your memory from
 21 that?
 22 A. I have.
 23 Q. Draw attention to the part of it you want to and explain
 24 how you think this conversation progressed.
 25 A. Yes. I think one of the — one of the channels as well

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1 was identifying that we had a major incident channel
 2 ourselves, an internal major incident channel, which is
 3 on there. And asking the question:
 4 "Have we got a channel opened up for this? Have we
 5 done a Hailing group to GMP? We're just struggling to
 6 get hold of them."
 7 But I think after that I did know that Annemarie had
 8 arrived and that put my mind at reassurance, basically,
 9 if that makes sense, you know, and I think I would know
 10 full well whether Annemarie would need any channels
 11 there, but by that point I'm pretty sure I knew we had
 12 good resource levels at scene. So there would have been
 13 face-to-face decision-making at scene, which gave me
 14 a lot of reassurance, if I'm honest.
 15 Q. Just take that down.
 16 So this is at 23.22, so about 30 minutes after you
 17 have become involved in the incident?
 18 A. Mm—hm.
 19 Q. Just looking back on it now, your job involved you
 20 acting as the NILO; is that right?
 21 A. Yes.
 22 Q. The NILO's sole reason for existence is to liaise with
 23 other agencies; is that right?
 24 A. Yes, I would agree.
 25 Q. It was plain to you, was it, that GMP were the most

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1 important agency that you needed to get hold of?
 2 A. Yes, in terms of intelligence and information, yes.
 3 Q. You were the person, given your conversation with
 4 Mr Butler, whose job it was to achieve that contact with
 5 this most important agency?
 6 A. Yes.
 7 Q. Do you think that 32 minutes is an acceptable period of
 8 time to have elapsed before you are making, in the
 9 language that you do, the suggestion to your control
 10 room?
 11 A. I think there was a lot of conversations in between that
 12 took some time scale up of that as well for myself for
 13 the first — for that first 30/40 minutes, yes. There
 14 was quite a lot of timescale for their ... but yes,
 15 I think we could have had a Hailing channel earlier if
 16 that's the question, I suppose, yes.
 17 Q. It is rather. But let's just focus. One side of your
 18 job is NILO?
 19 A. Yes.
 20 Q. In this situation making contact with the other
 21 emergency services partners, prioritising GMP, as you
 22 were, although not excluding Fire and Rescue, and we'll
 23 come back to them, and for that matter BTP.
 24 Your other role was to provide tactical advice; is
 25 that right?

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1 A. Yes, sir, yes.
 2 Q. Did you provide any tactical advice in the first hour?
 3 And when I say the first hour, I mean the first hour of
 4 your involvement.
 5 A. I would say I was still very much in information
 6 gathering and I was trying to give advice to the control
 7 rooms in terms of the command structure and ensuring
 8 that we were getting the tactical and strategic
 9 commander to the locations, the right locations. It was
 10 difficult after that. I would suggest I was having
 11 phone calls and I think I was getting phone calls back
 12 as well. I had a couple of phone calls with Jon,
 13 I think.
 14 In terms of the emphasis of the Hailing group, we
 15 could have done that earlier. Yes, I think we could
 16 have done that earlier.
 17 Q. Well, would that not have allowed you to get situational
 18 awareness directly from those who were most likely to
 19 know, which would have allowed you to communicate that
 20 on via your control room to the commanders on the
 21 ground?
 22 A. Yes. And I did know the commanders were on the ground,
 23 at the front end of the incident at the time. So,
 24 again, my expectation would have been that there was
 25 other commanders from other services there as well, and

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1 hopefully they would have that situational awareness
 2 down there as well.
 3 Q. Could you rely upon the fact that they were going to get
 4 that situational awareness or did you have a role as the
 5 NILO of obtaining that on behalf of NWAS?
 6 A. I did. And I think that's where the Plato bit comes in,
 7 where I was trying my best to find out whether we'd got
 8 an Operation Plato declared, which was about another
 9 half hour later on, I think it was, that I found out
 10 that.
 11 SIR JOHN SAUNDERS: I really don't want to be unfair to you,
 12 but you appear to be saying two inconsistent things. On
 13 the one hand, you are saying: I'm doing my very best to
 14 get situational awareness, that's my job.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: And then on the other hand you are
 17 saying: well, I knew they were on the ground there,
 18 I assumed there would be other commanders there, so they
 19 would have got situational awareness themselves,
 20 I really don't need to do it. They don't match up.
 21 A. Yes. I wouldn't say I wouldn't really need to do it.
 22 I think I was — I was certainly still trying on the
 23 phone for the FDO. But I think I had a lot of
 24 confidence in what I had heard, there hadn't been
 25 a secondary incident since then either, so I was pretty

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1 confident in the commanders who I knew were down there
 2 on scene to ask the right questions as well.
 3 MR DE LA POER: In fairness to them, in the middle of an
 4 incident, was that a fair assumption for you to make?
 5 A. I think I was still trying to get some information for
 6 the guys down there, yes, as well. I think all the way
 7 through this, once we'd got a tactical commander in
 8 place, and I wasn't too sure how far Jon was away from
 9 the TCG at the time, from GMP HQ, I was very much more
 10 aware that they would probably end up having better
 11 awareness than I would on any telephone, basically, as
 12 they would actually be in the room with the command team
 13 from the other services.
 14 Q. As part of your NILO role, did you make any attempt to
 15 contact British Transport Police?
 16 A. No, I didn't, sir, no.
 17 Q. Bearing in mind that this took place at part of the
 18 Victoria Exchange Complex, why was it that you did not
 19 speak to BTP?
 20 A. I think I was wholly — I don't think — I don't think
 21 I had got a direct route through to BTP on my phone.
 22 I would probably expect to do that through the police
 23 myself, through GMP. I wasn't wholly sure where the
 24 incident was either in terms of the — obviously with no
 25 eyes on in terms of where it was in terms of the foyer

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1 and the railway platforms.
 2 Q. Did you understand that it was part of the Victoria
 3 Exchange Complex?
 4 A. Yes, I did a bit later on, yes.
 5 Q. Did you understand that when you were first notified of
 6 it, that it was part of the Victoria Exchange Complex?
 7 A. Yes. Yes, I do know the arena, yes, yes.
 8 Q. And so was it not inevitable that BTP officers would be
 9 in the vicinity?
 10 A. Yes — yes, it probably was, yes, but quite admittedly,
 11 I didn't think they were the key agency at the time to
 12 be contacting, I was just going through trying to
 13 contact the GMP FDO and the command structure
 14 internally.
 15 Q. What about whether through the control room, North West
 16 Fire Control, or through the NILO? Did you make any
 17 attempt to contact them?
 18 A. Yes, I rang the North West Fire Service line quite a bit
 19 later on, but again I think my expectation — and it was
 20 an expectation — is that they would have responded to
 21 the GMP force HQ by then as well.
 22 Q. I think you might be referring to a call at 1.04.
 23 A. Yes.
 24 Q. All right. So let's focus upon that critical first
 25 period.

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1 Your job is to facilitate inter—agency liaison; is
 2 that right?
 3 A. Yes, sir. Yes.
 4 Q. Your job is to ensure that JESIP works; is that fair?
 5 A. Yes. Yes, sir. Yes.
 6 Q. You have, understandably perhaps, focused upon speaking
 7 to GMP, but that has not been successful. In that first
 8 hour that you became involved, so I'm talking about up
 9 to 11.50, did you make any effort to contact somebody
 10 who was working for or part of Fire and Rescue?
 11 A. No, I didn't, no.
 12 Q. Again, why do you think that was?
 13 A. I think my expectation, and it was an expectation, is
 14 that they would have responded. I was aware that they
 15 were aware of the call. So my expectation was that they
 16 would have a commander at the force HQ, and admittedly
 17 I think as — afterwards, later on in the call,
 18 I actually said to Jon, "Have you got somebody there
 19 from Fire and Rescue?", which I think was just after —
 20 on the 00.30 call, to Jon on the mobile that is, sorry.
 21 The initial answer was no, but I know that one of the
 22 NILOs did come in at that time from fire.
 23 Q. Mr Taylor, you have in relation to two matters cited
 24 your expectation, and don't think for a moment I'm
 25 doubting that evidence by asking this question. But we

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1 know that the commanders on the ground didn't in fact
 2 speak to each other for some time.
 3 A. Mm—hm.
 4 Q. We know that Fire and Rescue did not deploy for some
 5 time.
 6 A. Yes.
 7 Q. You had an expectation in relation to each of those. Do
 8 the facts of 22 May 2017 demonstrate that relying on
 9 such expectations is not the right way to approach the
 10 role?
 11 A. Yes. I would agree, and I think — I think I have —
 12 again, an expectation, I suppose, but I think that we
 13 know we have action cards and a call—out system that
 14 works to get people responding. And I did assume —
 15 I think one of the lessons I learned definitely was, you
 16 know, don't assume that expectation and be more sort
 17 of — just more empowering to make sure that it has
 18 clearly happened.
 19 Q. I'm just going to conclude my questions of you by just
 20 having a look at your debrief. But in terms of those —
 21 the lesson that you learned about not having
 22 expectations, was that something that you fed back to
 23 anybody within your organisation as a result of the
 24 debrief process or is that something that has come to
 25 you later than that?

