

# OPUS2

Manchester Arena Inquiry

Day 121

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Opus 2 - Official Court Reporters

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Wednesday, 23 June 2021

(9.30 am)

SIR JOHN SAUNDERS: Mr de la Poer.

MR DE LA POER: Good morning, sir. We'll begin, please, with the witness being sworn.

MR CARLOS MEAKIN (affirmed)

Questions from MR DE LA POER.

MR DE LA POER: Please can you state your full name.

A. Carlos Jamie Meakin.

Q. Are you an area manager for Greater Manchester Fire and Rescue Service?

A. Yes, sir.

Q. Did you join GMFRS in 2002?

A. Yes.

Q. In 2009, did you take up a role away from front line firefighting as a recruit instructor?

A. Yes, sir.

Q. Did you return to operational firefighting between 2010 and 2013?

A. Yes, sir.

Q. And then did you go back into the training division of Greater Manchester Fire and Rescue Service between 2013 and 2016?

A. Yes, sir.

Q. During that period, were you promoted to the rank of

1

station manager?

A. Yes, sir.

Q. But because you were within the training department, am I right in understanding that you weren't in fact in charge of any fire station at that time?

A. That's correct, yes.

Q. In 2015, did you seek promotion to the rank of group manager?

A. Yes.

Q. As part of preparing yourself for that higher rank, did you transfer to Gorton Fire Station to act as station manager from 2016?

A. Yes.

Q. Within a few months of being station manager at Gorton, were you promoted to temporary group manager?

A. Yes, I think it was about 7 months.

Q. At that rank, were you in charge of overseeing eight fire stations?

A. Yes.

Q. Once you had reached the rank of temporary group manager, did you begin to be exposed to a broader range of opportunities in terms of multi-agency working?

A. Yes, sir.

Q. Had you been permanently promoted to the rank of group manager by the time of the arena attack?

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A. Yes, sir.

Q. As we established in answer to my second question, have you subsequently been promoted to area manager?

A. Yes, sir.

SIR JOHN SAUNDERS: As a group manager on the night of 22 May, were you senior to Mr Berry?

A. Yes, sir, he was a station manager.

SIR JOHN SAUNDERS: Thank you very much.

MR DE LA POER: I have taken you through various ranks and it may be just be helpful if we review the rank structure, because it may come to be important, of Greater Manchester Fire and Rescue Service, although I'm sure you'll tell me that the rank structure is not exclusive to them but it's a national rank structure.

A. Yes.

Q. Does a person begin as a firefighter?

A. Yes.

Q. And is the first management rank above that, that of crew manager?

A. Yes, sir.

Q. And above crew manager, does one have watch manager?

A. Yes.

Q. Then, as we established through your career, from station manager to group manager to area manager?

A. Yes, sir.

3

Q. And then do we reach the chief officer ranks, assistant chief fire officer, deputy chief fire officer, and finally chief fire officer?

A. That's correct, yes.

Q. Before we turn to your training, I would just like to deal with your understanding of the position in May 2017 as to how incident command is managed within Greater Manchester Fire and Rescue Service.

We'll set aside for the time being a scenario as complex as that which was facing your Fire and Rescue Service on the night, and talk generally about a fire. In the event that there is a house fire, would I be right in thinking that North West Fire Control will have an action card appropriate to that, which will involve dispatching a predetermined number of appliances to that fire?

A. That's correct, yes.

Q. Within those appliances, will there be anybody of rank above firefighter?

A. Yes.

Q. Might the most senior person initially deployed be a crew manager or would it always be a watch manager?

A. No, it could be a crew manager.

Q. So in the event that we had that predetermined dispatch of appliances and, say, for example, they contained

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1 a crew manager, who would be in charge of that fire?  
 2 A. If the first attending appliance had a crew manager in  
 3 charge, the crew manager would initially take command.  
 4 If subsequent appliances arrived, so for a house fire it  
 5 is typically three or four fire engines, if a watch  
 6 manager came on a subsequent appliance they would take  
 7 over as the most senior fire officer in attendance.  
 8 Q. Is a person in the crew manager role, if that's the most  
 9 senior person initially dispatched, are they incident  
 10 commander from the moment they are notified or do they  
 11 become incident commander when they arrive at scene?  
 12 A. It's on arrival, because the mobilisation of resources  
 13 to an incident is simultaneous or very close together,  
 14 so it would be — they would undertake the role of  
 15 incident commander on arrival.  
 16 Q. On arrival?  
 17 A. Yes.  
 18 Q. And essentially would the process be that they would  
 19 look around, see whether they are the most senior person  
 20 there, and if they are, everybody understands they are  
 21 at that moment the incident commander?  
 22 A. I think on arrival, they would assess the scene, take  
 23 actions that were necessary, and then, as subsequent  
 24 appliances arrived, if a watch manager was there, the  
 25 watch manager would take charge.

5

1 Q. That leads us on to in the event that the situation is  
 2 more serious than initially thought or in the event it  
 3 escalates and further appliances need to be dispatched,  
 4 it may be that a person of more senior rank arrives at  
 5 which point, upon their arrival, presumably following  
 6 a brief handover, they become the incident commander?  
 7 A. Yes, they would take an assessment of the incident and  
 8 then make a decision to take charge.  
 9 Q. So in that conventional way of operating, the incident  
 10 commander is determined by who is the most senior person  
 11 at the scene?  
 12 A. Yes.  
 13 Q. Again speaking generally, as we've seen from action  
 14 cards, not every incident involves an immediate dispatch  
 15 to scene.  
 16 A. Mm—hm.  
 17 Q. Is that correct?  
 18 A. Yes.  
 19 Q. Would I be right in thinking that the vast majority of  
 20 situations that the Fire and Rescue Service confront  
 21 involve immediate dispatch?  
 22 A. Yes.  
 23 Q. So those situations where there is no immediate dispatch  
 24 are very much the exception; is that right?  
 25 A. I think a minority, yes.

6

1 Q. A minority?  
 2 A. Yes.  
 3 Q. Who then is the incident commander in the event that  
 4 there is not automatic dispatch?  
 5 A. It would depend on the incident type, so for certain  
 6 incidents a call would be placed to the duty NILO to  
 7 make a decision on what resources to send based on the  
 8 information. But in those circumstances, where there's  
 9 a discussion around a particular incident, where there's  
 10 not an automatic dispatch, there's not automatically an  
 11 incident commander.  
 12 Q. So, and it's a scenario close to home, if the action  
 13 plan determines that the NILO is contacted and if the  
 14 NILO dispatches units to the scene, then we are back  
 15 into a conventional arrangement so far as incident  
 16 commander is concerned, are we, because the most senior  
 17 person who arrives at scene will become the incident  
 18 commander; is that right?  
 19 A. Yes. So the NILO would be making and have the authority  
 20 to mobilise resources on behalf of the service where it  
 21 doesn't fit into a predetermined attendance, but of  
 22 those appliances which arrive on scene, whoever was the  
 23 most senior officer of those appliances would ordinarily  
 24 be the incident commander.  
 25 Q. So in the event that it goes via the NILO and you have

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1 a dispatch, the conventional arrangement applies. What  
 2 happens with who is the incident commander if there is  
 3 no dispatch to the scene?  
 4 A. As part of that decision, the duty NILO can mobilise  
 5 a station manager to act as an incident commander as  
 6 well as mobilising the fire engines to a particular  
 7 area, if it's not direct to scene, so for an RVP or  
 8 another muster point, and that station manager would be  
 9 mobilised as an incident commander.  
 10 Q. So it would be open to the NILO in that situation to  
 11 say: X person is to be contacted and they are to be told  
 12 that I have appointed them as incident commander and  
 13 that they are to undertake that role until they are  
 14 relieved by someone more senior?  
 15 A. For example, depending on the scenario, the NILO may  
 16 say, "Can you mobilise me three fire engines to whatever  
 17 the location is and the station manager as incident  
 18 commander?", and then North West Fire Control will  
 19 mobilise the nearest station manager to whatever that  
 20 location may be.  
 21 Q. In the event units are mustered away from the scene,  
 22 either to a rendezvous point or a muster point, however  
 23 it's being termed, will the most senior person on those  
 24 appliances become the incident commander if the NILO  
 25 doesn't say or is there an additional requirement that

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1 because you're not going to scene, the NILO has to  
 2 appoint an incident commander?  
 3 A. I think going to an RVP, the NILO would have to appoint  
 4 an incident commander. The pumps will go to an RVP but  
 5 would need more information in terms of what the next  
 6 steps are.  
 7 Q. As a NILO yourself, and we're going to come to have  
 8 a look at your training in a moment, had you been  
 9 trained to do that, in other words: if we are not going  
 10 to the scene, we need to appoint an incident commander  
 11 as well as those appliances that we've deployed to the  
 12 location away from the scene?  
 13 A. Yes, I think ... If we're mobilising resources to  
 14 an RVP, and obviously there's a range of scenarios, as  
 15 the NILO you may go yourself or you may send another  
 16 officer. If you go as a NILO to a particular location,  
 17 you would then be directing appliances and by default  
 18 become that incident commander for that RVP, if you  
 19 like, until you mobilise resources to the scene.  
 20 Q. You'll appreciate, very largely, that these questions  
 21 aren't asked in a vacuum. Do you agree that a very  
 22 important part of effective management of an incident is  
 23 to have a single person who is in command of that and  
 24 who can grip it?  
 25 A. Yes.

9

1 Q. And that without having someone who knows and  
 2 understands that they are the person in charge, making  
 3 the final decisions on what happens, there is a risk, do  
 4 you agree, that people operate in silos and you don't  
 5 have a coordinated response?  
 6 A. Yes.  
 7 Q. I would like to turn now just to look at your training.  
 8 We'll just do this in summary form. Did you receive  
 9 initial JESIP training in 2013?  
 10 A. Yes, sir.  
 11 Q. Did you receive incident command training in 2014?  
 12 A. Yes, sir.  
 13 Q. Over the course of the training that you received, did  
 14 you come, by the time we reach May 2017, to be qualified  
 15 at both the tactical and the strategic level?  
 16 A. Yes, sir. I think I had attended multi-agency Gold  
 17 incident command course.  
 18 Q. I'm going to come back to that in a moment.  
 19 In September 2015, did you undertake NILO training?  
 20 A. Yes, sir.  
 21 Q. Were you qualified and rostered as a NILO from July of  
 22 2016?  
 23 A. Yes, sir.  
 24 Q. We have talked about an incident commander and in  
 25 a straightforward scenario or conventional scenario

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1 where it is a fire that you are attending, we've  
 2 established that the incident commander is the most  
 3 senior person on scene. Is that person in that  
 4 conventional deployment operating as the sole commander  
 5 or do they sit within a Gold/Silver/Bronze hierarchy?  
 6 A. The conventional incident?  
 7 Q. Yes.  
 8 A. They would be -- depending on the scale of the incident  
 9 they will be in command of the scene and all the  
 10 resources on the scene.  
 11 For major incidents and wider spread incidents,  
 12 there's potential that a Silver or a Gold structure  
 13 could be stood up as well to support that. But in terms  
 14 of the directing of resources at an incident scene, that  
 15 incident commander is the person who makes those  
 16 decisions.  
 17 Q. So in that conventional deployment that is not on the  
 18 scale of a major incident, effectively they are the  
 19 Bronze, Silver and Gold, operational, tactical and  
 20 strategic commander for the incident?  
 21 A. Yes. We would class them as -- station manager, we  
 22 class that as a tactical commander; watch manager and  
 23 below is an operational, so Bronze. We generally use  
 24 operational, tactical and strategic.  
 25 Q. I will try to maintain that language. Obviously if

11

1 you are the only person who is managing an incident  
 2 you are making both operational decisions and tactical  
 3 decisions?  
 4 A. Yes.  
 5 Q. And strategic decisions?  
 6 A. Yes, you're in charge of that scene.  
 7 Q. So a watch manager might be playing all three of those  
 8 roles, albeit that it may not be hugely complicated?  
 9 A. Yes.  
 10 Q. But once, as you say, we get to a larger incident, and  
 11 in particular something of the scale of a major  
 12 incident, the three tiers of command become relevant, do  
 13 they?  
 14 A. Yes. Yes, sir.  
 15 Q. Who appoints people into those roles?  
 16 A. So obviously, on scene the incident commander, as I have  
 17 said, has command of that scene. There may be  
 18 supporting structures at a tactical coordination group  
 19 or Silver command, which is generally at GMP force  
 20 headquarters. Generally, the assistant principal  
 21 officer on the evening will make a decision of who  
 22 attends that incident. It could be the APO for the  
 23 evening or, depending on the availability of officers,  
 24 they may appoint somebody else to attend. Equally,  
 25 there's a duty principal officer for every shift and if

12

1 a Gold structure was established, then the principal  
 2 officer for that evening would ordinarily go to  
 3 Gold command, again generally at force headquarters.  
 4 Q. Let's just rewind to as an incident begins to develop to  
 5 see if we can understand how this should work in  
 6 practice.  
 7 If we don't have a deployment to scene, I think  
 8 we've established that that requires the NILO, where the  
 9 NILO is the first point of contact, to identify who the  
 10 incident commander is going to be. Right so far?  
 11 A. Yes.  
 12 Q. Would that incident commander be appointed as an  
 13 operational commander or at the point that they are  
 14 appointed, are they taking all three roles?  
 15 A. If they are not deployed to scene, they are appointed as  
 16 the incident commander, so they would be in charge of  
 17 those resources, and if they are deployed to scene,  
 18 obviously they would take up the role of incident  
 19 commander at that scene.  
 20 If that mobilisation or that decision had been made  
 21 by a NILO, they would act as a tactical adviser to that  
 22 incident commander, who would be passing information and  
 23 intelligence to that incident commander and at a point  
 24 in time a deployment would be made to a location  
 25 ordinarily .

