

# OPUS2

Manchester Arena Inquiry

Day 120

June 22, 2021

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1 Tuesday, 22 June 2021  
 2 (8.59 am)  
 3 Application re expert evidence  
 4 SIR JOHN SAUNDERS: Good morning, Mr de la Poer. Thank you  
 5 very much everyone for turning out earlier today.  
 6 I know that interrupts preparations people have for the  
 7 hearing. I think what we are discussing today is,  
 8 I hope, relatively non-controversial, but equally  
 9 I thought it was important that it was aired publicly.  
 10 Submissions by MR DE LA POER  
 11 MR DE LA POER: Sir, yes. This hearing is for the purpose  
 12 of assisting you in deciding what should be the next  
 13 steps in relation to an expert you have instructed,  
 14 Dr Matthew Wilkinson. Before I set out what the issue  
 15 is, I will provide a short summary of the background.  
 16 On 27 November 2019, Dr Wilkinson, an expert in  
 17 radicalisation into Islamic extremism, was instructed by  
 18 the solicitor to the inquiry to provide two reports.  
 19 The first was a general report dealing with a broad  
 20 range of topics to the extent they were within  
 21 Dr Wilkinson's expertise. It included addressing what  
 22 kind of actions might be taken to prevent a person from  
 23 becoming radicalised. This part of Dr Wilkinson's  
 24 instruction included a links of different circumstances,  
 25 the third of which was educational establishments.

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1 Dr Wilkinson provided his first report to the solicitor  
 2 to the inquiry on 13 March 2020.  
 3 On 23 June 2020, Dr Wilkinson was instructed to  
 4 write his second report. In that second report  
 5 Dr Wilkinson was instructed to focus upon the  
 6 circumstances of Salman Abedi's life. Within that  
 7 report, Dr Wilkinson was instructed to comment upon  
 8 a number of matters. One of those was what signs, if  
 9 any, there were of Salman Abedi becoming radicalised  
 10 during his time at three named educational  
 11 establishments. Dr Wilkinson was further asked to  
 12 comment on what form of intervention, if any, could have  
 13 been made to deradicalise Salman Abedi.  
 14 One of the three educational establishments was the  
 15 University of Salford, which Salman Abedi was enrolled  
 16 at during the period 2015 to 2017. Dr Wilkinson  
 17 provided his second report on 20 December 2020. In that  
 18 second report, Dr Wilkinson comments upon the University  
 19 of Salford. The terms of those comments imply criticism  
 20 of the University of Salford.  
 21 Pursuant to the inquiry's general approach to  
 22 experts, core participants were invited to pose  
 23 questions of Dr Wilkinson for his written response. As  
 24 has been the case with other experts, those questions at  
 25 that stage were confined to clarifying matters, drawing

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1 attention to evidence which may have been overlooked  
 2 and/or assisting Dr Wilkinson with the facts as they are  
 3 understood to be.  
 4 We were midway through this process when the issue  
 5 which gives rise to this hearing became apparent to the  
 6 inquiry legal team. The stage we have reached is that  
 7 the written questions have been received by  
 8 Dr Wilkinson, he has given them preliminary  
 9 consideration, but he has not yet provided his written  
 10 response.  
 11 What then is the issue? In the course of liaising  
 12 with Dr Wilkinson over his written response, core  
 13 participant questions, he drew attention to the fact  
 14 that he was in the process of discussing a long-term  
 15 academic project with the University of Salford. Those  
 16 discussions had resulted in the payment to him of money  
 17 on an hourly basis. The relationship was in its infancy  
 18 at the point he drew it to the inquiry legal team's  
 19 attention, but Dr Wilkinson informed us that he was  
 20 hoping that the University of Salford would come to host  
 21 his research project.  
 22 As Dr Wilkinson explained, this arrangement would be  
 23 funded by a third party. The contact between  
 24 Dr Wilkinson and the University of Salford had begun on  
 25 5 May 2021 and so post-dated the authorship of both

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1 expert reports and was proximate in time to when he  
 2 raised it with the inquiry legal team.  
 3 The solicitor to the inquiry wrote to all core  
 4 participants on 10 June 2020, setting out the above,  
 5 seeking views from core participants by reference to  
 6 a number of questions which were focused on whether or  
 7 not there was or might be a conflict of interest.  
 8 On 14 June 2020, those representing the University  
 9 of Salford notified the solicitor to the inquiry that  
 10 Dr Wilkinson's involvement in the inquiry had not been  
 11 widely known within the university, but upon being  
 12 notified of the issue, it had been decided by the  
 13 university that it would not be appropriate for the plan  
 14 to transfer Dr Wilkinson's research project to be taken  
 15 forward at this time.  
 16 Consequently, the relationship between Dr Wilkinson  
 17 and the University of Salford subsisted for just a few  
 18 weeks during the late spring of this year and no longer  
 19 exists.  
 20 I turn now to provide a short summary of core  
 21 participants' views. The bereaved families are in  
 22 agreement with each other. Joint submissions dated  
 23 14 June 2021 were provided. In short, it was submitted  
 24 on their behalf that there was no problem proceeding as  
 25 planned with Dr Wilkinson. In the alternative, it is

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1 suggested that an expert dealing exclusively with the  
 2 issue of Salman Abedi's education might be instructed.  
 3 This expert would take responsibility for matters  
 4 Dr Wilkinson comments upon in his second report.  
 5 On the same date a submission was received from the  
 6 Slater & Gordon team, which makes as its primary  
 7 submission the instruction of an expert who covers the  
 8 issue of Salman Abedi's education.  
 9 Greater Manchester Police have provided written  
 10 submissions. In summary, it is submitted on GMP's  
 11 behalf that by reason of the conflict of interest,  
 12 Dr Wilkinson should not be permitted to comment on the  
 13 University of Salford and, if feasible, the instruction  
 14 of an alternative expert to deal with the education  
 15 aspect is said to be the best course.  
 16 Finally, the University of Salford provided  
 17 submissions dated 20 June. In those, it is submitted  
 18 that following the termination of the relationship, the  
 19 conflict has been removed and Dr Wilkinson is therefore  
 20 able to continue as planned.  
 21 Sir, that concludes my summary of the relevant facts  
 22 which have led us to this point and what parties have  
 23 said in writing about them. I propose dealing with the  
 24 remainder of the hearing in three stages.  
 25 First, I will provide a summary of what the inquiry

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1 legal team has done in relation to the potential for an  
 2 education expert and what, in the inquiry legal team's  
 3 view, the instruction of that person would mean in  
 4 practice.  
 5 Second, I will invite submissions from core  
 6 participants, should they have any, to supplement what  
 7 has already been said in writing.  
 8 Third, I will seek to assist you, sir, with the  
 9 inquiry legal team's position in light of those  
 10 submissions.  
 11 So then to the first of those. Within the last week  
 12 the inquiry legal team has sought to identify  
 13 a potential candidate with the relevant expertise to  
 14 comment on whether or not there were missed  
 15 opportunities to identify Salman Abedi's radicalisation,  
 16 if he was radicalised, during his time at the three  
 17 identified educational establishments, including the  
 18 University of Salford.  
 19 On Friday of last week members of the inquiry legal  
 20 team spoke to Professor Lynn Davies. In the course of  
 21 that discussion we were able to establish that  
 22 Professor Davies regards this topic as being within her  
 23 expertise and that it is highly likely that she will be  
 24 able to assist the inquiry without disruption to the  
 25 existing timetable.

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1 A copy of Professor Davies' CV has been made  
 2 available to core participants. It is plain from that  
 3 that she has very considerable expertise in relation to  
 4 identifying radicalisation within the context of  
 5 educational establishments.  
 6 Before turning to the practicalities which would  
 7 arise if Professor Davies was instructed, it is  
 8 necessary to draw attention to two matters which the  
 9 inquiry legal team has been made aware of.  
 10 First, as Professor Davies has disclosed, in 2018  
 11 and 2019 her work brought her into contact with one of  
 12 the bereaved families.  
 13 Second, the Home Office has drawn to our attention  
 14 that the social enterprise that Professor Davies is  
 15 involved in, namely Connect Futures, has received  
 16 funding through the Home Office. This funding is  
 17 administered through a local authority grant.  
 18 If Professor Davies was to be instructed, it seems  
 19 to the inquiry legal team that it will be important to  
 20 have certainty in relation to the point at which any  
 21 report that she produces and Dr Wilkinson's reports  
 22 intersect. In the inquiry legal team's view, her  
 23 instruction would mean the following.  
 24 Dr Wilkinson would continue to be able to speak to  
 25 the content of his first report. Dr Wilkinson would

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1 continue to be able to speak to the admissible parts of  
 2 his second report, save in respect of educational  
 3 establishments. The issue of whether there were missed  
 4 opportunities during Salman Abedi's secular education  
 5 would be a matter for Professor Davies.  
 6 Consequently, any questions posed by core  
 7 participants of Dr Wilkinson in relation to any of those  
 8 three educational establishments would be withdrawn from  
 9 him and his opinion on them would not be sought. Nor  
 10 would the opinion he expresses in his second report be  
 11 adduced by counsel to the inquiry or any core  
 12 participant.  
 13 In the inquiry legal team's submission, the utility  
 14 of instructing Professor Davies is to negate any concern  
 15 there may be arising from a conflict of interest, real  
 16 or perceived, between Dr Wilkinson and the University of  
 17 Salford. This benefit is only accrued in the event the  
 18 issue of Salman Abedi's education no longer forms part  
 19 of his remit and is instead dealt with by  
 20 Professor Davies.  
 21 Sir, that concludes all that I wish to say at this  
 22 first stage. I turn to the second stage that  
 23 I identified and may I now invite submissions from core  
 24 participants, beginning, please, with Mr Horwell QC on  
 25 behalf of Greater Manchester Police in the event that

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1 there is anything that he wishes to add.  
 2 SIR JOHN SAUNDERS: Just while we're getting Mr Horwell on  
 3 the screen and before he starts, can I just say two  
 4 things. First of all, obviously the amount of the  
 5 hourly rate being paid to Dr Wilkinson is a matter of  
 6 commercial confidentiality. He has, however, disclosed  
 7 it to the inquiry team. I have seen it and it is  
 8 modest, so I don't think anyone should be in any doubt  
 9 about that. It's certainly fair to him to say that,  
 10 I think.  
 11 Secondly, I am grateful for Dr Wilkinson for  
 12 bringing this matter to our attention to so we have an  
 13 opportunity to discuss the implications of it before we  
 14 get to the stage when he will be giving evidence.  
 15 MR DE LA POER: Sir, if I may say so, I entirely endorse  
 16 that comment on behalf of the inquiry legal team.  
 17 SIR JOHN SAUNDERS: Mr Horwell.  
 18 MR HORWELL: Sir, thank you for the opportunity, but we have  
 19 nothing to add to our written submissions.  
 20 SIR JOHN SAUNDERS: Thank you. I'm grateful for them.  
 21 MR DE LA POER: Next then can I turn to Mr Weatherby QC as  
 22 the first of those that I shall seek supplementary  
 23 submissions from in relation to the bereaved families.  
 24 Submissions by MR WEATHERBY  
 25 MR WEATHERBY: Good morning, sir. Can I endorse what has

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1 been said so far by Mr de la Poer. Can I thank the  
 2 inquiry team for the careful way that this matter has  
 3 been approached. We have little to add to the written  
 4 note that we put in on behalf of all four of the family  
 5 teams on 14 June. But can I just make a couple of  
 6 comments so that everybody listening can understand the  
 7 position.  
 8 Whereas it's entirely appropriate that  
 9 Salman Abedi's journey through education should be  
 10 looked at and considered, and indeed there are points of  
 11 importance that arise in that, we don't believe that  
 12 this is a central issue and, in particular, about the  
 13 University of Salford, the issues around the University  
 14 of Salford are relatively peripheral. They were dealt  
 15 with by Dr Wilkinson in writing before any conflict  
 16 arose. His view can obviously be challenged and his  
 17 conduct regarding the conflict could potentially assist  
 18 anyone who wished to do so. So formally, we don't  
 19 believe that the issue that's arisen is of such  
 20 importance that he actually needs to be replaced.  
 21 However, taking all the matters in the round, it may  
 22 be that you take the view that it would be more  
 23 appropriate and safer if Dr Wilkinson continues to give  
 24 evidence about the rest of his reports, but the course  
 25 Mr de la Poer has already spoken to is taken.

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1 If that is your view, the instruction of the  
 2 alternative expert in our view it would be appropriate  
 3 for that expert to deal with the educational  
 4 establishments as a piece together, so we agree with  
 5 that approach as well.  
 6 With regard to the specific expert, we've only had a  
 7 day or two to consider the proposed alternative expert.  
 8 There doesn't appear to us to be any difficulty. She  
 9 appears to be an appropriate expert. If that position  
 10 changes, then of course we will immediately get back to  
 11 your team. I hope that makes the position clear.  
 12 I don't have any further submissions.  
 13 SIR JOHN SAUNDERS: Mr Weatherby, I'm extremely grateful.  
 14 It does make the position clear. Thank you for those  
 15 observations.  
 16 MR DE LA POER: Sir, next Mr Payter on behalf of the  
 17 Hogan Lovells team if he has anything to supplement what  
 18 has been said orally or in writing.  
 19 Submissions by MR PAYTER  
 20 MR PAYTER: Very briefly, please, sir. We support what  
 21 Mr Weatherby and Mr de la Poer have said this morning.  
 22 We also support the instruction of additional expert on  
 23 the educational piece so long as it does not delay the  
 24 inquiry's work or the chapter 13 evidential hearings.  
 25 Just on that point, sir, we note as well that in its

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1 response to Dr Wilkinson's report, the University of  
 2 Salford was critical about Dr Wilkinson's expertise  
 3 in relation to certain aspects of the educational part  
 4 of his report, so there is a further advantage to the  
 5 inquiry in having a second expert.  
 6 Sir, thank you very much.  
 7 SIR JOHN SAUNDERS: Thank you, I'm grateful, Mr Payter.  
 8 MR DE LA POER: Can I see if there is any representative on  
 9 behalf of the Addleshaw Goddard team who is attending  
 10 remotely who wishes to add to what has been said?  
 11 MR GOZEM: No, I have nothing to add. Thank you very much  
 12 for the opportunity.  
 13 MR DE LA POER: Finally, in terms of the bereaved family  
 14 teams, can I invite Mr Cooper QC to add anything he has  
 15 to say.  
 16 Submissions by MR COOPER  
 17 MR COOPER: There is little to add. We have made our  
 18 written submissions and we are grateful to CTI for  
 19 clearly taking them on board.  
 20 We support the position taken by CTI on this issue  
 21 although we do echo my learned friend's observations  
 22 a moment ago, as long as there is no slippage in  
 23 timetable and this doesn't cause a delay, because that  
 24 would be a very serious matter.  
 25 SIR JOHN SAUNDERS: Yes. I agree, Mr Cooper. If we do

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1 instruct another expert, it is a very discrete area, the  
 2 factual aspects seem to me to be pretty clear and  
 3 I don't see any reason why it should delay, but  
 4 obviously that's something which I will very much have  
 5 in mind. I am as keen as anybody not to delay the  
 6 inquiry to any extent.  
 7 MR COOPER: I'm grateful, sir, thank you.  
 8 MR DE LA POER: Finally, then, Mr Browne QC on behalf of the  
 9 University of Salford.  
 10 MR BROWNE: Good morning, sir. Can you hear me?  
 11 SIR JOHN SAUNDERS: I can, but I can't see you at the  
 12 moment, Mr Browne, which is disconcerting, but I know  
 13 what you look like, so I'm happy to continue without  
 14 seeing you if that's the only thing we can manage.  
 15 MR BROWNE: I don't think it's any loss to you, sir, that  
 16 you can't see me. There you go.  
 17 Sir, good morning, and thank you for the opportunity  
 18 to address you. We have nothing to add to that which we  
 19 set out in our email of 20 June of this year.  
 20 SIR JOHN SAUNDERS: Thank you very much, Mr Browne, I'm  
 21 grateful.  
 22 Reply by MR DE LA POER  
 23 MR DE LA POER: Sir, if there is not complete consensus,  
 24 there is at least broad consensus, certainly from within  
 25 the bereaved family groups and Greater Manchester

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1 Police, that the instruction of an expert who will deal  
 2 with the educational aspects is a good idea, subject  
 3 only to the question of whether or not we can timetable  
 4 it in a way that ensures that there is no disruption to  
 5 our process.  
 6 As I have already said, in the case of  
 7 Professor Davies, who clearly was speaking on  
 8 a preliminary basis without any knowledge of the  
 9 materials, she did so, certainly in my opinion, with  
 10 a degree of confidence. We will be able to revert to  
 11 her if we take that forward, if that's what you wish us  
 12 to do, and ensure it is timetabled in a way that means  
 13 that everyone has an opportunity to see her report,  
 14 comment on it in the usual way, and for her to be able  
 15 to give evidence at a time when ordinarily we would  
 16 expect her to do so.  
 17 SIR JOHN SAUNDERS: Thank you. I'm really grateful for the  
 18 concise way in which everyone has dealt with it and the  
 19 submissions. I will give a brief judgment in due course  
 20 but not now.  
 21 Just to any person who's listening to this who may  
 22 be confused about what's going on, no one is suggesting  
 23 that there is any actual bias on behalf of Dr Wilkinson  
 24 or that he would demonstrate that in any evidence. But  
 25 the law has always been concerned with what is described

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1 as apparent bias, so would a reasonable person looking  
 2 at the facts of the situation say, "Well, it may be that  
 3 this person is not completely objective and may have  
 4 a bias", and that is what I need to look at, apparent  
 5 bias rather than actual bias. So that is why we are  
 6 taking what may be seen as excessive steps to deal with  
 7 this situation. I'm grateful to everyone that we've  
 8 been notified of this at an early stage when I hope it  
 9 will be possible to deal with the matter satisfactorily.  
 10 Thank you all. See you in a quarter of an hour.  
 11 (9.18 am)  
 12 (A short break)  
 13 (9.35 am)  
 14 MR ANDY BERRY (continued)  
 15 Questions from MR GREANEY (continued)  
 16 MR GREANEY: Sir, good morning.  
 17 Mr Berry, can I begin by reminding you, please, to  
 18 keep your voice up nice and loud. Don't worry if it  
 19 feels like shouting. Yesterday some people were  
 20 struggling to hear you and the stenographers, I think,  
 21 were also struggling. So bear that in mind, please.  
 22 A. I will.  
 23 Q. Before we finished yesterday, we were dealing with the  
 24 22.48 call made by you to North West Fire Control and,  
 25 as you will recall, that was a conversation that you had

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1 with Dean Casey of NWFC.  
 2 A. Yes.  
 3 Q. It was, moreover, the call in which you stated that you  
 4 had been trying to call the FDO, that you had not been  
 5 able to get through, and that that was for what you  
 6 described as obvious reasons.  
 7 A. That's correct.  
 8 Q. You told me that you accepted that that was the moment  
 9 to do something different, namely to dispatch a member  
 10 of your staff to the rendezvous point at cathedral car  
 11 park.  
 12 A. Yes.  
 13 Q. As the chairman reminded you yesterday, and as you will  
 14 have known in any event, that RVP was in the result  
 15 somewhere that nobody went and you know that, don't you?  
 16 A. I believe so, yes.  
 17 Q. That doesn't mean, does it, that if you had dispatched  
 18 someone to that RVP that situational awareness would not  
 19 have been gathered? That's a rather clumsy question but  
 20 I think you understand the thrust of it.  
 21 A. Yes.  
 22 Q. The fact that someone going to cathedral car park would  
 23 have met no one doesn't mean that that person wouldn't  
 24 have gathered situational awareness?  
 25 A. Yes.

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1 Q. And let's just explain why. If you had deployed someone  
2 from Thompson Street or Philips Park, they would have  
3 had to have driven down Oldham Road?  
4 A. Yes.  
5 Q. That would mean that would have essentially turned down  
6 the back of the station?  
7 A. Yes.  
8 Q. They would have been able to see, as they reached the  
9 corner, the concourse area?  
10 A. Yes.  
11 Q. They would have seen Station Approach?  
12 A. Yes.  
13 Q. And so they would have seen the presence of other  
14 emergency services there?  
15 A. Yes.  
16 Q. In any event, they would, as we know, probably have hit  
17 a cordon and a police officer would have been able to  
18 explain what was going on?  
19 A. Yes.  
20 Q. And even if none of that had happened, and obviously  
21 it would, and they had arrived at the car park and  
22 no one else was there, you would have expected them to  
23 have done something, namely go to the arena?  
24 A. Yes.  
25 Q. So what you now acknowledge should have happened would

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1 have generated early situational awareness for the Fire  
2 and Rescue Service?  
3 A. Yes.  
4 Q. And do you agree that you would then have known that  
5 other emergency services were there?  
6 A. That seems to have been the case, yes.  
7 Q. You would have deployed?  
8 A. Yes.  
9 Q. And in particular, you would have deployed your  
10 specialist resources?  
11 A. Yes.  
12 Q. There's a broader point that I just wanted to explore  
13 with you before we go on to your subsequent calls and  
14 actions. As you explained to us yesterday, you had  
15 become aware before the arena attack that there was  
16 a risk that the FDO would become overwhelmed in the  
17 event of a genuine Plato situation.  
18 A. Yes.  
19 Q. That was not knowledge that was personal to you within  
20 the Fire and Rescue Service, it was known at a high  
21 level within the organisation?  
22 A. Yes, within those workshops we talked about yesterday,  
23 there were senior officers involved in those training  
24 days.  
25 Q. As we know from your evidence, in the result, on the

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1 night, you were unable until a late stage to make  
2 contact with the FDO, and even then it was Mr Myerscough  
3 that you spoke to?  
4 A. Yes, that's correct.  
5 Q. Bearing in mind that the Fire and Rescue Service knew of  
6 this risk before 22 May, what contingency did the Fire  
7 and Rescue Service have in place to deal with that  
8 foreseeable event?  
9 A. I think the agreed way of contacting the force duty  
10 officer was through the phone call, because we'd never  
11 had an issue, the police never identified it as being  
12 an issue and, like I say, it was the agreed method, so  
13 it probably wasn't thought about.  
14 Q. No. I'm not saying that this is in any sense a personal  
15 criticism of you, but your answer reveals a problem,  
16 doesn't it?  
17 A. Yes.  
18 Q. Because on the face of it, when a call comes in to NWFC  
19 they're going to do one of two things: they are going to  
20 mobilise resources to the scene or they are going to  
21 speak to the duty NILO?  
22 A. Yes.  
23 Q. And if the duty NILO is called, his first port of call  
24 is likely to be the FDO?  
25 A. Yes.

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1 Q. And if you can't get in touch with the FDO, the whole  
2 thing is at risk of grinding to a halt, as in fact  
3 occurred this night?  
4 A. Yes.  
5 Q. So there did need to be a contingency, a plan B, but  
6 there wasn't; is that fair?  
7 A. No, in the planning they were planning to have the  
8 tri-service multi-agency radio channel that came in  
9 shortly after. We were working towards that so we would  
10 have had that contact and I suppose that would have been  
11 plan B if it had been in position at the time. Plan C  
12 would have been to get further situational awareness, as  
13 we've already said this morning, about going to an RVP.  
14 SIR JOHN SAUNDERS: Mr Greaney, I'm sorry, I just want to go  
15 back to something before I actually forget it.  
16 You may remember yesterday I mentioned the fact it  
17 seemed odd that because you, as a tactical adviser, the  
18 NILO, were advising North West Fire Control of what  
19 steps they should take, that suddenly you became the man  
20 in charge of the whole operation when actually you are  
21 a tactical adviser.  
22 A. Yes, that's the position I found myself in because  
23 I wasn't able to get the information.  
24 SIR JOHN SAUNDERS: So had you said what you have just been  
25 through with Mr Greaney, and sent somebody or sent some

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1 fire engines to the RVP point and they got situational  
 2 awareness, the automatic response, am I right about  
 3 that, is that the person in charge of the first fire  
 4 engine to get there takes charge of the situation?  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: So you then get an operational commander  
 7 as well who can take over from the tactical adviser?  
 8 A. Yes, I would still be sourcing some information for that  
 9 group of people, but yes.  
 10 SIR JOHN SAUNDERS: You would be advising them --  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: -- which is the right way round when you  
 13 have an operation which needs to carry on?  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: Sorry about that.  
 16 MR GREANEY: That's very helpful, sir.  
 17 In the result, what was the GMFRS command structure  
 18 that night?  
 19 A. Well, like I mentioned yesterday, if it had been an MTFA  
 20 originally there wouldn't have been that command  
 21 structure because again it wasn't thought of, it would  
 22 have just been the -- the specialist response would have  
 23 been the SRT teams and the NILOs and again there was no  
 24 structure around that, no fire engines, no officers.  
 25 There is now, obviously.

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1 But because I'd asked for four pumps because my  
 2 thinking was it could be a fire, it could be -- you  
 3 know, on the basis of the explosion, there'd be  
 4 something to start with. I at that point didn't ask for  
 5 any other officers to attend at that time because I was  
 6 just again waiting for that information.  
 7 SIR JOHN SAUNDERS: So when I was told yesterday that  
 8 Greater Manchester Fire and Rescue Service were very  
 9 well prepared to deal with an MTFA, you would actually  
 10 disagree with that fairly fundamentally, because there's  
 11 no command structure?  
 12 A. It was an oversight at the time, definitely, yes.  
 13 SIR JOHN SAUNDERS: So the plans should have had a command  
 14 structure and they didn't?  
 15 A. They didn't at that time, no.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR GREANEY: So where we've got so far in the first  
 18 13 minutes this morning is: (1), there's a major problem  
 19 in the GMFRS planning because there's no proper command  
 20 structure; (2), what ought to have happened at an early  
 21 stage is that an officer should be deployed to the  
 22 rendezvous point, that would have generated situational  
 23 awareness and resulted in your resources being deployed;  
 24 (3), another major problem was that if, as the plan  
 25 anticipated, the NILO contacts the FDO and can't get

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1 through to the FDO, there is no formal contingency or  
 2 formal plan B at that moment on 22 May?  
 3 A. Yes. I think the other thing you need to remember at  
 4 this time -- yes, we can't get through to the force duty  
 5 officer, but we now know he didn't want to contact us or  
 6 made a decision not to contact us, but also that two  
 7 METHANE messages were sent, so the three things not to  
 8 happen were unusual.  
 9 SIR JOHN SAUNDERS: I think you will need to understand that  
 10 it is certainly a contentious issue on the basis of the  
 11 cross-examination of the FDO as to whether he did make  
 12 a deliberate decision not to contact or whether he was  
 13 overwhelmed, so at the moment we need to be considering  
 14 both possibilities.  
 15 A. Right, okay.  
 16 MR GREANEY: Did you see the evidence that Mr Sexton gave?  
 17 A. Yes.  
 18 Q. So you appreciate the issue. On the one hand he  
 19 maintained very firmly that he made a deliberate  
 20 decision to conceal the declaration of Plato from the  
 21 partners.  
 22 A. Yes.  
 23 Q. On the other hand, a series of matters were put to him,  
 24 which might be thought to suggest that the contrary was  
 25 true, namely that he was overwhelmed, and that will be

23

1 an issue for the chairman to decide.  
 2 SIR JOHN SAUNDERS: And that is what he was telling  
 3 Kerslake, that he was overwhelmed.  
 4 MR GREANEY: Indeed. So it was just helpful at the  
 5 beginning of this morning just to clear the decks and  
 6 establish where we were in relation to some of these  
 7 important issues. What I'm going to do next is to  
 8 resume a chronological analysis of what you did from  
 9 22.48.  
 10 At 22.52, did you call back North West Fire Control  
 11 and speak to Vanessa Ennis?  
 12 A. Yes.  
 13 Q. Again, we'll listen to that recording and we'll have the  
 14 transcript on the screen.  
 15 Mr Lopez, the recording is {INQ004426/1}. The  
 16 transcript is {INQ001148/1}.  
 17 So we have now reached 22.52. It's 12 minutes after  
 18 you have received your initial notification --  
 19 A. Yes.  
 20 Q. -- and probably about 8 minutes after you have departed  
 21 your home.  
 22 (Audio played)  
 23 It's a short call, but it's a call that you started  
 24 to tell us about yesterday. It's an important one in  
 25 terms of your decision-making --

24

1 A. Yes.  
 2 Q. -- and your actions, so I'm going to just ask you by  
 3 reference to some questions to help us a little more  
 4 with it. You said, "I'm getting the MTFA capability  
 5 together".  
 6 A. Yes.  
 7 Q. And you meant by that specialist teams of the Fire and  
 8 Rescue Service?  
 9 A. Correct.  
 10 Q. You made plain that you wanted:  
 11 "NILOs three and the MTFA capability to rendezvous  
 12 at Philips Park"?  
 13 A. Yes.  
 14 Q. So it is clear that by that stage at 10.52 you were  
 15 continuing to regard Philips Park as a rendezvous point  
 16 for the relevant Fire and Rescue Service resources?  
 17 A. Yes, because I was still unable to speak to the FDO.  
 18 Q. And you wanted three NILOs or rather NILOs three; what  
 19 did you mean by that?  
 20 A. Well, when you've already got a resource of that type  
 21 already, you just add to that number. So if it was two  
 22 fire engines and you wanted four, it'd be make pumps  
 23 four.  
 24 Q. Yes, but this was a reference not to pumps.  
 25 A. No.

25

1 Q. We have been told about this term, make pumps two, four,  
 2 six and so on. You wanted NILOs three. Did you mean  
 3 that you were one NILO?  
 4 A. That's correct.  
 5 Q. And you wanted two other NILOs to be deployed?  
 6 A. That's correct, yes.  
 7 Q. And as we know, that did happen in the form of, I think,  
 8 Mr Levy and Mr Meakin?  
 9 A. Yes.  
 10 Q. From whom we'll hear tomorrow, I hope. What was your  
 11 thinking behind seeking two further NILOs?  
 12 A. I mentioned yesterday about the on-scene commanders to  
 13 lead the specialist response into the warm zone.  
 14 Q. Is this the NILO 1/NILO 2 situation?  
 15 A. Yes.  
 16 Q. So at that moment at 10.52 you anticipated that one of  
 17 those two further NILOs would be NILO 1 and the other  
 18 would be NILO 2?  
 19 A. Yes.  
 20 Q. Did you know which people were going to be deployed as  
 21 NILOs?  
 22 A. Yes, I knew which NILOs were on duty that night.  
 23 Q. Did you have an idea about to which of them you'd  
 24 allocate different roles?  
 25 A. I wouldn't allocate them. I knew that Carlos lived

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1 closer. I didn't know exactly where, but I knew he'd  
 2 get there first, so I would expect him probably to take  
 3 on NILO 1.  
 4 Q. When you say "get there", you're talking not about the  
 5 arena but about Philips Park?  
 6 A. Yes. It's a dynamic situation, though, and it would be  
 7 judged on decisions made by the NILOs when they got  
 8 there.  
 9 Q. So were you essentially then leaving it up to them to  
 10 decide or leaving it up to whichever of them arrived  
 11 first to make that decision?  
 12 A. Either. If one got there first and one was more  
 13 experienced at doing one or either of the tasks I would  
 14 leave that to them to decide.  
 15 Q. So here you are, you're still travelling towards  
 16 Philips Park. As we are going to hear in a short time,  
 17 that journey was far from straightforward.  
 18 A. Yes.  
 19 Q. You had made the decision that NILO 1 and NILO 2 were  
 20 going to be deployed to Philips Park?  
 21 A. Yes.  
 22 Q. You knew, did you, that certainly Carlos Meakin was  
 23 going to arrive there before you?  
 24 A. Yes, I expected him to, and Ben.  
 25 Q. So what was, and I don't mean this in any sense in an

27

1 insulting way, but what was your purpose from that point  
 2 at which there were two NILOs, one for NILO 1 and one  
 3 for NILO 2?  
 4 A. I was still -- because I talked about a multi-seated  
 5 potential incident yesterday. So if it hadn't and it  
 6 had been a single site, that's fine, I could have  
 7 redirected to either the command support room or the  
 8 Silver room, the force command module, at police  
 9 headquarters.  
 10 Q. By this stage you were probably only about 8 minutes  
 11 away from home?  
 12 A. Yes.  
 13 Q. Did you give any thought at that stage to going back  
 14 home so that you could carry out your work there?  
 15 A. No, I didn't.  
 16 Q. So you carried on at that stage with the intention of  
 17 going to Philips Park?  
 18 A. Yes. Another option, looking back, would have been to  
 19 go to a closer fire station or the nearest, to stop  
 20 there and use some of those people to assist me.  
 21 Q. But your thinking at the time was: I need to get nearer  
 22 to the scene than that?  
 23 A. Yes.  
 24 Q. At 22.57, were you called again by North West Fire  
 25 Control?

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1 A. Yes.  
 2 Q. On this occasion, you were spoken to by Joanne Haslam.  
 3 We can't in fact listen to this recording, but we can  
 4 see a transcript with the operationally sensitive  
 5 content redacted on the screen.  
 6 Mr Lopez, this is {INQ001177/1}.  
 7 You say:  
 8 "Hi, Control."  
 9 And Joanne Haslam says to you:  
 10 "Just to let you know I've informed the duty group  
 11 manager, Dean Nankivell."  
 12 So this is a reference back to your request a little  
 13 earlier --  
 14 A. Yes.  
 15 Q. -- that Dean Nankivell should make contact with you?  
 16 A. Yes.  
 17 Q. And we're going to see that he did in fact make contact  
 18 with you 5 minutes later. You thank her for that and  
 19 you're told:  
 20 "And he said can we send the TRU over to  
 21 Philips Park."  
 22 So that's a reference to one of the specialist  
 23 resources?  
 24 A. Yes.  
 25 Q. You say:

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1 "Yes, if it's available."  
 2 "With the MTFA fire gear I think the [location] one  
 3 is the nearest, I think."  
 4 And you say:  
 5 "Well, I've made MTFA capability two so that should  
 6 just be happening hopefully."  
 7 What did you mean by "MTFA capability two"?  
 8 A. The two vehicles. I could have been clearer at that  
 9 time by saying the specialist response, but the  
 10 terminology I used at the time was "MTFA capabilities".  
 11 Q. So you'd already decided that two SRT vehicles should go  
 12 to Philips Park?  
 13 A. Yes.  
 14 Q. "You have done what, sorry? You have done -- sorry."  
 15 SIR JOHN SAUNDERS: Sorry, that was referred to on the  
 16 previous call when you said NILOs three and MTFA two?  
 17 A. Yes.  
 18 MR GREANEY: And we heard calls yesterday, I can't remember  
 19 his name, but you were telephoned by Mr Buckley,  
 20 I think?  
 21 A. Peter Buckley, yes.  
 22 SIR JOHN SAUNDERS: To get one released?  
 23 MR GREANEY: Yes.  
 24 The operator Joanne Haslam doesn't immediately  
 25 understand what you're talking about:

30

1 "You have done what, sorry?"  
 2 And you say:  
 3 "I have made MTFA capability two. I've asked for  
 4 both MTFA teams, which is the TRU to must..."  
 5 Were you probably going to say muster?  
 6 A. Yes.  
 7 Q. She says:  
 8 "Oh right."  
 9 And you say:  
 10 "Muster rendezvous and [probably 'at']  
 11 Philips Park."  
 12 "... so you've already asked them to proceed to the  
 13 rendezvous point, have you?"  
 14 "I should have, yes, so you can just confirm that  
 15 that's happened?"  
 16 And the control room operator says:  
 17 "Right, just bear with me a second. Have you asked  
 18 for three NILOs to go?"  
 19 So this is a reference back to 22.52?  
 20 A. Yes.  
 21 Q. And you reply:  
 22 "I've asked to make NILOs three and MTFA capability  
 23 two."  
 24 North West Fire Control:  
 25 "He's asked for make NILOs three and MTFA capability

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1 two, right. MTFA capability two. Is that correct?"  
 2 And you confirm that it is.  
 3 "Yeah, all right, leave it with us. All right,  
 4 thank you, Mr Berry."  
 5 And the call then comes to a close.  
 6 So this is all part of your plan at that stage that  
 7 you should muster both specialist and non-specialist  
 8 resources at Philips Park?  
 9 A. Yes.  
 10 Q. What I want to do is just to pause for a moment, now  
 11 that we're at 22.57, in order to assess what North West  
 12 Fire Control knew and did not tell you about and to ask  
 13 you what difference it may have made if they had told  
 14 you. Does that make sense?  
 15 A. Yes.  
 16 Q. Obviously, they did tell you some things. I'm going to  
 17 draw your attention to some things they didn't tell you  
 18 and then we'll analyse the significance of those  
 19 omissions.  
 20 A. Yes.  
 21 Q. At 22.41.11, as I told you yesterday, North West Fire  
 22 Control was told that GMP was deploying. As I said  
 23 yesterday, the way in which it was put was this:  
 24 "We've got absolutely loads of officers en route.  
 25 Obviously, I think we're going to meet at that RVP point

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1 before we go in just in case of any secondary device.”  
 2 So that's one thing that they knew from a very early  
 3 stage, that GMP were deploying en masse.  
 4 At 22.43.13, as again I told you yesterday, North  
 5 West Fire Control was told that the Ambulance Service  
 6 had five vehicles en route to the scene.  
 7 A. Yes.  
 8 Q. So by 10.43, they knew that both the police and the  
 9 Ambulance Service were deploying.  
 10 At 22.46.17, the log records David Ellis of North  
 11 West Fire Control being told by GMP that officers were  
 12 actually arriving on the scene.  
 13 A. Yes.  
 14 Q. At 22.48, David Ellis was informed that the injuries  
 15 that had been seen looked not like gunshot wounds but  
 16 instead like shrapnel wounds.  
 17 Then at 22.54.04, Mr Ellis was informed that the  
 18 NWS Bronze was actually at the scene.  
 19 So just to draw those strands together, by the time  
 20 that North West Fire Control spoke to you at 22.57, they  
 21 knew that the prospect that there had been or might be  
 22 a firearms attack had diminished and, importantly, that  
 23 other emergency services were at the scene, including  
 24 a member of the Ambulance Service command structure.  
 25 And you were not told that?