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1 A. It's probably come to me later than that that, sir, yes.
 2 Q. The debrief is at {INQ022381/1}. We are going to go to
 3 {INQ022381/22} for your entry.
 4 Just go to box some matters off, if we go to
 5 {INQ022381/23}, we can see yours starts at the bottom
 6 there.
 7 If we crop in to answer 3, I'm not proposing to take
 8 you through all of this at all, but you indicate here:
 9 "I received a call from my colleague and not EOC at
 10 10.53."
 11 Your notes record it at 10.43.
 12 A. Yes.
 13 Q. Is that a typo from your notes or at this stage had you
 14 realised that your initial note was wrong?
 15 A. Yes. Possibly in this, yes. Possibly that my initial
 16 note was wrong, yes. Yes.
 17 Q. So you think by the time of this debrief, which is
 18 before you made your statement, Mr Taylor, you realised
 19 that the timing in your note was incorrect?
 20 A. Yes.
 21 Q. Or is it a typo?
 22 A. I'm sorry I can't recall. I really can't recall that.
 23 Q. All right.
 24 A. Yes.
 25 Q. Now, what you go on to say — I'm so sorry. I have just

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1 lost my point in the note. You say:
 2 "Organisationally on occasions we have one tactical
 3 adviser on call and the incident would have been a huge
 4 challenge for one individual to make contact calls with
 5 partner agencies, our command team and mobilise at the
 6 same time."
 7 A. Yes, sir.
 8 Q. In effect, during that critical first hour or so, there
 9 really was only one tactical adviser, wasn't there,
 10 because the other was mobilising?
 11 A. Yes. Yes.
 12 Q. Was just having two of you enough?
 13 A. I think three would have been ideal. We did used to
 14 have three on call up to a few years ago and I think
 15 I was just trying to make the point that, you know, it
 16 was a very, very challenging incident from the onset of
 17 just trying to make a quick rapid decision with Jon
 18 about some rationale about how he was going to manage
 19 them calls, whether we start deploying, and obviously
 20 that conversation took place where Jon was then
 21 deploying and I would make the calls.
 22 Yes. I think it was very, very challenging.
 23 And I know — I know I missed calls on my mobile phone
 24 as well from other people. It was a very challenging 30
 25 to 40 minutes, if not slightly longer, that initial

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1 phase.
 2 Q. We can see that perhaps as an example of the point the
 3 chairman made about how inaccurate notes can end up as
 4 part of a debrief:
 5 "On contacting the force duty officer and our own
 6 EOC there was a confusion around the request for an
 7 interoperability channel."
 8 The two events seem to be tied as they are in your
 9 notes, but perhaps they were separate on the night; do
 10 you agree?
 11 A. Yes, yes, I would agree.
 12 Q. If we go over the page {INQ022381/24} we can see what
 13 you say under 4 in terms of what went well:
 14 "Quick decisions with my colleague on our roles and
 15 being able to have focus by being remote and
 16 communicating with relevant staff and partner agencies."
 17 You appear in that answer to be suggesting that the
 18 NILO tactical adviser role on the night was a success.
 19 Is that a fair interpretation of what you're saying
 20 there?
 21 A. I think it was just a rationale for how we responded to
 22 the incident together and broke up that — shared sort
 23 of that — the positions between us, hopefully, to —
 24 just to make really good use of the time in terms of
 25 focusing on the action cards whilst Jon was driving and

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1 mobile as well.
 2 We probably duplicated some as well because no doubt
 3 Jon made some calls very similar to reassure himself.
 4 SIR JOHN SAUNDERS: Okay. I can see the virtue of having,
 5 particularly when you're some distance away from the
 6 scene and from force headquarters, having you actually
 7 giving your tactical adviser doing these jobs from home.
 8 It doesn't look like it worked terribly well
 9 and I wonder whether it actually does work for you to do
 10 it from home in this way or whether actually it can only
 11 work properly if you've gone in to a central place.
 12 A. I think I was just worried about the timings, really,
 13 just whether we were going to get secondary incidents,
 14 whether — I didn't at that point, early in the
 15 incident, know how much staff were deployed and how many
 16 commanders were deployed. My concern was two things,
 17 really: one was whether there was a safety element to
 18 our staff responding at the — at the time, but also at
 19 the back of my head was probably just that — you know,
 20 were we going to be held back by anything as well, which
 21 obviously we didn't want to do, you know. You know, and
 22 that was a little bit of a concern around Operation
 23 Plato, had it been declared or not.
 24 SIR JOHN SAUNDERS: So these concerns prevented you doing
 25 the job properly?

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1 A. I think they just took — they just took me some time,
 2 that 30/40 minutes to get my head round where we were up
 3 to in the initial stages with the command structure —
 4 and my attempts to get hold of the FDO, yes.
 5 MR DE LA POER: You completed this debrief no doubt by
 6 reference to your notes and your incident log which we
 7 can see that in that critical first period contain
 8 a number of inaccuracies. Now that we have been through
 9 it all and in fact rearranged the timeline, I hope,
 10 better to reflect what we can be confident occurred, is
 11 it still your view, Mr Taylor, that the role of NILO and
 12 TAC adviser on the night was a success during that first
 13 hour or so that you were involved or do you have
 14 a different opinion now?
 15 A. I think there was some duplication on the tactical
 16 adviser role because I knew Jon was driving, and I think
 17 it could have gone better in terms of contacting the
 18 FDO. I think — I was thankful I got through, but there
 19 was other calls in between. But I was thankful I had
 20 got through in the end.
 21 Yes, I think from a lesson point of view, I would
 22 certainly do it differently or advise differently to go
 23 on to a Hailing channel, plus we have now got
 24 multi-agency interoperable channels as well now. So
 25 we've done quite a bit of work after the event on them

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1 as well, including other areas as well that we cover on
 2 call.
 3 MR DE LA POER: Thank you, Mr Taylor. I don't know, sir,
 4 whether you have any further questions.
 5 SIR JOHN SAUNDERS: "The mass casualties dispersal plan
 6 which we are looking at there, during the initial
 7 response it was clear the scene and tactical advisers
 8 were aware of the draft GM casualty distribution plan
 9 recently agreed with the acute trusts and trauma
 10 network. As a priority and very quickly the numbers of
 11 P1s and which hospitals we used was communicated from
 12 the tactical commander."
 13 How did you know all that?
 14 A. I'd already spoke to Annemarie about access to the plan
 15 while she was at GMP headquarters and I knew she'd got
 16 access to the plan. I think there was an Airwaves
 17 conversation around it as well, about the plan.
 18 SIR JOHN SAUNDERS: Okay. We know that the numbers are
 19 communicated at about 11.30-ish.
 20 MR DE LA POER: I think slightly later than that, but only
 21 by minutes.
 22 SIR JOHN SAUNDERS: Okay. So Annemarie Rooney is talking to
 23 Dan Smith and is communicating the numbers. He's asked
 24 her to go and find out what they were, and she's come
 25 back and did that.

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1 Is that what you were talking about, about it being
 2 very quickly that that had happened?
 3 A. I think it was very quickly, recognising that we could
 4 use that dispersal plan on the night. Yes, that was
 5 key, that we were all thinking the same, I think.
 6 I think Dan Smith, myself, I'm not sure about Annemarie,
 7 certainly Jon, we'd all been at that same exercise only
 8 a few weeks earlier and made it clear we'd use that
 9 dispersal plan.
 10 MR DE LA POER: Sir, I think — it was almost certainly my
 11 oversight, but you having raised that, sir, I wonder if
 12 I can deal with it, because in fact if we look at your
 13 notes, that mass dispersal casualty plan is mentioned.
 14 Mr Lopez, {INQ029154/1}.
 15 If we go to {INQ029154/3}, please. That's
 16 {INQ029154/4}, Mr Lopez. Thank you.
 17 If we crop in to the very centre, we can see under
 18 the entry number 3, 22.05.17, the action is:
 19 "To contact Annemarie Rooney tactical commander.
 20 Confirmation mass casualty dispersal plan being utilised
 21 for the incident."
 22 We don't need to go over the issues with the timings
 23 here. On the face of that, you are speaking to
 24 Annemarie Rooney within 15 minutes of the explosion,
 25 discussing that mass casualty plan. Can I just give you

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1 this piece of information before I ask you the question.
 2 The reference to the chairman made, and I think you
 3 were making, to the Airwaves is that there is a record
 4 of a conversation between Dan Smith and Annemarie Rooney
 5 at 23.39, so nearly an hour after this —

6 A. Yes.

7 Q. — in which Mr Smith raises the mass casualty
 8 distribution plan with Ms Rooney. It will be a matter
 9 entirely for the chairman what he makes of the audio of
 10 that, and we haven't heard from Ms Rooney, but one
 11 interpretation may be that that seemed to be something
 12 she hasn't thought about at that point. There is
 13 certainly a pause and potentially confusion in her voice
 14 for just a moment and she says that she will get back to
 15 him; all right?

16 Do you think, doing the best you can, Mr Taylor, and
 17 bearing in mind the frankness that you've spoken about
 18 the timings in your notes, that you had spoken to
 19 Annemarie Rooney before 23.39 about the mass casualty
 20 distribution plan?

21 A. Yes, we discussed it over the mobile phone just to
 22 ensure that she had access to it or could get access to
 23 it.

24 Q. Before 23.39?

25 A. I'm not 100% sure.

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1 Q. All right.

2 A. I'm sorry.

3 Q. I don't want you to guess. If there is uncertainty in
 4 your mind, I think the evidence therefore rests that we
 5 know she spoke to Mr Smith about it at that time because
 6 that's recorded. She may have spoken to you about that
 7 before or after so far as you are able to help us?

8 A. Yes. I'm — I would — I would say it was before
 9 because I think it was an early — an early sort of
 10 option for me to say, "What about the casualty dispersal
 11 plan if we need it?", and I know Annemarie was
 12 straightaway going to look for that, but I can't
 13 remember at what point, where she was at GMP, whether
 14 she was actually accessing the building at that time or
 15 in the building at that time.

16 Q. And of course you don't have reliable notes to draw on.
 17 If anything, the notes, would you agree, add to the
 18 confusion?

19 A. Yes, I think it was the fact that it was a mobile call
 20 as well, yes.

21 MR DE LA POER: Thank you. I have had an indication from
 22 Mr Horwell, turning to core participant questions, that
 23 unless something arose, he would not have any questions,
 24 and I propose, given he hasn't contacted me again, with
 25 no discourtesy to him, simply to move straight to

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1 Mr Gozem QC who is taking the lead on behalf of the
 2 families.

3 Questions from MR GOZEM

4 MR GOZEM: Good afternoon. Can I please begin by — first
 5 of all, let me say to you I am not, Mr Taylor, going to
 6 take very long over this, I hope.