13

1 Q. I suppose what I'm just trying to get underneath of here  
 2 is the term incident commander. Within the operational,  
 3 tactical and strategic structure, which of those roles  
 4 is the incident commander playing?  
 5 A. So probably operational and tactical.  
 6 Q. Whose job is it to determine whether or not a separate  
 7 tactical commander needs to be appointed or a strategic  
 8 commander needs to be appointed?  
 9 A. It would depend on the scale of the incident, so I think  
 10 there would be a discussion around: is the scale of the  
 11 incident sufficient that we'd need a tactical or  
 12 strategic coordinating group to deal with the issues  
 13 around business continuity issues or impact outside of  
 14 the immediate scene? So as I've said, whoever the  
 15 nominated APO and PO is, they would then pick up those  
 16 roles from the rota in terms of the person who would go  
 17 into Silver and Gold command.  
 18 Q. So you would expect those people, the on-duty group  
 19 manager and the on-duty principal officer or assistant  
 20 principal officer, you would expect them to be notified,  
 21 would you?  
 22 A. Yes, I would, yes. I think there's -- at a certain  
 23 trigger scale of incident, the duty GM is notified by  
 24 North West Fire Control.  
 25 Q. Yes.

14

1 A. So I think that's at any incident that's six pumps or  
 2 above or two simultaneous -- I think it's four--pump  
 3 incidents, but I'd have to double check that.  
 4 Q. It perhaps doesn't matter exactly, but there is  
 5 a predetermined limit above which the duty group manager  
 6 is notified. Are they notified simply so they are aware  
 7 of it or are they notified into the tactical role?  
 8 A. They are notified for awareness in terms of impact on  
 9 the wider fleet across the service and again it's  
 10 recognising what scale of incident is occurring, what  
 11 other simultaneous incidents are occurring across the  
 12 county, and then whether any decisions need to be made  
 13 about whether it's closing in -- we move -- so if we've  
 14 got one area of the county stripped of fire cover,  
 15 whether you need to move pumps into that area, whether  
 16 there's a likelihood that we need to do a recall to duty  
 17 because it's going to be protracted incident.  
 18 So they would assess what the level of impact has  
 19 been on resources across the county, they would -- my  
 20 expectation is they would ring the duty APO, who's area  
 21 manager level, and then a discussion would take place  
 22 and there's a requirement for the area manager to make  
 23 a decision whether to open up the command support room  
 24 or not to then undertake that function to deal with  
 25 those issues.

15

1 Q. Obviously, the list of issues that you've identified for  
 2 the group manager are everything but the incident, it's  
 3 how does the incident impact upon wider matters. Is the  
 4 area manager the tactical commander for the incident  
 5 either automatically or does that require  
 6 a conversation?  
 7 A. No, they don't automatically become the tactical  
 8 commander. Whoever is nominated as the incident  
 9 commander, they are the commander for that incident.  
 10 The duty group manager and the duty APO support the more  
 11 strategic issues across the county, but they would only  
 12 become the tactical commander if they are mobilised to  
 13 the scene as an incident commander.  
 14 Q. I suppose that is what we are just coming to because,  
 15 obviously, the inquiry has heard a great deal of  
 16 evidence about how the police structure their command,  
 17 and no doubt you have followed it sufficiently as area  
 18 manager to understand that the Silver commander or  
 19 tactical commander for the police is the incident  
 20 commander, they don't have to be at the scene, they  
 21 develop a tactical plan, they issue direction to their  
 22 operational or their Bronze commander, who puts into  
 23 effect that tactical plan. I think that where I've  
 24 arrived at in my understanding is it's rather different  
 25 than that for the Fire and Rescue Service.

16

1 A. Yes. So our tactical commanders, who are the incident  
2 commanders, are always on scene.  
3 Q. And if they are not on scene, they are managing the  
4 wider resources but they are not making command  
5 decisions?  
6 A. No, they are in support of the incident commander.  
7 Q. So it all comes down, does it, in terms of command  
8 decisions for how the incident is to be managed, to that  
9 person who is the incident commander?  
10 A. Yes.  
11 Q. Before turning to 22 May 2017, I would just like to  
12 briefly touch, and only briefly, I stress, on Exercise  
13 Winchester Accord. I think that you had some awareness  
14 of that exercise as it was taking place?  
15 A. Yes, sir.  
16 Q. Were you a participant in it?  
17 A. No, sir.  
18 Q. Were you an observer at it?  
19 A. Yes, sir.  
20 Q. Were you aware that there were tri-service communication  
21 issues, to state it neutrally and generally?  
22 A. Yes, sir.  
23 Q. Was it your view that GMP appeared to operate in a silo?  
24 A. That was my understanding on the night, yes, sir.  
25 Q. And that by reason of that, did you understand that

17

1 GMFRS's attendance was delayed?  
2 A. Yes, sir.  
3 Q. Just two aspects to follow up on there. Firstly, you  
4 speak in your witness statement -- we can turn it up if  
5 you want but I'm sure you'll remember the passage -- of  
6 anger as a result of Exercise Winchester Accord. That's  
7 the word used. Do you recall stating that in your  
8 witness statement?  
9 A. Broadly, yes.  
10 Q. Help us to understand -- that's obviously a very strong  
11 emotional reaction in the context of a professional  
12 environment; do you agree?  
13 A. Yes, sir.  
14 Q. So what was it that generated that strong emotional  
15 reaction?  
16 A. I think -- in the context of Winchester Accord?  
17 Q. Indeed.  
18 A. I think it was the fact that the response from our  
19 resources, and I think NWS as well, on the night was so  
20 delayed from what seemed to be a fundamental error in  
21 terms of -- I think from memory it was the nomination of  
22 an FCP. I was observing remotely, so I don't know the  
23 sort of intricate detail of it, but that was the general  
24 feeling I got from observing, that the FCP or the  
25 communication with the tactical firearms commander on

18

1 the night was so delayed that it severely impacted the  
2 deployment of resources into the exercise.  
3 Q. I don't want to be understood to suggest that exactly  
4 the way in which communication broke down for Exercise  
5 Winchester Accord precisely maps on to the events of  
6 22 May, but was it apparent that there was a very  
7 substantial communication issue --  
8 A. Yes.  
9 Q. -- between the services?  
10 A. Yes, sir.  
11 Q. And that that, in terms of a potential real-world  
12 effect, that communication issue could, if it manifested  
13 in real life, result in the loss of life?  
14 A. Potentially, yes, sir.  
15 Q. Well, NWS were not being deployed?  
16 A. Yes, sir.  
17 Q. All of your trauma-trained MTFA crews were not being  
18 deployed. These are people with highly specialist  
19 skills, capable of saving life where others without  
20 those skills may not be able to; do you agree?  
21 A. Yes, sir.  
22 Q. And you have identified that there was a very strong  
23 emotional reaction to that. How did that reaction,  
24 in the context of an issue that serious, translate into  
25 remedial action?

19

1 A. Following the exercise, I believe there was  
2 a multi-agency debrief. I wasn't part of the debrief as  
3 I recall, but I had had conversations with Paul Etches  
4 at the time. I think Paul was in Silver control at  
5 force headquarters and we'd had some frank discussions  
6 about our views and frustrations. I think Paul would  
7 likely have been involved in the multi-agency debrief  
8 and I believe the findings -- I could be incorrect, but  
9 I believe the findings from that debrief went through to  
10 the LRF to assess and then take some action to rectify  
11 the gaps.  
12 Q. It rather sounds like Mr Etches might be the person  
13 better informed than you are, and I mean that with great  
14 respect --  
15 A. Yes.  
16 Q. -- in terms of how the practicalities of that unrolled.  
17 But perhaps I've established what I needed to from you,  
18 which is that your perception was that this really did  
19 cause serious upset?  
20 A. Yes, on the night of the exercise, yes.  
21 SIR JOHN SAUNDERS: It sounds quite a surprising reaction,  
22 anger. So something had gone wrong with the exercise,  
23 so you now you have to sort something out, but anger?  
24 What's the basis for the anger: "We've all come to an  
25 exercise and it all failed because of someone's idiocy",

20

1 or, "This is the way they always treat us"?

2 A. I think maybe frustration would have been a better word

3 to use. Anger, frustration. Like I say, a lot of

4 preparation had gone into the exercise as I understood

5 it, we had teams which were trained and ready to go,

6 I think assets had come down from Merseyside as well.

7 So the preparations for the exercise were extensive to

8 my understanding, but then obviously the exercise didn't

9 play out as you would expect because of that lack of

10 communication.

11 SIR JOHN SAUNDERS: Thank you.

12 MR DE LA POER: Area manager, I'm now going to turn to the

13 events of 22 May 2017.

14 You were, that night, having performed your day job

15 and gone off duty, the on-call incident command cover;

16 is that correct?

17 A. Yes, sir.

18 Q. Were you the only on-call incident command cover for

19 that night?

20 A. No, sir.

21 Q. How many other, that night, on-call incident command

22 covers were there?

23 A. I wouldn't be able to say for definite, but generally

24 the on-call rota throughout the hours of the night at

25 that time I think were generally one area manager, three

21

1 group managers, and the rest were station managers up to

2 12 officers, so probably around eight station managers,

3 and then obviously above that would be the duty

4 principal officer.

5 Q. Because you are on call, you weren't on duty once you

6 took up your position, in other words you could be at

7 home, out of uniform, you could go to bed; is that

8 right?

9 A. I'd be on call all day, so when you're on a 24 shift,

10 you go into the office, do your day job, but you're

11 available for incident command cover. After around

12 6 o'clock, those officers who aren't on a 24 shift would

13 generally book off duty and then go about their evening

14 as normal, but those who were on call that night would

15 remain available throughout the night for incident

16 command cover.

17 Q. I don't want to know the precise location but how far

18 approximately was your house, where I understand you

19 were, from the centre of Manchester?

20 A. About 12/13 miles.

21 Q. As well as being the on-call incident command cover, you

22 were qualified as a NILO?

23 A. Yes, sir.

24 Q. Was that qualification relevant to the capacity in which

25 you were on call that night?

22

1 A. I think Mr Berry was the nominated duty NILO, but

2 obviously being qualified in that reference, I think

3 that's visible, so if a NILO is required, North West

4 Fire Control, or whoever required a NILO, would know

5 that I had that skill, so I could either go as an

6 incident commander or pick up some kind of NILO work if

7 that was required.

8 Q. Would all people on the incident command on-call rota

9 also be qualified as NILOs or might there be on-call

10 incident commanders who weren't a qualified NILO?

11 A. I think on the night in question there were four

12 qualified NILOs out of the group. Some other officers

13 are qualified as hazardous materials officers, so

14 there's a mix of references on the rota to provide that

15 tactical advice for the range of incidents that fire can

16 potentially be mobilised to.