33

1 A. No.  
 2 Q. At 22.57, were you?  
 3 A. No, sir.  
 4 Q. Obviously, you told us yesterday that the decision of  
 5 North West Fire Control to contact the NILO was, to use  
 6 your word, a reasonable one, and that's not something  
 7 that certainly I am going to challenge. But we've moved  
 8 on from that now and we are in a different phase when  
 9 they are harvesting information. Whilst you may be the  
 10 expert in relation to how to respond, are they or should  
 11 they be the experts in gathering information and passing  
 12 it on?  
 13 A. Yes, they are part of that JESIP sharing of information.  
 14 I'd expect them to share that information with me.  
 15 Q. You may just have answered my next question, which is:  
 16 should North West Fire Control have told you that other  
 17 emergency services were at the scene?  
 18 A. Absolutely, yes.  
 19 Q. If they had told you at 22.57 or perhaps shortly  
 20 afterwards what difference, if any, would it have made?  
 21 A. Well, we'd have quite clearly deployed probably straight  
 22 to the arena, proceeding with caution. Albeit, though,  
 23 they mentioned shrapnel and not gunshot wounds, that  
 24 still needed to be ruled out somewhat, I would say, so  
 25 more intelligence around that. But I think we probably

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1 have enough at that point, certainly knowing there's a  
 2 Bronze commander, ambulances, police on scene. There's  
 3 enough to go to the arena.  
 4 Q. So let's just be clear about this because yesterday,  
 5 perhaps understandably, you were not keen to get  
 6 involved in applying responsibility or culpability to  
 7 North West Fire Control. But from what you have said,  
 8 I believe we can be clear that your view is that there  
 9 was a failure by North West Fire Control to share  
 10 relevant information with you?  
 11 A. Yes.  
 12 Q. And that that had significant real world consequences  
 13 because it did not result in you deploying when  
 14 otherwise you would?  
 15 A. Yes, I was unable to assess the risk because I didn't  
 16 have the information.  
 17 Q. At all events, let's return to your journey towards  
 18 Philips Park. I'm going to ask that we have on the  
 19 screen that call record that we saw yesterday. For your  
 20 benefit and the chairman's, I'm going to be asking you  
 21 about paragraphs 75 and following of your witness  
 22 statement.  
 23 Mr Lopez, the call record is {INQ004348/63}.  
 24 As we know, at 22.52, line 54, you speak to North  
 25 West Fire Control. The next recorded contact on your

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1 billing record is line 45 and 46, which are calls to  
 2 Anthony Henshall. The first is only 5 seconds, perhaps  
 3 didn't get through. The second is 23 seconds. We'll  
 4 get to that call or those calls in a moment.  
 5 But between 22.52 or the end of that call and 23.00  
 6 when you started to call Mr Henshall were you making  
 7 further attempts to contact the FDO or had you given up  
 8 by that stage?  
 9 A. No, no, it was continual throughout the journey.  
 10 Q. The calls to Mr Henshall. First of all, who is he,  
 11 please?  
 12 A. Tony works or did work in the CPU department at the  
 13 time. He was a watch manager, so a lower ranking  
 14 officer. But he was the support officer for the MTFA  
 15 reference holder.  
 16 Q. For the MTFA?  
 17 A. Reference holder, which was Neil Gaskell at the time.  
 18 Q. You are dropping your voice slightly. Can people hear?  
 19 Just about, I think.  
 20 So he was a subordinate of yours?  
 21 A. I wasn't the lead for the MTFA; it was Neil Gaskell  
 22 at the time.  
 23 Q. I see, right. He was someone you knew well?  
 24 A. Yes.  
 25 Q. Who had a particular expertise in and experience of MTFA

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1 plans?  
 2 A. Yes.  
 3 Q. Was he someone that you trusted and had a high regard  
 4 for?  
 5 A. Very much so.  
 6 Q. And when you called him, what did you intend to seek  
 7 from him?  
 8 A. To see if he was available to assist , to attend. Tony  
 9 is very well-versed in the deployment of specialist  
 10 responders into the warm zone, so I wanted the best  
 11 people to be with me.  
 12 Q. So his particular skill was deployment into a Plato warm  
 13 zone. You're nodding your head. So you wanted him to  
 14 be there, by which you mean Philips Park, at least in  
 15 the first instance?  
 16 A. Yes.  
 17 Q. And in the result , at that stage, were you able to speak  
 18 to him?  
 19 A. No, I don't think he picked up in the first instance.  
 20 Q. We saw that the second call was more than 20 seconds.  
 21 Did you leave a message for him?  
 22 A. I think I probably did, yes.  
 23 Q. And later on, after 11 o'clock, I think you did speak to  
 24 him at 11.26.  
 25 A. I did at some point, yes.

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1 Q. Could we have that back on the screen, please?  
 2 Let's go over the page to {INQ004348/64}. As we  
 3 know, at 22.48 you had asked North West Fire Control to  
 4 facilitate a discussion between you and Dean Nankivell.  
 5 A. Yes.  
 6 Q. Who, let's remind ourselves, was the duty group manager  
 7 that night?  
 8 A. Yes.  
 9 Q. And in the call we've just heard, one of them, you were  
 10 told that that message had been passed on. Here we can  
 11 see, line 48, at 23.02, you in fact called  
 12 Dean Nankivell and there was a contact between you  
 13 lasting for 2 minutes 38 seconds.  
 14 A. Yes.  
 15 Q. Was that an effective contact in the sense that you  
 16 spoke to him rather than leaving a message?  
 17 A. Yes, I spoke to him.  
 18 Q. What was said between the two of you?  
 19 A. I had told him exactly what I'd been informed of, the  
 20 type of incident and the information I had at the time,  
 21 and what resources I had moved to Philips Park, and the  
 22 fact mainly that I couldn't get through to the force  
 23 duty officer .  
 24 Q. Were you seeking advice from him or simply making him  
 25 aware given his position as duty group manager?

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1 A. One of the things with the duty group manager is they'll  
 2 then cascade that information upwards into the  
 3 organisation.  
 4 Q. So did you expect him to liaise with the most senior  
 5 firefighters within the force?  
 6 A. Yes, the assistant principal officer and the principal  
 7 officer .  
 8 Q. Those persons being Mr O'Reilly and?  
 9 A. Mr Etches.  
 10 Q. Did you also anticipate that he would open something  
 11 called the command support room --  
 12 A. Yes.  
 13 Q. -- or the CSR?  
 14 A. Yes.  
 15 Q. Was that discussed between the two of you or was it  
 16 a matter of assumption?  
 17 A. It was an assumption but I think we did mention it  
 18 anyway.  
 19 Q. You had told Mr Nankivell what you had done, so namely  
 20 you hadn't deployed to the scene, or the RVP?  
 21 A. Yes.  
 22 Q. You had deployed resources to Philips Park, including  
 23 specialist resources?  
 24 A. Yes.  
 25 Q. And you told him about the difficulties you were having

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1 contacting the FDO?  
 2 A. Yes.  
 3 Q. In fact, not difficulties , you hadn't been able to  
 4 contact the FDO. Did he suggest that what you had done  
 5 was correct, incorrect , or did he express no view about  
 6 it?  
 7 A. I don't think he expressed a view. He didn't challenge  
 8 it. He said okay.  
 9 Q. Did you know where he was at the time that you spoke to  
 10 him?  
 11 A. No, I didn't. But I would have expected him to be at  
 12 home.  
 13 Q. He, as we've said a number of times, was the duty group  
 14 manager. Bearing in mind that you were in your car,  
 15 negotiating a difficult journey, and speaking, were you  
 16 not, to many other people during this period of time --  
 17 A. Yes.  
 18 Q. -- did you say to him, the duty group manager, "Boss,  
 19 I'm busy, can you take responsibility for speaking to or  
 20 seeking to speak to the FDO"?  
 21 A. I did mention that to him, I asked him to do that.  
 22 Q. What did he say?  
 23 A. He said, "Right".  
 24 Q. So did you expect that he would then make his own  
 25 efforts to contact the FDO?

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1 A. Yes. I'd already spoken to John Fletcher, I think, or  
 2 was about to. Every time I spoke to anybody I asked  
 3 them to make contact with the FDO.  
 4 Q. How were you feeling by this stage as a result of your  
 5 failure to make contact with the FDO?  
 6 A. Frustrated that I couldn't make contact, frustrated  
 7 in the limitations of the communications that I had,  
 8 because the very phone I'm trying to ring on, people are  
 9 phoning me on. And obviously messages are being left  
 10 that I only find out later on. So I was limited,  
 11 really, in what I could do.  
 12 Q. You were also driving?  
 13 A. Plus I'm driving.  
 14 Q. And there comes a time when no longer are you driving,  
 15 but you don't know where you are?  
 16 A. That's right.  
 17 Q. And that doesn't sound like an ideal situation to be  
 18 making decisions within.  
 19 A. No. Like I said, to manage that, I do try to spread the  
 20 workload among the other callers, I asked them to make  
 21 some calls for me.  
 22 Q. We know from what you told us yesterday that you knew  
 23 colleagues within the Ambulance Service and you knew  
 24 colleagues within GMP.  
 25 A. Yes.

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1 Q. And no doubt with some you had distant relationships and  
 2 with some you had closer relationships?  
 3 A. Yes.  
 4 Q. Did you have on your telephone numbers for colleagues  
 5 within the other emergency services?  
 6 A. I would say no for the ambulance but possibly police.  
 7 Q. Did you think during this stage, and bearing in mind the  
 8 difficulties that you were facing, did you think to  
 9 yourself: I can't get through to the FDO, what about  
 10 getting through to X or Y, because they are a senior  
 11 figure and they might be able to give me the information  
 12 that I need or source it?  
 13 A. Well, the people that I did have on my phone were  
 14 related to COMAH and they were more in a planning sort  
 15 of department as opposed to an operational officer.  
 16 SIR JOHN SAUNDERS: If you had been operating from home and  
 17 stayed there, would you have had more means of  
 18 communication than your mobile phone? Do you have  
 19 a radio?  
 20 A. I think the benefit of being at home was I would have  
 21 had some space and I wasn't driving. I'd have had  
 22 a clearer mind more than anything.  
 23 MR GREANEY: I was going to get to this, the idea of being  
 24 at home, and it is obvious you have reflected on this  
 25 yourself.

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1 A. Yes.  
 2 Q. People will understand why you wanted to go to the  
 3 scene. If you had been at home, you'd have had more  
 4 space, as you said. You wouldn't have been having to  
 5 focus on a journey and on your satnav.  
 6 A. Yes.  
 7 Q. Presumably you'd have had a landline as well as your  
 8 mobile telephone?  
 9 A. Yes.  
 10 Q. We know you had a computer.  
 11 A. Yes.  
 12 Q. Would you have access to the log on the computer?  
 13 A. Yes.  
 14 Q. And so it would seem that even though NWFC hadn't been  
 15 telling you about it, you would have picked up on  
 16 information such as the other emergency services being  
 17 at the scene?  
 18 A. Yes. As I said yesterday, I would have picked out the  
 19 salient bits of the log and passed that information on.  
 20 Q. So had you remained at home — and, again, I will  
 21 emphasise I'm not criticising you not for doing so, but  
 22 had you remained at home, again you would have gained  
 23 earlier situational awareness and there would have been  
 24 an earlier deployment to the scene?  
 25 A. Yes, I think so, yes.

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1 Q. It is now just beyond 11 o'clock and you still have some  
 2 way to go on your journey.  
 3 A. Yes.  
 4 Q. We know you don't arrive at Philips Park until gone  
 5 23.40. I just want to pause again to reflect upon two  
 6 issues, and those are, (1), progress of your journey —  
 7 I have said a number of times that we'll come to this —  
 8 and, (2), other things that you didn't know.  
 9 By now, at 23.02, 21 minutes have passed since you  
 10 were first notified of the bombing and you've been on  
 11 the road for probably about 18 minutes, something like  
 12 that. Ordinarily, your journey to Philips Park, we  
 13 learn from your statement, would have taken you about  
 14 35 minutes?  
 15 A. Yes, on blue lights, yes.  
 16 Q. Were you on blue lights?  
 17 A. Yes.  
 18 Q. But that night, you anticipated, before you set off,  
 19 that there were likely to be road closures?  
 20 A. Yes, I was told in one of phone calls that there were  
 21 road closures. It did influence the journey.  
 22 Q. I was going to remind you of that; I didn't need to do  
 23 so. You knew given what had happened, it was likely  
 24 some roads would be closed?  
 25 A. Yes.

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1 Q. At 22.48 you were actually told about some road  
2 closures, and did you anticipate that it was likely that  
3 there would be certain areas nearer to Manchester that  
4 would become backed up with traffic as a result of what  
5 was happening?  
6 A. Yes, naturally I would have gone down the M6 on to the  
7 East Lancs road, but because it sort of goes through  
8 Salford first towards the arena, I thought it better to  
9 go on the 62 and the 602 to give me more options.  
10 Q. I'm not going to go through every road you went on,  
11 others can do if they want to. The point is you knew  
12 from a very early stage that this was going to be a more  
13 difficult journey than would ordinarily be the case?  
14 A. Yes.  
15 Q. You knew it was likely to take you more than 35 minutes?  
16 A. Yes.  
17 Q. And I think you decided to take a different route from  
18 the natural route in order to try to remove some of the  
19 difficulties that you anticipated?  
20 A. Yes. It's something we do on a regular basis,  
21 particularly RTCs, because the traffic backs up, so we  
22 consider the route and the best way to come into it. It  
23 may be longer sometimes but it's more reasonable and  
24 sensible to go that way.  
25 Q. In the result, your journey was even more difficult than

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1 you had thought it would be?  
2 A. Yes.  
3 Q. And as you explained in your statement, you were  
4 significantly hampered by roadworks?  
5 A. I was.  
6 Q. You were diverted even from the different route that you  
7 had decided to take?  
8 A. Yes. When I approached the turnoff to the M62, it was  
9 closed, it was coned off.  
10 Q. In the end, you trusted your satnav?  
11 A. At that point I wasn't on the satnav. I knew that  
12 I could get off the M56 and work my way up  
13 Princess Parkway, that way.  
14 Q. But did that go to plan?  
15 A. No, that was closed as well.  
16 Q. So did there come a stage then when you didn't really  
17 have a choice but to switch on your satnav and see where  
18 that would take you?  
19 A. Yes.  
20 Q. The satnav took you along a number of winding country  
21 roads?  
22 A. It did.  
23 Q. You didn't really have the faintest idea where you were?  
24 A. I didn't.  
25 Q. And you just had to trust in your satnav?

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1 A. I did.  
2 Q. It would be fair, would it not, to just think about the  
3 situation you were in in that moment?  
4 A. Yes.  
5 Q. You know that there has been an explosion with loss of  
6 life at Manchester Arena. You are trying to make your  
7 way to Philips Park, where your resources are mustering.  
8 You can't get in touch with the FDO. You can't gain  
9 situational awareness. And now you don't even know  
10 where you are.  
11 A. It was difficult, yes.  
12 Q. To say the least, was that a moment of real stress and  
13 tension for you?  
14 A. It was.  
15 Q. I think it would be fair to say, as you have said  
16 already, that these were not circumstances that were  
17 likely to aid dynamic decision-making, were they?  
18 A. It wasn't helpful, no.  
19 Q. But on that journey, did you give thought, when these  
20 difficulties became so acute, to handing over your  
21 responsibilities altogether to someone else?  
22 A. No. Like I said, I had tried to manage that by speaking  
23 to the other callers that I spoke to. Must remember at  
24 this stage I've also mobilised two NILOs, who in a short  
25 period I expect to arrive at the rendezvous point, who

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1 will be doing something on arrival.  
2 Q. We'll just leave your journey for a moment and deal with  
3 some other calls that you were involved in over this  
4 period of time. We have dealt with your discussion with  
5 Dean Nankivell at 23.02 and I'm going to ask you next  
6 about a call that you mentioned just a moment ago with  
7 John Fletcher. We know from the records that you spoke  
8 to him at 23.13.  
9 A. Yes.  
10 Q. At the time was John Fletcher your line manager?  
11 A. That's right.  
12 Q. In the conversation that you had with him at 23.13,  
13 what was said?  
14 A. Again, I reviewed what I'd done, the actions and the  
15 information that I had, what I'd done, where I put the  
16 resources, the fact that I was struggling to contact the  
17 force duty officer, and I think at this stage I was  
18 telling John the consequence of being off track from my  
19 journey. The difference, I suppose, between the call  
20 between John Fletcher and Dean Nankivell is that John is  
21 well-versed in MTFA and is the NILO, and Dean Nankivell  
22 wasn't.  
23 Q. So did you think that he would have a better feel for  
24 this situation and how to deal with it?  
25 A. Yes.

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1 Q. Yesterday you referred to Mr Fletcher a number of times  
2 by his first name. Should we understand that he was  
3 someone that you were on very good terms with?  
4 A. Yes.  
5 Q. And regarded highly?  
6 A. Yes, absolutely.  
7 Q. And trusted?  
8 A. Yes.  
9 Q. You told him, I believe, that you needed more  
10 information about the incident?  
11 A. Yes.  
12 Q. About the rendezvous point?  
13 A. Yes.  
14 Q. And about the forward command point?  
15 A. Yes.  
16 Q. You told him that you couldn't get hold of the FDO?  
17 A. Correct.  
18 Q. And just as you had asked Mr Nankivell, did you ask him  
19 to see if he could get hold of the FDO?  
20 A. I did.  
21 Q. Did you know where he was?  
22 A. He did say within the conversation that he was heading  
23 over to the command support room.  
24 SIR JOHN SAUNDERS: Heading over where, sorry?  
25 A. The command support room at Fire Service headquarters.

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1 MR GREANEY: The CSR, as it is called in some of the  
2 documents?  
3 A. Yes.  
4 SIR JOHN SAUNDERS: Would you know roughly how long it would  
5 take him to get there?  
6 A. Twenty minutes, I'd imagine.  
7 SIR JOHN SAUNDERS: Thank you.  
8 MR GREANEY: And this was the CSR that you expected Group  
9 Manager Nankivell to be setting up?  
10 A. Correct.  
11 Q. How long would it have taken him to have reached the  
12 location?  
13 A. I'm not as familiar as to where Dean lives, to be  
14 honest.  
15 Q. We can no doubt ask him about that in due course.  
16 The next call I want to ask you about, and I'm not  
17 going to suggest that these are all the conversations  
18 that you were having --  
19 SIR JOHN SAUNDERS: Sorry, with Mr Fletcher, did you -- you  
20 said to him you were having difficulty getting there,  
21 did you, (overspeaking) --  
22 A. Yes. I told him that the motorway junctions --  
23 SIR JOHN SAUNDERS: Did you say: well, perhaps someone else  
24 should take over?  
25 A. No, I had explained that two NILOs were en route.

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1 SIR JOHN SAUNDERS: But wouldn't those NILOs en route need  
2 to know: when you get there, you take over, because I'm  
3 not going to take get there for some time?  
4 A. Yes, I do say in that in the conversations that I had  
5 with the NILOs.  
6 SIR JOHN SAUNDERS: With the NILOs? Okay, thank you.  
7 MR GREANEY: When were those conversations with the NILOs?  
8 A. They are further into the events of the evening?  
9 Q. Were they in fact once you had arrived at Philips Park?  
10 A. No, they were en route.  
11 Q. Let's just take this in stages to make sure we don't  
12 miss anything relevant. In fact, we're going to the  
13 first of the calls you just mentioned. It is 23.18,  
14 paragraph 85 of your statement.  
15 One of the NILOs two that you had deployed to  
16 Philips Park was Group Manager Ben Levy; is that  
17 correct?  
18 A. That's correct, yes.  
19 Q. Was he someone that you knew well?  
20 A. Yes.  
21 Q. And was he experienced as a NILO?  
22 A. Probably the most experienced on the night, yes.  
23 Q. At 23.18, whilst still on your way to Philips Park, did  
24 you speak to him?  
25 A. I did.

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1 Q. What did you say to him?  
2 A. It was a similar conversation. In effect, the  
3 information I had, the resources I'd moved forward.  
4 I explained about my journey again and the difficulties  
5 and the time it was going to take me to get there and  
6 the fact that we were saying that I would be sort of  
7 backing him up, I'd have expected them to move forward  
8 and I would follow them down.  
9 Q. So did you know where he was at that stage?  
10 A. Again, I would have assumed he was at home, I didn't  
11 know.  
12 Q. You told him about the nightmare that you were having  
13 getting into Manchester?  
14 A. Yes.  
15 Q. Did you tell him about your struggles to get hold of the  
16 FDO?  
17 A. Yes.  
18 Q. And as with the other two firefighters you'd spoken to,  
19 did you ask Group Manager Levy to make his own attempts  
20 to get hold of the FDO?  
21 A. Yes. I think everyone knew that was the priority, that  
22 was the information we needed.  
23 SIR JOHN SAUNDERS: He had been mobilised, had he, by NWFC,  
24 by then?  
25 A. Yes.

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1 SIR JOHN SAUNDERS: But he was still at home at this stage?  
 2 A. No, no, this is -- I've mobilised at 52 --  
 3 MR GREANEY: Yes.  
 4 A. -- or requested at 52. Obviously this is nearly half  
 5 an hour...  
 6 SIR JOHN SAUNDERS: And he was where?  
 7 A. He was still en route. I could hear the vehicle.  
 8 SIR JOHN SAUNDERS: Not at home but en route?  
 9 A. Yes.  
 10 MR GREANEY: That was a fault in my question. So he was on  
 11 his way to Philips Park?  
 12 A. Yes.  
 13 MR GREANEY: And I should know the exact time that he  
 14 arrives but I will make sure that we find that out in  
 15 the break.  
 16 SIR JOHN SAUNDERS: I misunderstood. I thought he was still  
 17 at home.  
 18 MR GREANEY: The next call I want to ask you about is a call  
 19 to the other NILO of NILOs two, this is paragraph 86 of  
 20 your statement. At 23.33, when you were still on your  
 21 way, did you speak to Group Manager Carlos Meakin?  
 22 A. Yes, I did.  
 23 Q. Where was he at that stage?  
 24 A. He was en route I think.  
 25 Q. What passed between the two of you?

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1 A. Again the information that I had, the resources that I'd  
 2 mobilised, and the fact that I'm having a nightmare  
 3 journey and the fact that I couldn't contact the force  
 4 duty officer, therefore can you try to contact them as  
 5 well.  
 6 SIR JOHN SAUNDERS: It just seems that everybody is  
 7 a relatively long way away. Is there no one senior in  
 8 the Fire Service who would actually be local?  
 9 A. There are other officers, but we're talking about NILOs,  
 10 who have the NILO skill. At the time we had to have one  
 11 on each rota. Fortunately, that night we had three.  
 12 MR GREANEY: It seems also, and you must tell me if this is  
 13 unfair, that the entire focus was just on making contact  
 14 with the FDO when there were obviously, were there not,  
 15 other routes to obtain information about what was going  
 16 on?  
 17 A. I think the training told us that that was where the  
 18 information was and that's -- they have the primacy,  
 19 they would have the knowledge of the zones and the  
 20 tactics that were going to be used.  
 21 SIR JOHN SAUNDERS: No plan B?  
 22 A. I think at the time, it was focused around an MTF, the  
 23 JOPs. It was very focused around a gunman, an  
 24 active shooter.  
 25 SIR JOHN SAUNDERS: So no plan B?

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1 A. Well, the contact point I would say, if the channel had  
 2 been in there, that would have been the next point of  
 3 call. But yes, and I've already said we should have  
 4 gone to the RVP to source some more information.  
 5 SIR JOHN SAUNDERS: And no one you spoke to knew about the  
 6 other way of contacting the police?  
 7 A. The Hailing channel?  
 8 SIR JOHN SAUNDERS: Yes.  
 9 A. No, that was never an agreed method of contacting the  
 10 FDO.  
 11 MR GREANEY: One of the, my word, extraordinary features of  
 12 what went wrong that night is that you and your NILO  
 13 colleagues, and Group Manager Nankivell, lacked the  
 14 situational awareness and yet your firefighters on the  
 15 ground at Philips Park, as I am sure you know now, they  
 16 knew what was happening. Nick Mottram had been speaking  
 17 to his wife, Helen, they had been seeing ambulances  
 18 screaming to the scene, so they had situational  
 19 awareness or some of it, yet you didn't.  
 20 A. Yes. Again, it would have been nice to have that  
 21 information.  
 22 Q. So it was my description, but is it fair to say that is  
 23 an extraordinary state of affairs that the troops on the  
 24 ground have that situational awareness, that's why they  
 25 are so desperate to get there, and yet the bosses don't?

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1 A. We were all desperate to get there and all frustrated on  
 2 the night. That information was never shared with me.  
 3 Q. We've been dealing with your journey to Philips Park and  
 4 let's deal with the time at which you arrived.  
 5 Mr Lopez, could we have on the screen, please,  
 6 {INQ004300/1}.  
 7 We spoke about the MODAS gateway system yesterday.  
 8 We can see from this that this records that you arrived  
 9 at G18 at 23.40.28. Do you see that?  
 10 A. Yes.  
 11 SIR JOHN SAUNDERS: And that's Philips Park?  
 12 MR GREANEY: Yes, G18 is Philips Park. G16 is  
 13 Thompson Street.  
 14 So if you were on the road by 22.44, as we  
 15 identified yesterday because of that call with  
 16 Mr Buckley and the call with NWFC, that means that your  
 17 journey has taken you not 35 minutes, not a bit longer,  
 18 but in fact a total of 56 minutes.  
 19 A. Yes.  
 20 Q. In the end, you arrived at Philips Park at the very  
 21 moment at which the final living casualty was being  
 22 evacuated from the City Room.  
 23 I said there were two matters that we were pausing  
 24 to consider. The first was your journey. I hope we've  
 25 dealt with that fairly now and that we've had

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1 appropriate regard to the difficulties that you  
 2 encountered through no fault of yours.  
 3 Next I want to look at what else you didn't know.  
 4 This takes us back to something that you mentioned  
 5 yesterday, namely the METHANE messages of other  
 6 emergency services, and I told you that we would come  
 7 back to that and I would help you with what was said.  
 8 METHANE stands for major incident?  
 9 A. Yes.  
 10 Q. Exact location?  
 11 A. Yes.  
 12 Q. Type of incident?  
 13 A. Yes.  
 14 Q. Hazard, access?  
 15 A. Yes.  
 16 Q. Number of casualties?  
 17 A. Yes.  
 18 Q. And very importantly for your decision—making purposes,  
 19 emergency services?  
 20 A. Correct, yes.  
 21 Q. So what I want to do is to look at the METHANE messages  
 22 that were passed. As for BTP, British Transport Police  
 23 declared a major incident at 22.39.18. That was  
 24 Inspector Dawson. In fact, NWS was told that BTP had  
 25 declared that shortly afterwards at 22.41.

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1 SIR JOHN SAUNDERS: Just give me the time of the  
 2 declaration. I know I can read it on the transcript.  
 3 MR GREANEY: The declaration was 22.39.18.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GREANEY: It was at 22.57 that the BTP METHANE message  
 6 was passed, passed from the scene to Control at BTP.  
 7 I haven't warned you about this, Mr Lopez, so I hope  
 8 it will work. The extracted audio for that METHANE  
 9 message at 22.57.29 is {INQ035613/1}. It ought to be  
 10 a clip and the transcript is {INQ028932/46}, and it  
 11 should be highlighted in blue.  
 12 (Pause)  
 13 I did intend that you should be given an opportunity  
 14 to listen to these this morning before we started and it  
 15 is my oversight that you weren't. I don't believe  
 16 you're going to be disadvantaged in any way because I  
 17 have a simple question and I think the answer will be  
 18 simple as well, but if you do need time to reflect on  
 19 these, you must let me know, please.  
 20 A. Okay, sir.  
 21 Q. So we can see Sergeant Cawley to Inspector Dawson,  
 22 22.57.59. It is the part in blue. Hopefully the  
 23 reference I've given you for the audio will be that  
 24 passage. Thank you.  
 25 (Audio played)

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1 Sir, we were starting not at the beginning of the  
 2 blue, but a little bit lower down.  
 3 SIR JOHN SAUNDERS: I caught it, two-thirds of the way down  
 4 the page.  
 5 MR GREANEY: Exactly.  
 6 Can we start that again?  
 7 (Audio played)  
 8 I'm sure you can agree, it might reasonably be said  
 9 that there were two police officers who knew what  
 10 a METHANE message was?  
 11 A. Yes.  
 12 Q. And the information was communicated clearly and  
 13 effectively?  
 14 A. Yes.  
 15 Q. You were not at any stage that night made aware of that  
 16 METHANE message, were you?  
 17 A. No.  
 18 Q. If you had received that message at about that time,  
 19 11 o'clock, what difference, if any, would it have made?  
 20 A. We would have attended the arena straightaway.  
 21 SIR JOHN SAUNDERS: Just help me with the evidence we've  
 22 heard about what happened with that METHANE message  
 23 being broadcast to other emergency services.  
 24 MR GREANEY: I don't believe it was.  
 25 SIR JOHN SAUNDERS: That was what my recollection was,

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1 thank you.  
 2 MR GREANEY: As for NWS, the position is at 22.46, Advanced  
 3 Paramedic Paddy Ennis, having arrived at the station,  
 4 called the NWS control room and he declared a major  
 5 incident standby. But almost straightaway, the control  
 6 room itself decided that they would declare a major  
 7 incident.  
 8 At 22.54, Paddy Ennis made a call, he recalled it  
 9 was just outside the City Room, in fact we know he was  
 10 making the call from within the City Room.  
 11 A. Yes.  
 12 Q. And he made a call from within the City Room in the  
 13 course of which he declared a major incident —  
 14 A. Yes.  
 15 Q. — albeit it had already been declared, and he passed  
 16 certain information. We won't listen to that recording  
 17 because it contains background noises which would be  
 18 highly distressing, but we will look at the transcript  
 19 of the call.  
 20 {INQ015070T/1}. This isn't in classic METHANE form,  
 21 that's certainly correct, but the information that  
 22 Mr Ennis passed was:  
 23 "This is a confirmed major incident. We've got at  
 24 least 40 casualties, approximately 10 appear to be  
 25 deceased on scene. We've got at least a dozen

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1 priority 1. Ambulances still need to be at Hunts Bank  
2 or Victoria Station, over.”  
3 And NWSA Control:  
4 “Everyone is now making their way to Hunts Bank.”  
5 “Yes, affirmative.”  
6 So as I said, it isn't in classic METHANE form, but  
7 what it did indicate was this was a major incident,  
8 there were multiple casualties, including fatalities,  
9 and that ambulances were on their way to the scene.  
10 You never received that message, is that correct?  
11 A. That's correct.  
12 Q. Had you received that message, what difference if any  
13 would it have made?  
14 A. The hazard information isn't there, but generally  
15 knowing that the other category 1 responders were there  
16 or were making their way there would have meant we'd  
17 have done the same.  
18 Q. So just before we take our break, if the chairman is  
19 content, it seems that what we have just looked at are  
20 two examples, although important examples, of the  
21 massive communications breakdown that you described  
22 yesterday?  
23 A. Yes.  
24 MR GREANEY: Sir, would that be a convenient moment for our  
25 break?

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1 SIR JOHN SAUNDERS: Yes. Quarter of an hour.  
2 (10.43 am)  
3 (A short break)  
4 (11.00 am)  
5 MR GREANEY: Mr Berry, it's 23.40, and you have now arrived  
6 at Philips Park Fire Station. I want to begin by asking  
7 you about what you detected of the atmosphere there once  
8 you arrived.  
9 A. It was busy. By busy I mean there was quite a few  
10 vehicles parked up that I'd requested. A number of  
11 firefighters and officers, junior officers. But I could  
12 also see Ben, I think, as well, quite animated at that  
13 time.  
14 Q. Really, when I asked you about the atmosphere what I was  
15 driving at was — we heard evidence at an earlier stage  
16 in this chapter of our process from the firefighters on  
17 the ground about their immense frustration that the Fire  
18 and Rescue Service had not deployed. Did you sense that  
19 frustration?  
20 A. No, I probably didn't because I parked further up the  
21 road because I couldn't get on to the fire station, so  
22 I parked probably 50 yards up the road.  
23 Q. Let's deal with what happened at Philips Park. I'm now  
24 at paragraph 80, page 23 of your witness statement. You  
25 say that it was full of vehicles so that you parked

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1 outside. Group Manager Levy called at this point to see  
2 where you were and you told him you were parking up and  
3 then you went to see him; is that correct?  
4 A. Yes.  
5 Q. What was he wearing?  
6 A. He was wearing his ballistic protection, PPE.  
7 Q. Is that protection which would have permitted him to  
8 deploy into a Plato warm zone?  
9 A. Yes.  
10 Q. Did you have a discussion with Group Manager Levy at  
11 that stage?  
12 A. Yes.  
13 Q. What passed between the two of you?  
14 A. We shared some early situational awareness, what we  
15 thought was happening, and what we understood to be the  
16 case, and it was quite a stark moment as well when  
17 Carlos was there, so we didn't know much more than we  
18 already knew.  
19 Q. You say you shared situational awareness. The problem  
20 was you didn't have a right lot of situational  
21 awareness, did you?  
22 A. No.  
23 Q. And did Ben Levy tell you that he wanted to be the  
24 officer in charge?  
25 A. He did at that point, yes. At this time it's worth

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1 remembering that I've asked for these resources some  
2 time ago and I am really surprised they are still there  
3 at this time.  
4 Q. When he told you that he wanted to be officer in charge,  
5 first of all what did you understand him to be saying or  
6 describing?  
7 A. I think what Ben did was recognise there was no officer  
8 in charge.  
9 Q. So he said he wanted to be that person?  
10 A. Yes.  
11 Q. Did you accept that decision by him?  
12 A. Absolutely, because I'd obviously been in the car for 50  
13 or so minutes, and I assumed because they had been there  
14 some length of time anyway that he was a better person  
15 than me to be in charge.  
16 SIR JOHN SAUNDERS: When you said you were surprised to see  
17 them still there — is that what you said?  
18 A. Yes.  
19 SIR JOHN SAUNDERS: The resources there at Philips Park?  
20 A. Yes.  
21 SIR JOHN SAUNDERS: You expected them to have gone?  
22 A. Moved forward potentially.  
23 SIR JOHN SAUNDERS: Okay. What gave you that — why would  
24 you think that? No one had told you that.  
25 A. No, no. I was surprised, though, we hadn't made any

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1 progress.  
 2 SIR JOHN SAUNDERS: When you just told us you shared  
 3 situational awareness with Mr Levy, didn't he tell you  
 4 that the firefighters had got information that the  
 5 Ambulance Service had already gone there? They must  
 6 have had that situational awareness by then.  
 7 A. I'm not sure it was Ben who said that or Carlos. I'm  
 8 not sure. But the information was at that point that we  
 9 had — the crews were aware, I think, or they'd seen it  
 10 on social media.  
 11 MR GREANEY: So at that stage, shortly after 11.40, you  
 12 speak to Ben Levy?  
 13 A. Yes.  
 14 Q. I think you're saying to us that Carlos Meakin shortly  
 15 afterwards becomes involved in your conversation?  
 16 A. Yes.  
 17 Q. And I'll come back to what you have just said in one  
 18 moment, but did they tell you, each of them, that they  
 19 had tried to get hold of the FDO?  
 20 A. I was confident that they had tried to get hold of him,  
 21 I'm sure they mentioned that at the time, yes.  
 22 Q. Did you tell them, as you had told them in your  
 23 telephone calls, that you had made repeated attempts to  
 24 get in touch with the FDO?  
 25 A. Yes.