7 Could, Mr Lopez, you please put up {INQ013132/17}.

8 This is part of the major incident response plan
 9 and I just want to look with you, please, at
 10 paragraph 4.3.1, NWAS tactical adviser. Can you see
 11 that?

12 A. Yes, I can. Yes, sir. Yes.

13 Q. The summary below the heading says:

14 "The NWAS tactical adviser provides advice with
 15 regards to options and specialist resources that may be
 16 available and appropriate to the management of a major
 17 incident that may help the tactical commander in their
 18 decision-making process."

19 That's part 1. Part 2, the next line:

20 "The tactical adviser also acts as the NWAS national
 21 inter-agency liaison officer (NILO), able to communicate
 22 with multi-agency partners to gather sensitive
 23 information."

24 So there are two parts to the role, and effectively
 25 did you split or share the role with Mr Butler?

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1 A. Yes, sir, yes.

2 Q. And were you effectively the NILO and was he the one who
 3 was going to help in the management of the major
 4 incident by assisting the tactical commander?

5 A. Yes, I think there was some duplication as well because
 6 I knew Jon Butler was driving, so it was a combination
 7 of both the tactical adviser role or certainly from the
 8 action card and the NILO role as well. But yes, we
 9 decided that — sorry.

10 SIR JOHN SAUNDERS: You keep going with your answer — have
 11 you finished or do you want to say something else?

12 A. I was just going to say that I think in the end, when
 13 we — and I derive the information that, certainly from
 14 a timescale point of view, at that time there was no —
 15 there was no further shooting, no further incidents, no
 16 active shooters. I know there were some other incidents
 17 that I wasn't aware of that were not relative to the
 18 arena one, but we made the decision that the — to
 19 support the tactical commander, that Jon Butler make his
 20 way there, and we discussed that.

21 So — and having worked in there with Annemarie,
 22 I know how busy it can get for the tactical commander as
 23 well.

24 Yes, I would say we duplicated roles in some points,
 25 just to reassure ourselves around the action cards.

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1 MR GOZEM: That's fine. Thank you for that comprehensive
 2 answer.
 3 Could we look next, please, at something you said in
 4 a debrief document. It's {INQ022381/23}, please,
 5 Mr Lopez.
 6 Could we close in a little on box 2, please? Sorry,
 7 I think that's box 3. Box 2 is at the top.
 8 SIR JOHN SAUNDERS: Yes, we have got that now.
 9 MR GOZEM: Thank you very much.
 10 It's the second paragraph:
 11 "I was called by my colleague to inform me of the
 12 incident. At that stage we made a decision that I would
 13 make any relevant phone calls to initiate the initial
 14 actions of action card 14 whilst he was already mobile."
 15 Right? Do you agree that's what you wrote and that
 16 was the agreement?
 17 A. Yes, sir. Yes.
 18 Q. Thank you. Did you have action card 14 available to
 19 you?
 20 A. Yes, I did, sir, yes.
 21 Q. Could we have a look at it, please. It's
 22 {INQ013422/27}.
 23 Number 1 on the list is:
 24 "On notification of the incident, start an incident
 25 log", isn't it?

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1 A. Yes, sir, yes.
 2 Q. You didn't do that, did you?
 3 A. I was frantic in phone calls, if I'm honest, yes. I was
 4 making lots of phone calls to try to get through to the
 5 FDO initially, yes, yes.
 6 Q. So you didn't do it, did you?
 7 A. I backtracked quite a bit, yes, and that's why there's
 8 inaccuracies within the time frames.
 9 Q. Yes. But the effect of that, ignoring the first action
 10 on that action card, is that your log can't now be
 11 relied on, can it?
 12 A. I think -- I think I was just concentrating really, sir,
 13 on the actual phone calls at the time, just -- probably
 14 because of the nature of the incident as well really.
 15 Admittedly, I think, you know, I could certainly have
 16 made better use of the digital voice recorder or -- and
 17 quite admittedly, yes, the time frames were inaccurate.
 18 Q. But, Mr Taylor, you've been very frank, and I understand
 19 that, but I just want to set out clearly for those who
 20 are listening, and wondering what we can learn for the
 21 future, that your log can't be relied on, can it?
 22 A. I would say that I was -- I was completing some entries
 23 down there as well, probably off the contemporaneous
 24 notes, rather than the log, around making in my own mind
 25 what calls I should have made, who I should have been

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1 contacting to. But yes, it's -- yes, I would have to
 2 accept that it's --
 3 SIR JOHN SAUNDERS: It's a mess, isn't it? The times are
 4 wrong, you've got bits of conversation with one person
 5 which were in fact with another, all mixed up in the
 6 same note, albeit --
 7 A. Yes, basically, yes.
 8 SIR JOHN SAUNDERS: So I think Mr Gozem is making a fair
 9 point when he says it is not a particularly reliable
 10 document.
 11 A. Yes.
 12 MR GOZEM: Thank you.
 13 I think it follows, doesn't it, that where your
 14 statement relies on the log, those same inaccuracies
 15 follow? So it makes it difficult to rely on the
 16 statement, doesn't it? Do you agree?
 17 A. The statement was done with the best of my knowledge on
 18 the night and my recollections, if I'm being quite
 19 honest, as well as entries in the log, albeit the time
 20 frames were out.
 21 SIR JOHN SAUNDERS: Okay. You relied on the log to make the
 22 statement. The log is inaccurate, so it follows the
 23 statement is inaccurate, doesn't it?
 24 A. And some conversations on the mobile phone as well.
 25 SIR JOHN SAUNDERS: Not everything is inaccurate but some

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1 things are?
 2 MR GOZEM: But it also follows, doesn't it, that it's quite
 3 likely that some of your debrief documents that are
 4 based on the log are going to be unreliable as well; is
 5 that fair?
 6 A. I think they would be -- they would be just my personal
 7 views, sir, on the debrief as well as some factual --
 8 probably around the plans that we have as well.
 9 Q. Yes, but can you just concentrate on this question:
 10 where the debrief documents rely on your log, the
 11 debrief documents are likely to be unreliable as well,
 12 aren't they?
 13 A. I would like to think not all of them, sir. And I think
 14 some of them were definitely recollections from myself
 15 as well, during the debrief, that event that we did
 16 have. There was a lot of -- there was actually a lot
 17 of -- there was a lot of -- a lot of the incident that
 18 took place and how I responded to it in the background
 19 that I wasn't probably aware of because obviously I --
 20 I wasn't at scene and the action cards were just -- were
 21 being followed as advised by the control room. So yes,
 22 there was a big reliance on me, you know, and I did make
 23 the advice, are we following the action cards, you know,
 24 in terms of the health control desk, notifying
 25 hospitals.

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1 But I would say my personal reflection on that is
 2 that I would certainly probably be more -- I would want
 3 more assurance that some of the actions had been done
 4 next time, I think, yes. That's my lesson, I should
 5 say.
 6 Q. Sorry, Mr Taylor, let me be clear. I'm not here to
 7 criticise every aspect of what you did, nor to mount an
 8 attack on you. I'm just seeing whether there's anything
 9 that can be learned for the future.
 10 You've told us that you have learned that you will
 11 use a dictaphone in the future. Just explain to us,
 12 please, why it didn't occur to you, or did it, to use it
 13 on the night? You'd been issued with one. Why didn't
 14 you --
 15 A. That was a mistake on my part, sir. I think I was just
 16 trying frantically to use the phone to get some
 17 information/intelligence. I didn't have a lot of
 18 information on what had gone on at scene at the time --
 19 SIR JOHN SAUNDERS: Can you just explain about the
 20 dictaphones.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: How long had you had a dictaphone?
 23 A. Probably a couple of years.
 24 Q. For what purpose were you supplied with a dictaphone?
 25 A. To actually record actions and to record --

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1 SIR JOHN SAUNDERS: For this sort of event?
 2 A. Yes. And I think it was just that frantic early nature
 3 that -- I was just really on the phone, if I'm --
 4 SIR JOHN SAUNDERS: Have you done before? Have you used
 5 your dictaphone on other occasions?
 6 A. Yes, just for personal use around other things, in terms
 7 of incidents and what have you, yes.
 8 MR GOZEM: Final point, Mr Taylor. Please could we have up
 9 {INQ014701/8}, Mr Lopez. Could you just look at point 1
 10 there:
 11 "Ensuring that all logs that are completed have used
 12 best practice."
 13 Now, help us: should that include, do you think, and
 14 stress the importance of the use of dictaphones in
 15 challenging or stressful situations like the one you're
 16 describing you being in that night? Should the training
 17 include that? Does it not at the moment?
 18 A. Yes. Yes, it does, sir. We did a -- some training --
 19 I think it was late last year or early this year and it
 20 was basically ensuring the commanders had the right --
 21 and it was in a lesson that I think we utilised in terms
 22 of the recommendations -- to ensure they had the right
 23 kit and equipment in the commander bags that they carry,
 24 which would include the dictaphones, Airwave radios,
 25 tabards --

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1 Q. Yes.
 2 A. -- certain plans if you wanted to carry plans as well.
 3 Q. Okay.
 4 SIR JOHN SAUNDERS: It says in the comments for that:
 5 "Logging best practice has been included in
 6 commander training since 26 July 2017."
 7 They'd given you dictaphones before that, a couple
 8 of years before?
 9 A. They had, sir, yes.
 10 SIR JOHN SAUNDERS: Hadn't they included that use of the
 11 dictaphone in logging best practice before July 2017.
 12 A. Once we had got them, yes, we would have that, and
 13 certainly in the -- certainly in the training, but the
 14 loggist training sometimes didn't always have
 15 commanders. It's got a lot of other staff, such as
 16 control room staff and administrative staff as well that
 17 are qualified to do logging.
 18 SIR JOHN SAUNDERS: So logging best practice had been
 19 included in commander training in 26 July 2017. That's
 20 not something new. You're saying that had been going on
 21 for a while?
 22 A. In terms of the?
 23 SIR JOHN SAUNDERS: Dictaphones.
 24 A. Yes. Yes.
 25 SIR JOHN SAUNDERS: Okay.