17 Q. You were in bed asleep when you received the

18 notification of the incident; is that correct?

19 A. Yes, sir.

20 Q. At the time, was a pager system operated?

21 A. Yes, sir.

22 Q. We are going to have a look at that pager notification

23 now. {INQ019078/1}. Can we crop into the top, please?

24 We can see that it's timestamped at 23.06. And

25 obviously, the screen on the pager requires a person to

23

1 scroll down, which is what we see in the series of

2 images:

3 "Proceed to admin/administration [and then there's

4 a call sign] Philips Park Fire Station."

5 So would you, as somebody with experience of

6 receiving such messages, understand that you were being

7 deployed to Philips Park Fire Station?

8 A. Yes, sir.

9 Q. Then if we look further down, we can see an address, and

10 Mr Lopez, if you can scroll down so we can see the

11 further screens, we've got on that second from the

12 bottom there, "Role: NILO". Was that to tell you that

13 you were being deployed in your NILO capacity?

14 A. As a NILO, yes.

15 Q. So we just need to bear this in mind. Although you were

16 an on-call incident commander that night, in fact you

17 were deployed as a NILO?

18 A. Yes, sir.

19 Q. We can see "NILO three", which is an indication that

20 three NILOs need to be deployed, of which you are one;

21 is that right?

22 A. Yes.

23 Q. And then:

24 "And MTS capability to RVP at Philips Park."

25 We can see that in the bottom image there.

24

1 When you received that, did you know what MTS  
2 capability meant?  
3 A. MTS isn't a term that meant anything to me. I had  
4 a suspicion that it would be -- it should have been MTFA  
5 and it was a typo. And I think it will go on, shortly  
6 after this page, where I make a call to North West Fire  
7 Control --  
8 Q. We'll come to that. You were being told that you needed  
9 to go to Philips Park, that you were one of three NILOs,  
10 so presumably that would tell you that this is  
11 potentially a very substantial incident --  
12 A. Yes, sir.  
13 Q. -- for three NILOs to be deployed? And we can see that  
14 the word "capability" is being used, so presumably you  
15 recognised immediately, as that wasn't a term that you  
16 knew, it must mean something else and it was likely to  
17 mean that?  
18 A. MTS.  
19 Q. Yes. When you received that, did you call North West  
20 Fire Control?  
21 A. Yes, sir.  
22 Q. I think that you originally thought that you got  
23 through, as you describe in your statement, but in fact  
24 you were called back. Have you understood that now?  
25 A. I haven't, sir, sorry.

25

1 Q. Let's have a look and see whether I'm right or wrong  
2 about that.  
3 Mr Lopez, we're going to play some audio and put up  
4 on screen the transcript of a call between you, area  
5 manager, and North West Fire Control at 23.10. The  
6 reference is {INQ034369A/1} for the audio and  
7 {INQ034369T/1} for the transcript.  
8 (Audio played)  
9 So area manager, you were given some further  
10 information by North West Fire Control there, which  
11 improved your situational awareness, would you agree?  
12 A. Yes, sir.  
13 Q. At that stage, as you were being deployed as a NILO, did  
14 you have any responsibility to be proactive in that call  
15 to try and direct the gathering of further information?  
16 A. I think in hindsight I could have challenged some of the  
17 information particularly around the active shooter and  
18 tried to confirm whether it actually was or not. At  
19 that moment in time, my mindset, I recall, was that the  
20 incident had just happened, that was the information  
21 that was available at that moment in time, clearly  
22 picturing a chaotic, dynamic scene. And the fact that  
23 I'd been given instruction to RVP at Philips Park, that  
24 was then my priority to get there as soon as possible.  
25 Q. You would need to get there by car?

26

1 A. Yes, sir.  
2 Q. And I think that as events transpired, you were able to  
3 get there within 20 minutes of the pager notification?  
4 A. I think it was about 22/23 minutes, yes, sir.  
5 Q. Once you were in your car, did you make any further  
6 calls?  
7 A. I did make a couple of calls, yes.  
8 Q. And to whom did you make calls?  
9 A. I think I called my wife to see if anything was on the  
10 news. I'd put the radio on, couldn't pick anything up  
11 about the incident, and then I think I called my mum to  
12 see -- I've got a younger sister -- to see if she was  
13 in the area or not. That was whilst I was driving to  
14 the RVP.  
15 Q. What about inter-agency calls? Did you make any of  
16 those?  
17 A. No. My expectation was that Andy Berry was contacting  
18 the force duty officer as the duty NILO. He will be the  
19 person who will be naturally contacting them to try and  
20 get as much intel as possible. I think I put my San-J  
21 radio on the relevant channel to listen in for any  
22 further information, but the priority for me was to get  
23 as close to the city centre as possible, as quickly as  
24 possible.  
25 Q. When I asked you, and I did so deliberately by reference

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1 to the phrase inter-agency, your response was to say  
2 that Andy Berry would be calling the FDO, meaning GMP?  
3 A. Yes, sir.  
4 Q. What about calling the NWS NILO? Did the thought that  
5 you might contact them to gain situational awareness  
6 cross your mind?  
7 A. Not at the time, I don't recall that, no.  
8 SIR JOHN SAUNDERS: Would you have their number?  
9 A. I don't think at the time I had the NWS NILO numbers,  
10 no, sir.  
11 MR DE LA POER: Would you expect North West Fire Control to  
12 have their number or to be able to get it for you?  
13 A. Yes, I would expect that, yes.  
14 Q. So an option available to you, and we'll come in  
15 a moment to whether that is something you could or  
16 should have done, was to contact North West Fire Control  
17 and say, "Can you get me the NWS NILO's number? I'm  
18 going to need to speak to them"?  
19 A. That was something that I could potentially have done  
20 with hindsight, yes, sir.  
21 Q. Had your training not envisaged that you would do that?  
22 A. Not that I recall. I think at that time our port of  
23 call was into the FDO, and as I've said, as Andy was the  
24 duty NILO, the expectation was that Andy would be doing  
25 that. The pager message that came through was a make-up

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1 or an assistance message to get assets to a point. So  
 2 my mindset at the time was that the duty NILO would have  
 3 been making that call and, as I have said, I needed to  
 4 get that location as soon as possible or go towards that  
 5 location and then anticipate some further information to  
 6 come to deploy to an FCP.  
 7 SIR JOHN SAUNDERS: So you'd expect Andy Berry to contact  
 8 the FDO, who's the equivalent of the police NILO in  
 9 effect?  
 10 A. Yes, sir.  
 11 SIR JOHN SAUNDERS: But you wouldn't expect him to have  
 12 contacted the NWAS NILO?  
 13 A. Andy Berry?  
 14 SIR JOHN SAUNDERS: Yes.  
 15 A. No, sir, because I think up to that point our standard  
 16 practice was to contact the FDO to get the intel and  
 17 I think in particular, with the potential for an  
 18 active shooter and the incident type that it was --  
 19 SIR JOHN SAUNDERS: Can I say, I really understand that the  
 20 first point of contact would be the FDO. But assuming  
 21 contact is obtained with the FDO, one of the things you  
 22 do, consider doing fairly soon after, would be actually  
 23 contact your relevant opposite number in NWAS?  
 24 A. We hadn't done that regularly, sir. It was the call to  
 25 the FDO to get the intelligence.

29

1 SIR JOHN SAUNDERS: Has that changed now?  
 2 A. I believe so, yes. I think some time -- and I can't  
 3 recall how long after -- there was a contact sheet for  
 4 NWAS NILOs that was shared. I'm no longer a NILO, but  
 5 I think --  
 6 SIR JOHN SAUNDERS: We'll find out and no doubt NWAS will  
 7 tell us or the Fire Service will tell us.  
 8 MR DE LA POER: The fact that it isn't part of, to use that  
 9 phrase that's been used frequently, the muscle memory of  
 10 a GMFRS NILO to contact the NWAS NILO, particularly in  
 11 a potential MTFA situation, may seem to some to be  
 12 really rather surprising because we've heard a lot of  
 13 evidence about how the SRT and HART worked very closely  
 14 together. They trained together, they shared  
 15 information, they had a very good understanding of each  
 16 other's capabilities. Was that all within your  
 17 knowledge in May 2017?  
 18 A. Yes, sir.  
 19 Q. So it might be thought entirely obvious and necessary  
 20 that the GMFRS NILO will want to speak to the NWAS NILO  
 21 to say, "I've got my specialist capability, where's  
 22 yours, we need to have a joint plan and we need to work  
 23 together just like we do in all of the exercises and  
 24 training we've had"; is that fair?  
 25 A. I think that is fair, yes.

30

1 Q. So what is the explanation, so far as you can tell, for  
 2 why it didn't form part of the muscle memory?  
 3 A. I think ... I think everything was predicated on being  
 4 able to make contact with the FDO up until that point.  
 5 I'm not aware of any events where we'd not been able to  
 6 get in touch with the FDO and I think I put it in one of  
 7 my statements or debriefs, I think when we have  
 8 exercised it is from the point of co-location, which is  
 9 one of the first principles of JESIP, but obviously on  
 10 that night we didn't co-locate, which impacted on the  
 11 effectiveness of our deployment. But I think it was an  
 12 oversight. I think part of it was there was a belief  
 13 that we'd always be able to contact the FDO.  
 14 SIR JOHN SAUNDERS: I do understand that, but you're  
 15 actually relying on -- it's the FDO will be contacting  
 16 you or you will be contacting them, and NWAS will be  
 17 doing it as well, so everything's going through the FDO,  
 18 rather as has been pointed out to you, because HART and  
 19 the SRT would act together, it's actually quite  
 20 important, or perhaps now understood that it is  
 21 important, that there should be at least the ability to  
 22 contact, you should at least have the phone number. It  
 23 seems a bit common sense, doesn't it?  
 24 A. Yes, sir. I think in hindsight we should have had those  
 25 numbers.

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1 SIR JOHN SAUNDERS: Even hindsight? You've trained  
 2 together, you're going to operate together, it's a good  
 3 idea if you actually went to the same RVP, for example,  
 4 so you set off together? Is it really just with  
 5 hindsight that that seems sensible? I know hindsight  
 6 invades everything, but actually do you really need that  
 7 to know it would be a good idea if you had the telephone  
 8 number?  
 9 A. I think we should have had the numbers.  
 10 SIR JOHN SAUNDERS: Okay, thank you.  
 11 MR DE LA POER: So you made your way to Philips Park and  
 12 I think you estimate your arrival some time shortly  
 13 after 23.25; is that correct?  
 14 A. Yes, sir.  
 15 Q. We don't need to turn it up unless you would like to be  
 16 reminded of it, but we have seen that there was a very  
 17 brief telephone contact between your mobile telephone  
 18 and that of GM Levy's, it's about 7 seconds, so it  
 19 doesn't look that there was any meaningful conversation.  
 20 At about the time of your arrival, were you trying to  
 21 contact Group Manager Ben Levy?  
 22 A. I believe so, yes.  
 23 Q. Why would you have in mind to contact him?  
 24 A. I had been told he was en route, I think, from the call  
 25 from North West Fire Control, so probably to just

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1 understand what he knew about it and to let him know  
 2 that I'd just arrived at Philips Park.  
 3 SIR JOHN SAUNDERS: Was he senior to you or you were the  
 4 same rank?  
 5 A. We were the same rank, we were both group managers, but  
 6 Ben had spent longer at the level of group manager than  
 7 I had at the time.  
 8 SIR JOHN SAUNDERS: So more experienced than you?  
 9 A. Yes, and he had substantially more experience as a NILO  
 10 than I had.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR DE LA POER: So within 3 minutes of your arrival at  
 13 Philips Park, there is a telephone call between you and  
 14 Lisa Owens at North West Fire Control. We're just going  
 15 to consider that in the context of what North West Fire  
 16 Control knew and what you were told. We're going to do  
 17 that through {INQ041473/49}. Before I ask you some  
 18 questions about this, I'm going to say something about  
 19 this document once it comes up on screen because this  
 20 page will illustrate what I need to say very clearly.  
 21 Area manager, what we're looking at here is  
 22 a sequence of communications, as it's been termed, which  
 23 has been prepared by those representing North West Fire  
 24 Control. I think that's a document that was added to  
 25 your evidence proposal, so you've had an opportunity to