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1 Q. And as you were there at Philips Park at about 23.45,  
 2 was your overriding sense one of disappointment that,  
 3 with all of the time that had passed, you were still  
 4 struggling for good situational awareness?  
 5 A. Yes.  
 6 Q. You'd seen that Group Manager Levy had his ballistic  
 7 protection on. What about Carlos Meakin?  
 8 A. I think Carlos had the overalls on but not so much the  
 9 ballistic protection.  
 10 Q. What were you dressed in?  
 11 A. I was still in my shirt — what we call shirt sleeve  
 12 order, so a shirt and working room(?) pants.  
 13 Q. Did you decide that it was the right thing for you to  
 14 put your ballistic gear on?  
 15 A. Yes.  
 16 Q. And did you therefore start to do that?  
 17 A. I did, yes.  
 18 Q. At 23.46 —  
 19 SIR JOHN SAUNDERS: You said you'd come back to what  
 20 Mr Meakin had said about...  
 21 MR GREANEY: You're quite right and then I forgot to.  
 22 SIR JOHN SAUNDERS: It's all right.  
 23 You say you were disappointed you hadn't got  
 24 situational awareness, but you've also told us that  
 25 actually all you would need to know is one of the other

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1 rescue services had gone forward.  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: So you now had sufficient situational  
 4 awareness to know exactly what you needed to do?  
 5 A. We're coming on to that and that's why we're trying to  
 6 push forward now and that's a conversation that Ben has  
 7 shortly.  
 8 MR GREANEY: The chairman is quite right. In that initial  
 9 conversation you have before 23.46 when you are called  
 10 by NWFC, had either Carlos Meakin or Ben Levy said to  
 11 you: the crews know from some source that other  
 12 emergency services have deployed to the scene?  
 13 A. I think it was mentioned then, yes, by Carlos.  
 14 Q. So at 23.46 you receive that further call from North  
 15 West Fire Control. This time from Rochelle Fallon.  
 16 We'll listen to that and have the transcript on the  
 17 screen.  
 18 The recording is {INQ004358/1}, the transcript is  
 19 {INQ004398/1}.  
 20 SIR JOHN SAUNDERS: 23.46 is this call. The time of  
 21 arrival, can just remind me?  
 22 MR GREANEY: 23.40.  
 23 This is after you've parked up, gone inside, had  
 24 your conversation with the other NILOs, I believe.  
 25 Am I right about that?

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1 A. Yes. I never entered the building, I remained outside.  
 2 Q. You remained outside. I see. That was my  
 3 misunderstanding. Thank you.  
 4 We'll play the recording.  
 5 (Audio played)  
 6 So this is 1 hour and 15 minutes after the  
 7 explosion, 1 hour and 6 minutes after you had been  
 8 notified of the explosion, and you are still not aware  
 9 of where you need to go to?  
 10 A. No.  
 11 SIR JOHN SAUNDERS: Where were you when they had that  
 12 conversation?  
 13 A. I was at the rear of my vehicle, getting dressed —  
 14 SIR JOHN SAUNDERS: Right, thank you.  
 15 A. — from in the boot.  
 16 MR GREANEY: Just after that call, for reasons that he'll no  
 17 doubt help us with tomorrow, Carlos Meakin switched on  
 18 a dictaphone for a short period. Were you aware that  
 19 he had done that?  
 20 A. No.  
 21 Q. But you were, I think, present for the conversation that  
 22 he recorded, and again we'll listen to that and have the  
 23 transcript on the screen.  
 24 The recording, Mr Lopez, is INQ03916A/1, and the  
 25 transcript is INQ03916 — I may have got this wrong.

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1 16T or it might be 161T.  
 2 The first reference might also be INQ039161A/1.  
 3 Yes, {INQ039161A/1} and {INQ039161T/1}.  
 4 (Audio played)  
 5 We can stop that now and go back to {INQ039161T/3},  
 6 please.  
 7 You have, I think, had an opportunity to listen to  
 8 that or at least see the transcript?  
 9 A. Yes.  
 10 Q. It does appear that, certainly towards the end of that  
 11 conversation, you were present, do you agree?  
 12 A. Yes.  
 13 Q. Do you remember that conversation?  
 14 A. I don't remember that, no. I was focused on making the  
 15 phone call, probably.  
 16 Q. Who is Tom Ludley?  
 17 A. I don't actually know. I don't think I know them.  
 18 I would suggest he's one of the firefighters .  
 19 Q. You have now heard what he was saying. He was pointing  
 20 out that the paramedics had gone to Thompson Street --  
 21 A. Yes.  
 22 Q. -- in their ambulances and yet the fire crews had been  
 23 deployed away from there, from their own yard, as he put  
 24 it , to Philips Park, and was observing that that seemed  
 25 crazy.

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1 A. Yes.  
 2 Q. Now you look back, do you think he had a point?  
 3 A. Yes, with the information that he had. This may be the  
 4 point that I was first made aware, I don't know, of the  
 5 sequence of events, but I can see how daft it would  
 6 look, yes.  
 7 Q. Did you throughout this period, whilst you were outside  
 8 Philips Park, continue to attempt to speak to the FDO?  
 9 A. Yes.  
 10 Q. And finally at 23.50, did you get through to the number  
 11 at least?  
 12 A. I did, yes.  
 13 Q. We're going to listen to that recording, although we did  
 14 listen to it earlier in the case, at least once, I think  
 15 probably twice, but you speak not to the FDO himself,  
 16 Chief Inspector Sexton, but to Mr Myerscough?  
 17 A. Yes, that's correct.  
 18 SIR JOHN SAUNDERS: It may become apparent during the call,  
 19 but why were you still trying to get hold of him? What  
 20 do you still need to know now?  
 21 A. We don't know much more than the original call  
 22 I received, so I am still trying to find out the exact  
 23 location, what is the means of attack. I know we know  
 24 now that it was the explosion, but I still think there's  
 25 an active shooter somewhere in at least one location if

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1 not several.  
 2 MR GREANEY: We're going to hear, as to the chairman's  
 3 question, that what you want is a "nailed-on FCP".  
 4 A. Yes.  
 5 Q. And once we've listened to the recording, I will ask you  
 6 about that. We're going to listen to the recording.  
 7 It is, as I've said, a conversation with Mr Myerscough,  
 8 and as he acknowledged and as Mr Sexton acknowledged,  
 9 it is a deeply unsatisfactory call , for reasons we're  
 10 going to hear, although may I say that's through no  
 11 fault of Mr Myerscough, who was doing his best in  
 12 difficult circumstances.  
 13 So can we have, please, the recording, which is  
 14 {INQ018835\_C/1} and the transcript is {INQ018835T/13},  
 15 I hope.  
 16 (Audio played)  
 17 So along the way of that call , a number of times,  
 18 twice I think, you said:  
 19 "We are not going to deploy anywhere until we get  
 20 a nailed-on forward command point".  
 21 A. Yes.  
 22 Q. Yet by this stage, on what you've told us, you knew that  
 23 the Ambulance Service had deployed to the scene?  
 24 A. No, to Thompson Street.  
 25 Q. To Thompson Street?

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1 A. Yes. I knew they were at Thompson Street, yes.  
 2 Q. Then I must have misunderstood you. Did you know at  
 3 that stage that any emergency services were at the  
 4 scene?  
 5 A. No. I suspected police firearms would be there, but  
 6 I was unaware of any other agency being there.  
 7 Q. This was 1 hour and 20 minutes after the explosion.  
 8 Didn't you realise , even if you hadn't been told by one  
 9 of your firefighters on the ground or by Carlos Meakin  
 10 or Ben Levy, didn't you believe that the other emergency  
 11 services were bound to be there?  
 12 A. They're not bound to be there. Some of these incidents  
 13 can last minutes, some can last several hours.  
 14 Q. What I want to ask you to consider, and this is a topic  
 15 I will come back to at the very end of my questioning,  
 16 is this: is what we are hearing there and you saying you  
 17 won't deploy anywhere until you have a nailed-on forward  
 18 command point, is what we are hearing an excessively and  
 19 unnecessarily cautious approach on the part of the Fire  
 20 and Rescue Service?  
 21 A. No. What I'm basically asking for is an FCP because  
 22 there will be some sort of risk assessment done for that  
 23 to be put in place.  
 24 Q. As I indicated, we will come back to the issue of  
 25 excessive caution in due course.

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1 As we heard, you were given one forward command  
 2 point, but it seems from the recording as if at the  
 3 time, whilst waiting for that, you were having  
 4 a discussion with someone else off call .  
 5 A. Yes, I was speaking to Ben.  
 6 Q. Did you become aware that whilst you were on the phone  
 7 to the FDO, Ben was on the phone to someone else?  
 8 A. Yes.  
 9 Q. To whom was he on the phone?  
 10 A. The chief fire officer .  
 11 Q. Were you picking up at any rate his side of that  
 12 conversation?  
 13 A. Yes, Ben was animated and being suggestive with his  
 14 hands that we were going to start moving the vehicles  
 15 and the resources.  
 16 Q. As we heard at the end of the recording, did you hear  
 17 from him or understand from his conversation that the  
 18 Ambulance Service were at G16, Thompson Street?  
 19 A. Yes.  
 20 Q. And that that was therefore where you should go to?  
 21 A. Yes, and that is where I'm asking to co-locate with,  
 22 in the first place, with the Ambulance Service, so we've  
 23 now got that information.  
 24 Q. Did you and the resources there at Philips Park then  
 25 deploy to Thompson Street?

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1 A. We did, yes.  
 2 Q. We don't need it back on the screen, but we know that  
 3 you arrived at Thompson Street at 00.06.38, so 00.06.  
 4 A. Yes.  
 5 Q. So the effect of your decision—making that night, have  
 6 I understood correctly, is that resources from  
 7 Thompson Street had driven across the city?  
 8 A. Yes.  
 9 Q. Away from the arena to Philips Park, and now at 00.06,  
 10 they were driving back to Thompson Street?  
 11 A. Yes, which may have been the intention originally. When  
 12 I was trying to make that initial call to the FDO there  
 13 would have been a point when they would have turned back  
 14 round and gone back down to the scene.  
 15 Q. You travelled, did you, in convoy back to  
 16 Thompson Street?  
 17 A. We did, on blue lights.  
 18 Q. When you and the other resources arrived at  
 19 Thompson Street, what was the situation?  
 20 A. The Ambulance Service were there. They were parked  
 21 round the rear of the station, quite a large number of  
 22 vehicles, which meant we parked on the forecourt in  
 23 front of the engine house doors.  
 24 Q. In your statement, I'm at paragraph 101, the bottom of  
 25 page 26, you observe:

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1 "I was told that no one was in charge, really .  
 2 There were loads of ambulances there from all over.  
 3 No one seemed to be managing them per se."  
 4 When you say that, "There was no one in charge,  
 5 really", at whom or at which organisation is that  
 6 directed?  
 7 A. The Ambulance Service.  
 8 Q. Can you see why it might be thought a little rich that  
 9 the Fire and Rescue Service should criticise how the  
 10 Ambulance Service were managing their resources given  
 11 what had happened?  
 12 A. No, I was asked by Ben on arrival at the station to go  
 13 and find out who was in charge so we could have some  
 14 discussions with them and share information. However,  
 15 when I went to speak to them, there didn't seem to be  
 16 anybody in charge or taking that role, which meant  
 17 I couldn't speak to somebody directly who'd either been  
 18 to the scene or had the situational awareness we  
 19 required.  
 20 Q. Could you see that ambulances were departing  
 21 Thompson Street and going somewhere?  
 22 A. I did later, as I walked back round the front I was  
 23 aware that, yes, there were two ambulances going.  
 24 Q. Where were they going to? Did you discover that?  
 25 A. I asked that, actually. I said, "Where are they

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1 going?", "They're just going down to the arena", and  
 2 I asked which route they were taking because again I'm  
 3 still under the impression that there's an  
 4 active shooter and they just said, "Well, they're just  
 5 going down".  
 6 Q. So at that stage, certainly you knew that other  
 7 emergency services were deploying --  
 8 A. Yes.  
 9 Q. -- to the arena? This is some time after 00.06. And  
 10 was that the first time that you knew?  
 11 A. Yes.  
 12 Q. We know that you had a conversation with Dean Nankivell  
 13 at 00.16. We don't need that on the screen. At that  
 14 stage, were you still at Thompson Street?  
 15 A. Can you just remind me where we are in the statement?  
 16 Q. We're at 102, although the time you give at 102 is not  
 17 correct. You describe a conversation in your statement  
 18 at 00.25.  
 19 A. Yes.  
 20 Q. In fact, the records show it was at 00.16.  
 21 A. Okay.  
 22 Q. So am I right that you had a conversation with Dean  
 23 Nankivell?  
 24 A. Yes, I did.  
 25 Q. At that stage, were you still at Thompson Street?

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1 A. Yes.  
 2 Q. So at that time, you did know that other emergency  
 3 responders were deploying to the arena; why had you not  
 4 deployed your resources straight there?  
 5 A. We were about to. We wanted to. Ben was speaking to  
 6 the command support room.  
 7 SIR JOHN SAUNDERS: Speaking to?  
 8 A. The command support room, sir.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR GREANEY: In that conversation you had with Group Manager  
 11 Nankivell, what did he say to you?  
 12 A. He asked me to proceed down to the arena with three fire  
 13 engines.  
 14 Q. Did you understand him to be talking about  
 15 non-specialist resources or specialist resources or  
 16 both?  
 17 A. Non-specialist regular crews.  
 18 Q. As you told me a moment ago, you still thought at this  
 19 stage that there was or might be an active shooter?  
 20 A. Yes.  
 21 Q. So in your mind, how did that fit, that concern, with  
 22 the indication that you should deploy with  
 23 non-specialist resources?  
 24 A. It didn't fit. I challenged what Dean was telling me  
 25 and said we should be sending the specialist response

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1 teams.  
 2 Q. What did he say?  
 3 A. He said, "Just take the three fire engines".  
 4 Q. So did he effectively give you an instruction that is  
 5 what you were to do?  
 6 A. Yes.  
 7 Q. Did he give you any explanation as to why that was the  
 8 decision as opposed to sending specialist resources?  
 9 A. No.  
 10 Q. Did you then travel with resources to the arena?  
 11 A. As I was setting off, Ben was notified that Op Plato had  
 12 just been declared, so Ben, as I was pulling off the  
 13 forecourt of the Thompson Street Fire Station, stood in  
 14 front of the vehicle and put his hand on the bonnet and  
 15 just said, "Hang fire", and then explained to me that  
 16 Op Plato had been declared.  
 17 Q. So he was saying, even at that stage, "hang fire"?  
 18 A. Yes.  
 19 Q. Was he suggesting that even those three fire appliances  
 20 should not deploy to the arena?  
 21 A. Yes, because quite clearly now we've just been  
 22 instructed that Op Plato has been declared. We'd been  
 23 working towards it during the evening, but now it had  
 24 officially been declared by the police and therefore  
 25 this was definitely a specialist response.

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1 Q. So how in the result was that situation resolved?  
 2 A. A phone call was made to the command support room to  
 3 challenge it.  
 4 Q. By whom?  
 5 A. By Ben.  
 6 Q. To challenge what, the decision to deploy or the  
 7 decision not to deploy?  
 8 A. The decision to send non-specialist responders.  
 9 Q. Do you know to whom he spoke?  
 10 A. I don't, no.  
 11 Q. What was the outcome?  
 12 A. I ended up taking three non-specialist pumps.  
 13 Q. Was that because the CSR gave that instruction or just  
 14 because you took it upon yourself to do so?  
 15 A. No, I was instructed.  
 16 Q. So you had a concern, even before you knew Plato had  
 17 been declared, that this might be an MTFA?  
 18 A. Yes.  
 19 Q. You were concerned that you were nonetheless told to  
 20 take non-specialist resources?  
 21 A. Yes.  
 22 Q. Your concern was overruled?  
 23 A. Yes.  
 24 Q. Then it was discovered that Plato had been declared?  
 25 A. Yes.

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1 Q. That amplified your concern and Mr Levy's that you were  
 2 deploying with non-specialist resources?  
 3 A. Yes.  
 4 Q. But it would seem that again the concern that was raised  
 5 was overruled and you were told to deploy with those  
 6 resources to scene?  
 7 A. Yes, and it's worth saying that we thought Op Plato had  
 8 just been declared, literally, not an hour or so before.  
 9 Q. Where did you understand you were to deploy to more  
 10 specifically?  
 11 A. I was given a location of the corner of Miller Street  
 12 and Corporation Street to co-locate with the ambulance.  
 13 Q. In what vehicle did you travel?  
 14 A. I had a Fire Service car.  
 15 Q. Did you travel in that vehicle in convoy with fire  
 16 appliances?  
 17 A. I did.  
 18 Q. When you got to the location that you had been told to  
 19 go to, what was the position?  
 20 A. The position was that the road was taped off and there  
 21 was a police officer.  
 22 Q. So had you been sent to the right or the wrong place?  
 23 A. It appeared to be the wrong place. There was no  
 24 Ambulance Service — well, there was nobody other than  
 25 the police officer and some traffic tape.

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1 Q. What did you do?  
 2 A. I spoke to the officer, he said nobody else had been,  
 3 passed through there, so he removed the tape, allowed us  
 4 to go through and then I made some phone calls.  
 5 Q. To whom?  
 6 A. I spoke to Ben and I spoke to Dean Nankivell.  
 7 Q. With what outcome?  
 8 A. They corrected the address and I was to go to  
 9 Hunts Bank.  
 10 Q. Is that where you and the other resources then went?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: So did you park up in order to make  
 13 these phone calls to find out where to go?  
 14 A. Yes. Briefly. I know there was a comment about me  
 15 sitting in my car and taking phone calls but that was  
 16 because my phone was linked to the Bluetooth.  
 17 MR GREANEY: We are going to look at some images of your  
 18 arrival and what you do when you arrive. We have seen  
 19 these before and I am certain you'll have seen them.  
 20 This is the sequence of events, Mr Lopez,  
 21 {INQ035612/470} to start with.  
 22 We in fact looked at this yesterday. This is the  
 23 first sight of you captured in the sequence of events.  
 24 Yes:  
 25 "A person is seen to alight from the small white

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1 motor vehicle, green circle. This person is Andrew  
 2 Berry."  
 3 That's 00.37.28.  
 4 Next, please, {INQ035612/472}. It's now 00.38.12,  
 5 and you continue your journey down Station Approach,  
 6 heading to the war memorial entrance.  
 7 {INQ035612/474}, please. You continue along that  
 8 road at 00.38.56.  
 9 Then {INQ035612/477}. 00.39.31. You are captured  
 10 approaching Chief Inspector Dexter, the ground-assigned  
 11 tactical firearms commander for GMP, and Stephen Hynes,  
 12 who by that stage has taken over the role of NWAS  
 13 Bronze.  
 14 Did you at that time have a conversation not with  
 15 Mr Dexter but with Mr Hynes?  
 16 A. Yes, I did.  
 17 Q. What was said between the two of you?  
 18 A. I just asked him straightaway what could we do to help  
 19 straightaway.  
 20 Q. What did he say?  
 21 A. He asked for us to collect some blankets and the  
 22 others — the remainder of my crew to assist with the  
 23 priority 3 casualties.  
 24 Q. By that stage, it was perfectly obvious to you, was it,  
 25 that many, many emergency personnel were present at the

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1 scene?  
 2 A. Yes.  
 3 Q. Was it apparent to you that they were present, many of  
 4 them, without ballistic protection?  
 5 A. Yes, it was.  
 6 Q. And that they were not just outside the station but  
 7 inside the station?  
 8 A. Yes, which didn't add up with the fact that I had just  
 9 been told it's Op Plato.  
 10 Q. Well, that may be an answer to what was to be my next  
 11 question, which is: bearing in mind by this stage you  
 12 knew that lots of emergency personnel without ballistic  
 13 protection were in that station, why did firefighters  
 14 not enter at that stage at 00.39?  
 15 A. That was purely because NWAS asked us to assist outside  
 16 initially to get the blankets and the P3s were outside  
 17 in what later became the cold zone.  
 18 Q. I think you told me at the very beginning of yesterday  
 19 that they remained outside?  
 20 A. Yes.  
 21 Q. Until you could clarify with GMP what was the position  
 22 is?  
 23 A. That's right.  
 24 Q. So can I just understand, therefore, is the position  
 25 that no firefighter entered the station on arrival and

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1 is the position that that was the consequence of two  
 2 things? First of all, a deliberate decision by you that  
 3 they would not go in until you understood zones, and  
 4 secondly that there was work to be done outside?  
 5 A. Well, the latter came first, if you know what I mean.  
 6 I asked what needed to be done, and the proposition was  
 7 that we would help with the P3s and get the blankets.  
 8 They were outside, so —  
 9 SIR JOHN SAUNDERS: But nothing was said then about helping  
 10 any of the P1s and P2s to the ambulances?  
 11 A. No, I wasn't aware at that stage of zones or anything,  
 12 so I'd not established some of that yet.  
 13 MR GREANEY: I just need to understand this, because there  
 14 were firefighters who were massing outside that  
 15 station —  
 16 A. That comes later, slightly later, I think, when they go  
 17 to the P3s and they don't need that much help, they then  
 18 come back to me and to the arena, the station.  
 19 Q. Maybe I'm jumping ahead, which will be my fault. Let's  
 20 look at some other images and see if they show what  
 21 you're describing.  
 22 Can we go to {INQ035612/499}, please, which is about  
 23 5 minutes later. It's 00.44.34 at this stage and the  
 24 description is:  
 25 "GMFRS personnel gather outside Victoria Station and

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1 they appear to be being spoken to by NWS paramedic  
 2 Patrick Ennis."  
 3 At this stage no firefighter enters the arena. Why,  
 4 notwithstanding that you knew that many other emergency  
 5 service personnel were in there, did no firefighter go  
 6 in?  
 7 A. Like I say, we were tasked or asked to help with the P3s  
 8 that were outside, so that was the focus. It wasn't  
 9 that we were averse to going in, it's just they weren't  
 10 directed in that direction.  
 11 Q. Did you, as I had understood you to say yesterday, and  
 12 a moment ago, ever issue a direction to the  
 13 firefighters, "Do not go into the station at this  
 14 moment?"  
 15 A. Yes, because I was still at that point trying to  
 16 establish -- and it didn't add up to the fact that I had  
 17 just been told it was Op Plato.  
 18 Q. I understand your reasoning. I am just at the moment  
 19 trying to establish at what stage you gave that  
 20 direction. So there comes a time from what you've said  
 21 when there are firefighters in numbers --  
 22 A. Yes.  
 23 Q. -- outside the station --  
 24 A. Yes.  
 25 Q. -- with a desire, an understandable desire, to go in and

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1 help?  
 2 A. Yes.  
 3 Q. And you say: no, hang on until I can establish --  
 4 A. I just said: wait there, I think I know now this is warm  
 5 zone. But it doesn't add up because I can see people in  
 6 non-ballistic protection, so why wouldn't the  
 7 firefighters go in? This is what my thoughts are  
 8 exactly at the time as well.  
 9 Q. Were you not also thinking: the other emergency services  
 10 are in there, we need to get in there?  
 11 A. Yes, but that was -- I think I go on to ask the question  
 12 of Mark Dexter then, "Is this still a warm zone?"  
 13 Q. But minutes are passing, aren't they?  
 14 A. They are, but like the other commanders that will have  
 15 arrived before me, I'm just trying to establish what's  
 16 going on. Don't forget this is my first opportunity to  
 17 get situational awareness from any other agencies.  
 18 Q. As it happened, there was no meaningful assistance that  
 19 you could give because of the stage at which you  
 20 arrived, but you weren't to know, as you were holding  
 21 back those firefighters outside, that minutes didn't  
 22 matter, were you?  
 23 A. No, and I didn't hold them back per se; I just asked  
 24 them to wait a minute while I got that information.  
 25 Q. Let's look at some other images. {INQ035612/507.

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1 SIR JOHN SAUNDERS: Just before we do that, you said they  
 2 were going to go and help the P3s.  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: What were they going to do with the P3s?  
 5 They're standing there, they're just waiting for  
 6 transport to come.  
 7 A. Again, I didn't know that at the time. NWS have asked  
 8 us to go and assist with that.  
 9 SIR JOHN SAUNDERS: They didn't give any indication of what  
 10 assistance they wanted for the P3s?  
 11 A. No.  
 12 MR GREANEY: So we'll look at the next image, 507, please  
 13 {INQ035612/507}. This is 00.47.53:  
 14 "Firefighters are pulling stretchers along Station  
 15 Approach heading towards the entrance."  
 16 SIR JOHN SAUNDERS: You just said no meaningful assistance.  
 17 This is obviously meaningful assistance, getting the  
 18 trolleys inside to get the patients out.  
 19 MR GREANEY: Sir, it's your view that matters, not mine.  
 20 I take your point.  
 21 SIR JOHN SAUNDERS: There are degrees of meaningfulness and  
 22 I understand that.  
 23 MR GREANEY: There are.  
 24 At {INQ035612/509}, please, 00.49.58. Firefighters  
 25 are outside the station.

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1 Then {INQ035612/521}, 00.54.39, we now see that  
 2 there are a number of firefighters present within the  
 3 station and assisting at the casualty clearing station.  
 4 A. Yes.  
 5 Q. That image is showing a time before your discussion with  
 6 Chief Inspector Dexter had concluded.  
 7 A. Right.  
 8 Q. So does it follow from that that those firefighters had  
 9 decided to enter, despite you having said, "Hang on"?  
 10 A. Yes. Like I said, the picture didn't weigh up. We can  
 11 see there is a low risk. However, you're telling me  
 12 that it's a warm zone, so we obviously have protocols  
 13 and procedures around that. All I am trying to do is  
 14 establish is it actually a warm zone.  
 15 Q. I understand that and we are going to listen to a call,  
 16 but I think the reality of what we are seeing there is  
 17 when firefighters do eventually get into the station,  
 18 it is not because of your instruction, it's despite your  
 19 instruction.  
 20 A. Well, when I go back to them, they've actually gone in,  
 21 and I haven't got a problem with that.  
 22 SIR JOHN SAUNDERS: Okay, but you had actually instructed  
 23 them not to go in and they went in?  
 24 A. I only spoke to one or two of them at that time because  
 25 there was only a couple of them. I asked them not to.

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1 By the time I looked round again, there's more of them.  
 2 MR GREANEY: But the point is, however one looks at it, that  
 3 when a number of hours later, members of the Fire and  
 4 Rescue Service go into the station, even at that point  
 5 it is not the result of an instruction that has been  
 6 given by a senior officer; they just decide to go in.  
 7 A. Yes, they're not instructed to go inside the station,  
 8 no.  
 9 SIR JOHN SAUNDERS: Had they asked you, can we go in, you'd  
 10 have said no?  
 11 A. Well, depending on the point of the conversation, yes.  
 12 MR GREANEY: Well, let's listen to the conversation that you  
 13 had with Chief Inspector Dexter and see the images on  
 14 the screen that show you speaking to him. Once we've  
 15 listened to it, I am going to come back to this issue  
 16 about excessive caution.  
 17 At 00.54 you approach Chief Inspector Dexter on  
 18 Station Approach.  
 19 Could we have {INQ035612/529} on the screen, please?  
 20 00.58.38, the timing was wrong. This is the moment at  
 21 which you are — a conversation does in fact start  
 22 a little earlier and this is the moment at which you  
 23 hand the phone over to Mr Dexter. So this is at about  
 24 00.55.  
 25 SIR JOHN SAUNDERS: While we're looking at what is said

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1 there, and the summary, is it actually the other way  
 2 round? Because it says:  
 3 "... Dexter still appears to be talking on a mobile  
 4 phone... when he is seen to hand it to GMFRS."  
 5 That may be the end of the call.  
 6 MR GREANEY: I think I missed out one image and this is the  
 7 end of the call, so I've confused everyone.  
 8 The exchange starts at 00.54, as firefighters have  
 9 entered the station and it ends at this moment, 00.58.  
 10 Can we just look at {INQ035612/533}, please? Right.  
 11 We are going to hear what happens. You approach and  
 12 have a discussion with Mr Dexter?  
 13 A. Yes.  
 14 Q. You are concerned with zoning and whether your staff  
 15 should deploy into there?  
 16 A. Yes.  
 17 Q. You are on the telephone with the chief fire officer,  
 18 Mr O'Reilly?  
 19 A. Yes.  
 20 Q. You hand the phone to Mr Dexter and he has a call with  
 21 him?  
 22 A. Yes.  
 23 Q. And subsequently you have a short conversation yourself  
 24 with Mr Dexter?  
 25 A. Yes.

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1 Q. Mr Lopez, we'll listen to that recording. I will give  
 2 you the transcript reference first of all. It's  
 3 {INQ040657/68}, at the top. The recording, I am going  
 4 to give you the INQ reference for the whole of the  
 5 recording and what we are going to be listening to, as  
 6 you'll appreciate, is part of a recording from  
 7 Mr Dexter's dictaphone.  
 8 A. Yes.  
 9 Q. I'll give you the reference for the whole of the  
 10 recording and then I'll give you the time that you need  
 11 to go to. The reference is {INQ025479A/1}. It's  
 12 87 minutes in.  
 13 Just before you start the recording, we can see that  
 14 at the very beginning of the conversation, you ask  
 15 Mr Dexter his name. You think he's Bronze at that stage  
 16 and he confirms that he's the ground-assigned TFC. This  
 17 might not come in at precisely that point, it may be  
 18 a little earlier, but when you're ready, you can play  
 19 that, Mr Lopez.  
 20 (Audio played)  
 21 So it seems, am I right, that you are on the  
 22 telephone to Peter O'Reilly?  
 23 A. Yes.  
 24 Q. The CFO?  
 25 A. Yes.

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1 Q. Is it the position that you needed his authority to  
 2 deploy your firefighters into the station?  
 3 A. I wish I hadn't made that phone call probably, I should  
 4 have just done it, but at the time I felt it was the  
 5 right thing to do. It's a foreseeable risk, so  
 6 I normally wouldn't use ops discretion or anything like  
 7 that to deploy people into a warm zone who hadn't got  
 8 the correct ballistic protection. Again, I thought  
 9 it would be a quick phone call to the chief fire  
 10 officer, I knew he was in the command support room  
 11 at the time, so I made the call. I tried to paint a  
 12 picture of what I was seeing, the non-ballistic  
 13 protected people, members of the public, all this type  
 14 of thing, to see if he was comfortable with letting me  
 15 do it.  
 16 Q. Were you either expressly or by implication seeking his  
 17 authority before firefighters went into that station?  
 18 A. Into the warm zone, yes, because again it's a corporate  
 19 risk to put non-protected people into a warm zone.  
 20 Q. What was Mr O'Reilly saying to you as you described this  
 21 situation?  
 22 A. He was trying to ask if there was a risk assessment,  
 23 he was asking for some more detail, and again I was  
 24 trying to fulfil that by painting a picture of what  
 25 I was seeing in front of me.

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1 Q. So he wasn't saying, "Yes, get them in", after what you  
2 had hoped would be a short phone call?  
3 A. Yes.  
4 Q. He was saying, "I need more information before I can  
5 authorise this"?  
6 A. He was asking about more risk information. I said,  
7 "Sir, I've only just got here myself, I just want to try  
8 and establish that myself. I have got the tactical  
9 firearms commander stood beside me".  
10 SIR JOHN SAUNDERS: Who had told you it was a warm zone?  
11 A. I think in my initial conversation with Steve Hynes  
12 after we deployed to help them, I had some — an  
13 information gathering conversation with him.  
14 SIR JOHN SAUNDERS: So Steve Hynes told you it was a warm  
15 zone?  
16 A. Yes.  
17 SIR JOHN SAUNDERS: Thank you.  
18 MR GREANEY: As we've just heard, you've handed your phone  
19 over to Mr Dexter so he can have a discussion directly  
20 with the chief fire officer?  
21 A. Yes.  
22 Q. Could we have the transcript back on the screen and  
23 carry on playing from where we were, please?  
24 (Audio played)  
25 Mr Berry, we've listened to that now. I'm certain

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1 you have listened to that before, have you?  
2 A. Yes.  
3 Q. And obviously you were there at the time. The reality  
4 is that other emergency responders had been in that  
5 station and indeed in the City Room without ballistic  
6 protection and some had been there for hours.  
7 A. Yes.  
8 Q. We've been through the failure to obtain situational  
9 awareness by the Fire and Rescue Service, which had, as  
10 its consequence, a significant delay in arrival at the  
11 scene. And we are now looking at something different,  
12 which is you are actually at the scene?  
13 A. Yes.  
14 Q. But even at that point you are not giving authority for  
15 a deployment into it. What you're doing is saying to  
16 Mr Dexter, "What's your collar number?", you're seeking  
17 authority from the chief fire officer, a conversation  
18 has to take place, and even at the end of that you're  
19 having to say, "Is he happy with that"? So I do ask you  
20 again, is what we are seeing here entirely unacceptable  
21 and excessive caution on the part of the Fire and Rescue  
22 Service?  
23 A. No, I think at that time I was right to ask the right  
24 questions and be cautious. I have just been told it's  
25 Op Plato. I was told the zones. You've just heard that

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1 Mark Dexter was saying, "It's cold or getting colder",  
2 but it was still low risk. So there's still an element  
3 of risk. I'm still just trying to establish all that.  
4 I think that's reasonable.  
5 SIR JOHN SAUNDERS: Was it you asking about the collar  
6 number? Because it's not actually identified on the —  
7 A. I'm not sure. It's normally something we do and we get  
8 a phone number in case they left and we couldn't find  
9 them so I could ring them and stuff like that.  
10 MR GREANEY: I don't doubt that there was in your mind  
11 a risk, obviously now we know with the benefit of  
12 everything that has been discussed that there wasn't  
13 such a risk, but I don't criticise you for thinking  
14 there was a risk. But it was a risk that the ambulance  
15 service were prepared to take, it was a risk the police  
16 were prepared to take, but it seems that it was a risk  
17 that the Fire and Rescue Service weren't prepared to  
18 take until they received a sign-off from the chief fire  
19 officer.  
20 A. No, that's not correct. Like I have said, it's  
21 a corporate risk to go against that sort of policy. All  
22 I was trying to do was — I can quite clearly see in  
23 front of me that people weren't wearing ballistic  
24 protection, so the police officer's just told me it's  
25 still a warm zone, so it is still a warm zone. So if

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1 I'm going to have to commit people or they're going to  
2 go in there, I have to get some — there is a corporate  
3 risk.  
4 Q. In the aftermath of the —  
5 SIR JOHN SAUNDERS: Sorry, there are degrees of risk, aren't  
6 there?  
7 A. Of course. This is all I'm trying to establish, sir.  
8 SIR JOHN SAUNDERS: And that's a low risk you are seeing?  
9 A. I'm told it's a low risk, but there is an element of  
10 risk.  
11 MR GREANEY: Isn't the job of firefighters to take risks?  
12 A. Absolutely, and we're the best at risk assessing,  
13 I would say.  
14 SIR JOHN SAUNDERS: You're the best at?  
15 A. Assessing the risk. But I have to gather the  
16 information first to be able to do that, and I think  
17 that's reasonable. I understand now we are a certain  
18 amount of time into this incident.  
19 MR GREANEY: Hours into it.  
20 A. Yes. But I have just been told it's Op Plato, this is  
21 the first time I've been able to speak to the other  
22 agencies face to face, so I think it's quite reasonable.  
23 Q. I think you agree with me that it is the job of  
24 firefighters to take risks. Not all risks but some  
25 risks?