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1 MR GOZEM: I have no more questions, thank you very much,
 2 sir.
 3 SIR JOHN SAUNDERS: Thank you, Mr Gozem.
 4 MR DE LA POER: I have been informed by Ms Roberts QC that
 5 she has no questions for Mr Taylor and, unless you have
 6 any further questions, sir, for him, that concludes the
 7 NWAS command and control witnesses. We will next, after
 8 a short break, I expect, be moving to Fire and Rescue.
 9 SIR JOHN SAUNDERS: Right, okay. Thank you very much. We
 10 will certainly have learned some lessons from your
 11 evidence.
 12 A. Thank you.
 13 SIR JOHN SAUNDERS: How long do you want?
 14 MR DE LA POER: If we could have 10 minutes, sir.
 15 SIR JOHN SAUNDERS: Right, a 10--minute break.
 16 (3.22 pm)
 17 (A short break)
 18 (3.34 pm)
 19 MR DE LA POER: Sir, do you require Mr Argyle to be
 20 re--sworn?
 21 SIR JOHN SAUNDERS: No. Thank you very much.
 22 MR PAUL ARGYLE (recalled)
 23 Questions from MR DE LA POER
 24 MR DE LA POER: Mr Argyle, thank you very much for your
 25 patience today.

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1 Before we begin with questioning, I'm just going to
 2 remind everybody of your previous appearance before this
 3 inquiry. You gave evidence on 1 February of this year;
 4 is that right?
 5 A. Yes.
 6 Q. And the focus of that evidence was of you in the role of
 7 the chair of the Greater Manchester Resilience Forum; is
 8 that correct?
 9 A. Yes.
 10 Q. And you will recall, Mr Argyle, that what Mr Greaney,
 11 who was questioning you on that occasion, made clear was
 12 that there were four topics that you would not be
 13 dealing with to conclusion, those being: your role in
 14 the MTFA capability at GMFRS; your role in the
 15 development of North West Fire Control; the debrief
 16 following 22 May 2017; and the lessons learned from
 17 Exercise Winchester Accord insofar as you didn't deal
 18 with them. Does that accord with your recollection?
 19 A. It does.
 20 SIR JOHN SAUNDERS: Can I make it clear to everyone we will
 21 go on until about 4.30. I'm afraid I'm going to have to
 22 ask you to come back tomorrow if that's all right.
 23 MR DE LA POER: I'm going to add a fifth topic to that,
 24 Mr Argyle, which arose during the course of your
 25 evidence and which you have subsequently dealt, namely

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1 matters arising from your evidence which had been the
 2 subject of a fourth witness statement by you.
 3 So as we turn then to the first of those four
 4 categories, let's just remind ourselves of who you were
 5 within Greater Manchester Fire and Rescue Service. Is
 6 it correct that you worked for GMFRS for approximately
 7 31 years?
 8 A. Yes.
 9 Q. Between the years 2011 and 2015 were you the assistant
 10 chief fire officer?
 11 A. I was one of two assistant chief fire officers.
 12 Q. I think that your particular role title was director of
 13 emergency response?
 14 A. Correct.
 15 Q. In September 2015, were you promoted to deputy chief
 16 fire officer?
 17 A. Yes.
 18 Q. And did you retire in July of 2017?
 19 A. Yes, I did.
 20 Q. And in terms of that career in the context of the
 21 resilience forum, did you become chair of the resilience
 22 forum in the same year that you became the deputy chief
 23 fire officer, 2015?
 24 A. Yes.
 25 Q. So anyone who wants to know more about you can look at

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1 the transcript for 1 February.
 2 I'm going to turn to the first of those topics now,
 3 Mr Argyle, namely the MTFA capability at Greater
 4 Manchester Fire and Rescue Service.
 5 I'm sure you are aware, but others listening may not
 6 be, but Mr Neil Gaskell is going to be joining us
 7 tomorrow. Did you know that?
 8 A. Yes, I did, yes.
 9 Q. And would it be fair to say that in terms of the detail
 10 of that capability, there will be elements that he will
 11 be in a better position to assist the inquiry with than
 12 you?
 13 A. Yes.
 14 Q. So we will use you to introduce this topic and follow up
 15 with Mr Gaskell.
 16 Did the MTFA capability come to Greater Manchester
 17 Fire and Rescue Service in about 2011?
 18 A. Yes.
 19 Q. And that was when, as we have just established, you were
 20 the assistant chief fire officer, one of two?
 21 A. Yes.
 22 Q. And was that capability developed in conjunction with
 23 officers at the Contingency Planning Unit?
 24 A. Yes.
 25 Q. And as we have identified, was one of those officers in

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1 particular Mr Neil Gaskell?
 2 A. He was, yes.
 3 Q. In the course of setting up that capability over time,
 4 were a number of fire stations that we are not going to
 5 identify selected to host an MTFA capability?
 6 A. Yes, they were.
 7 Q. And were you the lead for Greater Manchester Fire and
 8 Rescue Service in terms of MTFA capability until you
 9 became the deputy chief fire officer in 2015?
 10 A. Yes.
 11 Q. And so what will be immediately apparent from that was
 12 that there was a period of just short of 2 years before
 13 the attack when that was not your role; is that correct?
 14 A. Yes.
 15 Q. Now, in the course of your time as lead for GMFRS's
 16 marauding firearms attack capability, did you become
 17 aware of a dispute with the Fire Brigades Union?
 18 A. Yes, I was aware of it, yes.
 19 Q. And in summary, we're not going to go into the rights
 20 and wrongs of that dispute, that's dispute focusing on
 21 whether or not such a capability, namely to respond to
 22 an MTFA, whether that was or was not within the existing
 23 firefighters' role map?
 24 A. That was the crux of the matter, yes.
 25 Q. And for the record, am I right in saying, as you record

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1 in your statement, that your position was that it was
 2 within the firefighters' role map?
 3 A. Yes, it is.
 4 Q. We now know, and this includes events after the attack
 5 or after your tenure and after the attack, where that
 6 dispute ended up, namely that there was a period of time
 7 when the MTFA capability after the attack was withdrawn
 8 in the Manchester area; is that correct?
 9 A. I'm aware of that through seeing the media, yes.
 10 Q. But I think that you had left the Fire and Rescue
 11 Service by the time that occurred?
 12 A. Yes.
 13 Q. But you were present and in a relevant role during the
 14 years building up to that; is that fair?
 15 A. Yes.
 16 Q. Let's just see if we can get to the bottom of something
 17 raised with Mr Dark about whether or not that dispute
 18 has any bearing on the events of 22 May 2017.
 19 During your tenure as lead for MTFA in Greater
 20 Manchester, so we're talking 2011 to September 2015, did
 21 you speak to rank and file firefighters about that role?
 22 A. Yes, quite often.
 23 Q. And did you in the course of those conversations detect
 24 any reticence on the part of those rank and file
 25 officers to respond to an MTFA in that MTFA capacity?

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1 A. Not to respond. There was several periods where they
 2 would be confused because they were given information by
 3 the FBU that it was voluntary and they shouldn't be
 4 doing it. So they would feel concerned that they would
 5 come under a lot of pressure from the FBU if they
 6 continued in that role. So I would go and explain to
 7 them why it was in their role and that they were being
 8 confused, in my opinion deliberately, by the FBU.
 9 Q. So your word is "confused" in terms of how you perceived
 10 their state of mind and we are talking generally here?
 11 A. Confused as to whether the version of events that they
 12 were being told by the FBU was accurate or whether
 13 actually they were contracted by Greater Manchester Fire
 14 and Rescue Service and it was their contractual role.
 15 I would say that all the firefighters, whoever spoke to
 16 me, wanted to do the role, but were concerned that they
 17 would come under pressure from the FBU.
 18 SIR JOHN SAUNDERS: Can I make clear to you, as I made clear
 19 to everyone, that I'm not deciding this industrial
 20 dispute or not taking sides one way or the other.
 21 MR DE LA POER: Absolutely, and although you have made
 22 a comment about what you thought was the motivation of
 23 the FBU, if I can ask you -- I'm not suggesting that
 24 isn't your opinion, but just focus upon the effect on
 25 firefighters because we're trying to get to the bottom

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1 of whether this has any relevance at all to why that
 2 capability wasn't deployed or anything around MTFA and
 3 the assessment of risk. So that's what we are trying to
 4 get to the bottom of, Mr Argyle.
 5 So you have characterised it as confusion in the
 6 context of firefighters who otherwise wished to deploy.
 7 Did you see any evidence within those rank and file
 8 officers that had they been given the instruction to
 9 deploy, that they would have declined to do so?
 10 A. Absolutely not. They would have deployed. Can I add
 11 one thing to try and be helpful, even to the FBU. There
 12 were periods of national strike, and when the national
 13 strike was on, of course firefighters were not at work,
 14 but there was a national agreement with the FBU that if
 15 there was a major incident, the strike would be paused
 16 and people would go to a major incident, including
 17 an MTFA.
 18 Q. We've spoken about the rank and file. Obviously the FBU
 19 membership can go beyond that.
 20 A. Yes.
 21 Q. And at all events, whether or not an FBU member,
 22 somebody in a command position may nonetheless be
 23 issuing instructions to FBU members?
 24 A. Yes.
 25 Q. So far as those middle order commanders, so below chief

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1 officer rank but above those who will be deploying on
 2 the front line, did you have any discussions with people
 3 at that level -- so I'm imagining here the station
 4 manager, group manager level -- about the effect of the
 5 ongoing dispute with the FBU on deployment to MTFAs?
 6 A. My communications were wide. So they were involved in
 7 receiving those communications. Just to clarify, many
 8 of what you might consider senior managers are members
 9 of the FBU. FBU membership can be in quite senior
 10 management. They don't have to be, but they can be. So
 11 station managers can be in the FBU.
 12 That was never an issue. I don't see firefighters
 13 or the managers having a concern about deploying to
 14 MTFA; it was just the political backdrop about the
 15 national discussions.
 16 Q. One of the matters, and again not judging the rights and
 17 wrongs of it, the FBU were raising was whether or not
 18 firefighters deployed in that role would be sufficiently
 19 safe. Again, I'm trying to use neutral language here.
 20 There were concerns around personal protective equipment
 21 and training.
 22 Did that dispute, so far as you were able to
 23 perceive, in your role as lead for this capability, ever
 24 affect the assessment of risk by Greater Manchester Fire
 25 and Rescue officers?