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1 look at it.  
 2 For those that wish to know — and, sir, in  
 3 particular you may wish to look at this at some point if  
 4 you haven't already — it is {INQ041474/1}, no need to  
 5 bring it up. The next numbered INQ is a guide prepared  
 6 by North West Fire Control for the interpretation of  
 7 this document.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR DE LA POER: That's a useful document to read when  
 10 considering it.  
 11 The final thing to say about this document before we  
 12 turn to look at the detail is that certainly I am  
 13 extremely grateful for the provision of this document,  
 14 which is clearly the product of a lot of hard work.  
 15 I know there are some timings which are being finessed  
 16 which doesn't arise here, but one of the features of  
 17 this document is that it candidly shows points which are  
 18 against North West Fire Control and this will illustrate  
 19 that.  
 20 SIR JOHN SAUNDERS: So it shows information that they had  
 21 that they may not have been conveying when you say the  
 22 document is against them?  
 23 MR DE LA POER: I've termed it in that way. In fact, I let  
 24 Mr Smith know that that was the language I would use and  
 25 I think it's important to acknowledge that this document

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1 demonstrates that level of candour.  
 2 SIR JOHN SAUNDERS: Thank you.  
 3 MR DE LA POER: At 23.28, we can see extracts of the call  
 4 that you had with Lisa Owens. In summary, do you tell  
 5 her that you are booked in at Philips Park?  
 6 A. Yes, sir.  
 7 Q. And:  
 8 "Have we got a brief or any instructions?"  
 9 Just help us were that question that you ask,  
 10 please. I mean, you are one of the NILOs?  
 11 A. Yes, sir.  
 12 Q. One of your functions is to give advice?  
 13 A. Yes, sir.  
 14 Q. And you are expected, aren't you, to be proactive?  
 15 A. Yes, sir.  
 16 Q. So why are you asking North West Fire Control for  
 17 instructions rather than the other way round?  
 18 A. My belief at that time was that Andy Berry, as the duty  
 19 NILO, would be or was in touch with the force duty  
 20 officer. I was surprised on arrival at Philips Park  
 21 that I was the first one there and that there was no  
 22 further information that came during that journey from  
 23 any of the officers who had been mobilised. I asked  
 24 that question because I was keen, having got there, for  
 25 us to be able to deploy. The only information I'd had

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1 at that time was during that call to North West Fire  
 2 Control, which is why I asked that question.  
 3 Q. With three NILOs attending, is there any hierarchy  
 4 between them?  
 5 A. No, sir.  
 6 Q. So we've got three advisers, no incident commander;  
 7 is that right?  
 8 A. Not to my knowledge at that point, sir, no.  
 9 Q. You don't say in terms, "Who's the incident commander?",  
 10 do you?  
 11 A. No, sir.  
 12 Q. You are a higher rank than Andy Berry at this time; is  
 13 that right?  
 14 A. Yes, sir.  
 15 Q. You are a more experienced NILO than Andy Berry at this  
 16 point?  
 17 A. Yes, sir.  
 18 Q. He has one very substantial advantage over you, which is  
 19 that he has been involved for longer than you; is that  
 20 right?  
 21 A. Yes, sir. But at the time of being here, I didn't know  
 22 the incident had been going on as long as it had.  
 23 Q. You certainly would have expected the duty NILO to have  
 24 been notified before you were?  
 25 A. Yes, because I think that when I got the mobilisation

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1 message via the pager that would have come on any  
 2 instruction from the duty NILO, so whether that was  
 3 a couple of minutes or a significant amount of time, my  
 4 expectation at that point was that it was a few minutes  
 5 he'd been notified of the incident, made some decisions,  
 6 of which obviously I was then subsequently mobilised.  
 7 SIR JOHN SAUNDERS: Did you hear Mr Berry's evidence?  
 8 A. Yes, sir.  
 9 SIR JOHN SAUNDERS: He made quite a feature too of him  
 10 saying: well, I believed that the incident had just  
 11 happened. If when the incident happens is so important  
 12 to you for your reaction, why don't you actually ask  
 13 when the incident happens, "When did this bomb go off?",  
 14 if that is such a critical feature in how you respond?  
 15 A. I think for a lot of the incidents that we are mobilised  
 16 to, you generally — they are in the early stages and  
 17 have just occurred. As I sit here now, I do wish I'd  
 18 have challenged that and asked that question, but it  
 19 wasn't something that came into my mind. On the night  
 20 it was — I'd had a mobilisation message: get to  
 21 Philips Park because that's where you're needed.  
 22 SIR JOHN SAUNDERS: But you would have known that before  
 23 that there would have been a contact with somebody else,  
 24 ie Andy Berry, the actual duty NILO. He would give  
 25 instructions that would then need to be followed. So

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1 from how far down the instructions you are, it must be  
 2 quite difficult to know how quickly you're being  
 3 informed, mustn't it?  
 4 A. Yes, I wouldn't have known at that time how long Andy  
 5 would have known of the incident.  
 6 SIR JOHN SAUNDERS: Okay. Thank you.  
 7 MR DE LA POER: Do you agree, area manager, that what was  
 8 needed at this point was for one person to grip the Fire  
 9 and Rescue Service's response and start making command  
 10 decisions?  
 11 A. I think to make the command decisions, we needed the  
 12 information about the incident. As I've said, at that  
 13 time all I had was the pager message and the telephone  
 14 call with Control. I wasn't aware where other resources  
 15 were from other services. Like I say, my expectation  
 16 was that Andy would be speaking to the FDO to get that  
 17 intelligence so that we could then deploy. I would have  
 18 expected it to come before that point, which is why, as  
 19 soon as I was aware, obviously I had a conversation with  
 20 the crews at Philips Park on my arrival and then my  
 21 first action after that was to get on to Control for  
 22 some, as it says there, some brief or any instructions.  
 23 Q. If we have a look at the entry by your name a little  
 24 further down:  
 25 "I've just had reports from crews at Philips Park,

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1 they're from Central — they have been sent here from  
 2 the station — we've had NWAS staff turning up on the  
 3 forecourt."  
 4 So by 23.28 you had established, had you, that  
 5 firefighters from Thompson Street had been sent to  
 6 Philips Park and that they had seen NWAS personnel at  
 7 Thompson Street?  
 8 A. Yes, sir.  
 9 Q. Did that strike you as a remarkable state of affairs?  
 10 A. I was surprised when they said, but then I think as the  
 11 call goes on, I'd obviously mentioned that to North West  
 12 Fire Control, but the response I got from North West  
 13 Fire Control was that Andy Berry had made a decision to  
 14 go to Philips Park as the RVP, and I think the tone —  
 15 from memory, the tone of that call was quite confident,  
 16 so to my mind, there was a plan developing and it was  
 17 a conscious decision to do that, basically, on some  
 18 intel that I wasn't aware of.  
 19 Q. You didn't have a commander to give advice to because  
 20 there wasn't one, but was it any part of your function  
 21 to challenge what your fellow NILO's decision-making  
 22 might be?  
 23 A. At that point in time, I had no reason to challenge that  
 24 decision from Andy Berry —  
 25 SIR JOHN SAUNDERS: Didn't you? Didn't you have a lot of

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1 very frustrated firefighters sitting there saying, "We  
 2 want to get there"? Were they really just sitting there  
 3 calmly?  
 4 A. The firefighters were frustrated.  
 5 SIR JOHN SAUNDERS: What were they telling you was the cause  
 6 of their frustration?  
 7 A. That the ambulances were at Manchester Central and  
 8 they'd been sent to Philips Park. Obviously, I'd been  
 9 told by North West Fire Control there was a potential  
 10 for an active shooter but Andy Berry had made that  
 11 conscious decision to go to Philips Park.  
 12 SIR JOHN SAUNDERS: Did the firefighters there tell you that  
 13 they knew the ambulances were going to the arena?  
 14 A. I don't recall that. I think they said they were at  
 15 Manchester Central, but they could have said that.  
 16 SIR JOHN SAUNDERS: It's quite an important thing to be  
 17 told.  
 18 A. Yes, sir.  
 19 MR DE LA POER: Andy Berry wasn't there and so you could  
 20 have no reason to be confident that he knew what you  
 21 knew about NWAS being at Thompson Street; do you agree?  
 22 A. Yes, sir.  
 23 Q. So you potentially had a hugely important piece of  
 24 information that Andy Berry, the decision-maker, may not  
 25 have had, is that fair, insofar as you could tell at the

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1 time.  
 2 A. In terms of the ambulances being at Manchester Central?  
 3 Q. Yes.  
 4 A. I'm not aware that Andy was aware of that fact.  
 5 Q. You had no reason to think he did know that or that he  
 6 knew that when he made his decision to send the  
 7 appliances to Philips Park. At this point, bearing in  
 8 mind that NWS clearly had sufficient situational  
 9 awareness to be confident about Thompson Street at the  
 10 very least, did it occur to you: we need to get on to  
 11 NWS to find out what they know?  
 12 A. I think in the call from North West Fire Control, the  
 13 control operator states that NWS are aware of our RVP.  
 14 SIR JOHN SAUNDERS: Okay. Shall we go on with the rest of  
 15 the call and then we can come back to the questions  
 16 in the context of that?  
 17 MR DE LA POER: Yes. We can see, as it develops, you're  
 18 told:  
 19 "The duty NILO decided Philips Park. Ambulance --  
 20 obviously, I can't speak of why they've sent them there,  
 21 but they are aware that our RVP is Philips Park."  
 22 I think that's what you were referring to.  
 23 But even in the language that is being used there,  
 24 is North West Fire Control saying, "I don't know why  
 25 they are using Thompson Street"? As the national

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1 inter-agency liaison officer, wasn't there an obligation  
 2 on you to say, "We should find out"?  
 3 A. I think I should have challenged that at the time, but  
 4 as I say, the call that came back and the information  
 5 that came from North West Fire Control, it was conveyed  
 6 in an assured tone and that Andy Berry had made that  
 7 decision. My thought at that time was that would be  
 8 based on intel that he'd potentially got from the FDO.  
 9 SIR JOHN SAUNDERS: Okay. I'm sorry, but we need to ask: if  
 10 I asked you what the main, first principle of JESIP is,  
 11 what would you say?  
 12 A. Co-location.  
 13 SIR JOHN SAUNDERS: So you needed to be co-located with  
 14 NWS. They are at Thompson Street. You are where  
 15 you are. Don't you need to at least find out why they  
 16 are there and get someone down there, if necessary, if  
 17 you can't speak to them on the phone?  
 18 A. Co-location is obviously important, but like I say, the  
 19 call that came and the information that came from North  
 20 West Fire Control felt like an assured sort of message  
 21 that Andy Berry had made that decision, so I wasn't  
 22 aware what intel he had at that time.  
 23 SIR JOHN SAUNDERS: So we'll avoid co-location on this  
 24 occasion? Right, okay.  
 25 MR DE LA POER: Obviously you knew that appliances had been

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1 dispatched from Manchester Central, Thompson Street.  
 2 Would you expect that it was empty of Fire and Rescue  
 3 Service personnel or would there be some members of  
 4 GMFRS present still?  
 5 A. At Manchester Central?  
 6 Q. Yes.  
 7 A. I suppose at that time I wouldn't know -- until  
 8 I arrived I wouldn't know which pumps had been sent to  
 9 that RVP but I know the pumps from Manchester Central  
 10 are fairly close to Philips Park.  
 11 Q. You were being told -- you knew that the pumps at  
 12 Manchester Central had been dispatched to Philips Park.  
 13 Was it your belief that Manchester Central was now empty  
 14 of any GMFRS personnel?  
 15 A. Yes, sir.  
 16 Q. So there wouldn't be anybody that you could pick up the  
 17 telephone to who might be at Manchester Central and say,  
 18 "Put me on to NWS, I would like to speak to somebody  
 19 there"?  
 20 A. No, sir.  
 21 Q. What about dispatching somebody to go back to  
 22 Manchester Central, which is only a few minutes' drive,  
 23 to say, "I want you to take your mobile phone, find the  
 24 person at NWS, I need to speak to them"?  
 25 A. That was a possible option. But as I say, Andy Berry