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1 A. Yes.  
 2 Q. And here was a risk that police officers and paramedics  
 3 were taking. If it were to be suggested that the Fire  
 4 and Rescue Service weren't prepared to take many risks  
 5 that night, would that be a fair observation?  
 6 A. No. I think if they knew that it was low risk, why  
 7 didn't they make it a cold zone then?  
 8 Q. I have nearly finished but I just want to seek your view  
 9 on one final but connected matter.  
 10 SIR JOHN SAUNDERS: Can I know the outcome of these  
 11 conversations? What then happened?  
 12 A. I observed the fire crews inside the foyer, the area,  
 13 I can see in front of me, and I thought, do you know  
 14 what, they're doing a really good job.  
 15 SIR JOHN SAUNDERS: So from that moment, you let them all  
 16 in?  
 17 A. Yes.  
 18 MR GREANEY: So was the decision effectively taken out of  
 19 your hands by those on the ground?  
 20 A. This is it. I could see what I could see and it was  
 21 obvious that we should be in there, non-protective  
 22 crews, but there's procedures and this is a tri-service  
 23 agreement, that is a multi-agency response. All I am  
 24 doing now is trying to gather that information and make  
 25 the right decisions. But I have to go through that

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1 process first.  
 2 Q. It's really about processes that I want to ask you. On  
 3 12 July 2017, there was a GMFRS debrief at a place  
 4 called The Hive. Do you remember?  
 5 A. I do, sir.  
 6 Q. And you were present, weren't you?  
 7 A. Yes.  
 8 Q. And indeed you participated. There was just one part of  
 9 this that I wanted to ask you about because it bears  
 10 upon what we've been discussing. The INQ reference for  
 11 the debrief record is INQ030902 and it's {INQ030902/4}.  
 12 If you could enlarge the second half of that page,  
 13 please.  
 14 Nick, which in context I think must be Nick Mottram,  
 15 says:  
 16 "I got told by my wife again that it was a nail  
 17 bomb."  
 18 Do you see that?  
 19 A. Whereabouts in the page?  
 20 Q. Halfway down the page:  
 21 "Nick: I got told by my wife again that it was  
 22 a nail bomb."  
 23 I'm confident you'll agree with me that in context  
 24 that's Nick Mottram, isn't it?  
 25 A. Yes.

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1 Q. And Mick Lawlor says by way of response to that:  
 2 "They know what they were told was a nail bomb but  
 3 at the same time they were told active shooter. Andy  
 4 [that's a reference to you] has some information from  
 5 Control and tries to contact the FDO and can't, so he  
 6 makes a decision on what he knows to keep us safe. So  
 7 what I'm trying to say is your wife is at the scene but  
 8 what we're getting is gunshots and other things going on  
 9 in the mix that we have to take into account."  
 10 And Nick Mottram says:  
 11 "That's why we have the SRT."  
 12 And Dave says:  
 13 "All Andy can do is go on what we know."  
 14 Then Mr Simister, and this is what I want you either  
 15 to agree or disagree with, if you can, says this:  
 16 "Why are we hiding behind policies and procedures  
 17 when we have the capability? I could have told you all  
 18 the information we needed. I could have spoke to  
 19 a senior paramedic and the police and by not being  
 20 there, I couldn't. You couldn't get in touch with the  
 21 FDO because he's busy and we've got nothing by the  
 22 policies. That needs to change."  
 23 Can I ask you whether you regard it as a fair, and  
 24 indeed accurate, position for Mr Simister to have  
 25 adopted that essentially that night the Fire and Rescue

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1 Service was hamstrung by its policies and procedures?  
 2 A. I don't think they were adequate for the time and for  
 3 that type of incident, yes.  
 4 MR GREANEY: Thank you very much. Those are my questions at  
 5 this stage at any rate.  
 6 Sir, I know that there are many questions that core  
 7 participants wish to ask. We've been going for just  
 8 over an hour.  
 9 SIR JOHN SAUNDERS: Would you like to have a 10-minute break  
 10 and then we'll carry on?  
 11 A. Yes, sir.  
 12 SIR JOHN SAUNDERS: And then we'll carry on until 1 o'clock.  
 13 So back shortly after quarter past, please.  
 14 (12.09 pm)  
 15 (A short break)  
 16 (12.20 pm)  
 17 MR GREANEY: Sir, I'm going to call upon Mr Smith to ask his  
 18 questions first on behalf of North West Fire Control.  
 19 Questions from MR SMITH  
 20 MR SMITH: Mr Berry, I would like to introduce into the  
 21 proceedings a document which we haven't made reference  
 22 to which has been prepared by North West Fire Control  
 23 for the chairman's assistance.  
 24 If Mr Lopez could put on to the screen  
 25 {INQ041473/1}, please.

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1 MR GREANEY: That, I know, is not the document Mr Smith  
2 intended to put on.  
3 MR SMITH: {INQ041473/1} should be the inquiry reference.  
4 MR GREANEY: It is. It is {INQ041473/1}. Mr Smith is quite  
5 right. Yes, there it is.  
6 MR SMITH: Thank you very much, Mr Lopez.  
7 That's just the title, Mr Berry, for these purposes.  
8 Would you give me a moment while I just address the  
9 chairman?  
10 Sir, I just want to explain one thing. Mr Horwell  
11 has very kindly provided some further detail, having  
12 reviewed this document. There will be some very minor  
13 alterations to timings, but they don't affect the  
14 evidence that Mr Berry gives. There will be a version 2  
15 with just some minor changes in due course.  
16 SIR JOHN SAUNDERS: Is this a fairly recent document?  
17 MR SMITH: Yes, it was finalised 2 weeks ago and sent  
18 through to Mr Suter, considered by the inquiry legal  
19 team, and then uploaded to the portal.  
20 SIR JOHN SAUNDERS: Thank you.  
21 MR SMITH: It was distributed to the core participants on  
22 uploading, but in advance of that to Mr Warnock by North  
23 West Fire Control.  
24 SIR JOHN SAUNDERS: Thank you.  
25 MR SMITH: May I also add, sir, that in the second column

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1 are extracts from the transcripts. It is already  
2 a 100-page document. So if the full transcript were put  
3 in, it would become cumbersome and unwieldy. There are  
4 extracts from the transcripts.  
5 The third column gives the majority of the inquiry  
6 reference numbers, and as Mr Berry will see in a moment,  
7 the extreme right-hand column does contain what is  
8 intended to be neutral but helpful commentary.  
9 SIR JOHN SAUNDERS: Okay, thank you.  
10 MR SMITH: If I could take you, please, to page 16 of this  
11 document through Mr Lopez, please, {INQ041473/16}.  
12 We see the time at 22.48.01. Mr Greaney has asked  
13 you about this and I needn't go over the detail of the  
14 transcript, but at 22.48.01, you were involved in a call  
15 to North West Fire Control, which was answered by the  
16 control room operator, Mr Dean Casey.  
17 A. Yes.  
18 Q. I would like you to just have a look at the first  
19 paragraph of the extract from the transcript:  
20 "What other information we've got about this  
21 incident."  
22 So you were plainly seeking information from North  
23 West Fire Control; is that correct?  
24 A. That's correct.  
25 Q. In the right-hand column is the following commentary:

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1 "This call is in progress from 22.48.01 until  
2 terminated at 22.50.41. Dean Casey does not inform  
3 Station Manager Berry of the following information which  
4 was being entered on to incident log 9074 as it was  
5 being continually updated. In the following order in  
6 terms of proximity to the call: (i) from police, not  
7 gunshot wounds, look like shrapnel, information entered  
8 on to the incident log 9074 by David Ellis at 22.48.33."  
9 The next page, please, Mr Lopez, {INQ041473/17}.  
10 Second entry:  
11 "Police advise more officers arriving on scene.  
12 Ambulance have five vehicles en route. Police have  
13 advised more officers landing on scene."  
14 I think you said in answer to Mr Greaney that if you  
15 had had that information at that time when you asked the  
16 question, it would have resulted you in making  
17 a deployment or mobilising decision; is that correct?  
18 A. Yes, there is the element there about the bullet wound,  
19 shrapnel, I would still like some further information  
20 around that, but yes, in the likelihood I would have  
21 mobilised on that information.  
22 Q. Can we be very clear, Mr Berry, about what steps you  
23 would have taken had you been provided with that  
24 information at that time?  
25 A. I think there's enough information there to mobilise

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1 with precaution, perhaps.  
2 Q. Well, this is the point I wanted to come to, and there  
3 are two aspects to this that I want to ask you about.  
4 First of all, do you accept that you did exercise  
5 a considerable degree of caution when you arrived at the  
6 arena eventually in relation to the protection of fire  
7 crews from the risk of injury to them?  
8 A. Yes, in the sense of I've got a duty of care for my  
9 staff. From my training as a tactical commander or  
10 in the role of on-scene commander as a NILO, I have  
11 a duty of care, of course.  
12 Q. Are you confident that if you had received this  
13 information at the time of that call answered by  
14 Mr Casey you would have then deployed non-specialist or  
15 standard appliances to the incident scene?  
16 A. Again, because I'm not 100% about the shrapnel,  
17 because -- what's the word they use?  
18 Q. The words are:  
19 "From police, not gunshot wounds, looks like  
20 shrapnel."  
21 A. "Looks like", so that's not a definite.  
22 Q. No.  
23 A. So all I can do at that point is, with the information  
24 I've already got, add it to that information, assess  
25 that risk, consider my options, and then act on it.

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1 SIR JOHN SAUNDERS: I think the question was from Mr Smith,  
 2 if I remember rightly, would you have sent  
 3 non-specialist teams if you'd had that information?  
 4 A. It'd be difficult to, again because we'd still be  
 5 thinking about an active shooter. We are saying there's  
 6 possible gunshots, looking like shrapnel.  
 7 MR SMITH: So the possibility is plainly there, is it,  
 8 Mr Berry, that you would have still have been very  
 9 concerned about deploying standard appliances and crews  
 10 to the incident scene itself, based on that information  
 11 alone?  
 12 A. Yes.  
 13 Q. I would like to take you through Mr Lopez to page 28,  
 14 please {INQ041473/28}. And at the bottom of page 28,  
 15 the time is 22.57, a call from North West Fire Control  
 16 to yourself from the control room operator,  
 17 Joanne Haslam.  
 18 We've been through the text of that, but if you go  
 19 again to the right-hand column, the original three items  
 20 that I had drawn your attention to are included in that,  
 21 but there's some additional information there now.  
 22 First, a Bronze paramedic is on scene on the incident  
 23 log, 9074. The second new piece of information by that  
 24 stage:  
 25 "In the booking office looking over the main bridge,

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1 approximately 30 casualties. All ambulance to proceed  
 2 to this park (sic)."  
 3 That's how it reads. Then the other three items.  
 4 SIR JOHN SAUNDERS: These were given to Mr Nankivell?  
 5 MR SMITH: No, these were provided to Mr Nankivell in the  
 6 course of the telephone conversation at 22.52 when North  
 7 West Fire Control telephoned him as duty group manager,  
 8 sir.  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: And the point being made is they didn't  
 11 tell that to Mr Berry when they spoke to him afterwards  
 12 to say that they had spoken to Nankivell?  
 13 MR SMITH: Indeed.  
 14 SIR JOHN SAUNDERS: Thank you.  
 15 MR SMITH: And it's also material, importantly, which is  
 16 entered on to the incident log.  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR SMITH: With that additional information at that stage,  
 19 do you still think you would have exercised still  
 20 necessarily a degree of caution in relation to deploying  
 21 standard appliances and crews to the incident scene?  
 22 A. No, at this point now I'm more comfortable that there's  
 23 a Bronze commander there and ambulances are making their  
 24 way to the scene.  
 25 Q. What would you have directed North West Fire Control to

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1 do at that point if you'd had this information?  
 2 A. I would have sent regular crews, so it might have just  
 3 been a number of pumps and an incident command  
 4 structure.  
 5 Q. So you would have said at that point, "Send them down  
 6 there"?  
 7 A. Yes.  
 8 Q. I want to take your attention, please, to the fact that  
 9 at 23.01 -- and this is {INQ041473/3}, first of all,  
 10 Mr Lopez, the bottom of the page, and over the page to  
 11 {INQ041473/32}. At 23.02, you spoke to Group Manager  
 12 Dean Nankivell, first for 45 seconds, and then for  
 13 2 minutes 38 seconds.  
 14 A. Yes.  
 15 Q. During those calls, did Mr Nankivell tell you that he  
 16 had been informed in the call at 22.52 that a paramedic  
 17 Bronze commander was on scene?  
 18 A. No.  
 19 Q. What was the effect of your discussion with Mr Nankivell  
 20 at that time?  
 21 A. That was more about the information I had originally,  
 22 what resources I'd moved forward and the problem with  
 23 the journey. But the fact that I couldn't get through  
 24 to the force duty officer was the main consequence of  
 25 that and needing more information.

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1 Q. Clearly, Mr Nankivell didn't suggest to you,  
 2 "I understand there's a paramedic Bronze commander on  
 3 scene" --  
 4 A. No.  
 5 Q. -- "would you consider mobilising resources to the  
 6 incident"?  
 7 A. Yes.  
 8 Q. He didn't suggest anything of the sort?  
 9 A. No, he didn't.  
 10 Q. The second aspect of this that I said I would like to  
 11 ask you about is the access that senior Fire and Rescue  
 12 Service officers would have had to the incident logs  
 13 opened and created by North West Fire Control. I think  
 14 you've already indicated that on your laptop, when you  
 15 were at home, for example, you would have been able to  
 16 access the incident logs?  
 17 A. Yes.  
 18 Q. There are two relevant logs here. One is 9074, which is  
 19 the incident itself, the initial incident log, and the  
 20 second is 9078, which is an incident created for the  
 21 mobilisation of pumps to Philips Park Fire Station.  
 22 A. Yes.  
 23 Q. If you had remained at home with access to your laptop,  
 24 do you think it's likely that you would have looked at  
 25 the information I have just referred to and picked it up

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1 from the incident logs?  
 2 A. I could have done.  
 3 Q. Is it likely you would have done?  
 4 A. Yes.  
 5 Q. In your experience, would you have expected the senior  
 6 officers, such as the duty group manager, Mr Nankivell,  
 7 the area manager, Mr Etches, and the chief fire officer,  
 8 once he became involved, and Mr Fletcher, all to be able to  
 9 access the incident logs through their laptops?  
 10 A. Yes, to varying degrees. The expectation — they all  
 11 could have access, but I wouldn't expect the APO or the  
 12 PO to do that. The group manager, they could have done  
 13 definitely. John Fletcher was off duty at the time.  
 14 Q. Once the command support room was opened, with your  
 15 experience, would you have expected those in the command  
 16 support room to be able to access the incident logs at  
 17 North West Fire Control?  
 18 A. Yes, and that is one of the tasks of the command support  
 19 room, that they would have the log open.  
 20 Q. And be reviewing it as it was being updated?  
 21 A. Yes.  
 22 Q. Thank you. I would like to turn, if I may, to your  
 23 inability to contact the force duty officer.  
 24 SIR JOHN SAUNDERS: Just before that, do you mind?  
 25 When Mr Nankivell spoke to you, would he only have

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1 been in a position to advise you as to what steps to  
 2 take or could he say, "You should be doing this", or,  
 3 "Do this"?  
 4 A. He could challenge me by all means. He wasn't a NILO,  
 5 so he might not have had that knowledge.  
 6 SIR JOHN SAUNDERS: I have this difficulty that NILOs are  
 7 meant to be advisers.  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: He's an operational man —  
 10 A. Yes.  
 11 SIR JOHN SAUNDERS: — and senior to you in operational  
 12 terms.  
 13 A. He is the go-to person on the night for the corporate  
 14 person, you know, if there's an issue, an injury with  
 15 a firefighter or — within the business, he is the  
 16 person then that is the — in the cascade up to the  
 17 senior officers. So at that point, the conversation I'm  
 18 having with him is about, "We've got this serious  
 19 incident, can you inform these people?"  
 20 I am advising him, "This is what I've done", because  
 21 I am the tactical adviser, and he knows my role as the  
 22 NILO, so I think he's comfortable with that. He's not  
 23 challenged it.  
 24 SIR JOHN SAUNDERS: Thank you.  
 25 MR SMITH: I'm going to list out 10 short points that

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1 I would like your answer to, if I may, and I would  
 2 suggest that this is information that you would have  
 3 either requested from the force duty officer or would  
 4 have supplied him with.  
 5 A. Yes.  
 6 Q. And I'll quickly run through these, if I may. Would you  
 7 interrupt me if I've got any of this wrong?  
 8 A. Yes.  
 9 Q. First of all, you'd want to know, wouldn't you, what was  
 10 the exact nature of the incident so far as GMP could at  
 11 that stage ascertain?  
 12 A. Yes.  
 13 Q. Second, whether a major incident had been declared?  
 14 A. Yes.  
 15 Q. Third, whether Operation Plato had been declared, and if  
 16 not, whether it might be?  
 17 A. Yes.  
 18 Q. Fourth, that you had been informed that the RVP was  
 19 at the cathedral car park?  
 20 A. Yes.  
 21 Q. And whether that was a safe location to deploy  
 22 non-specialist appliances and crews to at that time?  
 23 A. Yes.  
 24 Q. Fifthly, whether a forward control point had yet been  
 25 established?

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1 A. Yes.  
 2 Q. Sixth, whether a multi-agency Talk Group had yet been  
 3 set up, and if so, on what channel?  
 4 A. Yes.  
 5 Q. Seventh, what specialist capabilities were required from  
 6 the Fire and Rescue Service at that stage or might be  
 7 and where?  
 8 A. Yes.  
 9 Q. Eighth, what GMFRS SRT and MTFA capabilities might in  
 10 due course be needed and should be put on standby?  
 11 A. Yes.  
 12 Q. Ninth, you would, I suggest, have wanted to tell him  
 13 that you had currently instructed or were considering  
 14 instructing mobilising specialist appliances and  
 15 non-specialist appliances and crews to Philips Park  
 16 Fire Station in the first instance?  
 17 A. Yes.  
 18 Q. And finally, would you want to know from him what steps  
 19 were to be taken to co-locate the three emergency  
 20 services with due regard to the safety of emergency  
 21 personnel?  
 22 A. Yes.  
 23 Q. All those are matters that you would have wanted to  
 24 discuss, is this correct, with the force duty officer?  
 25 A. It is. It's also important to know what's not involved.

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1 That's just as important.  
 2 Q. Could you explain that a little more, please?  
 3 A. Well, I'm trying to home in on what is involved and  
 4 rather than assume, it's to reject things that we think  
 5 are an assumption, we can reject it once it's confirmed  
 6 it's not involved and it will or may influence the  
 7 response to that incident.  
 8 SIR JOHN SAUNDERS: I just want to go back on a couple of  
 9 those things. I well understand most of what you want  
 10 to ask the FDO or him to tell you. Would you actually  
 11 be asking him what specialist capability would be  
 12 required or would that be determined by his answers to  
 13 the question whether a major incident had been declared  
 14 and whether Operation Plato had been declared or whether  
 15 it might be? So would you actually be saying to him,  
 16 "What specialist equipment"? Would he know?  
 17 A. I would probably be offering -- based on the information  
 18 he was telling me, I would suggest to him these are the  
 19 resources I can bring.  
 20 SIR JOHN SAUNDERS: One way or the other you'd have the  
 21 conversation?  
 22 A. Yes.  
 23 MR SMITH: There would be a discussion about it?  
 24 A. Yes.  
 25 Q. Can I turn now to another aspect of this, which relates

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1 to the RVP. At paragraph 49 of your witness statement,  
 2 I'm not sure it's necessary to put it on the screen,  
 3 Mr Lopez, but it's INQ026733/13. You explain the  
 4 following:  
 5 "I spoke with one of the operators [this is the  
 6 22.40 call], Michelle, and I was told that there had  
 7 been a bomb, an explosion near the foyer area. I recall  
 8 that Michelle mentioned the number of casualties, which  
 9 at the time I think was about 30. NWFC got a rendezvous  
 10 point of the cathedral car park."  
 11 Then I want to ask you about these words, please:  
 12 "NWFC would normally send the PDA to the incident  
 13 address..."  
 14 A. That's correct.  
 15 Q. "... and not to an RVP."  
 16 A. Yes.  
 17 Q. You went on to say:  
 18 "So by adding an RVP it suggested a reason for not  
 19 proceeding directly to the incident as normal. This was  
 20 further reinforced by Michelle saying I needed to speak  
 21 to the FDO."  
 22 Is the position that the fact that North West Fire  
 23 Control was advising you that an RVP had been identified  
 24 by GMP a factor which played into your decision as to  
 25 whether crews should be mobilised to the incident,

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1 that's standard crews, at that time?  
 2 A. Yes, it was unusual that we would have an RVP for an  
 3 explosion, and the fact that it was a public arena,  
 4 a transport hub, so it was another element of doubt, and  
 5 the fact that I was directed to speak to the force duty  
 6 officer.  
 7 Q. So was it obvious to you that North West Fire Control  
 8 were wanting you to speak to the force duty officer  
 9 because they were clearly speaking to the GMP control  
 10 room?  
 11 A. Yes.  
 12 Q. Was it obvious to you that North West Fire Control were  
 13 wanting accurate information?  
 14 A. Yes.  
 15 Q. And that that accurate information plainly, from their  
 16 point of view, needed to come from the FDO as well?  
 17 A. Yes.  
 18 Q. And for that reason, did you conclude that both the  
 19 control room and the Fire and Rescue Service needed  
 20 further information before a decision could be made on  
 21 deployment?  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Just explain that a bit more to me.  
 24 I can well understand why NWFC wanted accurate  
 25 information and they were talking to the control room.

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: Why would they have needed it to come  
 3 from the FDO as well?  
 4 A. They've come to me to get that level of understanding  
 5 and the person I'm going to get that from is the force  
 6 duty officer, so effectively they come -- I think it's  
 7 perhaps the wording but the information, the  
 8 confirmation of information is going to --  
 9 SIR JOHN SAUNDERS: If you're going to talk to anyone, you  
 10 would talk to the FDO?  
 11 A. Yes.  
 12 MR SMITH: So effectively, North West Fire Control were  
 13 asking you --  
 14 A. Yes.  
 15 Q. -- to contact the force duty officer?  
 16 A. Yes.  
 17 Q. Because that was the route that they would know, do you  
 18 agree, that you could follow?  
 19 A. Yes, that is the agreed route.  
 20 Q. That's the agreed route and in normal circumstances that  
 21 would be the expected route?  
 22 A. Yes.  
 23 Q. At the same time, you questioned, didn't you, whether  
 24 the cathedral was a safe place to deploy to?  
 25 A. Yes.

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1 Q. Was that because you were concerned that the initial  
2 reports could be part of a larger attack or secondary  
3 attack?  
4 A. Yes. I thought it may be an initiator for a larger  
5 attack.  
6 Q. And of course that's one of the matters that I have  
7 identified that you would want to discover from the  
8 force duty officer?  
9 A. Yes.  
10 Q. And indeed whether the rendezvous point at the cathedral  
11 was a safe place?  
12 A. Yes.  
13 SIR JOHN SAUNDERS: Would you not expect that to be part of  
14 the information which the GMP control room would be  
15 passing on to North West Fire Control?  
16 A. Yes. I suppose it goes back to the timing of this,  
17 where I think this has just happened.  
18 SIR JOHN SAUNDERS: Just happened? Okay. Thank you.  
19 MR SMITH: So your decision to mobilise appliances and crews  
20 to Philips Park Fire Station was an informed decision  
21 based upon these factors; is that correct?  
22 A. It was a safe decision at that time, yes.  
23 SIR JOHN SAUNDERS: Okay, sorry. I'm really sorry to --  
24 I just need to be really clear about things.  
25 MR SMITH: Of course, sir, of course.

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1 SIR JOHN SAUNDERS: Is it an informed decision? There may  
2 be reasons for it, but it sounds to me rather an  
3 uninformed decision.  
4 A. Yes, and that is the gap I am trying to fill. My  
5 intention again was not for these pumps to get to  
6 Philips Park. I'm expecting to get that information  
7 (overspeaking) --  
8 SIR JOHN SAUNDERS: So far as you are concerned, it is a  
9 reasoned decision but it's certainly not based on the  
10 necessary information that you needed?  
11 A. Yes. At that point no resources had been moved anywhere  
12 and I was keen to make sure we were doing something.  
13 MR SMITH: Perhaps I'll put it this way, that your decision  
14 at that time was informed by the limited information  
15 that you had?  
16 A. Yes.  
17 MR SMITH: Is that acceptable, sir?  
18 SIR JOHN SAUNDERS: I don't mind your wording or mine,  
19 Mr Smith.  
20 MR SMITH: It's important, isn't it, to bear in mind that  
21 Philips Park Fire Station may have been 4 miles away,  
22 but on blue lights, do you agree it would not have taken  
23 crews very long to have returned to the incident scene  
24 from Philips Park?  
25 A. No.

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1 Q. A matter of minutes?  
2 A. Minutes, yes.  
3 Q. Is there another possibility to introduce into your  
4 reasoning at this stage, that it was always possible,  
5 wasn't it, that if crews had been deployed to  
6 Philips Park and were en route, they could have been  
7 diverted before they arrived at Philips Park?  
8 A. Yes, and that was the intention.  
9 Q. That's what I want to come to. One of the things  
10 you have said in earlier commentary on this is that you  
11 never believed that you would ever have to arrive at  
12 Philips Park.  
13 A. Yes.  
14 Q. Is that correct?  
15 A. That's correct.  
16 Q. Did you therefore believe that the crews would  
17 necessarily arrive at Philips Park or, if you had been  
18 able to contact the force duty officer, did you consider  
19 that information might then be passed by you to the  
20 control room, which might result in those crews being  
21 diverted elsewhere, including to the incident?  
22 A. Yes.  
23 Q. That's how critical it was for you to contact the FDO;  
24 is that correct?  
25 A. Correct.

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1 SIR JOHN SAUNDERS: And not Thompson Street was based on the  
2 fear that a gunman might get there but not Philips Park?  
3 A. Yes. I drew those cordons in my mind, if you remember.  
4 I ruled out -- I didn't think it was inside the cordon  
5 but I thought let's just rule it out and go for  
6 Philips Park.  
7 MR SMITH: Put shortly, information could have come in that  
8 could have resulted in crews being deployed anywhere of  
9 your choice?  
10 A. Yes. Never had a problem before about contacting the  
11 force duty officer.  
12 Q. There was one point in your evidence which I would just  
13 like to clarify, if I may. That's the decision that  
14 pumps G16 P1 and G16 P2 were resourced from  
15 Manchester Central Fire Station to Philips Park.  
16 A. Yes.  
17 Q. And I think you have made the point that that wasn't  
18 your decision.  
19 A. I didn't even consider it. I just asked for fire  
20 engines.  
21 Q. Could you just assist the chairman with an issue arising  
22 out of the systems? Once a call comes in, an emergency  
23 call to the control room, are you aware that that will  
24 trigger the pre-alert to the fire station which is the  
25 nearest to the incident?

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1 A. Yes.  
 2 Q. So that explains the pre-alert?  
 3 A. Yes.  
 4 Q. Once an incident has been created, the system  
 5 automatically searches, does it not, for available  
 6 appliances, in other words resources, that are capable  
 7 of being mobilised to the incident?  
 8 A. Yes, and that will include mobile resources as well as  
 9 those that at our home station.  
 10 Q. So once, for example, the incident log was created for  
 11 the deployment of pumps to Philips Park, which is  
 12 incident log 9078, do you agree that the system would  
 13 then automatically select four available appliances  
 14 which were suitable?  
 15 A. Yes.  
 16 Q. The system would choose the location of those pumps and  
 17 would show on the screen for North West Fire Control  
 18 a list of pumps that were available?  
 19 A. Yes.  
 20 Q. And then the control room would make the decision to  
 21 deploy the pumps, normally in the order and sequence in  
 22 which they appeared?  
 23 A. Yes.  
 24 Q. So without the need to examine the incident log, what  
 25 happened in this case was that the first four pumps that

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1 were selected by the system on incident log 9078 were  
 2 the two Manchester Central pumps, the Gorton pump, and  
 3 the existing pump which was on station at Philips Park?  
 4 A. Yes.  
 5 Q. And that's how the four pumps were selected to go to  
 6 Philips Park?  
 7 A. That's correct, yes.  
 8 Q. I would like to turn, if I may, to your assessment of  
 9 the situation on the information you received that  
 10 a bomb had exploded at the MEN Arena with 30 casualties  
 11 reported so far.  
 12 When you received that information, was it  
 13 an important component of your thinking that this was  
 14 indeed directly next to a major transport hub?  
 15 A. Yes.  
 16 Q. When you received the information that there were  
 17 30 casualties so far reported and that the explosion was  
 18 due to a bomb in a public place, did you reach the  
 19 initial conclusion that this was either likely to be or  
 20 may be the result of terrorist action?  
 21 A. That was my thought at the time, yes.  
 22 Q. That was based on your considerable experience, which  
 23 included your NILO training; is that right?  
 24 A. Correct.  
 25 Q. Moving on from there --

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1 SIR JOHN SAUNDERS: Just before we go there, the effect of  
 2 it being a transport hub, are you saying that it  
 3 occurred to you transport hub, possible terrorist  
 4 attack?  
 5 A. No, I know the site. This is a large area that covers  
 6 the footprint of the building. I know there's the  
 7 arena. I passed it when I went to Gorton every day.  
 8 There's a concert on there pretty much every day.  
 9 I knew there was a good chance that that would be  
 10 populated, plus you've got the transport hub, the taxi  
 11 rank. It's quite a central point for a flow of people.  
 12 SIR JOHN SAUNDERS: The fact of it being a transport hub may  
 13 mean as well there are more things which could explode  
 14 there without a bomb going off. So in a way, isn't the  
 15 fact it's a transport hub a neutral point from your  
 16 point of view?  
 17 A. No.  
 18 SIR JOHN SAUNDERS: You still factored it in to being  
 19 a terrorist attack?  
 20 A. Yes, because some of the methodology that we had been  
 21 taught, it utilises some of the vehicles available  
 22 in that area.  
 23 SIR JOHN SAUNDERS: I just come back to something I said  
 24 before. Isn't this is for the police rather than you,  
 25 who take the lead on these things, as to whether

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1 something is a terrorist incident or not?  
 2 A. Exactly. That's the whole reason I'm ringing the force  
 3 duty officer.  
 4 SIR JOHN SAUNDERS: Okay.  
 5 MR SMITH: So that was another pressing reason, wasn't it,  
 6 for wanting to contact the FDO to gain an understanding  
 7 of whether that initial thought by you was to be  
 8 confirmed?  
 9 A. Yes.  
 10 Q. I'm just moving on from there. Could I ask Mr Lopez to  
 11 put on the screen {INQ041473/16}, please.  
 12 What we return to now is the call at 22.48.01,  
 13 {INQ041473/16}, and then running over to {INQ041473/17},  
 14 Mr Lopez.  
 15 You indicated to North West Fire Control in the  
 16 course of that call that you had just spoken to  
 17 Mr Buckley; is that correct?  
 18 A. Yes.  
 19 Q. The subject matter of that conversation was that  
 20 Mr Waterhouse was attending a road traffic collision  
 21 with the TRU?  
 22 A. Yes.  
 23 Q. Was Mr Buckley his senior officer?  
 24 A. Mr Buckley would have been the incident commander.  
 25 Q. The incident commander?

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1 A. But I'd imagine that Andrew Waterhouse was part of the  
2 crew.  
3 Q. Did Mr Buckley make it clear to you that he had received  
4 information from GMP which had given rise to concern on  
5 his part?  
6 A. Yes.  
7 Q. Do you remember what he told you in terms of the  
8 information he'd received from GMP?  
9 A. No. It was limited to the fact that the officers, the  
10 police officers who were attending the road traffic  
11 accident had mentioned that it had come over the radio  
12 that there was an incident. That was it.  
13 Q. Do you remember whether Mr Buckley was able to say to  
14 you that the information they had from GMP was that  
15 there had been an explosion in Manchester?  
16 A. I can't remember the words he used, but yes.  
17 Q. Was that the effect of it?  
18 A. Yes.  
19 Q. On that information alone, did you understand that  
20 Mr Waterhouse and Mr Buckley were concerned to consider  
21 deploying the MTFA?  
22 A. Yes. So in order to do that, they would have to change  
23 vehicles.  
24 Q. So we don't need to go into the technical details or the  
25 location. But the point is that, as you understood it,

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1 the reasoning of Mr Buckley and Mr Waterhouse on the  
2 motorway, where they were, was that with that  
3 information, may they have permission from you, the duty  
4 NILO, to return to their home station and prepare the  
5 MTFA capability in readiness?  
6 A. I don't think they were asking permission per se: they  
7 were asking would I need it.  
8 Q. But that's the effect of it?  
9 A. Yes.  
10 Q. Putting all this together, Mr Berry, do you agree, with  
11 the information that you had been provided with, there  
12 was good reason for you not to question why North West  
13 Fire Control was not mobilising at that time?  
14 A. I knew the information had to come from the FDO.  
15 Q. So in short, your view was the same as North West Fire  
16 Control's was: we're not mobilising at the moment,  
17 I need more information?  
18 A. I think that's reasonable.  
19 SIR JOHN SAUNDERS: This is slightly different to what  
20 you've told me before and I want to clarify exactly. As  
21 I understand what you said before, you didn't follow  
22 at the time why they weren't saying deploy to the scene,  
23 but since, having thought about it afterwards and  
24 considered it, you do consider it to be a reasonable  
25 request that you speak to the FDO first?