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1 A. No.
 2 Q. The final matter that I want to ask you about the MTFA
 3 capability, and I make clear that we will pick up the
 4 detail of it with Mr Gaskell, there was an assurance
 5 visit in February 2016. That was after you were the
 6 MTFA lead. Did you play any part in that, or I think it
 7 was Mr Keelan. Was he your replacement?
 8 A. He was.
 9 Q. The person who dealt with that?
 10 A. I recall the audit team, or at least one of them,
 11 I think two of them, speaking to me right at the
 12 beginning of the audit, mainly out of courtesy as the
 13 deputy chief fire officer and author, because they were
 14 aware I had been involved from the initial stages.
 15 Again, to the best of my recollection, on the final day,
 16 as is typical with audits, they gave us a verbal brief
 17 of their findings, sort of a summary of what would be
 18 coming in the final report.
 19 Q. So you had some prior knowledge before receiving that
 20 report of what was to come?
 21 A. That's my best memory of what happened, yes.
 22 Q. Was there anything in the information that they were
 23 conveying to you at the conclusion of that that gave you
 24 pause for thought and where you thought something needs
 25 to be done to address a significant problem?

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1 A. Not of great concern, no.
 2 Q. And in terms of the management of the conclusions of
 3 that report, would Mr Keelan or Mr Gaskell be a better
 4 person to ask questions of?
 5 A. Yes.
 6 Q. With that then I'll move on to the second topic that was
 7 left at the point at which you concluded your evidence
 8 on 1 February, North West Fire Control.
 9 Now, was North West Fire Control, the creation of
 10 that organisation, another project that you were
 11 involved in as part of your role as assistant chief fire
 12 officer?
 13 A. Yes.
 14 Q. And did that project begin at about the time that you
 15 were promoted into that rank, namely 2011?
 16 A. Yes, I think the final decision to move ahead with the
 17 project was shortly after I'd gone into that rank.
 18 Q. And did North West Fire Control become operational on
 19 15 May 2014?
 20 A. That I remember, yes.
 21 Q. And so it was a project some years in the making?
 22 A. Yes.
 23 Q. Let's just deal with, as we've been mentioning, evidence
 24 from the FBU.
 25 Mr Dark gave some evidence about the potential

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1 problem of a regional, as opposed to local, control
 2 centre and I think the way he articulated it was to do
 3 with local knowledge about geography. Were you aware of
 4 that evidence being given?
 5 A. I did see most of Mr Dark's evidence.
 6 Q. So you will have heard him raise that and I hope that
 7 I have characterised what he said fairly and not
 8 overstated it.
 9 Was that issue a concern that you had around this
 10 project?
 11 A. It was a factor I understood. It's a factor of scale.
 12 Greater Manchester Fire had its own Control as the
 13 other did. Greater Manchester, as anybody who knows
 14 Greater Manchester, is a large place, and no control
 15 operator can know the whole of Greater Manchester, every
 16 street, every building.
 17 So it is a matter of scale. The greater the area
 18 a Control covers, then that is a sliding scale of the
 19 likelihood of somebody having local knowledge.
 20 I would also say there can be a pro and a con to
 21 local knowledge on thinking you understand something
 22 because you think you know about that street, that
 23 building, that place.
 24 In terms of being able to deploy resources, then
 25 I had no concerns at all, and the control operators do

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1 not command incidents.
 2 Q. Well, we're going to come on to your views as part of
 3 your role in creating it, but the rationale behind North
 4 West Fire Control, as compared to what existed before,
 5 namely a local control room or a series of local control
 6 rooms across the region, what was it, please?
 7 A. My understanding — you know, I can't remember every
 8 detail, but there had been a long running national
 9 project. The government led a national project and
 10 built nine regional controls that were supposed to take
 11 up the whole Fire Service. All Fire Services were
 12 supposed to occupy those regional controls.
 13 After many years, the national project collapsed.
 14 So these buildings were there, these highly functional
 15 large expensive buildings were in place. I think London
 16 took theirs up as a region and I think we were the only
 17 ones at that time to then say — and I wasn't involved
 18 in that, but looked at, should we as North—west region
 19 actually follow what the ethos of that national project
 20 was and move to a regional control with this highly
 21 resilient building, highly resilient to deal with power
 22 outages and all sorts of other risks, highly resilient
 23 technical buildings, and clearly, out of the sight of
 24 me, the decision was, yes, we will move ahead with that
 25 project, we will move in as the North—west into that

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1 building and combine our five Controls and develop the
2 ability to use that more modern technology, because each
3 of the five Fire Services will have had different ages
4 of Controls, different capabilities, different skills,
5 and there would — and part of that business case is
6 there was a financial benefit that the sum of running
7 one North—west Control would be cheaper than running
8 five single Controls, partly because the building was
9 already built, and my understanding is the government
10 were effectively subsidising, they wanted the buildings
11 to be used.

12 I think we got the building for a long—term lease,
13 I'll call it, at a good value.

14 To me those were some of the decision that went into
15 that business case and a decision was taken we would
16 move with the North West Fire Control.

17 Q. So a number of factors in play that you have identified.

18 You were to join the project at around the time that
19 the green light was given, and you saw it through until
20 it went operational in May 2014? During that period did
21 you think it was a good idea?

22 A. I thought there were far more benefits than disbenefits.

23 Q. Having had experience of it, including after you moved
24 away from the role that you were in at that time, up
25 until July 2017, did it remain your view that those

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1 benefits outweighed the disbenefits or did your opinion
2 of it change?

3 A. I did get feedback from staff who worked for me that
4 they felt they got a different service and not as good
5 a service. I had other feedback that it was better and
6 more efficient.

7 I felt it was an advance in technology. We could
8 definitely have improved technology, increasing the
9 speed of mobilisations, better information. I suppose
10 personally, and by personally, my personal view
11 professionally, the biggest challenge was its location.
12 If I want — if I or an officer from Greater Manchester
13 Fire and Rescue Service wanted to go into that Control,
14 that was far more difficult because it was further away.

15 Q. Why would you want to go into Control?

16 A. It — it is common on a medium to large incident —
17 I think you will have heard already that we stand up
18 what we call the support command room to support the
19 operational incident or whatever is prevailing. Our
20 previous situation, that literally abutted the Control,
21 and you had a glass screen between you and Control.

22 So if you want to, you could walk 2 yards and speak
23 to Control face to face rather than picking up
24 a telephone, a radio, etc, and there could be advantages
25 of that.

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1 Q. As we have already established in the questioning of
2 Mr Greaney, in fact when it comes to the events of
3 22 May, you were out of the country at the time, so it
4 will be a question for others, would you agree, as to
5 whether or not that challenge, as you have characterised
6 it, made any difference on the night?

7 A. Yes.

8 Q. So just to complete the picture of North West Fire
9 Control, am I right in understanding that originally the
10 plan was, as you have said, that five Fire and Rescue
11 Services would use North West Fire Control, namely
12 Greater Manchester, Cheshire, Cumbria, Lancashire and
13 Merseyside?

14 A. Yes.

15 Q. In the event, when it went live in May of 2014, were all
16 five of those services still involved?

17 A. No.

18 Q. Which were no longer involved?

19 A. Merseyside.

20 Q. And I am anxious in my next question not to get involved
21 in a political or highly detailed situation, so I'll
22 just ask you to think about your answer. Were any of
23 the reasons that Merseyside did not take it forward
24 relevant, in your opinion, to the events of 22 May 2017
25 or were there other reasons for that decision as you

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1 understood it?

2 A. As I understand it, they chose to move towards an
3 ambition of a Merseyside tri — well, move towards
4 a tri—service Control. My memory is that they moved to
5 police and fire being in the same building and later the
6 Ambulance Service being in a very close by building.

7 Q. For that reason, I think that we heard from Mr Butler
8 this morning, from NWS, I'm not saying that you would
9 have heard his evidence, where he described Control as
10 being through the wall for other services, so he was
11 based in Merseyside, so that very much chimes with what
12 he said about it.

13 So ultimately it settled on four areas of which
14 Greater Manchester was one?

15 A. Yes.

16 Q. When it comes to unifying those four different areas,
17 were there challenges in terms of differing procedures
18 in different local control rooms?

19 A. Yes, there was work to do to do that, yes.

20 Q. Because over time, is it right, that different local
21 control rooms had developed slightly different ways of
22 doing things?