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1 had made that decision for them to RVP there and in my  
 2 head, at that time, my perception was that there was  
 3 a plan and that there had been conversations with the  
 4 FDO, which is why that decision had been made.  
 5 Q. Did you know at this time how long Andy Berry was going  
 6 to take to get there?  
 7 A. No.  
 8 Q. So was it your plan simply just to wait until he arrived  
 9 before any change could be made to his plan or any  
 10 further information could be gathered?  
 11 A. North West Fire Control told me that he was en route  
 12 with Ben Levy. I expected he would arrive relatively  
 13 soon after my arrival. I think as I said in my  
 14 statement, after that call to North West Fire Control,  
 15 it felt like the best use of my time then would be to  
 16 get my ballistic PPE ready and be ready to deploy when  
 17 that information came.  
 18 Q. Getting yourself ready wouldn't stop you saying to  
 19 a firefighter who you had available, "Get yourself down  
 20 to Thompson Street, let's find out why NWS think it's  
 21 safe to be there".  
 22 A. No, that wouldn't have stopped me doing that, no.  
 23 Q. Similarly, and we're not going to identify the precise  
 24 location, under blue lights, where the FDO was located  
 25 was between 5 and 10 minutes from Philips Park; is that

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1 right?  
 2 A. Yes, it's about that, yes.  
 3 Q. Did you know that at the time?  
 4 A. Yes, sir.  
 5 Q. So could you have said to one of the firefighters, "Get  
 6 yourself down to the OCR and see if we can find out what  
 7 the FDO's got to say"?  
 8 A. Potentially. I think in my mind I didn't expect that  
 9 the FDO would have the capacity to break off from what  
 10 they were doing to let one of our crews in and have that  
 11 conversation, but it was something that I could  
 12 potentially have explored.  
 13 Q. It was in your mind that the FDO would be having  
 14 capacity issues?  
 15 A. I thought that they'd be busy, yes.  
 16 Q. And did it occur to you that in their busyness that they  
 17 may not be able to speak to Andy Berry?  
 18 A. Not at that time. I thought that they would be busy  
 19 speaking to Andy Berry amongst other people.  
 20 Q. Why did you think that they would have capacity to speak  
 21 to Andy Berry but wouldn't have capacity to speak to one  
 22 of your firefighters if they turned up?  
 23 A. Because they have a contact sheet and they would know  
 24 that Andy Berry was the duty NILO that night, but  
 25 I just — it didn't cross my mind to send one of the

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1 crews to the location where the FDO was.  
 2 Q. Do you think it would be fair to characterise your time,  
 3 the first 15 minutes or so of your arrival at  
 4 Philips Park, as being passive and reactive?  
 5 A. I don't think it was passive. I'd obviously received  
 6 some information from the crews upon my arrival. As  
 7 I've said, I was surprised to get there. Once I'd had  
 8 that information from the crews, I got straight on to  
 9 the point to North West Fire Control, and from that  
 10 information there, they were really confident in the way  
 11 they relayed the instructions from Andy Berry. I think  
 12 during the call they said they were on the line to the  
 13 police or they had an open line to GMP, I could be  
 14 incorrect on that, but then obviously as well that NWS  
 15 knew where the RVP was, so in my mind there's some  
 16 communication across the control rooms. So then  
 17 I thought the best thing to do would be to get dressed  
 18 in my PPE, so that when that information did come, we  
 19 could deploy as quickly as possible.  
 20 Q. The fact that NWS knew where your RVP was, your muster  
 21 point, did you have it in mind, bearing in mind the  
 22 importance of co-location, that they would be leaving  
 23 Thompson Street to come and join you at Philips Park?  
 24 A. No.  
 25 Q. So they are not coming to you. Doesn't that require you

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1 to go to them?  
 2 A. Yes, I think obviously co-location is one of those  
 3 principles of JESIP, but again I go back to that call  
 4 with North West Fire Control, which — the instruction  
 5 from Andy Berry to RVP at Philips Park.  
 6 Q. Do you think a problem, just looking at this  
 7 structurally and what might have gone wrong, is that  
 8 we've got three NILOs, none of whom are commanding the  
 9 incident, they've got different levels of knowledge at  
 10 this moment in time because they are not all together,  
 11 you're relying on Andy Berry, he's in his car driving,  
 12 and we lack a single person who is saying, "I am in  
 13 charge and I am going to drive this response"? Do you  
 14 think that's fair?  
 15 A. Yes, I think that's fair.  
 16 Q. That position has been reached because, unlike the  
 17 majority of incidents where the incident commander is  
 18 just determined by the person who turns up, what needed  
 19 to happen here was that Andy Berry, or presumably you,  
 20 as NILO, said, "This person is going to be the incident  
 21 commander"?  
 22 A. Yes, I think in the context of this incident, appointing  
 23 an incident commander would still have needed the  
 24 information to deploy to the scene.  
 25 Q. Well, do you think that if you had thought you were the

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1 incident commander at this moment, you would have acted  
 2 more dynamically than you did?  
 3 A. I think it's difficult to say. You still need to get in  
 4 touch with the force duty officer. Given at that time  
 5 my understanding was it was an active shooter or  
 6 potential active shooter, I still would have needed some  
 7 information in terms of where to go to.  
 8 Q. Might you have been thinking — if you thought, "Right,  
 9 the buck stops with me, I'm in charge, I don't need to  
 10 wait for Andy Berry to make decisions, this is what  
 11 we're going to do, this is my plan, you go there, you do  
 12 that", do you think that sort of mindset might have come  
 13 to you if you had thought, "I am here as the commander"?  
 14 A. I still think I would have needed that information to  
 15 base some decisions on and at that time the information  
 16 I had was limited.  
 17 Q. You had the information that NWS thought  
 18 Thompson Street was safe. That was enough information,  
 19 surely, to deploy people to Thompson Street?  
 20 A. I did have that information, but as I've said, the  
 21 decision of Andy Berry to pick the RVP at Philips Park,  
 22 in my mind, that was based on information he was getting  
 23 from somewhere, and that there was a plan.  
 24 Q. But you didn't think he knew what you knew. That's  
 25 really the point, Mr Meakin, before we move on. At that

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1 moment you have told us you had no reason to think that  
 2 Andy Berry knew that NWSA thought that Thompson Street  
 3 was safe. If you were wearing an incident commander's  
 4 hat at that moment, and you were thinking, "Andy Berry  
 5 came up with that plan, he didn't know what I know, I'm  
 6 in charge, let's get on with this", might you not have  
 7 said, "Right, we need to send resources forward at this  
 8 time"?

9 A. Potentially, yes.

10 Q. I said I was going to return to the right-hand column --  
 11 SIR JOHN SAUNDERS: Have we seen all of the left-hand  
 12 column?

13 MR DE LA POER: We can certainly go down. I don't font  
 14 think that this purports to be exhaustive of the entire  
 15 conversation, but certainly if we could scroll down to  
 16 the next page, please, just to capture it,  
 17 {INQ041473/50}.

18 A. Okay.

19 Q. The bottom of that there. Mr Lopez, if we can go back  
 20 up there, {INQ041473/49}.

21 In the right-hand column North West Fire Control  
 22 have identified facts which were within the knowledge of  
 23 the control room which were not relayed to you in this  
 24 conversation. You can see them in the right-hand  
 25 column. Firstly:

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1 "All the ambulances have been directed to the  
 2 booking office. There is a Bronze paramedic on scene.  
 3 In the booking office looking over the main bridge there  
 4 are approximately 30 casualties. All ambulances to  
 5 proceed to this park [as it's rendered on the log].  
 6 From the police, not gunshot wounds, looks like  
 7 shrapnel."

8 And then over the page, {INQ041473/50}:  
 9 "Police advise more officers arriving on scene.  
 10 Ambulance have five vehicles en route. Police have  
 11 advised more officers landing on scene."  
 12 If any one of those pieces of information, let alone  
 13 all of them, had been conveyed to you in this telephone  
 14 call, would that have changed anything that you did?

15 A. I think so, yes.

16 Q. In what way would it have changed what you did?

17 A. I think having that information helps you sort of  
 18 develop a risk assessment and then will give you more  
 19 information to make a decision to deploy to the arena.

20 SIR JOHN SAUNDERS: Do we still have "Andy Berry's got  
 21 a plan though and he may have spoken to the FDO"? It's  
 22 very easy with hindsight to say you'd have done it, but  
 23 do you think you would have done that or would you still  
 24 have said, "I will wait for Andy Berry"?

25 A. No, I think I would have done that. I'd have contacted

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1 Andy Berry to relay the information and let him know  
 2 what the decision was.

3 MR DE LA POER: At 23.33, just after your call with North  
 4 West Fire Control, there is a contact with Station  
 5 Manager Berry's mobile telephone and yours. It lasted  
 6 under 2 minutes. Do you recall speaking to him before  
 7 he arrived?

8 A. Yes, sir.

9 Q. What passed between you in that conversation?

10 A. I can't recall exactly. I think it was probably the  
 11 information around the resources, that I was at  
 12 Philips Park and I'd been there for a number of minutes,  
 13 and likely I relayed the information about the  
 14 ambulances being at Manchester Central.

15 Q. Did he tell you that he hadn't got hold of the FDO by  
 16 that point?

17 A. He said he was having some difficulties, from memory.

18 Q. So your best source of information at that time, the  
 19 FDO, hadn't materialised, but you had a secondary piece  
 20 of information, which you had gathered. Did you say to  
 21 him, "Right, that was your plan, it's not working with  
 22 the FDO, let's go to Thompson Street"?

23 A. I don't recall at that time.

24 Q. Did you think that the Ambulance Service would be  
 25 putting their personnel in harm's way at

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1 Thompson Street?

2 A. No, sir.

3 Q. So does it follow from that that your thinking was  
 4 Thompson Street must be safe enough?

5 A. I think at a point in time, yes.

6 Q. The moment that you were told it, did that thought not  
 7 cross your mind?

8 A. I think the fact that the resources were there gives you  
 9 some indication that it's relatively safe.

10 Q. And you had crews available at your disposal who had  
 11 MTFA ballistic gear, so they would have very substantial  
 12 protection, so you could have sent them to join the  
 13 ambulances at Thompson Street, knowing that they had  
 14 that additional protection?

15 A. Yes, sir.

16 Q. Did that thought process occur to you?

17 A. No, sir.

18 Q. At 23.41, you sent a WhatsApp message. {INQ019040/1}.  
 19 We'll go to the very bottom. This is something that  
 20 we've looked at with Mr Argyle. At the bottom you send  
 21 a message to this group saying:  
 22 "Just RVPd at Park now. Waiting for some further  
 23 intel."  
 24 Does that accurately capture what you were doing at  
 25 that time?

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1 A. Generally, yes.  
 2 Q. What it doesn't suggest that you are doing is that you  
 3 are trying to gather intel; is that fair?  
 4 A. Yes, sir.  
 5 Q. So you are just waiting for that information to come to  
 6 you rather than proactively seeking it yourself?  
 7 A. I think as I said before, on the call to North West Fire  
 8 Control there was a line open to the police, NWSA were  
 9 aware of our RVP. I think at this point I'd spoken to  
 10 Andy Berry, as you said. So I don't think I was sat  
 11 there just passively, but I think, as we discuss it now,  
 12 I could have challenged some of the calls that came  
 13 through for further information.  
 14 Q. Time is passing here, isn't it, area manager, and you  
 15 know that in a catastrophic event like a bomb going off,  
 16 time can be extremely important for those who are  
 17 casualties of that bomb?  
 18 A. Yes, sir.  
 19 Q. And you had right beside you, at Philips Park, when you  
 20 sent this message, highly trained people who were  
 21 capable of assisting casualties in just that situation;  
 22 do you agree?  
 23 A. Yes, sir.  
 24 Q. Do you think that you were acting at this time as if  
 25 time was of the essence?