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1 A. Yes, just to be clear, my expectation at the time would  
2 have been that they would have followed the action plan.  
3 SIR JOHN SAUNDERS: But now you have thought about it and  
4 had all the information given to you, as it were --  
5 A. I think it's reasonable.  
6 SIR JOHN SAUNDERS: You think it's reasonable?  
7 A. Yes.  
8 SIR JOHN SAUNDERS: I just wanted to make sure whether  
9 at the time he had that view.  
10 MR SMITH: Yes. Thank you, sir.  
11 And at that time, with the information that you were  
12 provided with by North West Fire Control in the call at  
13 22.40, were you of the view that it was reasonable at  
14 that time for them not to have mobilised?  
15 A. We were of the same mindset, I think, like you've  
16 suggested.  
17 Q. Same mindset?  
18 A. Yes.  
19 Q. A situation could have arisen, of course, just testing  
20 this if we may -- let's assume you'd got through to the  
21 force duty officer and the force duty officer had  
22 explained to you the gravity of the situation as GMP  
23 understood it.  
24 A. Yes.  
25 Q. That they had assigned clearly a ground-assigned

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1 tactical firearms commander, the FDO was fulfilling that  
2 important role --  
3 A. Yes.  
4 Q. -- as tactical firearms commander at that time, and that  
5 GMP considered that until firearms officers swept the  
6 arena --  
7 A. Yes.  
8 Q. -- and made decisions in relation to zoning, the  
9 situation was far from clear?  
10 A. Yes.  
11 Q. If that had been explained to you, do you agree that you  
12 would still, at that point, not have been considering  
13 mobilising standard appliances and non-specialist crews  
14 to the arena?  
15 A. Yes, this would have been a specialist response.  
16 Q. And that specialist response would have required your  
17 authority, wouldn't it --  
18 A. Yes.  
19 Q. -- as duty NILO?  
20 A. I would have asked Control to mobilise.  
21 Q. But they would have needed you to tell them --  
22 A. Yes.  
23 Q. -- to mobilise?  
24 A. Yes.  
25 Q. I would like to just deal, if I may -- sir, if this is

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1 acceptable, I might only be 10 or 15 minutes yet. I am  
 2 in your hands, sir.  
 3 SIR JOHN SAUNDERS: Would you mind doing 10 or 15 minutes  
 4 after the lunch break? That would be more helpful.  
 5 2 o'clock. Thank you.  
 6 (1.03 pm)  
 7 (The lunch adjournment)  
 8 (2.00 pm)  
 9 MR SMITH: I would like to turn to a different topic now,  
 10 Mr Berry. You have explained that you were not  
 11 familiar, is this correct, with the content of all of  
 12 the action plans as there was a huge number for a duty  
 13 NILO to assimilate?  
 14 A. In total, yes. There's quite a -- well, a couple of  
 15 hundred.  
 16 Q. So you wouldn't be aware if, in some of those action  
 17 plans, for contacting the duty NILO as an initial action  
 18 may be required, it would require a detailed knowledge  
 19 of all of the plans, wouldn't it?  
 20 A. Yes, which may change.  
 21 Q. Of course. But I would like to focus, if we may, on the  
 22 "Explosion" action plan, BG3115, which was current  
 23 at the time of the explosion. That required the initial  
 24 actions of NWFC as follows:  
 25 "Send the TRU. Send [a specified number] of pumps."

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1 A. Yes.  
 2 Q. "Send Station Manager B. Send the duty NILO."  
 3 A. Yes.  
 4 Q. "Inform the duty fire investigation officer. Take other  
 5 steps to advise police and ambulance."  
 6 A. Yes.  
 7 Q. The first thing to note about that, do you agree,  
 8 is that the instruction to "send a specified number of  
 9 pumps" means standard appliances?  
 10 A. Yes.  
 11 Q. Can we bear in mind next that the "Operation Plato --  
 12 standby phase" action plan, BG3367, required the initial  
 13 actions of NWFC to be as follows:  
 14 "If call not received from NILO, inform duty NILO.  
 15 Obtain address and seek advice."  
 16 And number 2:  
 17 "Inform the duty group manager."  
 18 A. Yes.  
 19 Q. So those are the two plans that I would like to ask you  
 20 about.  
 21 A. Okay.  
 22 Q. If we have a situation confronting, let's say, yourself  
 23 as duty NILO, in which it is reasonable to conclude that  
 24 the incident to which the Fire and Rescue Service have  
 25 been asked to respond is a terrorist attack due to

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1 a bomb that has exploded in a public place, causing  
 2 numerous casualties, do you agree that that situation is  
 3 not readily catered for by the "Explosion" action plan?  
 4 A. Yes, and I think I said that yesterday.  
 5 Q. Yes. Because we are not dealing with explosions from  
 6 gas mains in domestic properties, cylinders or matters  
 7 of that sort, are we, we're dealing with something  
 8 approaching, in any view, consideration of the  
 9 "Operation Plato -- standby" action plan?  
 10 A. Yes.  
 11 Q. Do you therefore, Mr Berry, that there's room for what  
 12 might be described as operational discretion here, that  
 13 it's important to obtain accurate information as soon as  
 14 possible before mobilising?  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: Whose discretion?  
 17 A. Well, at that time it was directed to me, to me to get  
 18 that information.  
 19 SIR JOHN SAUNDERS: I don't think it is directed. It is  
 20 directed at North West Fire Control having the  
 21 discretion. I am sorry, I just wanted to make sure the  
 22 question is clear.  
 23 MR SMITH: I was going to come to that in a minute because  
 24 I think it's both ways, with respect.  
 25 SIR JOHN SAUNDERS: Right. Let's ask the thing in two parts

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1 then.  
 2 MR SMITH: Yes, we will.  
 3 First of all, you agree that there is room here for  
 4 operational discretion?  
 5 A. I probably disagree with the terminology, we use that  
 6 for something else, but yes, there is an element of need  
 7 to get some further information.  
 8 Q. Did you watch and listen to the evidence of Mr Dark?  
 9 A. Some of it.  
 10 Q. Did you watch and listen to his evidence that there are  
 11 circumstances in his view where operational discretion  
 12 is needed by the Fire and Rescue Service, whether it's  
 13 the control room or the Fire Service, in situations  
 14 where there is a gap in the procedures or policies and  
 15 as soon as that gap has been filled or rationalised,  
 16 then the situation returns to one whereby you follow the  
 17 policies and protocols?  
 18 A. Yes.  
 19 Q. Did you watch that evidence?  
 20 A. No, I didn't.  
 21 Q. But your view is that we do have a gap here; is that  
 22 right?  
 23 A. Yes, I think it fell between the two cards or several  
 24 cards.  
 25 Q. Therefore, with respect to the chairman and just

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1 breaking this up now, first of all, is it your view that  
 2 you had an operational discretion not to order  
 3 mobilisation until you had more accurate information?  
 4 A. It fell to me within my role, within policy I would say,  
 5 that my job is to gather information and bridge the  
 6 intelligence gap.  
 7 Q. So in simple terms, did you have a discretion within  
 8 your role --  
 9 A. Yes.  
 10 Q. -- to decide not to mobilise, whatever we're dealing  
 11 with now, until you had the information that you believe  
 12 you needed?  
 13 A. Yes.  
 14 Q. Turning now to the control room, would you agree that  
 15 in the circumstances that I have just ventilated with  
 16 you, they would have or should have an operational  
 17 discretion to decide to contact the duty NILO before  
 18 mobilising where this gap existed between the two action  
 19 plans?  
 20 A. I think that is reasonable.  
 21 Q. Thank you.  
 22 Finally this, please. That night, you were in  
 23 contact, the records show -- and these are shown in dark  
 24 blue type on the sequence of communications, sir.  
 25 You were in contact with calls going one way and the

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1 other: with duty Group Manager Dean Nankivell at 23.02,  
 2 00.16, 00.26 and 00.33; with Group Manager John Fletcher  
 3 at 23.13 and 23.37; with Group Manager Ben Levy at  
 4 23.18; with Station Manager Lawlor at 23.21 and 00.29;  
 5 and with Group Manager Henshall at 23.26; and with Group  
 6 Manager Meakin at 23.33.  
 7 So what I have tried to do is to pull together the  
 8 times at which you were in contact with colleagues and  
 9 senior fire officers, and indeed you spoke, as we know,  
 10 to Mr O'Reilly, just to complete the picture, at 00.53.  
 11 A. Yes.  
 12 Q. In the course of those various telephone calls, did any  
 13 of those officers, be they colleagues or senior  
 14 officers, ever question your decision to mobilise  
 15 standard pumps and appliances and other crews to  
 16 Philips Park?  
 17 A. I don't recollect anybody challenging it, no.  
 18 Q. Did anybody question your decision to mobilise  
 19 specialist MTFA crews to Philips Park?  
 20 A. No.  
 21 Q. And as far as you are concerned, was it always  
 22 anticipated that they would not remain at  
 23 Philips Park --  
 24 A. Yes, they might not ever get there.  
 25 Q. And they might not even get there. And in addition to

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1 the telephone calls and telephone communications, did  
 2 you also have available to you radio channels for  
 3 contact with senior fire officers and other NILOs?  
 4 A. I had one radio, yes, an Airwave radio.  
 5 Q. Was that the NILO Talk Group?  
 6 A. Later into the incident, I used it for the NILO Talk  
 7 Group, yes, but I was assigned an initial Talk Group for  
 8 the incident.  
 9 Q. On the initial Talk Group, is that one to which the  
 10 control room would have access?  
 11 A. Yes.  
 12 Q. But on the NILO Talk Group, is that one to which the  
 13 control room would not have access?  
 14 A. I actually don't know if they have access to it.  
 15 MR SMITH: Thank you, Mr Berry.  
 16 SIR JOHN SAUNDERS: Just before you finish, I want to go  
 17 back to the action cards. You were being asked about  
 18 how there would be a number where the direction would be  
 19 to consult the NILO as to what to do next.  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: There are a large number of cards and  
 22 you were saying, were you, that you couldn't know all of  
 23 the action cards where that direction was?  
 24 A. Without seeing all the cards and understanding all the  
 25 cards, I think that would be a problem. But --

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1 SIR JOHN SAUNDERS: I just wonder where a NILO ought to  
 2 know --  
 3 A. -- I could probably guess what those cards would be.  
 4 SIR JOHN SAUNDERS: -- where the direction is on it, consult  
 5 the NILO, NILOs ought to know and they ought to know why  
 6 they're meant to be being consulted.  
 7 A. I suppose at that point in time, I was a new NILO and  
 8 wasn't familiar with the cards or they had not been  
 9 explained to me at the time.  
 10 SIR JOHN SAUNDERS: It's one thing to get to know what the  
 11 cards are by experience, and you're saying, "I hadn't  
 12 had time to do that", but actually shouldn't it be part  
 13 of the training?  
 14 A. I would suggest it be, yes, a better opportunity in the  
 15 future, yes.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR GREANEY: Thank you, Mr Smith.  
 18 Sir, next Mr Horwell with his questions on behalf of  
 19 Greater Manchester Police.  
 20 Questions from MR HORWELL  
 21 MR HORWELL: Mr Berry, a number of topics, please. The  
 22 multi-agency or sharing Hailing Talk Group. You have  
 23 heard about that Talk Group now through the evidence  
 24 called before this inquiry?  
 25 A. Yes, that's correct.

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1 Q. You know that it enabled and enables the other emergency  
2 services to contact the GMP control room and that the  
3 GMP control room monitors the channel 24 hours a day?  
4 A. Yes, I realise that now, yes.  
5 Q. You had been an operational NILO from February 2017?  
6 A. Yes.  
7 Q. What training did you have in the use of the Airwave  
8 radio and the channels that were available on it?  
9 A. That was part of my initial NILO training in-house  
10 within Greater Manchester Fire and Rescue Service, where  
11 certain channels, the NILO channels in particular, were  
12 explained to me.  
13 Q. Do you know today if your Airwave radio on the night of  
14 this attack had the police multi-agency Hailing Talk  
15 Group on it?  
16 A. No, sir, I'm not aware. I haven't got that technical  
17 knowledge.  
18 Q. You haven't asked?  
19 A. No, sir.  
20 Q. As a NILO, did you ever take part in one of the Sunday  
21 morning tests that were conducted from the GMP control  
22 room at Manchester Airport?  
23 A. Yes. I didn't do it specifically as a NILO; it's shared  
24 amongst all the flexi duty officers.  
25 Q. That was a test of a channel that could link the three

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1 services?  
2 A. Yes.  
3 Q. Did you suggest to anyone on the night of this attack  
4 using that channel, setting it up so the three services  
5 could speak to each other?  
6 A. No, I didn't, and you'll know that the police have to  
7 authorise that as well, which channel we use.  
8 Q. The suggestion could have come from you, Mr Berry, could  
9 it not?  
10 A. It could.  
11 Q. Did you not think about it on the night of this attack?  
12 A. No, I didn't. As I've already -- during my evidence  
13 you'll have heard I was quite busy and I was having  
14 problems on my journey.  
15 Q. Did you have either in your radio or in your mobile  
16 telephone, the numbers of any NWA NILOs?  
17 A. No.  
18 Q. You didn't? You were at home when you were called by  
19 Michelle Gregson at 10.40?  
20 A. Yes, that's correct.  
21 Q. We've seen the transcript. If you at any time wish this  
22 or any other transcript to be put on the screen, please  
23 ask, Mr Berry, but I'm sure they are familiar and there  
24 are only a few questions I would wish to ask you about  
25 each transcript. Would you prefer to have it in front

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1 of you or not?  
2 A. No, I'm fine.  
3 Q. All right. As I've said, if you wish to look at any  
4 transcript, please say so.  
5 When you were told that there had been an explosion,  
6 you were told that, "Obviously, we are not mobilising",  
7 by Michelle Gregson and we've heard evidence about this  
8 before, that is not something that you challenged?  
9 A. No, I didn't at the time.  
10 Q. And you now accept you should have challenged that?  
11 A. Yes, and knowing now that I wouldn't have got through to  
12 the force duty officer, yes.  
13 Q. No, Mr Berry, please answer the question. You accept  
14 now that you should have challenged that decision by  
15 NWFC?  
16 A. Yes, I had an opportunity to challenge it.  
17 Q. Having been told that, you said, "We would normally  
18 muster at one of the stations, wouldn't we?"  
19 A. Yes.  
20 Q. What did you mean by that?  
21 A. At that point I think I'm thinking out loud, so my...  
22 I said yesterday about what you can't hear is me  
23 thinking and prioritising things, and I think at that  
24 point I am verbalising some of that.  
25 Q. What did you mean by, "Normally, we would muster at one

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1 of the stations"? What is that based on?  
2 A. I think that was as I'm going through the bomb action  
3 card, that would have been about preparation to move  
4 forward, so we would muster, then rendezvous the  
5 appliances in one particular area.  
6 Q. To go to the rendezvous point, the RVP?  
7 A. Yes, again it's just my thoughts at the time, and I'm  
8 just -- I think I've verbalised some of that.  
9 Q. And you were giving directions during the course of this  
10 call. You said, and these were your words:  
11 "Just give me four pumps to standby or rendezvous at  
12 Philips Park."  
13 You were giving directions to NWFC?  
14 A. Sorry, I spoke over you there. Yes, the direction was  
15 just for four pumps because I wasn't content that we  
16 hadn't moved any resources.  
17 Q. I am just going to freeze your response to these events  
18 at that time, 22.42. Who is in command and control for  
19 fire?  
20 A. There is no commander at the moment. I am just trying  
21 to find some information out.  
22 Q. You have taken command and control, haven't you?  
23 A. Not really, no. I have just -- I'm doing my job as the  
24 NILO to source that information, gather the intelligence  
25 from the place and the person who I think has got the

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1 information, which is the force duty officer .  
 2 SIR JOHN SAUNDERS: Can that really be right? You have  
 3 actually directed them to muster four fire engines at  
 4 Philips Park. That's a command and control decision,  
 5 isn't it?  
 6 A. It is, but it's in the absence of me not being  
 7 comfortable that Control have not mobilised anything.  
 8 MR HORWELL: So Mr Berry, if we can again freeze the action  
 9 at 22.42, is it your evidence that there is no one in  
 10 command and control for fire?  
 11 A. If the pumps had been mobilised at that point, it will  
 12 always be the officer in charge, the highest ranking  
 13 officer in charge on one of those fire engines at that  
 14 moment in time.  
 15 Q. I'm freezing the action, as I hope you understand, at  
 16 22.42, so 11 minutes after the explosion. Is it your  
 17 evidence that at that stage, there was no one in command  
 18 and control for fire?  
 19 A. I'm a tactical adviser, that is my role. So if you just  
 20 wind that back slightly and you were saying that Control  
 21 had just received that information, who's in charge  
 22 then? It's the same thing, there is nobody until we can  
 23 ask these questions.  
 24 Q. So is the answer, the simple answer to my question, that  
 25 at 22.42, there is no one in command and control?

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1 Is that correct?  
 2 A. Well, you could argue that —  
 3 Q. Yes or no, Mr Berry, please.  
 4 A. I don't think it is a yes—or—no answer.  
 5 SIR JOHN SAUNDERS: Okay. Fair enough.  
 6 MR HORWELL: Who was in command and control?  
 7 SIR JOHN SAUNDERS: Mr Horwell, I don't think he feels he  
 8 can answer it yes or no, so I will allow him to answer  
 9 in the way he wants to and obviously you can pursue  
 10 further questions.  
 11 How would you like to answer it?  
 12 A. Yes and no. Again, to say at point who is in charge,  
 13 there are no resources mobilised, there is no officer in  
 14 charge of a fire engine or anything.  
 15 SIR JOHN SAUNDERS: Even if they are mobilised, as  
 16 I understand it, it's the first person at the scene who  
 17 is then in charge. It's not the fact you're mobilised  
 18 and then someone becomes in charge of the fire engines,  
 19 do they? Are you saying the man in the first fire  
 20 engine is in charge of the whole operation?  
 21 A. No. It doesn't always have to be the first appliance in  
 22 attendance or —  
 23 SIR JOHN SAUNDERS: But there has to be some way in which  
 24 you can know who's in charge?  
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Someone has to actually be told, "You're  
 2 in charge", or there has to be a rule that you're in  
 3 charge. The rule is first one on the scene, first  
 4 officer, the first person in charge of the first fire  
 5 engine that arrives, they're in charge?  
 6 A. Well, it's not quite that simple. Within each fire  
 7 engine there is an officer, at least one if not two, so  
 8 even setting up, walking towards the fire appliance and  
 9 getting on it and turning through the doors they're in  
 10 charge.  
 11 SIR JOHN SAUNDERS: Of what?  
 12 A. Of the people, the vehicle, the station, so there is an  
 13 element of somebody in charge of this already. They've  
 14 been notified they're going to an incident. But there  
 15 is a responsibility — we are officers at the end of the  
 16 day. The perception might be wrong where in your minds  
 17 there has to be somebody in charge at that particular  
 18 point. They're already in charge of an element of it.  
 19 It's just when they come together on the incident  
 20 ground, we have an incident command structure.  
 21 SIR JOHN SAUNDERS: Okay, Mr Horwell.  
 22 MR HORWELL: You asked for four pumps to rendezvous at  
 23 Philips Park at 22.42.  
 24 A. Yes.  
 25 Q. Let's move to the next stage. Those four pumps are

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1 assigned to rendezvous at Philips Park and they are on  
 2 their way.  
 3 A. Yes.  
 4 Q. Who's in command and control then?  
 5 A. Right. Well, at this point I am hoping to get that  
 6 information that we need. If I get that information  
 7 that I need straightaway, I will be able to relay that  
 8 to — if I am going to send the non—specialist response,  
 9 I will inform Control and Control will inform the fire  
 10 engines of the information and then it will become the  
 11 first on scene that will take it back into normal  
 12 processes.  
 13 SIR JOHN SAUNDERS: I think the answer is no one at that  
 14 time.  
 15 MR HORWELL: Thank you, sir.  
 16 SIR JOHN SAUNDERS: That seems the implication to me of the  
 17 answer that's been given.  
 18 A. I think currently, if you look in the books you will see  
 19 an incident command structure that when A, B or C  
 20 happens at an incident, that person becomes the officer  
 21 in charge. But there is this element where we're  
 22 gathering information from the members of the public or  
 23 whoever that is and there are some processes we need to  
 24 go through to get to that point of mobilising and  
 25 informing people what they are being mobilised as.

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1 SIR JOHN SAUNDERS: Mr Horwell is saying to you at that  
 2 stage, when you get the necessary information to  
 3 mobilise people, so before the rules come into effect,  
 4 is there anyone actually in command and control at that  
 5 time when you're gathering the information?  
 6 A. I think it's difficult to identify that person, yes.  
 7 SIR JOHN SAUNDERS: That means there isn't one, doesn't it?  
 8 A. Possibly.  
 9 SIR JOHN SAUNDERS: He can't identify the person,  
 10 Mr Horwell.  
 11 MR HORWELL: Well, we got there in the end, sir. Thank you  
 12 for your efforts.  
 13 To Mr Greaney earlier today you said that if you had  
 14 had the information which NWFC had had -- and, Mr Berry,  
 15 we are going to go through this in a moment in short  
 16 fashion, but if you'd had the information that NWFC had  
 17 had, you would have deployed.  
 18 A. Are we talking about the initial information that  
 19 Control had?  
 20 Q. The information that they had before midnight -- before  
 21 11 o'clock that night. Do you not remember these  
 22 questions and answers?  
 23 A. Yes, yes. I'm just -- the document you were referring  
 24 to about the information I had and hadn't got... Yes,  
 25 I was comfortable at that point, yes.

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1 Q. So in that sense, deployment would have been your  
 2 decision?  
 3 A. Yes.  
 4 Q. The rendezvous point, second topic. In your witness  
 5 statement at paragraph 49, you said:  
 6 "By adding an RVP, it suggested a reason for not  
 7 proceeding directly to the incident as normal."  
 8 A. Yes. For us, as an agency, we would normally go  
 9 straight to the incident address.  
 10 Q. I'm sure you saw the recent evidence of Mr Argyle and  
 11 Mr Gaskell.  
 12 A. I saw most of it, yes.  
 13 Q. They both said it was normal to go to the RVP nominated  
 14 by the police.  
 15 A. Yes, I remember them saying that.  
 16 Q. All three of you are enormously experienced  
 17 firefighters, aren't you?  
 18 A. Yes.  
 19 Q. And Mr Berry, it is normal to go to the RVP nominated by  
 20 the police, isn't it?  
 21 A. Yes.  
 22 Q. I want to go back to that critical first call from NWFC,  
 23 the call that was made at 22.40. You made a number of  
 24 assumptions based on that call, didn't you?  
 25 A. Yes.

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1 Q. You assumed that the explosion had just happened?  
 2 A. That's right.  
 3 Q. You assumed that it might be part of a larger attack?  
 4 A. That's correct.  
 5 Q. You assumed that it might be an MTFA?  
 6 A. There was a potential, yes.  
 7 Q. You assumed that the RVP that had been given by the  
 8 police was a predetermined RVP?  
 9 A. I suggested it could be, yes.  
 10 Q. You assumed what cordons might be in place?  
 11 A. Well, I drew cordons in my mind, knowing the area.  
 12 Q. And on those assumptions, you made a risk assessment?  
 13 A. I assessed the risk, I suppose, yes.  
 14 Q. Based on those assumptions, Mr Berry?  
 15 A. Yes.  
 16 Q. And in respect of each of those assumptions, nothing was  
 17 ever said by Michelle Gregson to give you a basis for  
 18 those assumptions, was it?  
 19 A. No, I don't think Michelle actually said anything.  
 20 Q. For example, you never asked her when the explosion had  
 21 occurred?  
 22 A. No. Neither did she tell me.  
 23 Q. What you were told in that first call was that there  
 24 were 30 casualties?  
 25 A. That's correct.

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1 Q. And Mr Berry, would you agree that in a spontaneous and  
 2 significant emergency such as this, the number of  
 3 casualties reported often starts low and increases?  
 4 A. Yes.  
 5 Q. And because of the nature of this incident, serious  
 6 injuries were likely?  
 7 A. Yes.  
 8 Q. What risk assessment did you conduct for the casualties?  
 9 A. Well, the only information was that I had 30,  
 10 potentially 30 casualties. So the risk assessment  
 11 is that we need to get in there as soon as possible.  
 12 Q. "We are the best at assessing risks", you told  
 13 Mr Greaney.  
 14 A. Yes, I think we are, as an agency.  
 15 Q. And it was obvious to you that you had to get to the  
 16 scene as soon as possible?  
 17 A. Yes.  
 18 Q. The golden hour.  
 19 A. Yes.  
 20 Q. Treat and evacuate casualties as quickly as possible?  
 21 A. Yes, that's right.  
 22 Q. In the second call concerning NWFC at 22.48,  
 23 60 casualties were reported during the course of that  
 24 call?  
 25 A. Yes.

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1 Q. And predictably, the number is increasing?  
 2 A. Yes.  
 3 Q. In your witness statement at paragraph 63, you said:  
 4 "In my mind I thought that there was an ongoing gun  
 5 battle in the centre of Manchester."  
 6 A. Yes, I'd been informed at that time that there was an  
 7 active shooter.  
 8 Q. You had been told that there were reports of an  
 9 active shooter, and in your mind, and these are your  
 10 words, you thought there was an ongoing gun battle  
 11 in the centre of Manchester?  
 12 A. Yes, I suppose I envisaged a Paris-style attack.  
 13 Q. Do you think that that was an overreaction?  
 14 A. I think it probably was now, looking back, but at the  
 15 time with the training I'd been given and the battle  
 16 rhythm that I talked about yesterday, I think it was  
 17 a legitimate thought at the time.  
 18 Q. The third call with NWFC was at 22.52. Again, you are  
 19 issuing instructions, aren't you:  
 20 "I'm getting the MTFA capability."  
 21 A. That's right. I'm asking North West Fire Control to get  
 22 together the specialist response.  
 23 Q. That call was a short one and it ended 22 minutes after  
 24 the explosion. So we're just before 11 o'clock that  
 25 night, 22.53, Mr Berry.

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1 A. Yes.  
 2 Q. What I want to ask you about is not what was on the NWFC  
 3 incident log, I want to ask you about a much wider  
 4 source of information, the information that was being  
 5 relayed to NWFC. The question I ask is that by the end  
 6 of that third call, 22.53, if you had been told that  
 7 there was an absolute load of police officers on their  
 8 way to the scene, all GMP officers going to the scene,  
 9 if you had been told that there was an off-duty PCSO on  
 10 the scene, if you had been told that there was a BTP  
 11 sergeant involved — and Mr Berry, you knew the location  
 12 of this attack, you knew that the arena was either above  
 13 or next to the station, didn't you?  
 14 A. Yes.  
 15 Q. And you would have expected BTP officers to be amongst  
 16 the very first on the scene?  
 17 A. Yes.  
 18 Q. So a BTP sergeant involved. If you had been told that  
 19 every available ambulance was to attend the booking  
 20 office, where the explosion had occurred, as soon as  
 21 possible; if you had been told that a paramedic Bronze  
 22 had arrived on the scene; and Mr Berry, importantly, as  
 23 to the reports of an active shooter, if you had been  
 24 told that, first, what were thought to be gunshot wounds  
 25 were not gunshot wounds but looked like shrapnel wounds,

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1 and if you had been told that BTP had nothing regarding  
 2 an active shooter, if you had been given all of that  
 3 information, you would have deployed, wouldn't you?  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: Did you follow all that question with  
 6 the number of sub-questions in between? If not, I will  
 7 ask Mr Horwell to repeat it for you.  
 8 A. No, I followed it, sir, thank you.  
 9 SIR JOHN SAUNDERS: Do you do advocacy training, Mr Horwell?  
 10 MR HORWELL: All the time, sir.  
 11 SIR JOHN SAUNDERS: It might be regarded as a slightly long  
 12 question maybe.  
 13 MR HORWELL: I wanted to be sure that Mr Berry had all of  
 14 the relevant information.  
 15 SIR JOHN SAUNDERS: I understand the need for composite  
 16 questions. It did get a bit — with the sub-questions  
 17 and the rest.  
 18 MR HORWELL: I'm sorry. That's why I took it slowly, sir.  
 19 If I can ask you, Mr Berry, you did understand all  
 20 of the information I was relaying to you, didn't you?  
 21 A. I did understand it, yes.  
 22 SIR JOHN SAUNDERS: You're right and I'm wrong, Mr Horwell.  
 23 MR HORWELL: No, not at all, that's never the case in  
 24 a public inquiry, sir, as I said before.  
 25 Mr Berry, the point is this: if you had been told

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1 all of that by 22.53, you would have deployed, wouldn't  
 2 you?  
 3 A. Yes, I would.  
 4 Q. And that is information that you should have been given;  
 5 do you agree?  
 6 A. I agree, yes.  
 7 Q. And if you had been told that the Ambulance Service was  
 8 rendezvousing at Thompson Street, what would you have  
 9 done then?  
 10 A. Well, as a minimum we would have gone to  
 11 Thompson Street.  
 12 Q. Situational awareness can come from many sources,  
 13 Mr Berry, as you have accepted. I just want to ask you  
 14 what you expected from NWFC. Would you have expected  
 15 NWFC to attempt to contact the FDO or not?  
 16 A. Certainly the police and to inform them that the NILO  
 17 couldn't get through to the force duty officer.  
 18 Q. So you would have expected some contact?  
 19 A. Yes.  
 20 Q. What about the Ambulance Service?  
 21 A. Can you... Are you asking...  
 22 Q. Would you have expected NWFC to contact the  
 23 Ambulance Service for situational awareness?  
 24 A. Yes, I would imagine at that time that they're all  
 25 speaking to each other anyway. That is the agreed

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1 process. They have a three—way communication.  
 2 Q. Yes. All ambulances are going to the scene, so the  
 3 Ambulance Service is a good source of information; yes?  
 4 A. Yes, I agree.  
 5 Q. This being next to a station and there being  
 6 confirmation that a BTP sergeant is involved and  
 7 liaising, obviously BTP would be a good source of  
 8 information for situational awareness; do you agree?  
 9 A. Yes.  
 10 Q. You agreed with Mr Greaney last night and this morning  
 11 that during the course of your second call with NWFC,  
 12 a time was selected, 22.48, and you agreed that that was  
 13 the time to act. You hadn't been able to contact the  
 14 FDO and that was the time to act.  
 15 A. Yes.  
 16 Q. The time when a plan B became essential?  
 17 A. Yes. On reflection, yes, I accept that.  
 18 Q. Did you ever consider sending someone from Central Park,  
 19 Manchester Central or Philips Park on blue lights to the  
 20 GMP operations room, where the FDO was based?  
 21 A. No, which is further away than Philips Park.  
 22 Q. Well, how long on blue lights would it have taken from  
 23 Philips Park to the operations room?  
 24 A. From Manchester Central Fire Station?  
 25 Q. No, first of all from Philips Park and then

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1 Manchester Central. Roughly.  
 2 A. If one of the officers, one of the NILOs from  
 3 Philips Park went to Central Park, it wouldn't take  
 4 long, probably 5 minutes.  
 5 Q. 45 minutes?  
 6 A. Five.  
 7 Q. So from Philips Park to the GMP operations room, how  
 8 long?  
 9 A. Five minutes on blue lights, not long.  
 10 Q. And Manchester Central to the GMP operations room where  
 11 the FDO was based?  
 12 A. Not much longer, 10 minutes.  
 13 Q. Did you ever think of requesting that?  
 14 A. No. I certainly wouldn't have sent the crew because  
 15 they wouldn't have had that awareness and I didn't  
 16 consider a NILO.  
 17 Q. The question was: did you consider sending anyone?  
 18 A. No.  
 19 Q. The successful call you made to the operations room when  
 20 you spoke, as we now know to David Myerscough; yes?  
 21 A. Yes, sir.  
 22 Q. And you're familiar with that call, it has been played,  
 23 and you have seen the transcript.  
 24 A. That's right, yes.  
 25 Q. Do you think you could have been more demonstrative

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1 during the course of that call, Mr Berry?  
 2 A. The person on the other end of the phone didn't seem to  
 3 know what I was talking about, so it made it difficult.  
 4 As you have heard, I was put on hold quite a few times  
 5 and the information I was receiving wasn't what I was  
 6 asking for in the first place, but it was two or three  
 7 different places offered to me. So I wasn't really  
 8 convinced — I wasn't really convinced the information  
 9 was right.  
 10 Q. Why didn't you demand to speak either to the FDO or the  
 11 FDS?  
 12 A. I suppose I didn't think at the time. Again, realising  
 13 how busy that person was, my expectations were that  
 14 a member of the team would deal with that information  
 15 for them.  
 16 Q. Yes, but the person that you spoke to wasn't  
 17 satisfactory, was he?  
 18 A. Knowing what I know now about him, he was put in  
 19 a unfortunate position on the night.  
 20 Q. I'm not asking you about what you now know. On the  
 21 night, Mr Berry, he wasn't satisfactory, was he?  
 22 A. He wasn't, no.  
 23 Q. I'm just asking why on earth didn't you demand to speak  
 24 to somebody who could give you the answers, either the  
 25 FDO or the FDS or one of his assistants?

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1 A. He did inform me that he was speaking — he was asking  
 2 the question for me.  
 3 Q. But Mr Berry, this isn't an insignificant communication,  
 4 is it?  
 5 A. If everybody demanded to speak to the FDO, surely he  
 6 would be even more overwhelmed than he already was.  
 7 SIR JOHN SAUNDERS: I think we should probably also consider  
 8 you were actually talking — Mr Levy was talking as well  
 9 about going to Thompson Street?  
 10 A. Yes, that's correct, yes.  
 11 MR HORWELL: Let's not forget the time, Mr Berry: it's near  
 12 midnight —  
 13 A. Yes.  
 14 Q. — and the Fire Service is not at the scene.  
 15 A. No.  
 16 Q. I'm just wondering why you weren't more demonstrative  
 17 during this call.  
 18 A. Well, like I've said already, these type of incidents  
 19 could last minutes, they can last hours. We still feel  
 20 at some point the force duty officer will be calling us,  
 21 like he's supposed to, in accordance with the JOPs. So  
 22 I suppose at that moment in time, I am waiting for them  
 23 to speak to — the FDO to speak to us. I have no need  
 24 at that point to be being disingenuous to the person on  
 25 the other end of the call.

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1 Q. Mr Berry, it's nearly an hour and a half since the  
2 explosion. You have agreed with me that it is essential  
3 to get to the scene as soon as possible.  
4 A. Yes.  
5 Q. You've been told of 60 casualties, no doubt you would  
6 have thought there were more. Fire were not at the  
7 scene. Why weren't you more demonstrative during that  
8 call?  
9 A. I do state that I want a nailed on — I'm very precise  
10 about what I'm asking for. I'd expect within that room  
11 that the essential pieces of information will be on  
12 a whiteboard or something, that whoever answers the  
13 phone knows where the RVP is, knows where the forward  
14 command point is, knows where the contact numbers are  
15 for the people who really matter, and they're all  
16 looking at the same piece of information. These days  
17 it would be done with Resilience Direct probably a bit  
18 more or — even a basic method of a whiteboard on  
19 a wall. At least they're all looking at the same  
20 information.  
21 SIR JOHN SAUNDERS: Shall we move on from that, Mr Horwell?  
22 MR HORWELL: You said at paragraph 87 of your witness  
23 statement, just before your arrival at Philips Park:  
24 "No one has told me there was not a gun battle going  
25 on."