23 A. I would imagine so. I was coming more from actually the
24 four Fire Services had different ways of responding and
25 so Control had to deal with four different Fire

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1 Services, aiming to deal with them in the same way if
 2 they could, but probably not if the four Fire Services
 3 chose not to operate.
 4 But I'm sure your point is correct, that actually
 5 the four control rooms operated differently as well.
 6 Q. By the time that North West Fire Control went live in
 7 May of 2014, did you understand that those challenges of
 8 different procedures, whether control room or front line
 9 delivery, had been standardised?
 10 A. For control staff on how they operate, yes. There could
 11 still be a difference that, depending on the nature of
 12 the incident, they had a different instruction for each
 13 of the Fire Services. So if I give you a simple
 14 example, that usually helps, and again please don't
 15 quote me on the accuracy. It's the point. Say for an
 16 animal rescue, one Fire Service may say, we are not
 17 going to go to a sheep in a canal, call the RSPCA, and
 18 another may. So Control wouldn't deploy everybody the
 19 same. They would bring up the action card and say in
 20 this Fire Service, if we get that incident, we send
 21 a fire engine, in this Fire Service, we don't, we call
 22 the RSPCA. So they could have different actions
 23 depending on the Fire Service they were deploying.
 24 Q. You were in a unique position because not only were you
 25 helping to develop North West Fire Control, you were

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1 concurrently MTFAs lead.
 2 A. Yes.
 3 Q. By the time that North West Fire Control went live, had
 4 there been agreement reached about the response to
 5 an MTFAs for each of the four services?
 6 A. I don't know if it's operationally sensitive talking
 7 backwards about that period of time.
 8 Q. I think probably a yes or a no in terms of
 9 a standardisation will do for now, unless it is more
 10 nuanced than that?
 11 A. It is more nuanced. There was no need to standardise --
 12 Q. I think we will just pause there for a moment. I'm
 13 anxious not to go into something operationally
 14 sensitive. Let me see if I can come at this from
 15 a different point of view, in particular the point of
 16 view of Greater Manchester.
 17 We know from evidence, and it's a matter for
 18 investigation by the inquiry, we haven't heard any
 19 evidence from North West Fire Control about what
 20 happened, but that North West Fire Control had access to
 21 something called action cards.
 22 A. Yes.
 23 Q. And I think you have mentioned that already.
 24 As you understood it, did North West Fire Control
 25 have action cards which were relevant to events of

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1 22 May 2017?
 2 A. As far as I understand it, yes.
 3 Q. And where had they got those action cards from?
 4 A. We had lead officers who worked on the North West Fire
 5 Control project at strategic, tactical and operational
 6 levels, so they would work with the North West Fire
 7 Control staff to develop the new action cards. So we
 8 will have had GMFRS officers doing that, as would the
 9 other Fire Services, and they would use our operational
 10 procedures to make sure that that action card was
 11 relevant to achieve the outcome needed.
 12 Q. So does it come to this: as you understood the position,
 13 that in the event that North West Fire Control were
 14 given information which may lead to the conclusion that
 15 an MTFAs or similar event was taking place, that there
 16 were cards or an action card provided to North West Fire
 17 Control by Greater Manchester Fire and Rescue Service
 18 relevant to that?
 19 A. Yes, and if it's helpful, I know you are having
 20 a witness who can probably talk in more detail on that.
 21 Q. Who are you referring to?
 22 A. Ben Levy.
 23 Q. Is that because he was the person responsible for that?
 24 A. He was heavily involved in the North West Fire Control
 25 project. I can't, to be fair to him -- I don't know if

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1 he was from the beginning, but a point in time he was,
 2 and definitely when it went live in 2014.
 3 Q. Was it your understanding that North West Fire Control
 4 operatives would reach for the same action cards in the
 5 event that it occurred in Kendal as compared to
 6 Manchester?
 7 A. Again, this is --
 8 SIR JOHN SAUNDERS: Does it matter?
 9 MR DE LA POER: It might do in this sense, if the response
 10 was determined by region, that might mean there were
 11 four different ways in which --
 12 SIR JOHN SAUNDERS: I think you are worried because this
 13 might be sensitive information, so let's leave it over
 14 until tomorrow.
 15 Obviously, if there is confusion between different
 16 areas' action cards, that may become relevant to the
 17 inquiry, but if that's not a live issue --
 18 MR DE LA POER: Well, it may be that North West Fire Control
 19 are ultimately best placed to assist with us this, and
 20 perhaps Mr Levy. But I'll leave it there, and I will
 21 move on to my third topic, if I may, which is the
 22 Greater Manchester Resilience Forum and the debrief
 23 process post-attack.
 24 Let's just recap, please, as we are having a topic
 25 change here, on your evidence as you gave it previously.

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1 You were in Mexico on annual leave; is that right?
 2 A. I had taken annual leave, yes.
 3 Q. And you were also, whilst on annual leave, attending a
 4 global platform on disaster risk reduction; is that
 5 right?
 6 A. Yes.
 7 Q. And we looked at some WhatsApp messages with Mr Greaney,
 8 but what it all amounted to is that you received some
 9 notice of events on the night and that led you to
 10 cutting your trip short and returning to Manchester?
 11 A. Yes.
 12 Q. And you indicate in your statement that you returned on
 13 26 May, that being the Friday?
 14 A. That's when I got back into England, yes.
 15 Q. And did you speak to the chief fire officer,
 16 Mr O'Reilly, on your return?
 17 A. Yes.
 18 Q. And did you quickly become aware that the Mayor of
 19 Greater Manchester had announced an independent review
 20 into the emergency response?
 21 A. I'd have to refer to my statement. I don't know if it
 22 was in that discussion, but I did relatively quickly
 23 know that, yes.
 24 Q. Well, perhaps we can conveniently turn up your statement
 25 because I'm going to ask you further questions about it

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1 as we build up to the incident, and here of course we
 2 are not yet turned to the resilience forum, but we are
 3 focusing upon GMFRS.
 4 Paragraph 62 of your second statement, Mr Argyle.
 5 A. Yes.
 6 Q. So we can see there the narrative that you say that you
 7 spoke to the chief, Peter O'Reilly; do you see that?
 8 A. Yes.
 9 Q. And as your statement continues, you indicate that
 10 Mr O'Reilly had spoken to the mayor?
 11 A. Yes.
 12 Q. And you go on to say that the mayor had announced there
 13 would be an independent review?
 14 A. Yes, sir.
 15 SIR JOHN SAUNDERS: Okay. I think you do say you had some
 16 difficulty recollecting what came out of the
 17 conversations.
 18 MR DE LA POER: So far as Mr O'Reilly is concerned, and
 19 again we remain with you as a GMFRS officer for the time
 20 being, did he give you a perspective briefly on what had
 21 occurred?
 22 A. Yes.
 23 Q. Again, I'm still looking at paragraph 62 over the page.
 24 Was what he was saying to you in those days following
 25 the incident, although not the days immediately

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1 following, that he was frustrated?
 2 A. Yes.
 3 Q. And that his frustration was because he hadn't been
 4 alerted sooner?
 5 A. Yes.
 6 Q. And also that he didn't have enough information; is that
 7 right?
 8 A. Yes.
 9 Q. As to the former, was he referring to North West Fire
 10 Control?
 11 A. Yes, he thought they should have -- they or an officer
 12 who they had told should have informed him.
 13 Q. As to the latter, was his concern about the information
 14 from GMP?
 15 A. He wanted the information from GMP. He may have wanted
 16 that via a Fire Service officer.
 17 Q. But at all events, what he was communicating to you at
 18 that stage was that he was frustrated about elements of
 19 what happened on the night?
 20 A. Yes.
 21 Q. Was there anything else that you can recall that he told
 22 you as his deputy in those early days on your return
 23 from Mexico?
 24 A. It was just that afternoon and then he was due on leave.
 25 So it was just that one discussion as far as I recall.

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1 He mentioned that the mayor had indicated to him not to
 2 do public communication and that the mayor would arrange
 3 for that to be dealt with.
 4 Q. As you say, he then went on a period of pre-planned
 5 leave; is that right?
 6 A. Yes.
 7 Q. And I think during that period you stepped up as his
 8 deputy and one of the things that you did in that role,
 9 stepping up in his absence, was to involve yourself in
 10 staff welfare to a degree?
 11 A. Yes.
 12 Q. What were your conclusions, having spoken to the staff?
 13 A. I started -- that was the Friday. I was aware that the
 14 watch who had been on duty on the night, the Monday
 15 night, were coming back to shift. So they had been off
 16 for their 4 days, they would be on the next morning. So
 17 I had two main concerns which was their welfare, but
 18 also to start to get an understanding of what had
 19 happened because the national risk threat had moved to
 20 critical, the threat hadn't gone away, it had increased
 21 or was perceived to increase, so we could deploy to
 22 an MTFA or another terrorist attack at any time.
 23 So I needed to understand -- by this stage I was
 24 starting to understand that things had not gone
 25 properly, so I needed to try quickly to understand what

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1 had gone wrong and do we need to do something now, not
 2 after a debrief, understand what may need to be done,
 3 and also to put in place welfare arrangements for staff.
 4 Q. And so far as those conclusions — I appreciate you've
 5 learned many things subsequently and wearing your
 6 different hat of in the resilience forum, but just
 7 focusing upon what you were being told by the rank and
 8 file, those who were about to come back on shift, who
 9 had been on shift on the night, what did you understand
 10 from their point of view had gone wrong?
 11 A. From those actual staff who were at the fire stations,
 12 that they'd — some of them had heard the explosion,
 13 they'd had a pre-alert, the bells had gone on, they
 14 expected to go to the incident, but they were surprised
 15 that they were going to a rendezvous point at
 16 Philips Park.
 17 They saw the ambulances pulling in as they were
 18 leaving and then those fire officers I'm talking about,
 19 and also others at Philips Park, talked about
 20 frustration at not deploying. They were speaking with
 21 the NILOs. The NILOs were equally frustrated and time
 22 passed and it was difficult.
 23 Eventually, they moved forward to Manchester Central
 24 Fire Station, where there were ambulances, and I was
 25 told about discussions, for example, by one of the

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1 firefighters, was, I think, married to a paramedic and
 2 there was different forms of information coming forward
 3 and there was a strong degree of frustration at not
 4 attending.
 5 Q. From your point of view, bearing in mind that part of
 6 your investigation was to work out whether there was
 7 something that needed to be addressed in short order,
 8 did you reach a conclusion that there was something that
 9 needed to be done or that there wasn't?
 10 A. I didn't just speak to those firefighters. I spoke to
 11 officers who were involved, plus I was chair of the
 12 resilience forum and was speaking to members of the
 13 resilience forum and we initiated there very quickly
 14 a task and finish group to deal with some immediately
 15 perceived areas of potential failure.
 16 Q. In summary, what were those?
 17 A. Could I just refer to my statement?
 18 Q. By all means, yes?
 19 A. We appointed a very small task and finish group. It's
 20 in my first statement if we can turn to that — this is
 21 under the resilience forum, because I'm wearing two hats
 22 at that time.
 23 Q. That's really why I started where I did, because I think
 24 the two begin to merge at this point, don't they?
 25 A. So obviously — not obviously. People were telling me

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1 they'd struggled to get information. There was
 2 confusion about the declaration of Plato. So I spoke to
 3 colleagues, and we initiated a small task and finish
 4 group. I'll tell you who chaired that if it's relevant.
 5 I don't think it's sensitive.
 6 They looked into four key areas: Operation Plato
 7 declaration and communication; the activation process;
 8 joint situational awareness; and utilisation of the
 9 military aid to the civil authorities.
 10 Q. We are going to leave that last one well alone. It's
 11 not something that we need to trouble ourselves with.
 12 But in terms of that first area, the declaration of
 13 Operation Plato, the inquiry has received evidence from
 14 the force duty officer, Inspector Dale Sexton, as he was
 15 then, about his thinking about that.
 16 A. Yes.
 17 Q. At the time that you were preparing this group that was
 18 targeted at fixing problems as quickly as possible, was
 19 it ever communicated to you that there had been
 20 a deliberate decision to withhold the declaration of
 21 Operation Plato?
 22 A. No.
 23 Q. We've moved on to the resilience forum and that group
 24 that you set up. I wonder if a document might assist us
 25 at this point: {INQ012579/1}.