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1 A. I think knowing what I know now, I could have done more  
 2 and moved forward to Manchester Central.  
 3 Q. Did you have enough information at the time to make that  
 4 decision reasonably?  
 5 A. I think given that the ambulances were there and, as  
 6 you've said, we got staff in ballistic PPE, there was  
 7 enough information to move forward to  
 8 Manchester Central.  
 9 Q. That wouldn't have been a reckless decision based on the  
 10 information you had at the time, would it?  
 11 A. I don't think so, no.  
 12 Q. In fact it would have been a reasonable decision?  
 13 A. Yes, sir.  
 14 Q. And you recognise that had those crews gone forward, and  
 15 spoken to the Ambulance Service, they would almost  
 16 certainly have immediately discovered that by then there  
 17 were tens of paramedics, not just the Hazardous Area  
 18 Response Team, actually on scene?  
 19 A. I think that's quite clear, yes, sir.  
 20 Q. Had that information been conveyed to you, wouldn't  
 21 you have been saying, "We need to get our resources to  
 22 the scene"?  
 23 A. Yes, sir.  
 24 SIR JOHN SAUNDERS: I think we need to bear in mind  
 25 Mr Berry's evidence which was that actually when he got

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1 to Thompson Street and did speak to the crews, actually  
 2 he wasn't given that information. We'll bear that in  
 3 mind.  
 4 MR DE LA POER: Yes.  
 5 At 23.42, there is a telephone call of just over  
 6 2 minutes between you and Area Manager Etches.  
 7 A. Yes.  
 8 Q. Does this start a series of calls between you and  
 9 Area Manager Etches at the CSR?  
 10 A. Yes, sir.  
 11 Q. Why were you wanting to speak to Area Manager Etches?  
 12 A. Area Manager Etches was the APO on the night. I was  
 13 aware that he was going into the CSR, from memory.  
 14 Following the conversation with Andy Berry about issues  
 15 contacting the FDO, from memory I got in contact with  
 16 Paul to try and get some information through him and the  
 17 team in the CSR.  
 18 Q. The people in the CSR, you have told us, are not in  
 19 command of this incident; is that right?  
 20 A. That's right.  
 21 Q. At this stage, who is in command from GMFRS?  
 22 A. I think we hadn't nominated an incident commander  
 23 specifically at that point. Andy Berry was the duty  
 24 NILO. He had made the decisions around where to locate,  
 25 what appliances to send, but obviously the role of NILO

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1 is not an incident commander per se.  
 2 Q. At this point of this call, 23.42, which is over an hour  
 3 after the explosion, are we right in understanding that  
 4 there was no commander of the incident for GMFRS?  
 5 A. Not to my knowledge, no.  
 6 SIR JOHN SAUNDERS: It looks like, doesn't it, we've got  
 7 three advisers and no one to advise?  
 8 A. Yes, sir. I think the MTFA incident is different from  
 9 most other incidents in that regard.  
 10 MR DE LA POER: But the MTFA incident isn't different in the  
 11 sense that it needs a commander, doesn't it?  
 12 A. Yes, sir.  
 13 Q. It doesn't look like the procedures envisaged that one  
 14 would be automatically appointed; is that right?  
 15 A. Yes, sir.  
 16 Q. It relied upon the NILO nominating someone?  
 17 A. Yes, sir.  
 18 Q. And if they overlooked doing that, and if the other  
 19 NILOs didn't think to question that, we arrive at the  
 20 position that we have, which is nobody gripping this  
 21 incident and acting as commander?  
 22 A. Yes, sir. I think to make the command decisions we  
 23 still needed some more information.  
 24 SIR JOHN SAUNDERS: I think we've got the point.  
 25 MR DE LA POER: Shortly after your call with Mr Etches, did

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1 Mr Berry and Mr Levy arrive?  
 2 A. Yes, sir.  
 3 Q. And did they also arrive with the TRU, the Technical  
 4 Response Unit?  
 5 A. I believe so, yes.  
 6 Q. Were you told by Mr Berry that he had been given the  
 7 cathedral as a rendezvous point in the first call that  
 8 he had with North West Fire Control?  
 9 A. No, sir.  
 10 Q. Would you have regarded that as an important piece of  
 11 information, had you been told it?  
 12 A. Yes, sir.  
 13 Q. In what way might it have affected your thinking?  
 14 A. I think in the absence of any contact with the FDO that  
 15 an RVP had been shared, I would have expected that  
 16 we would have deployed to that RVP.  
 17 Q. At 23.47 you switched on your dictaphone; is that right?  
 18 A. Yes.  
 19 Q. I think you had been issued with a dictaphone for some  
 20 time?  
 21 A. I'd not been issued with it, I chose to purchase it as  
 22 I became a NILO. I can't remember exactly when it was,  
 23 probably in the early stages of picking up the NILO  
 24 role.  
 25 Q. You had it with you that night, plainly?

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1 A. Yes.  
 2 Q. And you decided to switch it on?  
 3 A. Yes, sir.  
 4 Q. Why do you think you decided to switch it on at that  
 5 point?  
 6 A. At that specific time, I think it was probably just  
 7 I had an opportunity to put it in my pocket and turn it  
 8 on, and the anticipation of deploying and capturing  
 9 discussions and decisions in a dynamic incident that we  
 10 probably wouldn't have the time to write out longhand  
 11 and could refer back to after.  
 12 Q. We listened to the recording with Mr Berry yesterday and  
 13 I am not planning to play it again, but can we please  
 14 bring it up in the form of the North West Fire Control  
 15 sequence of communications document, {INQ041473/60}.  
 16 I just want to ask you about one thing that you say at  
 17 this time.  
 18 We can see that's timed, and it's an approximate  
 19 time, 23.47. What you are recorded as saying in the  
 20 second entry by your name:  
 21 "As soon as they declare a forward control point,  
 22 we'll go to wherever that is and we'll start getting  
 23 people into the warm zone."  
 24 Do you see that? It's in response to what Mr Ludley  
 25 said about:

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1 "What's the chance of us actually going?"  
 2 I just want to ask you about what you said there:  
 3 "As soon as they declare an FCP we'll go wherever  
 4 that is and then we'll start getting people into the  
 5 warm zone."  
 6 The FCP, is that a place where the on-scene  
 7 commanders congregate under JESIP?  
 8 A. Yes, sir.  
 9 Q. Is having an FCP a requirement before deployment?  
 10 A. I think in terms of a suspected marauding terrorist  
 11 attack, yes, we need to agree the limits of exploitation  
 12 and what the casualty plan is.  
 13 Q. So you cannot deploy to a scene in your understanding if  
 14 it is a suspected MTFA without there having been  
 15 identified an FCP?  
 16 A. I think if we've got the information on the incident in  
 17 terms of where the zones are and limits of exploitation,  
 18 then in theory we could, but all of our training would  
 19 have been around those over-the-bonnet conversations,  
 20 how they are termed, with the commanders from police and  
 21 ambulance, to agree that, to get the teams together,  
 22 agree the casualty plan, as I have said, and kind of go  
 23 from that point.  
 24 SIR JOHN SAUNDERS: Don't you just go to the scene and find  
 25 the bonnet when you get there?

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1 A. Not in terms of an MTFA incident, sir. We go to an RVP,  
 2 and muster resources there, but then the NILOs will go  
 3 on to the FCP to have those conversations.  
 4 MR DE LA POER: I think you've just anticipated my next  
 5 question. Isn't the more important place, before we get  
 6 on to an FCP, the rendezvous point?  
 7 A. Yes, sir.  
 8 Q. So shouldn't you be saying, "What we need is  
 9 a rendezvous point and then the NILOs can go forward and  
 10 find the FCP"?  
 11 A. In the context of that discussion?  
 12 Q. Yes.  
 13 A. I think at Philips Park we were at the RVP, as  
 14 I understood it, so then what we were waiting for was  
 15 the FCP to be declared to then move forward to bring  
 16 resources on and start to deploy.  
 17 SIR JOHN SAUNDERS: This RVP did not meet the normal  
 18 requirement because no one else was there. The point is  
 19 being made you go to an RVP where the other people are  
 20 there, the other forces, and then you can — so this was  
 21 not actually fulfilling an RVP function, it was a muster  
 22 point for the Fire Service. It wasn't an RVP where all  
 23 the services got together, was did?  
 24 A. No, it wasn't a multi-agency RVP, no, sir.  
 25 MR DE LA POER: Isn't that the critical location for an MTFA

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1 where you can co-locate all of the resources and then  
 2 the commanders can move to the FCP, wherever that has  
 3 been determined to be?  
 4 A. Yes, sir.  
 5 Q. So why do you think you were fixated upon the need for  
 6 an FCP to be declared before you could mobilise  
 7 resources?  
 8 A. I don't know if fixated is the right word.  
 9 SIR JOHN SAUNDERS: Let's get rid of that rather emotive  
 10 word.  
 11 MR DE LA POER: Thank you. I regret it and I withdraw it.  
 12 SIR JOHN SAUNDERS: You regarded it as important that you  
 13 had an FCP?  
 14 A. Yes, sir.  
 15 SIR JOHN SAUNDERS: So why? I'm just replacing the word.  
 16 A. For the purposes of clarifying the zones and calling  
 17 resources forward to wherever that was.  
 18 MR DE LA POER: How did you know that there would be a warm  
 19 zone?  
 20 A. I was working on the basis that this was an MTFA  
 21 incident, so you will expect that that will be  
 22 declared — obviously in the call from North West Fire  
 23 Control, there was a suspected active shooter or there  
 24 was an active shooter, from what North West Fire Control  
 25 had relayed, so my expectation, given my training, was

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1 that there would be a hot, warm and cold zone.  
 2 Q. You hadn't been told that Operation Plato had been  
 3 declared?  
 4 A. No, sir, not at that time.  
 5 Q. You had been told that there was confirmed information  
 6 that it was a bomb, which may or may not be a precursor  
 7 to an MTFA, and that there was some information that  
 8 there may have been an active shooter?  
 9 A. Yes, sir.  
 10 Q. But you had reached the conclusion, had you, that this  
 11 was an MTFA?  
 12 A. I think ... I think that was my understanding. I was  
 13 building a picture in any mind that it had the sort of  
 14 makings of an MTFA incident, although it hadn't been  
 15 formally declared as such.  
 16 Q. Were you present during Mr Berry's call to GMP, where he  
 17 got through on the force duty officer's line? Did you  
 18 overhear that conversation?  
 19 A. I don't recall overhearing it, but obviously I was in  
 20 the vicinity at Philips Park.  
 21 Q. Because Mr Berry was anxious to identify an FCP in that  
 22 call as well. Do you think that was a product of  
 23 a discussion that you'd had with him?  
 24 A. Which discussion was that, sorry?  
 25 Q. The discussion that we heard on the dictaphone. He was

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1 a participant in that.  
 2 A. I think at that point the NILOs were under the  
 3 impression that it was an MTFA incident and that  
 4 Op Plato, if not formally declared, was likely to be.  
 5 That was probably in his mind. I can't speak for him,  
 6 but I imagine that was in his mind, about an FCP, with  
 7 the purpose of, once we get there, we can deploy crews  
 8 into wherever they needed to be.  
 9 Q. Were you told that he was told in that conversation that  
 10 the parking at the cathedral was the place that was the  
 11 FCP? The question was:  
 12 "Can we have an FCP?"  
 13 And he was told the cathedral car park. Did you  
 14 know that, that a location was given?  
 15 A. I don't recall that, sir, no.  
 16 Q. And that later in the conversation, he was told the  
 17 Boddington's car park; did you know that?  
 18 A. I don't recall that, sir, no.  
 19 Q. At all events, shortly after that call, was it decided  
 20 to move forward to Thompson Street?  
 21 A. Yes, sir.  
 22 Q. And who made that decision?  
 23 A. I believe at around that time, Mr Levy was on the phone  
 24 to the chief fire officer, there were conversations  
 25 being had then, and following that we had a conversation

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1 as NILOs and we agreed we were going to move to  
 2 Manchester Central.  
 3 Q. By this point had Mr Levy decided that he was going to  
 4 be the incident commander?  
 5 A. That's not my recollection. I think there'd been  
 6 a brief discussion around it, but the actual formal  
 7 decision around Mr Levy taking over as incident  
 8 commander was made on the forecourt at  
 9 Manchester Central.  
 10 SIR JOHN SAUNDERS: Who made the decision? Was it a  
 11 democratic decision?  
 12 A. I think Mr Levy made the decision and I don't think  
 13 there was any disagreement with that. He was the most  
 14 experienced NILO.  
 15 SIR JOHN SAUNDERS: We'll have a break in a moment. We've  
 16 been going for an hour and a half, I think, now.  
 17 MR DE LA POER: Yes, thank you very much indeed, sir.  
 18 I will just take us to Thompson Street.  
 19 That conversation around incident commander occurred  
 20 at Thompson Street. Just before you deployed, you had  
 21 a conversation at 00.01 with Area Manager Etches. Do  
 22 you recall that? One of a sequence of them.  
 23 A. Yes, sir.  
 24 Q. And I think at that time, we can see from other  
 25 information, he was arriving at the CSR himself, so