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1 A. Yes.  
2 Q. So even as late as this time, you still thought that  
3 there was a gun battle going on in the City of  
4 Manchester?  
5 A. Yes. I appreciate looking at it now, the time passes in  
6 a blink of an eye, and the mindset is still the same  
7 until it's been corrected or been allowed to correct by  
8 the information I've been given.  
9 Q. Mr Berry, I want to ask you, please, when you went  
10 eventually to the station, who was in command and  
11 control of the firefighters that went with you?  
12 A. Can I just clarify, you're talking about the  
13 fire station or the train station?  
14 Q. Sorry, my fault, Mr Berry. The train station,  
15 Victoria Station. Who was in command and control?  
16 A. Ben Levy was the officer in charge at that point.  
17 Q. And he was at Manchester Central?  
18 A. That's correct.  
19 Q. If you had gone to the scene with firefighters, if you  
20 had been told that the casualties were in the hot zone,  
21 no one from the Fire Service would have entered; is that  
22 right?  
23 A. Currently, yes, we don't work in the hot zone — at that  
24 point in time, sorry.  
25 Q. As you understand, I'm asking you questions

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1 about May 2017, not the present.  
2 A. Yes.  
3 Q. If you had been told that the casualties were in a warm  
4 zone, regular firefighters would not have been permitted  
5 to enter; is that right?  
6 A. At that point in time, yes.  
7 Q. And if you had been told that the casualties were in  
8 a warm zone, that the possibility of a secondary device  
9 could not be excluded, and that some of the panels of  
10 the glass ceiling had been completely smashed and that  
11 there was one which looked like it was about to fall at  
12 any time, would you have sent the specialist responders  
13 into the City Room in those circumstances?  
14 A. Yes, in those circumstances we would have taken risks to  
15 save saveable lives, definitely.  
16 Q. But certainly not the regular firefighters?  
17 A. No, that's not to say at that moment in time, if they  
18 were the regular firefighters, we will take some risks,  
19 yes.  
20 Q. I'm sorry, Mr Berry, I hadn't understood this. You  
21 would have sent regular firefighters into a warm zone?  
22 A. The policy at the time was not to put them in a hot  
23 zone, not to put even specialist response in a hot zone.  
24 We would use the specialist response in a warm zone but  
25 not the regular firefighters. That's the policy. But

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1 for a saveable life, we will take risks.  
2 Q. You wouldn't even send the regular firefighters into the  
3 station after midnight?  
4 A. Well, that was an established warm zone and I think the  
5 pictures you've shown sort of isolate that area as the  
6 warm zone. And you can see, you're looking at it,  
7 thinking, well, that's not a very big area, you can see  
8 it. In fact, the warm zone on the night was the  
9 footprint of the building pretty much, and the arena  
10 itself, the bowl, was the hot zone. That's quite  
11 a sizeable area. I can't see all that area.  
12 SIR JOHN SAUNDERS: Who told you that on the night? Not  
13 now.  
14 A. It was Steve Hynes.  
15 SIR JOHN SAUNDERS: So Steve Hynes —  
16 A. That was confirmed later on by the other officers I was  
17 dealing with.  
18 SIR JOHN SAUNDERS: Steve Hynes said all a warm zone.  
19 A. Yes.  
20 SIR JOHN SAUNDERS: Actually the arena itself is a hot zone.  
21 A. Yes, and that was confirmed as well by Mick Lawlor who  
22 was in the Silver — the force command module at the  
23 time. So it's a sizeable area, so you're asking me to  
24 put people into a warm zone. It's not in line of sight.  
25 I need to know more information about it. But for

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1 saveable life , yes, we'll definitely take risks .  
 2 MR HORWELL: We hear your evidence, Mr Berry.  
 3 Sir, I have no further questions, thank you.  
 4 SIR JOHN SAUNDERS: Thank you, Mr Horwell.  
 5 MR GREANEY: Sir, next will be questions on behalf of the  
 6 bereaved families by Mr Cooper. I'm wondering whether  
 7 it's better that he makes a start and goes for 10 or  
 8 15 minutes or whether we take our break now and he then  
 9 runs through.  
 10 SIR JOHN SAUNDERS: Which would you like?  
 11 A. I'm happy to do 10 minutes.  
 12 SIR JOHN SAUNDERS: Are you, Mr Cooper?  
 13 MR COOPER: Whatever is convenient to you.  
 14 SIR JOHN SAUNDERS: Let's do 10 minutes then, thank you.  
 15 When you find a convenient moment, tell me.  
 16 Questions from MR COOPER  
 17 MR COOPER: As you know, I ask questions on behalf of the  
 18 bereaved families, Mr Berry, who have been listening to  
 19 your evidence with a great deal of interest .  
 20 Let me go straight to it: you have effectively told  
 21 the chair that the Fire Service were the best in the  
 22 business at risk assessment. This has been touched on,  
 23 I'm not going to repeat all that. That is your  
 24 position, isn't it?  
 25 A. I said as an agency we are good at risk assessments,

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1 yes.  
 2 Q. And indeed Mr Horwell was asking you questions about  
 3 your risk assessment based upon casualties, but I want  
 4 to put a question to you which is based on direct and  
 5 positive instructions I have from those that were  
 6 actually in the City Room at the time. Let me put these  
 7 positive matters to you.  
 8 Did you appreciate when you were prevaricating over  
 9 policy and procedure, about whether or not to go into  
 10 the City Room, that there were casualties in the  
 11 City Room who were lying there afraid, injured, bleeding  
 12 and confused? Did that cross your mind? I put this to  
 13 you directly on the basis of positive instructions. Did  
 14 that cross your mind?  
 15 A. No, sir. When I arrived at the incident, I spoke to the  
 16 force commander, which is Steve Hynes, and he directed  
 17 me to assist the P3 casualties.  
 18 SIR JOHN SAUNDERS: I think we need to bear in mind that  
 19 I am not minding about the question, but by the time you  
 20 arrived, everybody was out of the City Room. So we're  
 21 talking about a time before.  
 22 MR COOPER: I will predicate the question better. I'm  
 23 talking about for the 2 hours or so before you even  
 24 arrived at the scene, whilst you were prevaricating over  
 25 policy and procedure, did it at all cross your mind that

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1 during that time casualties were lying, some of them  
 2 perhaps dying, in the City Room, afraid, terrified, and  
 3 injured? Did it cross your mind?  
 4 A. Of course. We go to incidents of a serious nature on  
 5 a regular basis.  
 6 Q. Did it cross your mind perhaps that these individuals  
 7 were lying in the City Room and they could hear sirens  
 8 outside the City Room, emergency service sirens, and  
 9 they were desperate for people to walk through the doors  
 10 from those sirens to help them? Would that have crossed  
 11 your mind over those 2 hours or so while you were  
 12 prevaricating about what to do?  
 13 A. We wanted to be there. We wanted to assist.  
 14 Q. That they felt scared and they wanted the emergency  
 15 services there desperately in their time of critical  
 16 need? Might that have crossed your mind perhaps while  
 17 you were prevaricating over policy?  
 18 A. I'm not sure about the policy aspect of this, but  
 19 casualties are always at the forefront of our minds,  
 20 yes.  
 21 SIR JOHN SAUNDERS: Do you mind? There's something I wanted  
 22 to ask earlier on and I didn't do so. You talk about  
 23 a risk assessment and the ability of the Fire Service to  
 24 do a risk assessment. There are here two risk  
 25 assessments involved: there is the risk to the people

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1 Mr Cooper is talking about, who are there in desperate  
 2 states and need to be rescued and their risk, and then  
 3 there's a risk to Fire Service personnel in going in.  
 4 Do you just assess one of them or do you assess both of  
 5 them? And if you assess both of them how do you balance  
 6 out that risk?  
 7 A. It's the risk versus the benefits of the action that you  
 8 take. For saveable life, we will take more risk.  
 9 SIR JOHN SAUNDERS: In this case, knowing that there may  
 10 well be saveable life, you couldn't know either way but  
 11 you knew there were a number of casualties, then you  
 12 were in a situation where if you went there you could  
 13 save lives?  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: That was outweighed in your view at  
 16 certain stages by not having the information to assess  
 17 the risks to fire personnel? I'm not saying you're  
 18 wrong necessarily, no one is saying you should send  
 19 firefighters into a situation where they are going to  
 20 lose their lives, I understand that, but I just wonder  
 21 how you balance out those two risks in your mind.  
 22 A. It's very difficult.  
 23 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 24 MR COOPER: Can I, on the back of that, ask: was there any  
 25 balance exercised in your mind at the time or was it

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1 simply, and again I don't undermine the equation, but  
 2 was it simply that you needed to be sure that  
 3 firefighters were safe and that that trumped everyone  
 4 else?  
 5 A. It's not a case of trumping anybody, it's a case of ---  
 6 firefighter safety is paramount, you know, it's going  
 7 back to that --- a decision has to be made at some point  
 8 to take some risk. I accept that.  
 9 SIR JOHN SAUNDERS: One of your problems in a way is all the  
 10 firefighters wanted to take that risk.  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: They wanted to be in there.  
 13 A. Myself, I wanted to be in there, but...  
 14 SIR JOHN SAUNDERS: What stops it, policy?  
 15 A. At the time I think the policy didn't help. It has been  
 16 changed a couple of times since.  
 17 MR COOPER: That's of little solace, you can understand, to  
 18 those listening on behalf of the families. You  
 19 understand that, don't you ---  
 20 A. I accept that, yes.  
 21 Q. --- that policy has been changed? But to understand what  
 22 I'm putting to you directly, again I emphasise on the  
 23 basis of positive instructions, these people or some of  
 24 them inside that City Room can actually hear the sirens  
 25 outside the City Room and yet, can you understand the

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1 desperation that they felt when no one was coming in and  
 2 particularly, as you are here, the Fire Service?  
 3 A. Yes.  
 4 Q. Do you understand that desperation?  
 5 A. I do.  
 6 SIR JOHN SAUNDERS: I think it's fair to say it applies to  
 7 paramedics as well.  
 8 MR COOPER: Of course, sir.  
 9 SIR JOHN SAUNDERS: Who perhaps more instantly come to mind  
 10 because they're the ones helping to treat. We  
 11 understand the point on both sides.  
 12 A. I think the point as well is this is an agreed  
 13 multi-agency response and the need to share situational  
 14 awareness.  
 15 SIR JOHN SAUNDERS: I know that. The whole thing fell down  
 16 in the most appalling way, actually getting  
 17 communication between everybody. But actually if you  
 18 can't get the communication, it is not there, you have  
 19 to make a decision and you have already agreed with  
 20 Mr Greaney that actually at 10.48 you made the wrong  
 21 decision.  
 22 A. Yes.  
 23 MR COOPER: Again, I'm instructed to give you the  
 24 opportunity now at the start of my questioning to say  
 25 sorry to the families, sorry that effectively the Fire

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1 Service were impotent on that night as far as helping  
 2 them are concerned. They have not yet heard that word  
 3 said yet and I'm instructed to give you the opportunity  
 4 to say it now.  
 5 A. I apologise if any of my decisions have impacted on the  
 6 response on the night, yes.  
 7 MR COOPER: All right then. I am going to move on, sir, but  
 8 would that be a convenient moment?  
 9 SIR JOHN SAUNDERS: Yes. Ten minutes, is that long enough  
 10 for you?  
 11 A. That's fine.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 (3.05 pm)  
 14 (A short break)  
 15 (3.28 pm)  
 16 MR GREANEY: Sir, can I suggest that at about 4.30, we take  
 17 stock of how much longer Mr Cooper thinks he will be at  
 18 that stage, assuming he hasn't finished, and see also  
 19 how long Mr Warnock thinks he will be and make  
 20 a decision, obviously having taken into account the  
 21 views of the witness about whether we try to finish or  
 22 whether we draw stumps at that stage.  
 23 SIR JOHN SAUNDERS: I'm happy for the families to take  
 24 instructions as well. From my point of view, if we can  
 25 finish a witness, that is always good, but I know these

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1 are long days and I know the evidence today may have  
 2 been upsetting.  
 3 MR COOPER: Thank you, sir. As I indicated to Mr Greaney,  
 4 I've been afforded access to the New Plato this evening  
 5 as well, so obviously when we finish here, there's other  
 6 work we need to be doing as well on behalf of ---  
 7 SIR JOHN SAUNDERS: I'm sure there's always things to do.  
 8 MR COOPER: Thank you, sir.  
 9 In the spirit, Mr Bery, of making a lot of  
 10 progress, I want to ask you just a little bit about your  
 11 experience. If I précis your experience, please  
 12 understand I'm probably going to miss things out and  
 13 that's not intentional and you can add or supplement if  
 14 you will.  
 15 You worked for GMFRS for 22 years, and I have a list  
 16 of your positions here which I was going to read to you,  
 17 but I'll put them in one question: the majority of your  
 18 positions really have involved work in policy, strategic  
 19 drafting, for instance, and procedure. That's been the  
 20 majority of your career, hasn't it? We can go through  
 21 it stage by stage if needs be, but I'm putting it to you  
 22 globally.  
 23 A. I wouldn't have thought so, sir.  
 24 Q. You wouldn't?  
 25 A. No.

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1 Q. All right. Well, you were recruited as a firefighter  
2 when, in what year? When did you first start?  
3 A. I started in January 1997.  
4 Q. And you were a watch manager in 2006; is that right?  
5 A. Yes.  
6 Q. And then immediately, in March 2007, you went to Fire  
7 Service HQ, as you call it, in a corporate support role,  
8 as a staff officer for the deputy county fire officer  
9 and you tell us in your statement you were involved with  
10 administrative support and strategic drafting?  
11 A. The department was called corporate support, but however  
12 I maintained my operational availability during that  
13 time.  
14 Q. All right then. You have maintained your operational  
15 availability and was that exploited?  
16 A. Yes, occasionally I would ride out on the fire engines.  
17 Q. How occasionally would you ride out on fire engines?  
18 A. Generally at pinch points in the roster system.  
19 Q. All right. In 2010, you were involved with drafting  
20 operational policy, that was your job, in relation to  
21 MDT terminals?  
22 A. Yes, I think that lasted about 3 months.  
23 Q. And then in May 2011, you are fire safety at the city  
24 centre borough command in Thompson Street and your role  
25 was to audit premises in the county and enforce fire

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1 legislation?  
2 A. Yes. However, again, I maintained my operational  
3 availability.  
4 Q. Can I put it again bluntly: your day job was in policy?  
5 A. No, sir.  
6 Q. All right. Then we go on. You were a station manager  
7 at Blackley Fire Station, covering someone for sick  
8 leave?  
9 A. Yes.  
10 Q. And then in early 2013, you became the permanent station  
11 manager at Gorton Fire Station, which involved in your  
12 statement, apparently, partnership working, liaison with  
13 councils, local police inspectors and housing  
14 associations, and you were also involved with a project  
15 on cannabis farming. Would that be right?  
16 A. However, the day job is the preparedness of the station  
17 to respond to operational (overspeaking) —  
18 Q. I'm going to suggest to you that your day job was in  
19 fact continually and for a significant period of time in  
20 policy and process and you occasionally, as you put it,  
21 rode out on a fire engine.  
22 A. No, that's not the case, I was a flexi duty officer at  
23 Gorton.  
24 Q. Then you went to the Contingency Planning Unit and then  
25 became a NILO. Your whole ethos in the majority of your

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1 career was about policy, wasn't it?  
2 A. No.  
3 Q. That's how you're driven, your mindset is policy,  
4 policy, policy, isn't it?  
5 A. No, I wouldn't say that. An element of obviously my  
6 work in my career has been around some policy but  
7 I wouldn't have said that was my focus.  
8 Q. That dictated the way your mind worked on 22 May, didn't  
9 it? You were focusing not necessarily on firefighter  
10 operational issues but on policy, weren't you?  
11 A. No, I had to consider the policy.  
12 Q. Do you remember Mr Simister's evidence when he said  
13 policy should not overcome the imperative to get in?  
14 A. Yes, and I understand that ethos, but as a tactical  
15 commander I am trained to consider the safety of the  
16 crews and the wider parts of the incident and the  
17 consequences of it.  
18 Q. You mean risk aversion as far as fire officers are  
19 concerned?  
20 A. No, sir.  
21 Q. You emphasised today about your duty of care to those of  
22 your colleagues you were responsible for.  
23 A. Correct.  
24 Q. What of your duty of care to the public?  
25 A. Of course, yes.

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1 Q. Where does that lie in the balance?  
2 A. Well, you are taking it out the context. At the moment  
3 in time of the evidence I was giving, I responded by  
4 saying there is a duty of care by myself to the  
5 employees, to the staff.  
6 Q. I have dealt with that in short measure. I have not  
7 taken you through every item of your work experience and  
8 I won't, but you understand what I'm suggesting to you.  
9 You are a policy and procedures man?  
10 A. I understand what you're suggesting; I disagree.  
11 Q. Let me take you then to certain parts of your  
12 statement —  
13 SIR JOHN SAUNDERS: Just let me ask you this. Sorry to do  
14 this.  
15 I understand what you're saying about you kept doing  
16 the job and the day job.  
17 A. Yes.  
18 SIR JOHN SAUNDERS: But compared with most of your peers,  
19 I suspect you were involved more with policy than they  
20 were?  
21 A. Not necessarily, no.  
22 SIR JOHN SAUNDERS: Okay, not necessarily. Do you think you  
23 had a greater knowledge of policy and procedure than  
24 many of your peers?  
25 A. Only the aspects that I'd worked on, and the necessity

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1 to know policy and procedure to be an effective  
2 commander.

3 SIR JOHN SAUNDERS: Do you think other commanders also  
4 appreciate the necessity of knowing policy and procedure  
5 to be an effective commander?

6 A. Yes, absolutely.

7 SIR JOHN SAUNDERS: You think they all do?

8 A. Yes, I would say it's a necessity, and they would need  
9 to know under what legislation they're deploying certain  
10 things or which powers —

11 SIR JOHN SAUNDERS: And to what extent do you have  
12 a discretion as a commander not to follow policy and  
13 procedure or does it depend on the policy?

14 A. There is some operational discretion.

15 SIR JOHN SAUNDERS: Always?

16 A. Yes. As long as it's recorded and the reasons why. But  
17 first of all, to do that you need to understand and have  
18 a knowledge of the policy that you're stepping out of.

19 SIR JOHN SAUNDERS: Right.

20 MR COOPER: Thank you.

21 Looking at your statement, go to paragraph 19, will  
22 you, please, Mr Berry, just dealing again with matters  
23 that you dealt with, exercises as such, that may have  
24 predicted the problems, this is the heading, that lay  
25 ahead.

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1 You have told us that you were a COMAH reference  
2 holder; is that right?

3 A. Yes.

4 Q. What's that mean in short?

5 A. It's control of major accident hazards, so if you  
6 imagine a chemical plant, a chemical site, those are the  
7 regulations that surround that, which are governed by  
8 the HSE and the Environment Agency.

9 Q. And looking at paragraph 9, you say:

10 "These plans include critical elements of incident  
11 response, such as the establishment of rendezvous  
12 points, joint working, correct PPE, and joint  
13 communications. It also includes planning around the  
14 communication of METHANE messages."

15 So these were tests and procedures you went through  
16 to test the effect of (inaudible), is that right?

17 A. So the responsibility I had at the time as the COMAH  
18 reference holder was to exercise the plan, to make sure  
19 that the plan is effective and efficient, sufficient,  
20 because — and that is done within a three-year cycle.

21 Q. How is it done, how is it tested?

22 A. It's done by some live play on the actual site, and then  
23 there is an element of a tactical coordinating group  
24 tabletop, but the two speak together and communicate.

25 Q. Did that, whilst you were working in that capacity,

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1 throw up any problems with any of those issues that  
2 I have just read out from your paragraph 19 and predict  
3 any difficulties?

4 A. Yes, like I said, there was the quality of the  
5 information that was being passed between the two, the  
6 perhaps misunderstanding of the severity of some of the  
7 risk information that was being shared or not at that  
8 particular time, and/or even the process of how  
9 information should be shared through METHANE.

10 Q. If we look at your paragraph 20, right at the top:  
11 "One of the major challenges arising from these  
12 exercises was in relation to inter-agency communications  
13 and shared situational awareness."

14 So again, when was this red flag, for want of  
15 a better expression, being waved about major challenges  
16 in relation to inter-agency communications and shared  
17 situational awareness? What year was this flag waved?

18 A. I would have to look at the minutes of these meetings.

19 Q. Approximately?

20 A. At the earliest it would have been 2016 because I was in  
21 post from the end of 2015, so...

22 Q. Certainly before the Manchester atrocity?

23 A. Perhaps, yes.

24 Q. When these major challenges were flagged in relation to  
25 inter-agency communications and shared situational

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1 awareness, what was done about them?

2 A. Okay, so like I've said, the standard sub-meetings of  
3 the LRF that I chaired, I raised some of these points.  
4 I brought some guest speakers to the meetings to educate  
5 some of the people. But also, I tried to introduce —  
6 well, I did introduce Resilience Direct into the  
7 training, moving forward, which gave that shared  
8 situational awareness and enabled people to set up an  
9 incident on there, so every agency was looking at the  
10 common picture.

11 Q. Based upon what happened at the Manchester Arena, you  
12 miserably failed, didn't you?

13 A. I don't think it was personally down to me.

14 Q. Someone miserably failed.

15 SIR JOHN SAUNDERS: I'm interested in this particular topic.  
16 So perfectly reasonably and for perfectly understandable  
17 reasons, all the rescue services have become really  
18 focused on JESIP.

19 A. Yes.

20 SIR JOHN SAUNDERS: Because only if JESIP works do you get  
21 a decent response.

22 A. Yes.

23 SIR JOHN SAUNDERS: Lots of people have said, well, it  
24 doesn't always work, particularly in the early stages,  
25 and the remedy has been, really, to say: let's give

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1 people more training on JESIP, let's do it more and  
 2 more. But actually, had consideration been given to the  
 3 situation which occurred on 22 May, which is JESIP  
 4 failed? Where do you go from there? Does the policy  
 5 make allowance for JESIP failing?  
 6 A. Probably in my experience, no.  
 7 SIR JOHN SAUNDERS: So we're talking about the plan B as  
 8 well?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: If you are aware of procedure and  
 11 policy, then actually when you need to go out of it,  
 12 perhaps there's just not sufficient consideration been  
 13 given to that?  
 14 A. Perhaps, and training to that effect, you know,  
 15 realistic training.  
 16 SIR JOHN SAUNDERS: Okay. Thank you, Mr Cooper.  
 17 MR COOPER: Thank you.  
 18 I'm just assimilating the chair's last question  
 19 in the sense that, yes, JESIP failed and steps have been  
 20 taken, as we hear, to improve JESIP. In your view, is  
 21 JESIP actually capable of improvement or do we really  
 22 need to go back to the drawing board?  
 23 A. I'm not sure I'm the right person to answer that, but  
 24 I think currently JESIP is the answer. I think it just  
 25 needs a commitment that we're all on board and trained

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1 in it and understand it fully. I think it'll always  
 2 have to be reviewed and refreshed because nothing stands  
 3 still.  
 4 Q. It may well be I'm pushing you to the limits on what you  
 5 can answer on JESIP, I do understand that. Might it be,  
 6 and you're an experienced man, we've seen your  
 7 credentials, that instead of focusing on people  
 8 understanding JESIP and that sort of thing, that JESIP  
 9 needs to be completely scrapped and we start again with  
 10 a clean sheet? Could that be an option?  
 11 A. It's an option. I'm not sure I am the right person to  
 12 answer that question.  
 13 SIR JOHN SAUNDERS: By the time it comes to recommendations,  
 14 perhaps you'd like to fill out the clean sheet for me,  
 15 Mr Cooper.  
 16 MR COOPER: No, sir, I have enough on my plate. Let's just  
 17 leave it that way.  
 18 In paragraph 22 you reflect, do you not, in the  
 19 third line:  
 20 "There is considerable overlap between COMAH and the  
 21 NILO role in the context of threat and response  
 22 required."  
 23 So is there a very close association then as so far  
 24 as those two roles are concerned?  
 25 A. I have not articulated it properly, but it is probably

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1 more around the threat to the community and the  
 2 response — it will be a multi-agency response.  
 3 SIR JOHN SAUNDERS: You're the NILO on duty for fire.  
 4 There's a NILO on duty for NWAS.  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: You don't know who he or she is on any  
 7 particular night?  
 8 A. I do now.  
 9 SIR JOHN SAUNDERS: Then? 22 May?  
 10 A. No.  
 11 SIR JOHN SAUNDERS: The whole point of a NILO is to  
 12 communicate between the services.  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: And you don't know how to contact him or  
 15 her?  
 16 A. No. I could have done that through Control. There is  
 17 that facility to go control to control.  
 18 SIR JOHN SAUNDERS: It might have helped. You'd have got  
 19 more idea of what NWAS were doing.  
 20 A. Yes.  
 21 MR COOPER: In terms of exercises that you were involved  
 22 in that may have flagged or assisted or indeed lessons  
 23 learned, I want to go on to a lessons learned point now.  
 24 Paragraph 27, please, of your statement. You say:  
 25 "During the same period as MTFA lead I was also the

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1 airport liaison officer. That included liaison with the  
 2 Manchester Airport Fire Service. I led GMFRS's  
 3 participation in Exercise Scott, a mass casualty  
 4 exercise, in July 2018."  
 5 So after the atrocity:  
 6 "That was a multi-agency exercise designed around an  
 7 aircraft landing away from the airfield."  
 8 Here's what I want to ask you about:  
 9 "The exercise highlighted an issue in relation to  
 10 the use of Airwave radios."  
 11 What issue was that that was highlighted in  
 12 July 2018 in relation to Airwave radios?  
 13 SIR JOHN SAUNDERS: Can I just ensure that that is not  
 14 sensitive?  
 15 Is that sensitive information or is it something you  
 16 can tell us?  
 17 A. I can put it in simple terms.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 A. It was because we used a cross-border response from  
 20 a different county, we had different codes for the  
 21 received channels.  
 22 MR COOPER: Were any of those problems apparent at all  
 23 during 22 May 2017?  
 24 A. Not to my knowledge, no.  
 25 Q. Then I'll move on from that.

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1 We are aware, not just through you, Mr Berry, but  
 2 through other witnesses as well, about a multiplicity of  
 3 exercises that went on, both before and after  
 4 Manchester Arena, testing responses in different venues.  
 5 We know, for instance, also, that Project Griffin, you  
 6 tell us about, on 10 May 2017, dealt with security for  
 7 venues of business owners. Was there any exercise  
 8 specifically designed, before Manchester Arena, to cater  
 9 specifically for entertainment venues like  
 10 Manchester Arena?  
 11 A. Not from my knowledge. Not that I am personally aware  
 12 of.  
 13 Q. Have there ever been, since Manchester Arena, any  
 14 exercises, such as Griffin, on 10 May, in fact, 2017,  
 15 that tested security for business owners? Has there  
 16 ever been since Manchester Arena an exercise or a test  
 17 of any sort, again in relation to circumstances such as  
 18 Manchester Arena?  
 19 A. I'm personally unaware.  
 20 Q. You're not aware of any. So what we have here is  
 21 a plethora of exercises, tabletop or otherwise, both  
 22 before Manchester Arena, Winchester Accord and others,  
 23 and indeed after Manchester Arena, but still the  
 24 problems that pertained specifically to venues like  
 25 Manchester Arena, there still hasn't been an exercise

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1 about it?  
 2 A. Not that I'm aware of.  
 3 Q. Would you accept that was a problem and inappropriate  
 4 before Manchester Arena that there wasn't such an  
 5 exercise?  
 6 A. I agree there's probably an opportunity to do that.  
 7 Q. And indeed if there's a problem not doing it before  
 8 Manchester Arena, there's certainly a problem now for  
 9 not doing it since Manchester Arena?  
 10 A. I would agree.  
 11 Q. Thank you. Who is responsible for initiating these  
 12 exercises, be they tabletop or more significant  
 13 exercises such as Winchester Accord? Who comes up with  
 14 the ideas and the priorities for these exercises?  
 15 A. Well, I imagine -- well, there is a training needs  
 16 analysis done within each agency. But also, at the LRF  
 17 level there is a training and exercise group.  
 18 SIR JOHN SAUNDERS: I think we need to bear in mind that  
 19 different people are responsible and it's not just on  
 20 person. For example, Winchester Accord had a particular  
 21 objective as I understand it and then had  
 22 a sub-objective that was a second matter which was being  
 23 considered on days 2 and 3, and I think it may be that  
 24 different agencies do do it, but ...  
 25 Is that right?

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1 A. Yes.  
 2 MR COOPER: I mentioned a moment ago Winchester Accord and  
 3 you've told us in evidence, Mr Berry, that you were not  
 4 involved in that, but noted yourself that there was  
 5 a confusion over a number of matters including the  
 6 declaration of Plato, lack of communication, problems  
 7 concerning rendezvous points, delays, sections of the  
 8 emergency services feeling that they were not deployed  
 9 correctly.  
 10 As far as that's concerned, were you very, very  
 11 aware of the issues found in Winchester Accord, although  
 12 you didn't attend?  
 13 A. No. I wasn't that well-versed in it, no.  
 14 Q. Again, you're a senior officer, you are an influential  
 15 officer, and became very influential on the night of the  
 16 arena. What is the cascade principle again as far as  
 17 you're concerned? Shouldn't the very lessons learned  
 18 from exercises such as Winchester Accord and others  
 19 certainly come across your desk?  
 20 A. Yes. Not just obviously my desk but through the  
 21 debrief, there will be some learning outcomes. They  
 22 will be fed into a training needs analysis and I would  
 23 hope over the coming period that training will be set  
 24 against that. In the interim as well, safety alerts,  
 25 ops alerts will be sent out, giving updates on perceived

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1 gaps or risks that were identified.  
 2 Q. Did you see any of these?  
 3 A. Yes, I have received an email about some of the issues.  
 4 Q. An email?  
 5 A. I think so, yes.  
 6 Q. From?  
 7 A. A line manager.  
 8 Q. What I'm suggesting to you is that an operation such as  
 9 Winchester Accord, which was terribly prescient as far  
 10 as Manchester is concerned, a year or so later, that  
 11 that should have been brought to not just your attention  
 12 but people like you in your position, cascaded on to  
 13 your desk, and marked as "must read", mustn't it?  
 14 A. I would agree it's important information to have, yes.  
 15 Q. And what now? Has that improved? Is what we're calling  
 16 here in this inquiry as the cascading of information,  
 17 has that improved or is it simply the same that there  
 18 could be another Winchester Accord and once again it  
 19 misses you?  
 20 A. This is not my area of work, but obviously I concede  
 21 there is an issue if I'm not receiving that type of  
 22 information --  
 23 SIR JOHN SAUNDERS: Let's deal with some specifics if you  
 24 don't mind me dealing with them. Winchester Accord  
 25 revealed the FDO could get overloaded.

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: I know that an explanation was given,  
 3 which appears to be largely accepted that it wouldn't be  
 4 like that in real life. But had you known that, would  
 5 you have accepted some information coming out saying:  
 6 look, if we do have this, then the FDO may get  
 7 overloaded and this is plan B, this is what you do, you  
 8 go on the Hailing channel, if you know about it, or you  
 9 do something like that? Did you ever get information  
 10 like that?  
 11 A. No.  
 12 SIR JOHN SAUNDERS: The other thing which undoubtedly failed  
 13 was that the armed police having gone through, the other  
 14 services, ambulance and fire, were not called forward --  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: -- by the police.  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: That's exactly what happened again with  
 19 fire on this night.  
 20 So if you'd heard about that and relevantly someone  
 21 had said, "If that happens this is what you do", that  
 22 presumably would have helped you?  
 23 A. Absolutely, yes.  
 24 MR COOPER: Mr Berry, you might think, and you'd be wrong to  
 25 think, people are having a go at you. That's not the

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1 situation. In certain circumstances it may well be that  
 2 people above you are not giving you the information you  
 3 need and have left you in the lurch. Would you agree  
 4 that that's a possibility?  
 5 A. That they didn't provide that information?  
 6 Q. Yes. It's not just an email, but people who are  
 7 responsible for informing people like you let you down.  
 8 SIR JOHN SAUNDERS: I think you can leave me to say that; is  
 9 that all right?  
 10 MR COOPER: (Overspeaking) of course.  
 11 Let me move on again. I'm moving swiftly through  
 12 what I have to ask, quicker than I thought.  
 13 I am going to take you now -- under the same heading  
 14 of warnings and what warnings were out there, I want to  
 15 take you to paragraph 43 of your statement, please.  
 16 There you say:  
 17 "On the NILO courses, we were told that the UK was  
 18 expecting an attack. The likely targets were thought to  
 19 be Manchester or [irrelevant and sensitive]. This is  
 20 what is meant as the battle rhythm."  
 21 You have referred to that:  
 22 "An attack was expected and it was thought this  
 23 would be a similar style to Paris, multi-seated,  
 24 starting with an explosion."  
 25 It may well be that the purport of that statement

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1 has been slightly disjuncted because of the perfectly  
 2 proper redactions but I just want to understand what  
 3 you're saying here. So the NILO courses that you are  
 4 referring to, when were they taking place?  
 5 A. The NILO course I attended, I think we said, in  
 6 October 2016.  
 7 Q. 2016:  
 8 "... told [you] that the UK was expecting an attack  
 9 [operationally sensitive], the likely targets were  
 10 thought to be Manchester..."  
 11 Do I understand from that that in the NILO courses,  
 12 not only were you told the UK was expecting an attack  
 13 but the likely target was thought to be Manchester and  
 14 somewhere else?  
 15 A. That's correct, and obviously we were at level severe at  
 16 that time.  
 17 Q. Yes. So far we have analysed the fact that the nation  
 18 was at severe level. But here I just want to drill down  
 19 into the fact that not only were emergency services  
 20 informed, and you were informed as far as fire is  
 21 concerned, and other NILOs, but not only was the country  
 22 under severe risk, Manchester specifically was?  
 23 A. That's the information I was being given.  
 24 Q. I'm going to be careful here because obviously none of  
 25 us want to give succour to murderous terrorists so

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1 please feel free without any criticism from anyone to  
 2 tell me if I am asking you questions that may be  
 3 operationally sensitive. And a simple yes or no might  
 4 assist.  
 5 Was detail given in these courses that were attended  
 6 by NILOs as to precisely what sort of risk or what  
 7 venues might be at risk as far as Manchester is  
 8 concerned?  
 9 A. No.  
 10 Q. No. Was, and again I can't see how it would be  
 11 sensitive, it's historic now, do I understand from that  
 12 answer that Manchester Arena was not mentioned in any of  
 13 these courses as being a likely target?  
 14 A. It was certainly never mentioned specifically.  
 15 Q. It was mentioned specifically?  
 16 A. It was not. Was not. It was more about the capacity or  
 17 area of people, you know, in crowded places.  
 18 Q. Could it be said, I keep prefacing it with please tell  
 19 me if I'm straying where I shouldn't go, that during  
 20 these courses in 2016, although the arena wasn't  
 21 mentioned, the types of places that were mentioned,  
 22 generically, would clearly have included places like the  
 23 arena?  
 24 A. Yes.  
 25 Q. So it is correct to take away from this evidence, is it,

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1 that a year or so, maybe less, before Manchester Arena  
 2 was bombed and 22 people lost their lives, those who  
 3 were responsible for looking after us expected an attack  
 4 in Manchester and expected an attack in a place such as  
 5 the arena?  
 6 A. That was what I was being told, yes.  
 7 Q. Who was telling you this?  
 8 A. Some of the people who lectured on the course.  
 9 Q. I presume that's right.  
 10 A. Yes.  
 11 Q. Can you tell us who these people were? Not names  
 12 of course but their positions.  
 13 A. People who had specialisms, who had —  
 14 Q. Security people?  
 15 A. Yes.  
 16 Q. People from MI5, for instance?  
 17 A. Possibly.  
 18 Q. Possibly. Were the police lecturing at these courses in  
 19 2016?  
 20 A. Yes, there were multi-agency people talking.  
 21 Q. It's a short paragraph but I'm suggesting to you it's  
 22 an important paragraph, 43:  
 23 "This is what is meant by the battle rhythm. An  
 24 attack was expected."  
 25 And from your evidence now was expected in a place

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1 such as Manchester Arena in Manchester:  
 2 "It was thought this would be of a similar style to  
 3 Paris, multi-seated, starting with an explosion."  
 4 As a result of that knowledge, do you now, and I'm  
 5 not asking for detail, do you know what steps were taken  
 6 to protect places such as Manchester Arena and alert  
 7 people responsible for the safety of Manchester Arena as  
 8 a result of this expectation?  
 9 A. I am not privy to that. I don't know.  
 10 Q. All right. You don't know whether they were warned by  
 11 the security services, because if the security services  
 12 are giving lectures about this to NILOs, one can assume  
 13 they'll be telling Manchester Arena?  
 14 SIR JOHN SAUNDERS: Okay, I don't think he has given that  
 15 evidence. I am not sure whether he is not giving it  
 16 because he is not meant to give it or because he doesn't  
 17 know and so he said the police were —  
 18 MR COOPER: I think I'm asking a question about MI5 as well  
 19 and —  
 20 SIR JOHN SAUNDERS: You asked security and he said "maybe",  
 21 I think, "I don't know" or "could be".  
 22 A. Yes, they did.  
 23 MR COOPER: I'm grateful, sir.  
 24 SIR JOHN SAUNDERS: We've got a clear answer now.  
 25 MR COOPER: So MI5, I presume?