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1 Those four areas that you've identified do appear in
 2 this document; is that right?
 3 A. Yes.
 4 Q. Is this the document that was a product of what you had
 5 set in motion with that group?
 6 A. No.
 7 Q. Was that something different?
 8 A. It's something different.
 9 Q. All right. What is this document then?
 10 A. It will be a reasonably long answer.
 11 Q. Yes.
 12 SIR JOHN SAUNDERS: We can cope.
 13 A. So it is normal for major incidents, etc, to do
 14 a multi-agency debrief.
 15 MR DE LA POER: Yes.
 16 A. It is normal so that that debrief can have informed
 17 people at it to allow the single agencies to do their
 18 internal debrief and then come forward to the
 19 multi-agency debrief and have a multi-agency debrief,
 20 but only bring forward the multi-agency issues and if
 21 they have got smaller in-house issues, deal with those
 22 issues, but bring forward the multi-agency issues.
 23 We knew that we needed to do that. That is normal
 24 for us to do that. We knew it would take some time.
 25 We initiated what I have just talked about very

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1 quickly because that — we wanted to do that
2 immediately. We became aware, as an example, that the
3 police were going to have to do many debriefs because
4 they had many functions, I think 13 or 14 debriefs.
5 They and others also need — they used the College of
6 Policing and this is a capacity of the debriefers to
7 achieve those debriefs.

8 So although we wanted to give some time, we wanted
9 to make some progress, not just on those four urgent
10 issues, but on the normal debrief. So we set in place
11 two tactical debriefs, in my statement I think they're
12 in July, and two strategic debriefs.

13 Q. Do you want to just take the time to find that and I'll
14 see if I can help you. I think that we are looking at
15 page 17 and following of your first statement.

16 A. I think at paragraph 6.11.

17 Q. Yes.

18 A. As I said, two tactical debriefs, two strategic
19 debriefs.

20 The reason for that partly is that NPoCC, the
21 College of Policing and Process, where they limit the
22 size or the amount of people and agencies in a room, so
23 it was against their process to have one debrief with
24 everyone in the room. They would say that's too big.
25 So we held a debrief in the morning, tactically,

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1 a debrief in the afternoon, and then that's put together
2 as one tactical debrief.

3 The same with the strategic, half and half, which
4 has a challenge for the people in the room because
5 they're only hearing half of that story, it's not even
6 the full story.

7 So we did those to get some early learning. We then
8 said: now continue with your single-agency debriefs,
9 we've gathered some information from you to start
10 learning, and when you finish your single-agency
11 debrief, we will then have a final multi-agency debrief,
12 which is — that's what this document is.

13 So that has allowed all those debriefs to happen and
14 now everyone has had time to do their debriefs and come
15 together and do a final strategic debrief.

16 Just to add one — that is the debrief we did of the
17 whole 9 days of operations.

18 Q. Yes. So we shouldn't consider that this is just about
19 what we've been focusing on, namely the first hour or
20 so, but, as you say, the days following as well?

21 A. Yes.

22 Q. We can see on the face of this document it's dated
23 December 2017.

24 A. Yes.

25 Q. We are just going to have a look at some aspects of it,

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1 if we may. Firstly, let's acknowledge your role in it,
2 {INQ012579/2}, please, Mr Lopez.

3 You provided the foreword to this debrief; is that
4 right?

5 A. Yes.

6 Q. We don't need to read the detail of it. It's there now
7 and will be published on the inquiry website.

8 I'm just going to cover one exercise in particular
9 that this debrief rehearses. If we go to
10 {INQ012579/11}, please. Here we have towards the
11 bottom, here we have a — the fourth topic that
12 Mr Greaney left over to some degree, and captured in
13 December of 2017, is the view from the resilience
14 forum's perspective, is that right, of Exercise
15 Winchester Accord in high summary form?

16 A. Yes.

17 Q. And we can see they're captured two points in
18 particular:

19 "Activation and notification of partners was slow,
20 some self-deployed as a result, and the formation of the
21 strategic coordination centre, RDG..."

22 Can you help me with that?

23 A. Resilience Development Group.

24 Q. "To scope work needed to amend the SCC arrangements."
25 Now, were both of these learning points from

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1 Exercise Winchester Accord identified by the resilience
2 forum following Winchester Accord or was the process
3 that Winchester Accord was reviewed in the light of the
4 arena attack and those points identified after the
5 attack? It's rather a long question, but I see you
6 nodding.

7 A. No, I understand.

8 Q. Can you help us with that?

9 A. Reading those, and just to check, are there any more on
10 the next page?

11 Q. No, I think we have got the next title, but let's just
12 turn over to confirm that {INQ012579/12}. No, that's
13 the next entry. So that's the entry in this document
14 about Exercise Winchester Accord. Do you think you need
15 to have it in front of you or can we take it down?

16 A. You can take it down.

17 Q. Thank you very much, Mr Lopez?

18 A. It's my understanding, and I think from my memory of
19 those points, I gave evidence before to the effect that
20 Winchester Accord was run as a live play exercise.

21 Q. It was.

22 A. And there was a second exercise which was focused on
23 setting up the strategic coordinating centre.

24 Q. Yes.

25 A. And the GMRF was only involved in that second exercise.

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1 Q. Yes.
 2 A. My understand is that those two learning points are from
 3 that second exercise that the GMRF was involved in.
 4 Q. And had they been identified before the arena attack?
 5 A. Yes, in that exercise, yes.
 6 Q. So that wasn't a review process of Exercise Winchester
 7 Accord that identified things that perhaps hadn't been
 8 picked up before; they were known about before the
 9 attack?
 10 A. Yes, and I would imagine and I would think it seems like
 11 they would have been lifted from that debrief which was
 12 before the attack.
 13 Q. At {INQ012579/15}, I think we're going to get our list
 14 of four matters under the heading "Early Identification
 15 of Learning" --
 16 SIR JOHN SAUNDERS: Sorry, I'm sure you've already told us
 17 and I have forgotten, so forgive me, but why were you
 18 only involved in that other part of Winchester Accord
 19 rather than the major exercise itself?
 20 A. Only through research to be here and to be helpful, and
 21 hearing evidence. So that first -- the main live play
 22 exercise was set up as a military re-licencing exercise,
 23 and only limited agencies were invited. We were unaware
 24 of that exercise going on. In fact, initially it was
 25 going to be in a different police force, I understand.

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1 June Roby, from GMP, became aware of the exercise
 2 and took the opportunity to say we could run a parallel
 3 exercise of establishing a strategic coordinating
 4 centre, and that also incorporated, because there is
 5 a plan, to relocate the FDO's workstation into the force
 6 command module, so we could simulate that in this
 7 parallel exercise.
 8 So two parallel exercises ran and of course then we
 9 will -- the GMFRS will have known they are running
 10 a parallel exercise to another exercise they're not
 11 involved in, so I think it would be unlikely at that
 12 point they were totally unaware a live play exercise was
 13 involved, but they were not involved in it.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR DE LA POER: One of the things I'm going to ask you to
 16 do, Mr Argyle, given the time, is to just read the
 17 transcript of your evidence on the last occasion,
 18 because we may be able to deal with it quite efficiently
 19 tomorrow morning when we turn to Exercise Winchester
 20 Accord simply by way of -- whether there is anything for
 21 you to add to anything you've said on the point, because
 22 what Mr Greaney did was to take you to some paragraphs
 23 of your witness statement and read them out and then he
 24 parked it, but it may be that you have more to say on
 25 the point, you may have less. But if we can leave

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1 Exercise Winchester Accord until tomorrow morning, we
 2 will just finish, if we may, with this document here,
 3 which is {INQ012579/15}, please, Mr Lopez, "Early
 4 Identification of Learning".
 5 We're going to see, as we scroll down, at 4.1 there
 6 is:
 7 "Declaration and communication of Operation Plato."
 8 Mr Lopez, if you can just track us through 4.2, 4.3
 9 and 4.4:
 10 "Activation and notification arrangements.
 11 Developing shared situational awareness and the military
 12 aid to ..."
 13 If we go back to the previous page {INQ012579/14},
 14 please, were those the four areas of quick time learning
 15 that were identified by the resilience forum?
 16 A. Yes.
 17 Q. And is what this document doing rehearsing the fact
 18 that, before we get to December 2017, considerable work
 19 had been done in those four areas?
 20 A. Yes, this debrief reflected on that task and -- group,
 21 the two tactical debriefs, the two strategic debriefs
 22 and then a final debrief. So it was aiming to capture
 23 all that learning.
 24 Q. And so I think we need to turn to {INQ012579/17} to see
 25 the key findings. I'm not going to take you to every

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1 single one of these, but what I would like you to do, if
 2 you don't mind, with it up on screen, if you need to
 3 refresh your memory, is if I just direct you to -- I am
 4 going to ask you to consider six of them. If you could
 5 speak to them or summarise as you understood them to be,
 6 given that you were chair of the forum at the time, as
 7 I understand it.
 8 Preparedness, 5.1, what was the key finding there in
 9 summary form, please?
 10 A. Responders felt the overall preparedness was good.
 11 Plans stood up well as they had been rehearsed and they
 12 gave some more specific points. Then the transport cell
 13 was formed quickly. The GM generic response plan was
 14 used as would be expected and that with the Greater
 15 Manchester Combined Authority being a new entity and the
 16 elected mayor being a new entity, it had not been fully
 17 developed yet.
 18 Q. 5.2, we may need to go over the page, but just take
 19 a moment to refresh your memory from it in terms of the
 20 key finding. 5.2.
 21 A. So some agencies were notified and deployed and some
 22 weren't. Some self-deployed based on previous
 23 experiences. People felt the force duty officer was
 24 overwhelmed but that the force had said this had been
 25 addressed as part of an early identification of

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1 learning. And a more robust system has been put in
2 place, reducing the likelihood of a single point of
3 failure.