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1 he hadn't been present there before that conversation.  
 2 Was the decision to go to Thompson Street connected in  
 3 any way with your conversation with Mr Etches, in other  
 4 words was that something that he approved, encouraged,  
 5 discouraged or said anything about, or was that movement  
 6 to Thompson Street exclusively between the NILOs?  
 7 A. I think from memory, it was a discussion and a decision  
 8 between the NILOs. I think what is likely is I rang  
 9 Paul to relay that information.  
 10 Q. Simply to tell him that's what was happening?  
 11 A. Yes.  
 12 MR DE LA POER: All right. Well, we will return after the  
 13 break, then, sir, if we may.  
 14 SIR JOHN SAUNDERS: I just have a couple of things I want to  
 15 ask you before we do that.  
 16 When Mr Berry gave evidence yesterday, and you know  
 17 he got delayed on his trip, so he was expecting, I think  
 18 you and Mr Levy to arrive before him. His expectation  
 19 was that once one of you arrived, you would get a grip  
 20 of the situation and take it over. It has been  
 21 suggested that you didn't appear to do that. Do you  
 22 think that is a justified criticism of Mr Berry of you  
 23 that you should have, at that stage, got much more of  
 24 a grip?  
 25 A. I don't know in terms of getting a grip what his

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1 expectation was. In terms of him being delayed,  
 2 I wasn't aware from memory to the extent of his delay.  
 3 He never rang me. He may have rang Ben to give him some  
 4 instruction, but he never gave me any instruction to get  
 5 a grip and do something.  
 6 SIR JOHN SAUNDERS: I think the impression of his evidence  
 7 was he wouldn't be in a position to give you  
 8 instruction.  
 9 You're in a higher rank than he is, so there's no  
 10 reason to think if you got there first you'd need to  
 11 wait for an instruction from him. I know you expected  
 12 him to have more information than you did, but you  
 13 actually do have the feel of how the people closest to  
 14 the scene, the fire officers, are actually feeling and  
 15 you must have actually felt rather under some pressure  
 16 to do something from them. They are desperate to go and  
 17 do something to help people and essentially you're  
 18 saying, "Hang on, we'll get there, we need more  
 19 information".  
 20 A. Yes. I don't think it was a case of standing back and  
 21 doing nothing. As I've said, the call from North West  
 22 Fire Control was quite decisive in terms of  
 23 (overspeaking) --  
 24 SIR JOHN SAUNDERS: Okay. As a result of that call, you  
 25 decided: this is what the plan is, let's stick by the

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1 plan?  
 2 A. Yes, sir.  
 3 SIR JOHN SAUNDERS: Okay. Let me now --  
 4 A. Sorry, I was just going to say, in the context of being  
 5 made aware of the potential for an active shooter still.  
 6 SIR JOHN SAUNDERS: Yes. You could have appointed yourself  
 7 incident commander; is there is any reason why you  
 8 shouldn't?  
 9 A. No, not necessarily, no reason not to.  
 10 SIR JOHN SAUNDERS: You knew you needed one?  
 11 A. I knew we would need an incident commander, but I think  
 12 what we needed more than anything was more information  
 13 to make a decision.  
 14 SIR JOHN SAUNDERS: Maybe but you need both and you actually  
 15 do need someone to take command, don't you?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: I just want to ask you this of  
 18 Mr Berry's actions: we know that he was told on the  
 19 first call from him that the RVP designated was the  
 20 cathedral car park -- you'll have heard his explanation  
 21 about this -- he didn't go there and one of the factors  
 22 was, what you have said: I didn't know how long ago the  
 23 incident had actually happened so it could have  
 24 immediately happened. If you had been in his position  
 25 and you had been told in the same way that he was that

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1 the RVP was the cathedral car park, what would you have  
 2 done? I know it may involve a criticism of a fellow  
 3 officer and I'm sure you don't want to do that, but we  
 4 all need to get to what happened and why it happened.  
 5 A. Yes. I think given that an RVP was shared, I think  
 6 I would have gone to the RVP.  
 7 SIR JOHN SAUNDERS: It's coming from the police.  
 8 Okay. Quarter of an hour. Thank you.  
 9 (11.06 am)  
 10 (A short break)  
 11 (11.21 am)  
 12 MR DE LA POER: Area manager, let's just identify some key  
 13 times and then fill in some gaps between them, just  
 14 briefly. We know from the information which tracks  
 15 radios and vehicles that Mr Berry arrived at  
 16 Thompson Street at 00.06. I think you led the convoy  
 17 that arrived there, so that will be your approximate  
 18 arrival time as well; is that correct?  
 19 A. That's correct, yes.  
 20 Q. We know that Mr Berry arrived at the Victoria Exchange  
 21 complex at 00.36, so exactly half an hour after he  
 22 arrived at Thompson Street. I think you were deployed  
 23 to the scene at 01.15; is that correct?  
 24 A. Yes, sir.  
 25 Q. So the period that we're going to briefly look at now is

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1 the period between the arrival at Thompson Street and  
 2 Mr Berry's deployment. We covered already that shortly  
 3 after you arrived at Thompson Street, Group Manager Levy  
 4 proposed that he would be incident commander and there  
 5 was no disagreement with that?  
 6 A. That's correct, sir.  
 7 Q. You then made a number of calls to Area Manager Etches,  
 8 as part of your ongoing dialogue with him; is that  
 9 right?  
 10 A. Yes, sir.  
 11 Q. I think you also had a call with North West Fire  
 12 Control, which we don't need to look at the detail of,  
 13 in relation to the TRU.  
 14 A. Yes, sir.  
 15 Q. When you were at Thompson Street, did you become aware  
 16 of Crew Manager Mottram's particular frustration bearing  
 17 in mind that he knew his wife was at the  
 18 Victoria Exchange complex?  
 19 A. I don't recall it specifically, but I am aware that  
 20 he had some frustrations.  
 21 Q. Thompson Street Fire Station is less than a mile from  
 22 the Victoria Exchange complex; is that right?  
 23 A. Yes, sir.  
 24 Q. You had already donned your ballistic PPE when you were  
 25 at Philips Park?

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1 A. Yes, sir.  
 2 Q. Would you agree that at a brisk pace you could walk  
 3 there in under 10 minutes?  
 4 A. Yes, sir.  
 5 Q. Was there any discussion once you arrived at  
 6 Thompson Street about somebody in ballistic PPE making  
 7 their way forward to the scene in order to gain  
 8 situational awareness?  
 9 A. Not specifically just after we arrived, sir.  
 10 Q. At any point in the 30 minutes before Mr Berry deployed  
 11 was there that discussion?  
 12 A. I think I recall a discussion at a point in time about  
 13 the -- we'd seen ambulances leaving Manchester Central,  
 14 going towards the direction of the arena, but I think at  
 15 that point obviously we were really frustrated that we'd  
 16 not had the information that we were seeking. I recall  
 17 a conversation around that being a sufficient risk  
 18 assessment for us to go towards the scene.  
 19 Q. You now have an incident commander in the form of Mr  
 20 Levy.  
 21 A. Yes, sir.  
 22 Q. Did you in your capacity as tactical adviser to the  
 23 incident command say to him, "We can go now"?  
 24 A. I think there was a joint conversation, yes, saying that  
 25 the ambulances going were sufficient for a risk

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1 assessment for us to make a deployment and head towards  
 2 that direction.  
 3 Q. So did you deploy?  
 4 A. No. From memory, and Mr Levy is probably the best  
 5 person to speak to about this, there was  
 6 a conversation -- I believe Mr Levy had a conversation  
 7 with the chief fire officer, and then some time -- I am  
 8 not exactly sure on the timings -- there was a specific  
 9 request for 12 firefighters to be sent down to the  
 10 scene.  
 11 Q. We have a good understanding of that. I think that  
 12 request originated from Mr Hynes of NWAS, it went via  
 13 the chief fire officer and was then relayed to those at  
 14 Thompson Street.  
 15 But Mr Levy is the incident commander, you've  
 16 explained to us that within the Fire and Rescue Service,  
 17 the hierarchy is such that the incident commander is the  
 18 one who makes the decisions. Was it appropriate, in  
 19 your view, based on the structures that were in place,  
 20 for the chief fire officer to be determining deployment?  
 21 A. It didn't feel it was appropriate, no, sir.  
 22 Q. Well, the only authority that he would have would be  
 23 rank, wouldn't it, it wouldn't be role?  
 24 A. Yes, sir, as the chief fire officer.  
 25 Q. Yes. You may be capturing this in a letter that you

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1 were a signatory to, to Lord Kerslake. We're just going  
 2 to have a look at that and see what comment you make,  
 3 just one very small part of it.  
 4 It is {INQ004198/2}. Just for everybody's  
 5 reference, this is a letter written on 8 March 2018. Do  
 6 you recall the correspondence I'm talking about?  
 7 A. Yes, sir.  
 8 Q. This letter was written following your first discussion  
 9 with members of the Kerslake team.  
 10 In it you are responding to a letter that you had  
 11 received, you and others had received, which was  
 12 critical of GMFRS, is that right, and the NILOs in  
 13 particular?  
 14 A. Yes, sir.  
 15 Q. I am not going to consider all the term of it, but  
 16 I would just like to have a look at the penultimate  
 17 paragraph:  
 18 "Finally, we consider your draft report places an  
 19 unfair portrayal of the lack of initiative on the part  
 20 of the NILOs. It appears to fail to recognise that from  
 21 the point at which the absence of situational awareness  
 22 became so apparent, any further attempts to apply  
 23 initiative were thwarted by a remote command structure  
 24 which was applied contrary to standard operating  
 25 principles by the principal officer on 22 May 2017."

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1 And we can see that you, Mr Levy, and Mr Berry are  
 2 co-signatories.  
 3 Thank you very much indeed, we can take that down.  
 4 Is what you are describing in your final paragraph  
 5 there about having gained situational awareness, are you  
 6 referring there to your arrival at Thompson Street?  
 7 A. Yes, sir.  
 8 Q. And are you, when you talk about the principal fire  
 9 officer and the interference, my word not yours, are you  
 10 talking about that intervention by Mr O'Reilly once  
 11 you are at Thompson Street, which ultimately resulted in  
 12 deployment, albeit of 12 non-specialists?  
 13 A. Yes, sir.  
 14 SIR JOHN SAUNDERS: Just let me understand that a bit. So  
 15 you don't have the conversation with the fire officer,  
 16 that's Mr Levy, so it actually depends what it is,  
 17 because there can be a difference between the chief fire  
 18 officer saying, "Right, you're to send these, not send  
 19 those", that could contrast with, "Look, I've had  
 20 a conversation with the man in charge of the  
 21 Ambulance Service at the scene and he said this is what  
 22 he wants, so would you send those?" It's a different  
 23 thing, isn't it, a bit?  
 24 A. Yes, sir, I think it's slightly different.  
 25 SIR JOHN SAUNDERS: Okay. One of the things the chief fire

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1 officer is doing, and we'll obviously hear from him in  
 2 due course, but it may be said is looking more at the  
 3 overall picture, so if there were to be things happening  
 4 elsewhere, if they didn't actually need the specialist  
 5 Fire Service vehicles at the arena, then actually it's  
 6 better to keep them back in case they are wanted  
 7 elsewhere?  
 8 A. I think for the type of injuries that were described,  
 9 the capabilities of the Specialist Response Team, in my  
 10 opinion, would be more appropriate to deploy. There are  
 11 other specialist resources that could be brought in to  
 12 backfill that capability, but without obviously getting  
 13 to the scene to make that determination ourselves.  
 14 SIR JOHN SAUNDERS: It would certainly have eased the  
 15 problem with sending people into the warm zone.  
 16 A. Yes, sir.  
 17 SIR JOHN SAUNDERS: So from that point of view, clearly the  
 18 decision to send them would have been right and that  
 19 would have avoided that problem.  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: Okay, thank you.  
 22 MR DE LA POER: During this period, you spoke to  
 23 Area Manager Etches on a number of occasions. I'd just  
 24 like to ask you to turn up paragraph 91 of your first  
 25 witness statement, page 19.