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1 A. Yes.  
 2 Q. One presumes that if they're giving lectures to NILOs,  
 3 would you accept one naturally assumes they're telling  
 4 the arena owners, SMG, and ShowSec as well?  
 5 SIR JOHN SAUNDERS: I don't think he can answer that.  
 6 MR COOPER: All right. Well, again, I tread carefully here.  
 7 Manchester Arena in 2016, named or otherwise in these  
 8 courses, run by the security services, with the police  
 9 present, was expected, using your words, to be the  
 10 target for an attack. Can you help us, did anyone tell  
 11 Manchester Arena?  
 12 A. I wouldn't know that.  
 13 Q. So potentially, despite these courses that were being  
 14 held in 2016, despite the battle rhythm, which is  
 15 resounding, it seems, around Manchester Arena, it could  
 16 be that no one told them?  
 17 SIR JOHN SAUNDERS: It could be, but he doesn't actually  
 18 know.  
 19 MR COOPER: I will move on. You're absolutely right, sir,  
 20 I will move on.  
 21 SIR JOHN SAUNDERS: Are you leaving paragraph 43?  
 22 MR COOPER: Yes, I am — well, not quite.  
 23 SIR JOHN SAUNDERS: I don't want to take anyone's question  
 24 away from them.  
 25 MR COOPER: It is simply this, sir. I simply was going to

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1 ask so you know — in context I was simply going to,  
 2 just to put it in its place — that it was assumed that  
 3 the attack on Manchester Arena would be a Paris-style  
 4 attack, but it was a different style of attack, which  
 5 I'll ask you about later.  
 6 SIR JOHN SAUNDERS: That is the point I wanted to come to.  
 7 You are specifically warned (a) about Manchester and  
 8 actually crowded places in Manchester, and an attack is  
 9 expected, and it's thought it would be similar to  
 10 a Paris, multi-sited, starting with an explosion. I'm  
 11 sure that made an impression on you, did it?  
 12 A. Yes, but obviously we're focusing currently on  
 13 Manchester, but it wasn't just Manchester.  
 14 SIR JOHN SAUNDERS: No, no.  
 15 A. It was a wider —  
 16 SIR JOHN SAUNDERS: It's not that point that I was trying to  
 17 make. It was that this was not in fact a Paris-style  
 18 attack.  
 19 A. No.  
 20 SIR JOHN SAUNDERS: And one of the reasons why you didn't go  
 21 in was your concern that it was a Paris-style attack.  
 22 I wonder whether the effect of this sort of teaching to  
 23 you has been for you to overemphasise in your own mind  
 24 the fact that it might be a Paris-type attack when in  
 25 fact it wasn't. Do you understand what I mean?

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1 A. Yes, I've reflected on that and I think it did influence  
 2 that. I said yesterday about some of the safety alerts  
 3 that we got internally and that build-up, I called it  
 4 a battle rhythm, but I think it probably did influence  
 5 my response.  
 6 SIR JOHN SAUNDERS: Okay, thank you. That's all I wanted to  
 7 know.  
 8 MR COOPER: I have some other questions that I don't then  
 9 have to ask.  
 10 Let me move on then to your paragraph 47, just  
 11 something on North West Fire Control, please. There is  
 12 an intonation, if I can put it that way, in the way you  
 13 write this and I want to just for a moment clarify it.  
 14 You say this:  
 15 "Given that I had requested four appliances from  
 16 NWFC, I would have expected that they would also contact  
 17 a station manager or above to mobilise... the incident."  
 18 It's just that when you say you would have expected,  
 19 and I wanted to enquire of you, why would you have  
 20 expected that?  
 21 A. I did say I wanted four fire engines, but I suppose  
 22 at the time I expected them to put the command support  
 23 around that.  
 24 SIR JOHN SAUNDERS: Okay, so he would, the station manager  
 25 would be the person in command and control, the one that

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1 Mr Horwell was asking you about?  
 2 A. So in the incidents where I made pumps four for an  
 3 incident, there's an action plan for that, and a series  
 4 of actions plus resources that would get sent to that  
 5 incident, including the incident commander.  
 6 SIR JOHN SAUNDERS: In fairness to NWFC, they are asking you  
 7 for advice as what to do.  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: And they could fairly say, couldn't  
 10 they: if you expected us to contact a station manager,  
 11 you should have told us?  
 12 A. Yes. I suppose I'm being specific there, but actually  
 13 what I'm saying is I would have expected them to go to  
 14 the action plan for four pumps, four fire engines and  
 15 what that entails.  
 16 SIR JOHN SAUNDERS: That's a bit of a leap, isn't it?  
 17 A. That's not to say that I understand why they didn't.  
 18 SIR JOHN SAUNDERS: Okay. You accept that may be your  
 19 fault?  
 20 A. Yes.  
 21 MR COOPER: At paragraph 52, please, still dealing with  
 22 North West Fire Control. You say this:  
 23 "I was told during the initial phone call that North  
 24 West Fire Control were not mobilising any appliances to  
 25 the arena. It was put to me on the basis that, 'We are

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1 obviously not mobilising'. The decision had therefore  
 2 been taken by NWFC. This was an unusual call to receive  
 3 as a NILO."  
 4 Can you explain that, please, a little further than  
 5 you do in your statement? Elaborate, please.  
 6 A. Yes. I would expect them to --- and I said it  
 7 yesterday --- to mobilise first and then inform me.  
 8 Q. Why?  
 9 A. Because that's the agreed procedure.  
 10 Q. And when the agreed procedure --- because you've  
 11 explained to us that policy and procedure is important  
 12 to you --- when that seemed to have been breached by  
 13 NWFC, you no doubt took great exception to it?  
 14 A. Like I said yesterday, I expected them to mobilise, but  
 15 I think it's reasonable that they didn't, so that  
 16 confused me in the sense of I'm now being approached ---  
 17 Q. Might that --- I don't speak for NWFC and I just put this  
 18 to you as a hypothesis: might that have been them being  
 19 flexible about policy and procedure to move matters  
 20 forward? A good example perhaps on this occasion?  
 21 A. Yes, they ---  
 22 Q. Because it is possible, isn't it? I'm not suggesting it  
 23 was there, but I'm just putting it as a hypothesis.  
 24 It is possible, isn't it, going back to this major issue  
 25 we suggest to you, policy? It is possible to be

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1 flexible with policy, isn't it, when sometimes lives  
 2 need to be saved?  
 3 A. Absolutely, yes.  
 4 Q. You have made attempts to speak to the FDO and you have  
 5 been asked a myriad of perfectly helpful questions as  
 6 far as that is concerned. Mr Horwell covered it  
 7 comprehensively, but there's only one other matter  
 8 I want to ask you about in terms of your difficulty.  
 9 You didn't seem to have many telephone numbers of  
 10 relevant people to call on your mobile phone for  
 11 instance, on your personal mobile?  
 12 A. On my work mobile, yes.  
 13 Q. That's just something I want to interrogate a little  
 14 further. Why was that? You're a man who's worked  
 15 in the profession for some time, you'll have made  
 16 contacts. You'll know who's who. Why didn't you have  
 17 these numbers that may have been very helpful on the  
 18 night?  
 19 A. Those were the numbers --- well, the number that was  
 20 provided for me and nobody else had any additional  
 21 numbers that I'm aware of.  
 22 SIR JOHN SAUNDERS: I do find it odd you didn't have the  
 23 NWAS NILO.  
 24 A. Yes, that was standard, I would say, across all the  
 25 NILOs.

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1 SIR JOHN SAUNDERS: You wouldn't have it?  
 2 A. No.  
 3 SIR JOHN SAUNDERS: You wouldn't be told it when you were on  
 4 duty —  
 5 A. No.  
 6 SIR JOHN SAUNDERS: — "This is your opposite number who  
 7 you are meant to combine with"?  
 8 A. That's all in place now, but at the time, yes.  
 9 MR COOPER: One of the reasons may be that in terms of  
 10 operational work, you were out of the loop, you were  
 11 a policy man, you were a head office man, I use that in  
 12 inverted commas, you'd lost touch with these people?  
 13 A. Well, I disagree with that because if somebody would  
 14 have been operational, you'd guess then and they were  
 15 in the same position I was.  
 16 SIR JOHN SAUNDERS: Let me return to what may be sounding  
 17 like a bit of an obsession of mine, about the NWAS NILO?  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: The fact of the matter is that the NILO  
 20 network is set up to connect with each other, to  
 21 interact with each other in an emergency.  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: What you need then is the number. And  
 24 as a matter of routine, as a matter of procedure,  
 25 a matter of policy, you were not supplied with it.

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1 There wasn't a thing saying: on the night when you're on  
 2 duty, you are to know the number of the NILO for NWAS,  
 3 just as you knew the FDO's number, who I suppose was  
 4 in the equivalent position. You're now saying it is  
 5 done now —  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: — no doubt as a result of what happened  
 8 on 22 May.  
 9 A. Of course.  
 10 SIR JOHN SAUNDERS: But it was perfectly predictable that  
 11 you needed it. If you need to be in contact with  
 12 someone you're going to liaise with, you need to know  
 13 how to contact them?  
 14 A. There was an oversight, yes.  
 15 SIR JOHN SAUNDERS: Not an oversight of yours, an oversight  
 16 of the policy.  
 17 A. Policy or — yes.  
 18 SIR JOHN SAUNDERS: Or procedure?  
 19 A. Yes.  
 20 MR COOPER: Indeed there were some, for instance, voicemail  
 21 messages, I don't need to go to them, I think they've  
 22 been covered. For instance, one from North West Fire  
 23 Control that you didn't receive until the following day.  
 24 A. Yes.  
 25 Q. Is that because you weren't accessing your phone for

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1 messages during that night?  
 2 A. I could have done but obviously you know now that I was  
 3 busy throughout the incident.  
 4 Q. I understand you were busy, I'm not trying to decry  
 5 that. Let me make it very clear indeed: we are all  
 6 acutely aware of the urgency of the matter, but  
 7 nonetheless, wouldn't it be something that might have  
 8 been on your mind, "Who's been trying to contact me?  
 9 Maybe the FDO has been trying to contact me and left  
 10 a message?" Did it not cross your mind, for instance,  
 11 to check your phone?  
 12 A. I was driving most of the time.  
 13 Q. Well, if we're in the criminal courts I think you'd  
 14 probably have to be given the statutory warning before  
 15 my next question. That is, when you were driving, were  
 16 you still making calls? That's not a criticism by the  
 17 way.  
 18 A. I continued making calls because it was in a cradle.  
 19 Q. Of course. It wasn't a trick question. What I'm  
 20 suggesting is you had access to your telephone despite  
 21 the fact you were driving, didn't you?  
 22 A. Yes.  
 23 Q. And when you stopped the car, for instance, you could  
 24 have thought, as many of us do, I will just access my  
 25 mobile phone messages, there might be an important one,

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1 say, from the FDO?  
 2 A. If I'd have had the opportunity, yes, but I think you  
 3 can see already that I was busy throughout the incident.  
 4 Q. The fact of the matter is, as has already been covered,  
 5 you made various attempts to contact the FDO, you  
 6 weren't aware of the Hailing channel, and you didn't ask  
 7 the Fire Control for any substitute information. That's  
 8 where we are, isn't it?  
 9 A. I did ask for the information, yes.  
 10 Q. But didn't get it from them?  
 11 A. I didn't get any, no.  
 12 Q. I want to ask you this, because it's something that  
 13 hasn't been covered and it's been confusing me for some  
 14 time now. It's how the team is put together. We know  
 15 the team that develops, Levy, Meakin, we know Fletcher  
 16 gets involved, a perfectly senior man, and various other  
 17 people seem to coalesce into certain positions. You're  
 18 making telephone calls to people while you're driving  
 19 down, and this is the team that's being formed, as far  
 20 as fire is concerned, to deal with this terribly,  
 21 terribly atrocious event.  
 22 It all seemed a little ad hoc, would you agree? The  
 23 team is being formed whilst you're driving down to  
 24 Manchester. Was there any structure put in place in  
 25 advance of this as to who the names would be or was it

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1 simply a matter of you contacting those who you felt  
2 would be appropriate?  
3 A. Well, I mobilised the NILOs, the other two NILOs, and  
4 they were on duty. I knew that they had that specific  
5 reference that night. As for John Fletcher and others,  
6 and Mick Lawlor, they were off duty.  
7 Q. So was it down — and I'm not actually criticising you,  
8 I'm trying to work this out. So you were responsible  
9 for putting the Manchester Arena fire team together,  
10 effectively?  
11 SIR JOHN SAUNDERS: I think we've heard that North West Fire  
12 Control contacted Mr Nankivell; is that right?  
13 A. I asked them to.  
14 SIR JOHN SAUNDERS: And he would then —  
15 A. Call me back.  
16 SIR JOHN SAUNDERS: Cascade it up?  
17 A. Yes.  
18 SIR JOHN SAUNDERS: So we've got him.  
19 MR COOPER: That's the tree, is it? I have to say, I'm not  
20 criticising you, I see how it works. Basically, the  
21 team that reacted to this atrocity was put together by  
22 you?  
23 A. Some of the resources, yes. The resources on the night.  
24 Q. It's a clear question. It's not necessarily critical,  
25 I just need to understand this. The team that

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1 Manchester Fire Service put together to deal with this  
2 atrocity was put together by you?  
3 A. Initially, yes.  
4 Q. When you say initially, did someone else take over?  
5 A. I believe later on there was more vehicles and resources  
6 put at the RVP.  
7 Q. Was that part of policy and procedure that in an event  
8 such as this, which was fast moving, was it policy and  
9 procedure that it would be someone in your position's  
10 responsibility to put at least the initial team  
11 together?  
12 A. Again, I suppose we were working on the information we  
13 got and I was putting the team together, reacting to the  
14 information I was given.  
15 Q. I understand that, but my question was: was this part of  
16 policy? You're a policy man. Was this part of —  
17 A. I'm not the policy man.  
18 SIR JOHN SAUNDERS: Don't go back there.  
19 MR COOPER: I'm not going there.  
20 I'm asking you nonetheless about policy. What was  
21 the policy? What was the procedure? Was it that the  
22 duty NILO puts the team together until and unless other  
23 people can take over and nuance it?  
24 A. No. It's more a case of getting the information  
25 I required, going back to Control and saying, "This is

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1 the type of incident we've got, this is the resources  
2 that I would like you to send".  
3 SIR JOHN SAUNDERS: So when you have a situation, which we  
4 do, on a number of action cards where what is said is to  
5 contact the NILO and get his advice, is it part of your  
6 training that that advice includes getting the resources  
7 you need to wherever?  
8 A. Yes.  
9 SIR JOHN SAUNDERS: Getting the hierarchy in place in order  
10 to run it as well, is that part of the advice you're  
11 giving?  
12 A. Yes.  
13 SIR JOHN SAUNDERS: So it is part —  
14 A. And that command structure — sorry, I interrupted you.  
15 SIR JOHN SAUNDERS: I talked across you, that's my fault.  
16 Is that how it's meant to work as part of your  
17 advice job?  
18 A. No, you would identify an officer in charge or that  
19 might be the officer on the fire engine, or it might be  
20 a flexi duty officer, a station manager and above.  
21 SIR JOHN SAUNDERS: And you never did that?  
22 A. Because the four pumps became redundant in the sense of  
23 it now became a specialist response and I've established  
24 already that the specialist response didn't really have  
25 an identified command structure around it.

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1 SIR JOHN SAUNDERS: So that's where the problem is, is it?  
2 A. It's an issue. In a sense I've got four pumps there  
3 I could actually use in the cold zone that were above  
4 and beyond at that time, that would have been on an  
5 action plan.  
6 SIR JOHN SAUNDERS: But at that time you're thinking —  
7 well, you're actually mobilising the special response  
8 team.  
9 A. Yes.  
10 SIR JOHN SAUNDERS: You know one is coming. So you'd expect  
11 there to be a commander appointed for them or you do it?  
12 A. That was my training, that the NILOs and the specialist  
13 response went to the incident.  
14 MR COOPER: So you're doing all this, are you, while you're  
15 driving from your home to the arena on the night?  
16 A. Yes.  
17 Q. On top of receiving, no doubt, countless other demands  
18 upon your time as duty NILO?  
19 A. Yes.  
20 Q. Whilst getting involved in roadworks, driving, in your  
21 statement, down winding country lanes and generally  
22 getting lost?  
23 A. Yes.  
24 Q. Would you accept then from me that whatever policy,  
25 procedure or process puts those demands on you, to do

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1 all that as well as putting a team together is too  
 2 onerous, particularly when you're also driving, no doubt  
 3 at speed on blue lights, to an emergency? Would you  
 4 accept that whatever was expected of you was far too  
 5 onerous?  
 6 A. It was a lot of work, yes.  
 7 SIR JOHN SAUNDERS: You have accepted that you made  
 8 mistakes.  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: A number of them. You had become the  
 11 single point of failure for the Fire Service, hadn't  
 12 you?  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: And is the reason for that the amount,  
 15 the load of responsibility that was put on you that  
 16 night, which was just too much?  
 17 A. Yes. I did try to manage it by sharing that with the --  
 18 trying to contact the FDO and so forth, but yes, it was  
 19 very demanding.  
 20 MR COOPER: The chair's already indicated this inquiry is  
 21 not interested in scapegoats, obviously issues will be  
 22 balanced as to responsibilities, but I am inviting you  
 23 not to have a misplaced loyalty to the Fire Service and  
 24 if you feel, for the sake of people in the future,  
 25 things need to be said, now is your time to say it and

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1 you'll be thanked for it.  
 2 Now, were the responsibilities being placed upon you  
 3 at this time, on top of everything else, having to  
 4 choose a team, too much?  
 5 A. Like I said yesterday, we had never practised mobilising  
 6 to an incident of this type. It wasn't until the night  
 7 we realised there was an issue. Following the incident,  
 8 it was debriefed and now we have different circumstances  
 9 that we've talked about and working from home and so  
 10 forth.  
 11 Q. So those responsible for training and preparing you and  
 12 your colleagues at this crucial moment failed you?  
 13 A. I wouldn't put it failed --  
 14 Q. You might not, but I'm putting it to you. They failed  
 15 you.  
 16 A. I was in a position that night that was very difficult.  
 17 No one obviously foresaw it, because I'm sure we'd have  
 18 done something about it --  
 19 SIR JOHN SAUNDERS: For whatever reason, and it's obviously  
 20 a mistake, no practice had been done on mobilisation, so  
 21 you couldn't see in practice why it didn't work.  
 22 Did you need to practice not to foresee there could be  
 23 these sort of problems with mobilisation? Did it really  
 24 need it to go wrong in practice before you could see  
 25 that it would? Do we need hindsight (overspeaking) --

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1 A. Sorry, I have done it again, talking over you.  
 2 SIR JOHN SAUNDERS: No, it is my fault.  
 3 A. It was never foreseeable that we wouldn't get hold of  
 4 the FDO --  
 5 SIR JOHN SAUNDERS: Okay, that's a bit of an issue.  
 6 A. -- and the information that we required.  
 7 SIR JOHN SAUNDERS: You say it was not foreseeable. I think  
 8 you could possibly say it was not foreseen, but just  
 9 leave the foreseeability to me.  
 10 A. Okay.  
 11 MR COOPER: Reluctantly, I'll leave it there.  
 12 SIR JOHN SAUNDERS: Fine. I've got the point.  
 13 MR COOPER: Absolutely. That's why I said I'll leave it  
 14 there.  
 15 GM Levy said, and I'm looking to paragraph 89 if you  
 16 want to check the terminology, that he wanted to be the  
 17 officer in charge. He wanted to be the officer in  
 18 charge.  
 19 A. Yes.  
 20 Q. Again, I am just trying to work out how this is  
 21 happening. You've picked your team. In due course one  
 22 of your team says, not, "Let's have a talk about this",  
 23 but, "I want to be the officer in charge". Why did he  
 24 want to be the officer in charge? Weren't you doing  
 25 your job?

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1 A. You'd have to ask Mr Levy that.  
 2 Q. Don't worry about that. But I'm asking you while you're  
 3 here. Was your interpretation of that that Mr Levy  
 4 didn't think you were doing your job?  
 5 A. No, I'd only just arrived.  
 6 SIR JOHN SAUNDERS: How long had Mr Levy been there?  
 7 A. I now know he'd been there 5 minutes before me.  
 8 SIR JOHN SAUNDERS: Was there anything to stop him taking  
 9 charge before you arrived and just getting on with it?  
 10 A. No.  
 11 MR COOPER: Was there an issue between you and Mr Levy?  
 12 A. No.  
 13 Q. Really?  
 14 A. Really.  
 15 Q. And you willingly handed over responsibility, did you?  
 16 A. I've nothing to hand over, I wasn't in charge anyway,  
 17 I was tactical adviser.  
 18 Q. You say in your statement:  
 19 "Given that I had been stuck in the car for  
 20 a considerable period of time, I had no issue with  
 21 this."  
 22 Was that on the basis that you thought he knew far  
 23 more than you knew?  
 24 A. Yes, I assumed, because I'd mobilised quite some time  
 25 earlier, that they'd been there for some time.

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1 Q. Shouldn't he have been duty NILO from the start then if  
2 the system is working correctly?  
3 A. In what sense, sir?  
4 Q. In many senses. Here we have a situation where you, the  
5 duty NILO, is getting lost in a glorious countryside of  
6 Cheshire, knowing nothing about what is going on and  
7 here we seem to have, if you're telling us correctly  
8 here, GM Levy, who's eminently suitable and there on the  
9 scene.  
10 SIR JOHN SAUNDERS: Was he on duty that night?  
11 A. Yes.  
12 SIR JOHN SAUNDERS: As the second one on duty, as it were?  
13 A. He was the second one to arrive.  
14 SIR JOHN SAUNDERS: They called you. Did they call you  
15 because you were the first on duty, as it were?  
16 A. We're all exactly the same.  
17 SIR JOHN SAUNDERS: So any one of you could have been  
18 called?  
19 A. But that night, I am the point of contact, I am the  
20 nominated person.  
21 SIR JOHN SAUNDERS: You were nominated to be the person they  
22 should contact first?  
23 MR COOPER: Who nominated you?  
24 A. It's done on a rota basis.  
25 MR GREANEY: So you know there were four duty NILOs for the

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1 Fire and Rescue Service of whom Mr Berry was one,  
2 Mr Meakin was another and Mr Levy was a third.  
3 A. Can I just be clear on that? I am the nominated duty  
4 NILO for that shift.  
5 SIR JOHN SAUNDERS: So you're the one who should be  
6 contacted first and that goes in rotation so you're not  
7 always the first to be called?  
8 A. Yes. However, we are all NILOs of an equal footing.  
9 MR COOPER: Briefly this: was there not an opportunity,  
10 immediately the moment you realised you were in  
11 difficulty to say, well, Levy should be the officer in  
12 charge here, straightaway?  
13 A. Why would I do that, sir?  
14 Q. Because you knew nothing about what was going on and you  
15 were getting lost in the countryside.  
16 A. No, but I've mobilised them, sir. You have perhaps  
17 misunderstood this. Once I've been notified there was  
18 an active shooter, I've organised for the specialist  
19 response to go to Philips Park. That includes two NILOs  
20 to be the on-scene commanders. However, you'd be better  
21 speaking to Ben why he decided that at that point.  
22 Q. I'll tell him you suggested that.  
23 A. You can do, yes.  
24 Q. I will move on. Effectively, you have told us that  
25 in the middle of all this, you didn't receive the

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1 British Transport Police or NWS METHANE messages;  
2 is that right?  
3 A. Correct.  
4 Q. We've already examined the effects of that. Would you  
5 actually describe this developing situation as  
6 a complete and utter fiasco as far as fire is concerned?  
7 Fiasco. I don't mince my words.  
8 A. All we need is the information and we will go forward  
9 every time.  
10 Q. But I'm suggesting for whatever reason, and it's  
11 a matter for the chair, and it's not necessarily all  
12 at the door of fire, but for whatever reason, this whole  
13 situation was developing at this stage now into  
14 a complete and utter fiasco, wasn't it?  
15 A. It's very difficult. When a terrorist sets a bomb off,  
16 you lose the initiative.  
17 SIR JOHN SAUNDERS: Can we just stop for a moment? Whatever  
18 the reason, you may be able to agree with what Mr Cooper  
19 is saying because if we now look back, and you turn up  
20 2 hours after the bomb has gone off, in the result it  
21 was a fiasco for the Fire Service and I think they've  
22 already said that, so I think you can agree.  
23 But what you're saying is there are actually, from  
24 your point of view, reasons why it developed in the way  
25 it did?

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1 A. That's correct.  
2 SIR JOHN SAUNDERS: Will that do?  
3 MR COOPER: That'll do, sir.  
4 SRT. At the outset of all this, your concern was  
5 this was an MTFA; is that right?  
6 A. It was in my thinking.  
7 Q. You were having a telephone conversation with  
8 Mr Buckley?  
9 A. Yes.  
10 Q. You were prompted by this call to make a decision about  
11 SRTs; is that right?  
12 A. Whether I want to possibly use it.  
13 Q. And what was your decision?  
14 A. I said, yes, return it to station, yes.  
15 Q. Is the nature of the SRT capability that relevant  
16 officers are often away from the vehicle and attending  
17 on other incidents?  
18 A. That can be true, yes.  
19 Q. And did you instruct, through whatever channel, them to  
20 return to their bases immediately?  
21 A. Yes.  
22 Q. And as far as you are concerned was there any delay in  
23 the potential deployment of the SRT?  
24 A. I'm unaware of that, if there was a delay.  
25 Q. But the reality was at the end of day there was no SRT

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1 deployed in this event, was there?  
 2 A. No.  
 3 SIR JOHN SAUNDERS: I think it did arrive at Philips Park.  
 4 MR GREANEY: Sir, the two SRT teams did go to Philips Park  
 5 and from Philips Park to Thompson Street, but they never  
 6 deployed to the arena.  
 7 SIR JOHN SAUNDERS: Thank you.  
 8 A. However, I did request them.  
 9 MR GREANEY: That's also correct, yes.  
 10 SIR JOHN SAUNDERS: Thank you.  
 11 MR COOPER: A few matters which, again, you have not been  
 12 asked about, but I want to clarify. We'll hear from  
 13 Mr Nankivell, but there is a potential view that  
 14 Mr Topping, the command support officer, was present.  
 15 Can I ask you what a command support officer is and  
 16 would you agree that they are a vital participant in  
 17 this?  
 18 A. Yes. The command support officer — we have a command  
 19 support vehicle, but they are the person — the officer  
 20 is the person that will link in with the officer in  
 21 charge to take some of those functions away in the sense  
 22 of support the officer. So they keep the fire spans of  
 23 control so they don't become overwhelmed.  
 24 Q. So they're important, make an important contribution?  
 25 A. Yes.

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1 Q. It may be said by Mr Nankivell that he observed that  
 2 Mr Topping was cold-shouldered by attending NILOs.  
 3 Cold-shouldered by attending NILOs. What do you say  
 4 about that? That's paragraph 73 of Nankivell's  
 5 statement for those who want to see it. Did you  
 6 cold-shoulder him?  
 7 A. I don't even remember seeing Mr Topping that evening.  
 8 Q. All right. I'll try and ask a general question to  
 9 encompass a number of questions. The chief fire  
 10 officer, who's that?  
 11 A. At the time?  
 12 Q. Yes.  
 13 A. Mr Peter O'Reilly.  
 14 Q. From your work with him on that night, were you happy  
 15 with the way he conducted himself?  
 16 A. I was blind to a lot of what he did on the night. My  
 17 interaction was around the warm zone and I had requested  
 18 the specialist response to come to the arena and he  
 19 asked me — he didn't ask me, he said I wasn't going to  
 20 get it, he was saving it for something else.  
 21 Q. Did he seem to have a grasp of command from your contact  
 22 with him?  
 23 A. Command of what, sir?  
 24 Q. In terms of making the correct decisions that were asked  
 25 of him by you, for instance.

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1 A. All I can say is he is obviously aware of another  
 2 incident that was ongoing at the time and he's probably  
 3 better placed than me to suggest where that resource —  
 4 Q. You were asking, for instance, for deployment in the  
 5 warm zone, weren't you?  
 6 A. I wanted the specialist response to go down to the warm  
 7 zone because I'd just been told it was Op Plato.  
 8 Q. And during that conversation with him and your  
 9 colleague — and I can take you to your Kerslake  
 10 interview if I have to, page 70 — but during that  
 11 conversation the chief fire officer hung up on you and  
 12 your colleague, didn't he?  
 13 A. Is this the one with Mark Dexter?  
 14 Q. When you were discussing deployment into the warm zone.  
 15 A. Yes. He'd gone off the phone before I spoke to him.  
 16 SIR JOHN SAUNDERS: Can I just set the scene for this so  
 17 I understand and make sure that I do? We know, I think,  
 18 that the other NILOs in any event found it curious, to  
 19 say the least, that you weren't sending the SRT and you  
 20 were sending ordinary fire engines to the scene.  
 21 Is that right?  
 22 A. Yes, I was told I was taking the fire engines, yes.  
 23 SIR JOHN SAUNDERS: Were you aware that they found that an  
 24 odd decision to be taken by Mr O'Reilly?  
 25 A. Sorry, are we talking about the firefighters?

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1 SIR JOHN SAUNDERS: No, we're talking about the other NILOs.  
 2 A. Yes. All the NILOs agreed that we should be sending the  
 3 specialist response.  
 4 SIR JOHN SAUNDERS: So when Mr O'Reilly said you should take  
 5 the ordinary ones, there was some —  
 6 A. Yes, debate.  
 7 SIR JOHN SAUNDERS: But of course you didn't know about his  
 8 conversation with Mr Hynes?  
 9 A. No.  
 10 SIR JOHN SAUNDERS: Which — perhaps you still don't know  
 11 about his conversation with Mr Hynes.  
 12 A. Not really, no.  
 13 SIR JOHN SAUNDERS: Anyway, we know that's where the idea  
 14 came from. So when the discussion took place about  
 15 sending ordinary, please forgive the expression,  
 16 firefighters into the warm zone, did you ever actually  
 17 know what his answer was to that?  
 18 A. No. Not until later when he rang me back to ask me if  
 19 I'd put them into the warm zone.  
 20 SIR JOHN SAUNDERS: And by that time they were in the warm  
 21 zone?  
 22 A. They were in anyway.  
 23 SIR JOHN SAUNDERS: Did he agree with that?  
 24 A. Yes, he sent me a text.  
 25 SIR JOHN SAUNDERS: To say?

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1 A. "Well done."  
 2 MR COOPER: On the same issue as decisions made by the  
 3 chief, paragraph 124, please, of your statement.  
 4 A matter of acute concern to those we represent. You  
 5 say:  
 6 "The chief seemed pleased with the progress I had  
 7 made. I discussed more resources with him and told him  
 8 that we wanted to help NAWAS lift casualties. They were  
 9 waiting for stretchers to come back. I referred to the  
 10 resources I had requested from the RVP, which could do  
 11 this. It was at this stage that the chief told me this  
 12 would not be happening and he was going to keep the MTFA  
 13 capability in case of a second attack. In my view  
 14 a second attack was the reason for having Merseyside  
 15 Fire and Rescue Service on standby."  
 16 So again, another decision here from the chief,  
 17 you're telling us, whereby you and your colleagues  
 18 wanted to help NAWAS lift casualties and were waiting for  
 19 stretchers, and the chief said, no, those extra  
 20 resources, including stretchers, would, as you put it,  
 21 not be happening. Did that surprise you?  
 22 A. It did.  
 23 Q. Because here's you asking, to your credit, for  
 24 equipment, which could have helped casualties,  
 25 especially it might have helped them being put on

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1 hoardings and metal railings?  
 2 SIR JOHN SAUNDERS: I think that's later than this stage.  
 3 I'm really sorry.  
 4 MR COOPER: Perhaps I'll leave it.  
 5 SIR JOHN SAUNDERS: I don't want to interrupt you but I just  
 6 don't want to go down — I was trying to tell from the  
 7 statement where we're talking about. By the time you  
 8 arrived, and we're talking about after you've arrived,  
 9 all the casualties had come out on the railings. And  
 10 what we do know is that firefighters used trolleys from  
 11 out of the ambulances.  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: But you still wanted more stretchers at  
 14 that stage, did you?  
 15 A. Again, I have just been told it's Op Plato. I am still  
 16 under the understanding — so when I get the initial  
 17 brief from NAWAS of what they want us to help them with,  
 18 which is the P3s and the blankets, I am still aware of  
 19 this bigger area of warm zone and I have just been told  
 20 it's Op Plato, so we need the specialist response.  
 21 SIR JOHN SAUNDERS: You need the?  
 22 A. Specialist response teams.  
 23 SIR JOHN SAUNDERS: Okay. That's what you told the chief  
 24 fire officer?  
 25 A. What I'd done is I'd sent it over the Airwave, back to

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1 the RVP or Thompson Street, to Ben Levy, saying, "Send  
 2 me everything down".  
 3 SIR JOHN SAUNDERS: Okay. And that didn't happen.  
 4 A. Unbeknownst to me until later, I think in the  
 5 conversation between Mark Dexter I now know, and the  
 6 chief, they talked about an Op Plato standby, which is  
 7 the resources standing by.  
 8 SIR JOHN SAUNDERS: Right, okay.  
 9 A. I think if you go —  
 10 SIR JOHN SAUNDERS: You wanted this large vehicle to come so  
 11 you could have the stretchers off it?  
 12 A. I wanted the specialist response vehicles and any other  
 13 pumps that were there. I wanted it all there.  
 14 SIR JOHN SAUNDERS: And you're being told you're not having  
 15 them?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: That wasn't said to you by the chief —  
 18 A. No.  
 19 SIR JOHN SAUNDERS: — but it was on the chief's direction  
 20 there?  
 21 A. When I got to the meeting, the JESIP meeting with the  
 22 others, he then says, "And they're staying up there".  
 23 That's the first time I say, "What, still at the  
 24 station?"  
 25 SIR JOHN SAUNDERS: So that's O'Reilly saying that to you?

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1 A. Yes. O'Reilly never said it to me until a second phone  
 2 call after that. I know it's a bit confusing, but  
 3 I hope I've made sense of it.  
 4 MR COOPER: Sir, I am conscious of the time. If I was given  
 5 a little longer, 20 minutes, it may be I would finish  
 6 but I'm conscious also that my learned friend behind me  
 7 has questions as well. I'm well within my time  
 8 estimate, might I say.  
 9 SIR JOHN SAUNDERS: Congratulations.  
 10 MR COOPER: Not at all, sir.  
 11 SIR JOHN SAUNDERS: Keep it up.  
 12 MR COOPER: It may well be perhaps part heard, but I'm  
 13 in the inquiry's hands.  
 14 MR GREANEY: Mr Warnock had 15 minutes. I don't know  
 15 whether that has increased.  
 16 MR WARNOCK: I think I'll be 15 minutes, 20 at the outside.  
 17 SIR JOHN SAUNDERS: So we're talking about going beyond 5.  
 18 I know this can be stressful for members of the  
 19 families. Would you mind going to talk to people at the  
 20 back, Mr Cooper, so they can talk freely to you as to  
 21 whether they would prefer to stop now and come back  
 22 tomorrow or whether they would be happy to go on for a  
 23 bit longer?  
 24 MR COOPER: Of course I will.  
 25 MR GREANEY: Do you want to rise, sir? Thank you.