4 Q. Over the page {INQ012579/18}, please, we can just scroll
5 down a little so we can capture the whole of 5.3, so
6 that Mr Argyle has that in front of him. I can assure
7 you, although I have done the first three, I'm not going
8 to look at every single one of these, Mr Argyle. Can
9 you summarise the key finding in 5.3 for us?

10 A. The incident triggered an immediate multi-agency
11 partnership response all command levels. Structures
12 were set up, an SCG. The force command module was set
13 up, tactical command, mass fatality -- and obviously
14 some of this is going into hours and --

15 Q. If I could just ask to you summarise the key facts as
16 they relate here. I appreciate that all 9 days were
17 considered. I think one of the things that was being
18 fed back was that some partners felt that the SCG was
19 not soon enough, given that it took place at 4 am.

20 A. Yes. Yes, that's correct.

21 Q. Next, 5.4, if we can just scroll down again. If you can
22 just capture for us and we will need to turn over the
23 page in just a minute, when you have had a chance to
24 read that, what 5.4 says. Please indicate, Mr Argyle,
25 when you've had a chance to refresh your memory from

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1 that.

2 A. Yes, okay.

3 Q. Over the page {INQ012579/18}, please, Mr Lopez.

4 A. Okay. It indicates North West Ambulance Service and BTP
5 had people on scene quickly there because they may have
6 already been there or deployed very quickly. The Fire
7 Service did not deploy quickly because there was
8 a breakdown in communication. I think they were the key
9 points there.

10 Q. And penultimately, please, 5.6. You will need to scroll
11 down a little bit, Mr Lopez, so Mr Argyle can see the
12 entirety of that entry. Again, if you can just remind
13 yourself of that and capture it for us in summary form.
14 (Pause)

15 A. So it indicates shared situational awareness could have
16 been improved. It talks about the use of Resilience
17 Direct as a possible tool to use to improve situational
18 awareness moving forward. It indicates that partners do
19 have Resilience Direct, but that it could be used more
20 comprehensively.

21 Q. And the last one that I would like you to look at,
22 please, is on {INQ012579/22}. If you look at 5.12 at
23 the bottom.

24 Again, we may need to turn over the page once you
25 have had a chance to remind yourself of that.

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1 A. Okay. So it indicates that partners were not aware of
2 the level of support and knowledge. The site managers
3 and staff could have assisted in understanding such a
4 complex building. And that they are often not -- sites
5 are often not involved in exercises, but actually the
6 arena had been involved in exercises and training.

7 Q. We are going to move on to -- there are just two other
8 parts of this, and then, sir, with your leave, I would
9 invite us to conclude for the day, just parking that
10 fourth topic.

11 At {INQ012579/33}, there is just one reference as
12 part of the structure debrief that I just wanted to see
13 whether this had reached your level as chair.

14 One of the areas for improvement, the third one
15 down:

16 "GMP sometimes has a big force arrogance of 'we can
17 cope'. It was clear that GMP ran out of officers and
18 staff very early on. There are cultural issues around
19 mutual aid where the ask is always for warranted
20 officers, where actually the consideration needs to be
21 asking for the best trained person which will include
22 police staff or staff from other agencies. Currently
23 there are no on-call procedures for police staff and
24 many of the other agencies involved and this did
25 restrict the staff used."

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1 There is a mixture within that and there is feedback
2 from people we don't need to look at. What I'm looking
3 at in terms of your level as resilience forum chair: was
4 this what some people have identified as a big force
5 arrogance of "we can cope" something that bubbled up to
6 the surface so far as you were concerned or was that
7 just one of a very large number of comments which didn't
8 just focus on GMP but focused on other emergency
9 responders as well?

10 A. I have read this debrief. I was involved in this
11 debrief, as in physically at the debrief, so I will have
12 heard that and I'll have read that it's been captured.
13 I'm just trying to actually interpret myself the focus
14 of where they're saying -- these contributors are saying
15 they ran out of staff and whether that is in the force
16 command module or -- I'm not quite clear where they're
17 saying they ran out of staff. I think it will be around
18 doing command support and running the force command
19 module and dealing with communication and
20 administration, but I could be wrong on that.

21 Q. Certainly we can see the comment in the right-hand
22 column indicates this will be dealt with in detail
23 through the GMP internal review. So it may be that,
24 would you agree, that Deputy Chief Constable Pilling
25 would be the best person to speak to about that?

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1 A. Yes.
 2 Q. And the final matter that I wanted to raise with you is
 3 {INQ012579/34}. I'm sure you would agree, as that's
 4 being brought up, there are very many areas of feedback.
 5 I'm being highly selective here and no doubt others want
 6 to draw your attention to other parts, but it was just
 7 to try and draw out whether via themes of the inquiry or
 8 something that perhaps hasn't emerged with such clarity
 9 in other debriefs.
 10 Can we see the third one there, the second under the
 11 heading "Knowledge":
 12 "There is a national question raised over exactly
 13 what Plato means as this was not a Plato incident as no
 14 firearms involved."
 15 So from the point of view of the resilience forum,
 16 what was it that you were understanding was being
 17 communicated about that and what needed to be done?
 18 A. To understand when Plato should be declared and when it
 19 should be withdrawn, but also it was felt that across
 20 the country Plato was being announced on any terrorist
 21 incident, and so that could cause confusion because it
 22 indicates firearms are involved, but it seems it was
 23 being declared whether or not firearms were involved.
 24 SIR JOHN SAUNDERS: I find that a slightly surprising answer
 25 in that that the information I have been given so far --

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1 and you will have to correct me if it is wrong -- was
 2 this was only the second occasion on which Plato had
 3 ever been declared.
 4 A. Yes, but it depends when the person is making this --
 5 this debrief is in September.
 6 SIR JOHN SAUNDERS: So you say there are quite a lot more?
 7 A. Well, there was at least a further one.
 8 SIR JOHN SAUNDERS: Right.
 9 A. And there had been challenge about whether it would be
 10 normal as a proactive measure to declare Plato for
 11 a terrorist attack.
 12 SIR JOHN SAUNDERS: I mean, I can understand the confusion.
 13 It's been apparent during the inquiry, if I may say so,
 14 by various -- I mean, it is certainly something which
 15 needs to be clarified so everybody has the same
 16 understanding what it is, and when it ought to be
 17 declared, which certainly didn't appear to be the scene
 18 in May of 2017.
 19 A. And I'm not really referring to confusion here,
 20 I understand your point, but that people may perceive
 21 that the capability you get by declaring Plato, you
 22 genuinely might want that capability even though
 23 firearms aren't involved.
 24 SIR JOHN SAUNDERS: Yes, okay.
 25 MR DE LA POER: Thank you very much indeed, Mr Argyle. That

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1 was all I'm going to ask you about this document. As
 2 I say, others may want to ask you about other aspects of
 3 it, no doubt. They will already have notified us of
 4 that.
 5 Can I just repeat what I said earlier: namely if
 6 I can invite you to consider what you said about the
 7 Winchester Accord debrief on the last occasion. I refer
 8 you particularly to the part where Mr Greaney takes you
 9 through aspects of your witness statement, and we can
 10 perhaps resume tomorrow on whether there is anything you
 11 wish to add to about that answer that you've not yet
 12 given and I will then conclude my questions by asking
 13 you about your fourth statement and those matters that
 14 you raised previously.
 15 Would you just bear with me one moment, and you as
 16 well, please, sir.
 17 (Pause)
 18 I'm assisted by Mr Greaney who has drawn my
 19 attention on the last issue about the declarations of
 20 Plato that, as is publicly known, Operation Plato was
 21 declared on Westminster Bridge on 22 March and again on
 22 22 May and on 3 June at London Bridge.
 23 Sir, with that being the pause in my question now,
 24 may we adjourn now and return at 9.30 tomorrow?
 25 SIR JOHN SAUNDERS: Is that convenient for you?

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1 A. Yes, sir.
 2 SIR JOHN SAUNDERS: Right. Then in addition to finishing --
 3 MR DE LA POER: It is worth saying, and thank you for the
 4 prompt, sir, that bearing in mind that volume 1 of your
 5 report is, as is now widely known, to be published on
 6 Thursday and there will be no evidence on Thursday, it
 7 is absolutely essential that we conclude Mr Argyle's
 8 evidence and start and conclude Mr Gaskell's. I know
 9 that your legal team will do a lot of work overnight to
 10 make sure that we play our part in achieving that, if
 11 and if I can respectfully ask other core participants to
 12 do their best to achieve that also.
 13 SIR JOHN SAUNDERS: Thank you.
 14 (4.37 pm)
 15 (The hearing adjourned until
 16 Wednesday, 16 June 2021 at 9.30 am)

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