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1 (4.34 pm)  
 2 (A short break)  
 3 (4.38 pm)  
 4 MR COOPER: I have had an opportunity of speaking to all the  
 5 families that sit behind me and they, subject to your  
 6 view, would prefer to carry on and complete. But I'm in  
 7 the hands of others as well.  
 8 SIR JOHN SAUNDERS: Are you happy? It's important that  
 9 you're fresh enough to answer the questions and I'm sure  
 10 answering questions for a long period of time is  
 11 difficult.  
 12 MR GREANEY: I have spoken to Mr Berry myself and am  
 13 satisfied that he is okay to continue and wishes to do  
 14 so.  
 15 MR COOPER: I'm taking you now, please, to the evidence you  
 16 gave earlier today concerning your arrival at the arena.  
 17 This was about 2 hours later or so.  
 18 Let me again put this straight to you: by the time  
 19 you and your colleagues arrived at the arena, all that  
 20 there was left for you to do was to porter trolleys for  
 21 NWAS? Would that be the blunt assessment of what there  
 22 was left to do?  
 23 A. Obviously, initially I didn't know what there was to do.  
 24 That was part of the assessment. But the majority of  
 25 the work was working alongside NWAS, yes, and assisting

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1 them move casualties.  
 2 Q. I just wanted to get clarity on that, working alongside  
 3 NWAS. I'm aware from recollection, indeed Mr Hynes  
 4 asked for help with the trolleys. But however important  
 5 that was, I think the learned chair took Mr Greaney up  
 6 a little on this in good humour, although there was --  
 7 SIR JOHN SAUNDERS: I seem to be taking up all counsel on  
 8 something today.  
 9 MR COOPER: Absolutely.  
 10 SIR JOHN SAUNDERS: And none of them like it.  
 11 MR COOPER: However important the portering of trolleys was,  
 12 that was all that you and your colleagues were doing,  
 13 wasn't it?  
 14 A. Well, I would say there's a bit more than that. We were  
 15 assisting NWAS.  
 16 SIR JOHN SAUNDERS: You helped with the P3s, but in reality  
 17 that was all that was happening?  
 18 A. That's the stage of the incident, unfortunately, we got  
 19 there, yes.  
 20 MR COOPER: Had you been there for instance 6 minutes after  
 21 detonation, just to compare, so we can get this in  
 22 perspective, you'd have been helping with tourniquets,  
 23 blast dressings, Skeds, and generally assisting the  
 24 casualties, wouldn't you?  
 25 A. Yes.

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1 Q. And you were in fact trained to do this, weren't you,  
 2 not just you, your colleagues, by NWAS for precisely  
 3 this situation?  
 4 A. Yes. And I suppose that's why it's disappointing after  
 5 6 years of training together, they didn't recognise  
 6 we weren't there.  
 7 Q. Would you agree, what a waste of skill and resources?  
 8 A. I agree.  
 9 SIR JOHN SAUNDERS: I think in fairness actually to NWAS,  
 10 the HART team, who are the ones who trained with you,  
 11 did recognise you were not there; it was the other  
 12 paramedics, I think, who didn't. So the ones who  
 13 trained with you were aware of your absence and the  
 14 contribution you could have made had you been there.  
 15 A. That was also the police as well. It was a tri-service  
 16 training.  
 17 MR COOPER: Again, I'm doing this from recollection, I can  
 18 find the reference later, but at least one of your  
 19 colleagues says that he felt that fire had been  
 20 forgotten about by people there. Does that have  
 21 a resonance with you?  
 22 A. I felt it was disappointing. I was very disappointed  
 23 that we hadn't been communicated with.  
 24 Q. Was there a feeling amongst at least some of your  
 25 colleagues that fire had been forgotten about by other

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1 services?  
 2 A. I repeat what I've just said really: yes, by myself and  
 3 the frustration in the firefighters, yes.  
 4 Q. I understand that. I want to ask you about the  
 5 terminology you have used today about risk. You used  
 6 the expression this morning "corporate risk". You said  
 7 that you were considering corporate risk in putting  
 8 non-protected people into the warm zone. What's your  
 9 definition of corporate risk? It seems, if I can  
 10 suggest to you, a rather strange expression to use for  
 11 a blue light service.  
 12 A. There is an impact of committing people who have not got  
 13 the correct PPE, there's an identified risk in that  
 14 area, and we're now being asked or being approached  
 15 about putting people into that area without the correct  
 16 PPE. So that is -- we've trained against it, it's  
 17 a foreseeable risk.  
 18 SIR JOHN SAUNDERS: The risk to the corporation is  
 19 reputational --  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: -- if something happens to them, but  
 22 also health and safety legislation?  
 23 A. Yes.  
 24 SIR JOHN SAUNDERS: Maybe corporate manslaughter? Is that  
 25 what you're thinking of?

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1 A. Yes.  
 2 MR COOPER: Do you think as a result of the lack of help  
 3 that the Fire Service ultimately gave, there should be  
 4 corporate responsibility? If we're dealing with  
 5 corporate risk, it comes with the risk responsibility,  
 6 doesn't there?  
 7 A. I don't think I'm the right person to answer that  
 8 question.  
 9 Q. All right. Because as you said a moment ago, your  
 10 colleagues were, or some of them, were extremely  
 11 emotional about not being able to get in there and do  
 12 their jobs, to be fair? That's right, isn't it?  
 13 A. Yes, we all were.  
 14 Q. We have Mr Topping saying:  
 15 "I have never seen firefighters crying at a debrief.  
 16 Firefighters and officers felt such shame."  
 17 "Firefighters and officers felt such shame."  
 18 Did you feel shame?  
 19 A. Yes. I wanted to be down there like everybody else.  
 20 Q. Says Mr Topping:  
 21 "I felt ashamed to be a firefighter and I felt like  
 22 we had let the people of Greater Manchester down."  
 23 At that time, did you feel ashamed to be  
 24 a firefighter and that you'd let the people of  
 25 Greater Manchester down?

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1 A. Really disappointed and an emptiness that we weren't  
 2 there to be able to provide that, that care.  
 3 Q. If it all, God forbid, happened again, you say things  
 4 would be done differently, do you?  
 5 A. Yes, I think there's been some real steps forward and  
 6 major improvements, yes.  
 7 Q. Are the processes in place to mean that on this  
 8 occasion, given the same circumstances arising again,  
 9 fire would be in there and doing their bit?  
 10 A. Yes, I'm confident, yes, we would do that. We have that  
 11 communication in place now. It is tested regularly.  
 12 Q. When ultimately various firefighters decided to take  
 13 matters into their own hands and go in, you told the  
 14 chair that you saw them go and you felt, good job, sort  
 15 of thing?  
 16 A. Why not, yes.  
 17 Q. Are you sure about that?  
 18 A. Yes. But I was still aware that it was a warm zone. It  
 19 depends what period of time you're talking about because  
 20 they had requested the specialist response, so if the  
 21 specialist response had attended, they'd have gone in.  
 22 Q. You have let them go in, you know what they're going to  
 23 have to deal with. By this time you're aware, are you  
 24 not, of the devastation in the City Room?  
 25 A. Not really, no.

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1 Q. You're standing outside, but let's try and be sensible,  
 2 if I may. You're standing outside the arena, we've seen  
 3 the photographs of the outside of the arena, with  
 4 attending emergency services and people running scared.  
 5 You must have suspected something rather nasty had  
 6 happened inside the arena.  
 7 A. I did know that, yes, that there had been some sort  
 8 of — well, the explosion. But I was never made aware  
 9 of the scale of it.  
 10 Q. No, no, all right. Let's just go with that for the time  
 11 being. Some sort of explosion. Some sort of explosion  
 12 might cause some sort of injury?  
 13 A. Of course.  
 14 Q. Your firefighters are going in there without instruction  
 15 — that's no criticism of them, might I say, from me —  
 16 but going in there without instruction to deal with what  
 17 they may find?  
 18 A. Yes.  
 19 Q. So you are happy for them to go in there, yes?  
 20 A. There's a difference, though. The regular firefighters  
 21 are not aware at this time about zones and MTFAs, so my  
 22 thinking would be very different to theirs and their  
 23 awareness.  
 24 Q. So why did you let them go in? I'm asking for a reason.  
 25 SIR JOHN SAUNDERS: I don't think he did. They went in and

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1 you thought, "You're in so I'll let you stay in";  
 2 is that right?  
 3 A. Yes. Because my assessment in real life was I could  
 4 see —  
 5 SIR JOHN SAUNDERS: But you weren't saying, "Come on, boys,  
 6 let's all go in now", or anything like that, they just  
 7 went in?  
 8 A. No, they were in and they were doing a good job, so  
 9 leave them in.  
 10 MR COOPER: "They were doing a good job so leave them in",  
 11 that's your evidence?  
 12 A. They were making progress with NAWAS.  
 13 Q. So, "They were doing a good job, so leave them in". Did  
 14 you at any stage try to take them out again?  
 15 A. I mentioned it, like I said before, that I'm trying to  
 16 get to grips of what is a warm zone and a cold zone and  
 17 trying to establish — you're telling me it's getting  
 18 cold, there was that conversation.  
 19 Q. I will persist with you, with the inquiry's leave.  
 20 SIR JOHN SAUNDERS: Would you mind answering the question:  
 21 did you try and get them to come out once they'd gone  
 22 in?  
 23 A. I don't remember doing, no.  
 24 MR COOPER: I can remind you and I've given Mr Greaney  
 25 notice of this. It's in rebuttal, as it were, of

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1 evidence that you gave today. You have seen it because  
 2 I know Mr Greaney, very properly, has told me that  
 3 you have. I'm going to put to you again before I take  
 4 you to the material that having let them in or having  
 5 not tried to get them out because, as you've said,  
 6 they're doing a good job, you then even later try to get  
 7 them out again knowing they were doing a good job.  
 8 A. That's not my recollection.  
 9 Q. That's not your recollection. Well, there's a number of  
 10 references I need to take you to, please.  
 11 Mr Lopez, a statement of Mr Simister, {INQ016381/3},  
 12 at the bottom:  
 13 "After this, I broke off from dealing with any  
 14 further casualties, spent my time moving in and out of  
 15 station supervising and checking on the welfare of fire  
 16 crews still assisting with casualties. During this  
 17 period and for around 1 hour after I arrived on the  
 18 scene two further appliances... At one point... Berry  
 19 informed me and crews that we would have to leave the  
 20 scene as we were not wearing ballistic protection.  
 21 I pointed out to him that we could not leave now because  
 22 we were needed and as a service we would be crucified  
 23 even more. I also highlighted to him that the  
 24 Ambulance Service were not wearing ballistic protection  
 25 either. We stayed on scene until all the casualties had

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1 been removed and transported to hospital before  
 2 returning to G16."  
 3 I need to put this in context in fairness to you.  
 4 Can we now go, please, to Day 69, page 163, and  
 5 Mr Greaney's questions of you (sic). Day 69, page 163.  
 6 Lines 3 to 23 {Day69/163:3-23}.  
 7 Mr Greaney says:  
 8 "Question: ... at one stage were you informed by  
 9 SM Berry that you and the fire crews would have to leave  
 10 the scene?  
 11 "Answer: That's correct. We'd not been there long  
 12 and he said, 'We're going to have to leave the scene'.  
 13 I said why and it was because of this Ops Plato, he  
 14 said, 'You're not wearing ballistic gear'. I pointed  
 15 out to him that there was hardly anyone wearing  
 16 ballistic gear by that time, apart from him and the  
 17 armed police, and I don't think we were going to leave.  
 18 So he said then that he would have to speak to the  
 19 chief.  
 20 "Question: In other words, you refused to leave?  
 21 "Answer: We wouldn't have left, no.  
 22 "Question: The way in which you put it in your  
 23 statement, which very clearly illustrates your feelings,  
 24 perhaps, is this:  
 25 "'I pointed out to him that we could not

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1 leave now because we were needed and as a  
 2 service we would be crucified even more."  
 3 "Answer: That's correct, sir.  
 4 "Question: Did you remain on the scene until all  
 5 casualties had been removed?  
 6 And finally, my questions on the matter. Day 69,  
 7 page 201, line 7 {Day69/201:7}, please. I'm asking ...  
 8 I'm just looking down there. Towards the bottom:  
 9 "... I know Andy Berry had concerns because  
 10 10 minutes/5 minutes earlier, he'd realised that Plato  
 11 had been declared..."  
 12 Over the page {Day69/202:2}, please:  
 13 "Answer: Sorry, yes. I'm getting the two -- the  
 14 two are the same but in different ... Yeah, we'd already  
 15 started to go in by then, but then Andy Berry said to  
 16 me, 'We're going to have to go, we're going to have to  
 17 withdraw'. By that time I think the crews were already  
 18 in there and already committed.  
 19 "Question: The question really is designed to get  
 20 to this point: when the crews were in there, the service  
 21 and the help offered to survivors and, sadly, those  
 22 dying as well as a paramedic paired up with a  
 23 firefighter? Would that be right?  
 24 "Answer: That's correct, yes.  
 25 "Question: That firefighter would have all the

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1 equipment, the medical equipment, that you described at  
 2 the start of your answers to me? Is that right?  
 3 "Answer: We didn't need any medical equipment. The  
 4 Ambulance Service..."  
 5 And then, sir, you ask some questions.  
 6 So I have given you the full resonance of the  
 7 evidence, Mr Berry. Would you accept that you, despite  
 8 all you're telling the chair today about what  
 9 a wonderful job they were doing, you actually knowing  
 10 that, still wanted them out because they weren't wearing  
 11 ballistic gear, didn't you?  
 12 A. No. That fits with what I've said whether or not, that  
 13 I had been made aware by Steve Hynes that that was the  
 14 warm zone. I don't think I'd had the conversation at  
 15 that point with Mark Dexter, and I was in that -- we  
 16 might have to come out, I'm just trying to gauge where  
 17 we're up to based on the information --  
 18 Q. Is Mr Simister telling the truth?  
 19 A. I think from his point of view he is, but there may be  
 20 a misunderstanding of what at that moment in time I'm  
 21 trying to achieve.  
 22 Q. I'm going to suggest to you there's no misunderstanding  
 23 there, that he's of the view, and has given such  
 24 evidence that going in, doing a good job, you wanted  
 25 them out again because they weren't wearing ballistic

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1 gear. Yes or no; is that right?  
 2 A. I don't think it's a yes or no.  
 3 Q. All right. One more document I would like to take you  
 4 to and I'm not going to refer to it in any great depth  
 5 but it might be of assistance in due course to the  
 6 chair. This is the debrief of GMFRS, {INQ004253/3},  
 7 which deals with your debrief:  
 8 "From your own perspective [this is a question to  
 9 you] what aspects of Operation Newtown did not go well?"  
 10 I am not going to take you to each and every one of  
 11 those. I'm simply going to obviously refer them to this  
 12 inquiry and ask you, Mr Berry, if there's any bullet  
 13 point there you want to elaborate on or develop or  
 14 simply do you stand by that?  
 15 A. Can I just have a minute to --  
 16 Q. By all means. I'm sure you'll have looked at it before  
 17 because we did flag this as an INQ.  
 18 A. Yes.  
 19 (Pause)  
 20 A. I would say that's a fair reflection, yes.  
 21 Q. Can we look over the page to make sure there's nothing  
 22 tailing over to the next page, Mr Lopez? {INQ004253/4}  
 23 No, there isn't.  
 24 So you adopt then page 3 as to your observations as  
 25 to what went wrong?

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1 A. Yes, because the restrictions around the JOPs on the  
 2 night, about non-specialist responders in the warm  
 3 zone -- and I did later give some feedback to the  
 4 Home Office about my views on what we should do about  
 5 the zones.  
 6 Q. Did you get any response from the Home Office about  
 7 that?  
 8 A. The new JOPs moving forward -- it wasn't just around the  
 9 zones, it was about putting a descriptor on Op Plato and  
 10 that was adopted in the new JOPs, yes.  
 11 MR COOPER: I'm grateful for the court's indulgence. Those  
 12 are my questions.  
 13 Further questions from MR GREANEY  
 14 MR GREANEY: Just before Mr Warnock asks his questions,  
 15 there were three short matters that I wanted to deal  
 16 with.  
 17 First of all, in answer to the perfectly proper  
 18 questions of Mr Cooper this afternoon, Mr Berry first  
 19 equivocated over whether on the NILO course there was  
 20 a lecture from a member of the security services and  
 21 then I think, sir, in answer to a question of yours, he  
 22 said yes. We would urge caution before anyone concludes  
 23 that that is necessarily correct or reports that fact.  
 24 For our part, we are far from sure that it is correct.  
 25 So that is a word of caution. That is not in any way to

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1 be critical of Mr Cooper. His questions, as I have  
 2 said, were entirely proper.  
 3 MR COOPER: I'm grateful for that. Nonetheless, as time  
 4 goes on, if that could be perhaps investigated and  
 5 a definitive position be provided.  
 6 MR GREANEY: I'm sure it can, and indeed I agree that it  
 7 should.  
 8 The second matter -- and this does require input  
 9 from you, Mr Berry -- is that I just wanted to make sure  
 10 that I was clear about your evidence and about the  
 11 requests that were made once you had arrived at  
 12 Thompson Street and subsequently for the deployment of  
 13 the SRT and what the answer was.  
 14 I believe that at Thompson Street, you received an  
 15 instruction from the CSR that you are to deploy with  
 16 non-specialist resources to the scene.  
 17 A. That's correct.  
 18 Q. That that is queried in the sense that you were  
 19 querying, why are we not deploying specialist resources?  
 20 A. Yes.  
 21 Q. And essentially, the message that came back from the CSR  
 22 was: get on with it and deploy non-specialist resources?  
 23 A. Yes.  
 24 Q. There then comes a further time very shortly thereafter  
 25 when the crew are on the pumps. They are about to drive

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1 from Thompson Street, Mr Levy discovers that  
 2 Operation Plato has been declared, stops, and there is  
 3 then a further question raised with the CSR: why are the  
 4 SRT not being deployed now we know Operation Plato has  
 5 been declared? And again the answer that comes back is:  
 6 you should deploy with the non-specialist resources.  
 7 A. Yes.  
 8 Q. Then thirdly, and I didn't ask you about this, but  
 9 you have volunteered it and I believe it to be correct:  
 10 once you were at the scene, you made a further request  
 11 via Mr Levy for resources, including the SRT specialist  
 12 resources to be deployed to the scene?  
 13 A. I did.  
 14 Q. So that's once you're at the arena. And as we will hear  
 15 from Mr Levy tomorrow, again the answer came back "no"?  
 16 A. Well, no. Ben did say, "Yes, I will send them", and  
 17 then conversations happened and they never arrived.  
 18 Q. And they never arrived in the result and we'll ask him  
 19 about that.  
 20 The third matter. You referred to the fact that  
 21 ultimately you did receive some feedback, to use that  
 22 awful phrase, from Mr O'Reilly. He had discovered that  
 23 you had deployed non-specialist assets into a warm zone?  
 24 A. Yes.  
 25 Q. And he sent you a text or WhatsApp message?

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1 A. Yes.  
 2 Q. In fact, we can put that on the screen. It's  
 3 {INQ004188/1}. There are two messages on that page. In  
 4 fact, you're right, it's a text message, from Peter,  
 5 that's Peter O'Reilly. The first is just to alert you  
 6 to a voicemail message timed at 00.53. So that means  
 7 that the message we are concerned with comes after that,  
 8 it isn't timed. It reads:  
 9 "Well done Andy, Pete."  
 10 Is that right?  
 11 A. Correct.  
 12 Q. You understood that to be his reaction to the fact  
 13 that — a better way of putting it is this: that you had  
 14 permitted non—specialist assets to remain in what you  
 15 understood to be a warm zone?  
 16 A. Yes.  
 17 MR GREANEY: Thank you. I raise those matters at this stage  
 18 so if Mr Warnock wishes to ask about them, he is able to  
 19 do so.  
 20 Questions from MR WARNOCK  
 21 MR WARNOCK: Mr Berry, I'd just like to start by looking at  
 22 a couple of policies which I don't think we've looked at  
 23 yet. It's in particular having in mind the relationship  
 24 between mobilisation and incident command and the role  
 25 of the NILO.

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1 Could I ask Mr Lopez kindly to put up {INQ019308/1}.  
 2 This is the Chief Fire Officers Association national  
 3 inter—agency liaison officer guidance document. Is this  
 4 a document with which you're familiar, Mr Berry?  
 5 A. Yes.  
 6 Q. In this version we see — on page 1, we see the drafting  
 7 history of it and the final draft before the incident  
 8 had been 21 September 2015. Could we look, please,  
 9 Mr Lopez, at {INQ019308/3}?  
 10 At paragraph 2.1 — perhaps at paragraph 2, we see  
 11 the NILO function:  
 12 "The function complements existing strategic,  
 13 tactical and operational inter—agency coordination and  
 14 within the incident command system the role is defined  
 15 as "a trained and qualified officer who can advise and  
 16 support ICs..."  
 17 That's incident commanders, yes?  
 18 A. Yes.  
 19 Q. "... police, medical, military and other government  
 20 agencies on the Fire and Rescue Service's operational  
 21 capacity and capability to reduce risk and safely  
 22 resolve incidents at which an FRS attendance may be  
 23 required."  
 24 At 2.2, the NILO role falls into two main functions,  
 25 the first is proactive response, and that refers, does

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1 it, to pre—planned incidents?  
 2 A. That's correct, yes.  
 3 Q. Then secondly, reactive response and mobilising. So  
 4 that's where the NILO function in relation to mobilising  
 5 comes, is it?  
 6 A. Yes.  
 7 Q. Where the underpinning knowledge, skills, of the other  
 8 agencies' capabilities can be used to bring the incident  
 9 to a safe conclusion.  
 10 Then if we look down the document, at {INQ004253/4},  
 11 we see at paragraph 2.5 — and I should say this follows  
 12 a list of bullet points of how the NILO will — the  
 13 roles the NILO will take. It says at paragraph 2.5:  
 14 "Where possible, the NILO will not take over  
 15 incident command or take on other command functions.  
 16 The command responsibility will remain with the incident  
 17 commander and the NILO will act as a tactical adviser."  
 18 Can you just help with this? Can you explain the  
 19 difference between or the relationship between  
 20 mobilisation and incident command?  
 21 A. Mobilisation is the mobilising of the resources. The  
 22 incident command is command of the incident. I know it  
 23 sounds obvious, but that is it, basically, having that  
 24 autonomy to use your resources once in situ on the  
 25 incident ground.

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1 Q. In what circumstances might a NILO take over incident  
 2 command?  
 3 A. In the absence of an officer in charge.  
 4 Q. Is that at the scene or elsewhere?  
 5 A. That would be at the scene, normally.  
 6 Q. Then could I ask you just to look at a GMFRS document.  
 7 Mr Lopez, this is {INQ004561/1}. This is the standard  
 8 operating procedure, national inter—agency liaison  
 9 officer, for the Greater Manchester Fire and Rescue  
 10 Service.  
 11 If we go to {INQ004561/4}, we see the dates of this  
 12 document. The approval date is 14 February 2014. In  
 13 fact, I think it says the next review date is  
 14 14 February 2015, but I'm not sure that any review has  
 15 led to anything different. We can check that.  
 16 If we could go to {INQ004561/10} of that, please.  
 17 We see there, again consistent with the CJOA advice, the  
 18 purpose of the NILO role; is that right?  
 19 A. That's right, yes.  
 20 Q. And again that division at paragraph 11 between the  
 21 proactive response and the reactive response?  
 22 A. Yes.  
 23 Q. Then the types of incident at paragraph 12, which may  
 24 involve multi—agency response and can be supported by  
 25 a dedicated NILO role. They include conventional and

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1 CBRN terrorism?  
 2 A. Yes, that's correct.  
 3 Q. Then at {INQ004561/11}, we see again set out at the top  
 4 of the page under bullet points, the roles the NILO  
 5 might be expected to play. Then at paragraph 16 under  
 6 "operational deployment", there's a distinction made  
 7 between covert operations and overt operations. The  
 8 incident at the arena would have been an overt  
 9 operation; is that right?  
 10 A. That's correct.  
 11 Q. In this instance, the initial contact will be generated  
 12 via the GMP force duty officer?  
 13 A. Yes.  
 14 Q. The protocol is for the FDO to contact Brigade Control  
 15 and ask to speak to the duty NILO and Fire Service  
 16 Control will then contact the duty NILO and inform them  
 17 of the incident and request that they contact the FDO  
 18 direct. Does that accord with the procedure you were  
 19 operating under that night?  
 20 A. That's correct, sir, yes.  
 21 Q. Turning to the night itself, you were told at 22.48, and  
 22 the inquiry has listened to the recording of the call,  
 23 you were told by Mr Casey of North West Fire Control at  
 24 22.48.01 that there had been reports of an  
 25 active shooter at the incident.

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1 A. Yes.  
 2 Q. Between that conversation and your arrival at the arena  
 3 at 00.40, had anyone told you that those reports were  
 4 not in fact accurate?  
 5 A. No, they hadn't.  
 6 Q. Between your arrival at the arena and the conversation  
 7 that you're recorded having with Mr Mark Dexter on  
 8 Mr Dexter's dictaphone at about 00.54, did anyone tell  
 9 you that those reports that there was an active shooter  
 10 had been inaccurate?  
 11 A. No.  
 12 Q. When was the first time you learnt that there had not in  
 13 fact — there was not in fact an active shooter?  
 14 A. I don't think anyone on the night told me there was no  
 15 active shooter. It was still being investigated.  
 16 Q. You told us that when you arrived at Thompson Street,  
 17 you looked for an ambulance commander.  
 18 A. Yes.  
 19 Q. Would you have expected an ambulance commander to be  
 20 there?  
 21 A. Yes, I assumed that they would have their own command  
 22 structure.  
 23 Q. Why would you have expected them to have a command  
 24 structure at Thompson Street?  
 25 A. Because it's an RVP and I would have expected there to

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1 be, like we would, a senior officer taking some sort of  
 2 command.  
 3 Q. Is that the normal process that at an RVP each agency  
 4 will have — there will be someone present who's in  
 5 a command role?  
 6 A. There will be a leader, yes.  
 7 SIR JOHN SAUNDERS: In fact what we're being told is what's  
 8 happening is this is being really used by now as  
 9 a holding point for ambulances so we don't have them all  
 10 rushing to the scene at the same time, so they were  
 11 being summoned up by a loading officer who said, "Send X  
 12 ambulances", so in those circumstances, when they're  
 13 actually being directed from the arena, would you expect  
 14 them to have a commander at that holding point as well?  
 15 A. That was my expectation at the time.  
 16 SIR JOHN SAUNDERS: Okay.  
 17 MR WARNOCK: In fact, did you know that that was the  
 18 situation which the chairman has just described to you,  
 19 that in fact they were being directed from the arena?  
 20 A. No, I didn't know that.  
 21 SIR JOHN SAUNDERS: None of the ambulance crews told you  
 22 what was happening?  
 23 A. No, this is the thing. Again, this is the first  
 24 opportunity I have had to speak to another agency face  
 25 to face.

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1 SIR JOHN SAUNDERS: Did you know from them that some of the  
 2 ambulances had gone to the scene?  
 3 A. No. It was just shortly after, I was moving away from  
 4 that area, that two ambulances set off, and then  
 5 I queried where they were going and the route they were  
 6 taking.  
 7 SIR JOHN SAUNDERS: Your conversation with the ones you went  
 8 to speak with, what was the general gist of the  
 9 conversation?  
 10 A. The general gist — there were ambulance crews from  
 11 different areas, so I think they were just generally  
 12 talking about that.  
 13 MR WARNOCK: Did you ask them did they have a commander?  
 14 A. I did. I asked who was in charge and who was leading  
 15 and where they were going.  
 16 Q. What answer did you get?  
 17 A. Well, nobody, really.  
 18 Q. Before you went to Thompson Street, what was your  
 19 understanding of what the Ambulance Service were doing  
 20 at Thompson Street?  
 21 A. They were using it as an RVP to respond from.  
 22 Q. You've described how, when you arrived at  
 23 Victoria Station, you had a discussion with Mr Hynes and  
 24 then you were asked about how that fitted with your  
 25 concern about sending non—specialist responders into the

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1 warm zone. I wonder, please, if we could just — if you  
 2 could turn up your statement and go to paragraph 109.  
 3 You say there:  
 4 "I spoke to the NWS commander, Steve Hynes.  
 5 I asked what GMFRS could do. He asked us to look after  
 6 the P3 casualties, who were the walking wounded. He  
 7 also said that they needed some blankets and pointed at  
 8 tall trolleys which needed to be relocated for the  
 9 paramedics."  
 10 I think you have said you didn't hear the evidence  
 11 of Mr Hynes.  
 12 A. No, I have not.  
 13 Q. Therefore you won't be able to help with this, but for  
 14 the chairman's note, that's essentially the evidence  
 15 Mr Hynes gave as well. You then go on to describe —  
 16 and I just want to be sure we've got the chronology of  
 17 this right: so you turn up, you arrive, you ask Mr Hynes  
 18 what help you can provide, he tells you. Then at  
 19 paragraph 113 you tell us about a conversation you had  
 20 with Group Manager Levy at 00.45.  
 21 A. Yes.  
 22 Q. Then at paragraph 114, you say:  
 23 "Around this time, some of the firefighters were  
 24 coming back from helping with the walking wounded  
 25 because there was not much to do or they had family

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1 members comforting them. The firefighters could see  
 2 what was going on in the station and wanted to assist  
 3 inside. I was mindful that the station was a warm zone  
 4 and that because we had deployed non-specialist  
 5 responders, our training and procedures required PPE  
 6 training and equipment for warm zone work."  
 7 So is it at that stage that you then, when the  
 8 question of firefighters going into Victoria Station  
 9 arises, that you become concerned about the zones or  
 10 were you concerned about it at an earlier stage too?  
 11 A. Yes, there was no issue at the start because the  
 12 firefighters weren't going towards the zone.  
 13 Q. Then that led into your conversation with Mr Dexter?  
 14 A. Yes.  
 15 Q. One final topic. I wonder if Mr Lopez could be so kind  
 16 as to put up {INQ008372/1}, which is the JOPs edition 3.  
 17 If we could go to paragraph 4.16 {INQ008372/17}. It  
 18 says — I just want to ask you about your understanding  
 19 about this at the time:  
 20 "Emergency personnel who are not in possession of  
 21 full ballistic protection (ballistic body armour and  
 22 helmets) for the threat will not normally be deployed  
 23 into warm zones."  
 24 Then it goes on to say:  
 25 "A police commander, however, may consider that the

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1 prevailing circumstances require that unarmed officers  
 2 with standard PPE be deployed to support warm zone  
 3 activity ."  
 4 What was your understanding as to whether or not  
 5 JOPs permitted deployment of non-specialist resources  
 6 into the warm zone as at 22 May 2017?  
 7 A. My understanding was that there was to be no specialist  
 8 responders in the warm — sorry, non-specialist  
 9 responders.  
 10 Q. Did you understand JOPs to give a degree of discretion  
 11 about that?  
 12 A. No. It was quite rigid.  
 13 Q. Did you consider it was something that you could use  
 14 operational discretion to step outside the JOPs?  
 15 A. Yes, which is what I did, but it was a foreseeable risk.  
 16 Q. When you say foreseeable risk, you were taking a risk by  
 17 going against the JOPs, is that what you mean?  
 18 A. Yes, so going against the policy and the procedure.  
 19 MR WARNOCK: Thank you, Mr Berry.  
 20 SIR JOHN SAUNDERS: I just have one thing I want to ask you.  
 21 I'm thinking about what's been done since.  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Your main complaint about this evening  
 24 was communication, so you weren't given the information,  
 25 and I don't think anyone can dispute you were not given

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1 all the information, so JESIP failed. So now, as  
 2 a result, JESIP and the system for it has been improved  
 3 in that we have a three-way communication system —  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: — which we open all the time and maybe  
 6 there are other improvements that have been made to the  
 7 JESIP procedures. We will just have to see. But  
 8 is that all that has been done or is there a plan B now  
 9 in case JESIP fails again, and this is not the first  
 10 time it's failed?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: Is there a plan B? Has someone said,  
 13 "We cannot just rely on JESIP and following JESIP making  
 14 everything right"?  
 15 A. Since I took over in my new role in September, I have  
 16 reviewed the action plans and, during that, I've created  
 17 some workshops to go through the plans and we've updated  
 18 them now to reflect some — of always moving forward.  
 19 So if we don't have an address, we go to the RVP, we  
 20 move forward, go to an FCP. In the lack of any of them,  
 21 we go straight to the incident.  
 22 SIR JOHN SAUNDERS: Provision has been made if you can't get  
 23 the information, like you were crying out for an FCP —  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: — and wouldn't go until you got it?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: Now if that situation applied, you'd go  
 3 to the scene whatever?  
 4 A. Yes, and the action plans have been changed accordingly.  
 5 SIR JOHN SAUNDERS: When was that done?  
 6 A. So I have taken it through some governance for that,  
 7 which has been signed off by Dave Keelan, who's the  
 8 chair of that meeting. They were implemented  
 9 in February.  
 10 SIR JOHN SAUNDERS: This February?  
 11 A. This year.  
 12 SIR JOHN SAUNDERS: Okay. Thank you very much.  
 13 MR WARNOCK: Were there, in fact, other changes as well,  
 14 Mr Berry, made? For instance, as to how the NILOs are  
 15 deployed?  
 16 A. Yes, initially, after the event, there were some  
 17 changes, that incident command structure put in place to  
 18 make sure there was --  
 19 SIR JOHN SAUNDERS: So it wouldn't be left to the NILO to  
 20 not only advise but run the incident as well?  
 21 A. Yes.  
 22 MR GREANEY: Mr Berry has just referred to his current role.  
 23 I am not confident that he has ever told us in evidence  
 24 what his current role is as of September last year.  
 25 A. I've just moved sideways in a group manager role, but

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1 I've taken up a position of service improvement officer,  
 2 and I also have the reference as the single point of  
 3 contact for North West Fire Control.  
 4 MR WARNOCK: Can I just clarify something else you said?  
 5 There has been a recent amendment to the action plans,  
 6 but was there not also an amendment to the action plans  
 7 after the incident that would lead to a deployment if  
 8 there was an exploded bomb?  
 9 A. Yes. There was a change to that plan that -- the first  
 10 line said -- the bomb action card was:  
 11 "Has the bomb gone off? If yes, refer to explosion  
 12 card".  
 13 MR WARNOCK: Then would that lead to a predetermined  
 14 attendance?  
 15 A. It would, yes.  
 16 MR WARNOCK: Sir, for your reference the lessons learned and  
 17 changes made have been set out in the statement.  
 18 SIR JOHN SAUNDERS: Thank you. I'm sorry not to have that  
 19 instantly to mind.  
 20 MR GREANEY: Sir, we're grateful to everyone for agreeing to  
 21 sit late.  
 22 SIR JOHN SAUNDERS: It's been a very long day, maybe our  
 23 longest, from 9.00 to 5.20, but thank you very much for  
 24 your patience, everybody.  
 25 It means that you have finished with your evidence.

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1 I'm very grateful. I'm grateful for the thought  
 2 you have put into what happened and obviously we'll have  
 3 to give your evidence considerable consideration.  
 4 MR GREANEY: Could I just mention our ushers and the  
 5 stenographers and thank them as well.  
 6 SIR JOHN SAUNDERS: Yes, of course. I keep forgetting them,  
 7 we always do, and I'm really sorry about that. They do  
 8 an invaluable job and we must have worn them out  
 9 completely.  
 10 MR GREANEY: 9.30 tomorrow morning.  
 11 SIR JOHN SAUNDERS: Thank you very much.  
 12 (5.22 pm)  
 13 (The inquiry adjourned until 9.30 am  
 14 on Wednesday, 23 June 2021)  
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