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1 (Pause)  
 2 SIR JOHN SAUNDERS: It doesn't look like the first statement  
 3 to me.  
 4 MR DE LA POER: It may be the longer statement dated  
 5 25 November 2019. Paragraph 91.  
 6 A. Yes.  
 7 Q. Just follow it with me, please:  
 8 "It was obvious to me by this stage..."  
 9 And here we are talking about Thompson Street; is  
 10 that right?  
 11 A. Yes.  
 12 Q. "... that something hugely serious was taking place and  
 13 that other services were on scene. I rang AM Etches  
 14 in the CSR knowing that as a former NILO he would  
 15 understand the role. I told him, 'For fuck's sake,  
 16 Paul, we need to go'. However, our request was denied."  
 17 So was that Mr Etches responding to your emphatic  
 18 statement by saying, no, you can't go or was somebody  
 19 else ---  
 20 SIR JOHN SAUNDERS: I think you're talking about the SRT,  
 21 aren't you, there?  
 22 A. Yes, sir. I don't think it was Paul who said no,  
 23 I think that instruction had come from the chief fire  
 24 officer.  
 25 MR DE LA POER: Right. But is this all happening before the

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1 deployment actually takes place?  
 2 A. I believe so, sir, yes.  
 3 Q. Then as we know, Mr Berry and non-specialists did go at  
 4 00.36. You had a further 40 minutes at Thompson Street?  
 5 A. Yes, sir.  
 6 Q. And during that period, what were you doing?  
 7 A. I don't recall exactly. Throughout the whole period  
 8 I was there with Area Manager Levy. I think he had  
 9 a meeting with a --- an on-scene meeting with other  
 10 agencies at that point. I could be slightly out on the  
 11 timings. Yeah, I was there at the RVP at  
 12 Manchester Central.  
 13 Q. Were you wishing to go to the scene during that period?  
 14 A. Yes, sir. I think just --- sorry, I think just before  
 15 Andy was deployed to the arena, we'd had a conversation  
 16 about when he arrives there and requests all of the  
 17 resources, that's for everything to get there, because  
 18 recognising it was very late in the day, we wanted to  
 19 get as many resources there as we could to do what we  
 20 could at that point.  
 21 Q. I don't want to go into the detail, but no doubt you'll  
 22 be able to confirm that once you got to the scene at  
 23 01.15, you did your best to play a role there?  
 24 A. Yes, sir.  
 25 Q. The final document I would like to take you to is your

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1 debrief. We are just going to show two pages on the  
 2 screen. You don't need to look at it. {INQ004263/1}.  
 3 It's dated 12 July. If we go to {INQ004263/3}, we'll  
 4 just capture this so your comments are there. I'm not  
 5 going to take you through all of them, I show you that  
 6 to show that you have a list of matters which you  
 7 considered at that time went wrong.  
 8 What I'm more interested in, please, is  
 9 {INQ004263/5}, which is where you make your  
 10 recommendations.  
 11 We'll park number 1 for the moment. At number 2.,  
 12 you are indicating there a need for exercising?  
 13 A. No—notice exercising.  
 14 Q. Why no notice?  
 15 A. Because I think on reflection, following the incident,  
 16 I recognise my experience at that point was fairly  
 17 limited in terms of exercising even though I'd observed  
 18 and been involved in some decent—sized exercises. They  
 19 were generally, from my understanding, from the point of  
 20 co—location but not necessarily from the point of  
 21 mobilisation, just getting a call.  
 22 Q. It's that first stage where, would you agree,  
 23 substantial problems were encountered?  
 24 A. Yes, sir.  
 25 Q. I would like to just return to that first bullet point

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1 because JESIP and whether or not it actually works in  
 2 practice is an important matter that is being  
 3 investigated. Is it your view that JESIP is capable of  
 4 working or by reason of your experience and what you  
 5 know, do you think that it needs to be changed?  
 6 A. I think JESIP does work. JESIP is not exclusive to  
 7 major incidents or incidents of this type. It applies  
 8 on a daily basis, whether it's from a fire perspective,  
 9 a relatively small scale RTC, there's multi—agency  
 10 working there, the principles are sound. I suppose it's  
 11 that commitment to the principles of JESIP and fully  
 12 embedding them across all organisations.  
 13 Q. Do you think that there was a lack of commitment to the  
 14 principles which became apparent on the night?  
 15 A. I think there was a breakdown in communication, yes,  
 16 which is one of the fundamental principles of JESIP, so  
 17 I think by that argument I would say, yes, JESIP fell  
 18 down. I'm not saying there was, you know, a dismissal  
 19 of JESIP principles by any of the responding services.  
 20 Q. Do you think you had the JESIP principles firmly in mind  
 21 throughout the night?  
 22 A. I think so. I think the principle of co—location,  
 23 obviously, one that we've discussed, and I've tried to  
 24 explain the reasons why when we got to Philips Park we  
 25 stayed there, but I think obviously co—location is the

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1 one that failed and the most significant one is  
 2 communication.  
 3 SIR JOHN SAUNDERS: So do you think you were not following  
 4 JESIP yourself by not doing more to achieve co—location  
 5 with NWAS?  
 6 A. I think we were trying to work by the principles of  
 7 JESIP and I think as an organisation we're aware of the  
 8 JESIP principles quite well at all levels.  
 9 SIR JOHN SAUNDERS: So they are embedded?  
 10 A. I think they're well—known across the organisation, yes,  
 11 particularly at tactical and strategic level.  
 12 SIR JOHN SAUNDERS: So how do you make it work if it's  
 13 embedded everywhere, they all know what it is, but  
 14 they're not doing it, which arguably, I'm afraid,  
 15 includes you.  
 16 A. Yes, sir. I think... I think the only thing we can do  
 17 is keep exercising and testing them.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 MR DE LA POER: That concludes the questions that I have of  
 20 Area Manager Meakin. Can I now turn to Mr Smith QC on  
 21 behalf of North West Fire Control.  
 22 Questions from MR SMITH  
 23 MR SMITH: Mr Meakin, I would like to begin by asking you  
 24 about your experience with the command support room  
 25 after the attack. I think that from August 2017, you

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1 were appointed to a particular role with the command  
 2 support room; is that correct?  
 3 A. The command support room is located in what was called  
 4 at the time the Emergency Response Hub, which consisted  
 5 of a number of teams who generally coordinate training  
 6 for the service, (inaudible: distorted) fire engines on  
 7 a daily basis. But within that office if you like, that  
 8 office space, there's a command support room function.  
 9 Q. Were you therefore familiar with the equipment that was  
 10 in the command support room at the time of the  
 11 explosion?  
 12 A. Generally, yes, sir.  
 13 Q. As far as the equipment is concerned, do you agree that  
 14 within that room, once opened and up and running, there  
 15 would be displayed on the screens, or there should be,  
 16 the incident logs that had been opened and created by  
 17 North West Fire Control?  
 18 A. Yes, sir. There was a terminal within the command  
 19 support room which was dedicated for a system where the  
 20 incident (inaudible: distorted) all incidents, yes.  
 21 Q. We do know that log 9074 was the incident log that was  
 22 first created for the report of the explosion. We know  
 23 that incident log 9078 was created for the mobilisation  
 24 of four pumps to Philips Park Fire Station. So on the  
 25 night of the attack, once those incident logs had been

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1 created and once the terminals were opened at the  
 2 command support room, do you agree that all officers  
 3 within the command support room would be able to read  
 4 the content of the incident logs if they chose to do so?  
 5 A. They would have had access to it, to my knowledge, yes,  
 6 sir .  
 7 Q. Looking at another document which you've been shown  
 8 already this morning, could I ask Mr Lopez to put on the  
 9 screen {INQ019040/1}, please, which I think is the  
 10 WhatsApp sheet.  
 11 Your entry, which we've already seen, at 23.41 is  
 12 at the bottom of the page. But I would like to take you  
 13 up the page to an entry that reads, "Phil Nelson".  
 14 Do you have that?  
 15 A. Yes, sir .  
 16 Q. Mr Nelson, who is Mr Nelson?  
 17 A. Phil Nelson is a group manager and also a NILO.  
 18 Q. So he's a senior officer and a NILO?  
 19 A. Yes, sir .  
 20 Q. It reads:  
 21 "Just on iNet, Dave. It looks really bad. Police  
 22 are reporting minimum number of 18 fatalities!"  
 23 The time of that was 23.11. What do you discern  
 24 from those words, "Just on iNet", and what he has  
 25 explained in that short message?

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1 A. It appears from that entry that he's accessed iNet and  
 2 had a look at that incident log. What he's discerned  
 3 from that is that it's a significant incident and then  
 4 obviously the fatality numbers at that time are reported  
 5 there.  
 6 Q. As far as we know, he was not in the command support  
 7 room, so physically what would he have to do to access  
 8 the incident log for this incident and be in a position  
 9 to report that on the message?  
 10 A. He'd have to open up his laptop and log on to the system  
 11 and find the relevant incident log, open that up.  
 12 Q. Would that be straightforward for an officer of his  
 13 experience?  
 14 A. Yes, sir .  
 15 Q. And no doubt an officer of your experience, if you were  
 16 in his position?  
 17 A. Yes, sir .  
 18 Q. If you had not been travelling and if you had not been  
 19 effectively on your feet at Philips Park Fire Station on  
 20 arrival, would you have had the capacity to access the  
 21 incident log in the same way?  
 22 A. Yes, sir .  
 23 Q. Was any such capacity available at Philips Park  
 24 Fire Station?  
 25 A. Potentially I would have had to go into the station to

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1 get on to the Wi-Fi System or done a mobile hot spot off  
 2 my phone. It would have been doable, but would have  
 3 been a little bit more complicated, I think.  
 4 Q. But certainly the possibility existed, did it, that the  
 5 station itself had the facility to permit access to the  
 6 incident log?  
 7 A. I would have had to have taken my personal laptop,  
 8 I think, for the access to it because it isn't available  
 9 to everybody, is my understanding.  
 10 Q. What about your telephone? Is that capable of accessing  
 11 INet Viewer, or was it at the time?  
 12 A. Not to my knowledge, no.  
 13 Q. So that puts you in a very different position to  
 14 Mr Nelson, who clearly had access to his laptop; is that  
 15 correct?  
 16 A. Yes, sir .  
 17 Q. Just moving from there, could I take you, please, to  
 18 {INQ041473/1}, a schedule of communications, at page 49,  
 19 please {INQ041473/49}. That's the call that you made to  
 20 North West Fire Control, which we've been looking at  
 21 with Mr de la Poer, isn't it?  
 22 A. Yes, sir .  
 23 Q. It is timed at 23.28. I'd like to take you to the  
 24 second reference to you in that transcript:  
 25 "I've just had reports from crews at Philips Park.

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1 They're from Central. They've been sent here from the  
 2 station. We've had NWAS staff turning up on the  
 3 forecourt."  
 4 This is just under 4 minutes after your arrival,  
 5 I think. So clearly, you had obtained that information,  
 6 do you agree, when you got out of your vehicle and spoke  
 7 to the fire crews at G18?  
 8 A. Yes, sir .  
 9 Q. What do you recall being told by the fire crews, if you  
 10 could give the inquiry the detail, please, on your  
 11 arrival at Philips Park?  
 12 A. I can't remember the specific details. I recall crews  
 13 approaching me as I parked up my vehicle and then they'd  
 14 said that as they were leaving the engine house at  
 15 Manchester Central, ambulances were arriving at the  
 16 station, and I was surprised and wondered why they'd  
 17 been sent to Philips Park.  
 18 Q. Well, did any firefighter, crew member, at Philips Park  
 19 say to you that a firefighter's wife, who was  
 20 a paramedic, was on scene?  
 21 A. I don't recall being told that there was a paramedic on  
 22 scene specifically.  
 23 Q. To put this in context, I would like to take you back to  
 24 page 47 just to give you some information which you were  
 25 not directly involved with but which may be helpful in

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1 dealing with my question. {INQ041473/47}.

2 We see the entry at the bottom of that page,

3 23.25.59. Watch Manager Simister made a call to North

4 West Fire Control at that time, received by a different

5 control operator, Rochelle Fallon, and his opening words

6 were:

7 "Is it possible to give us an update, like a NILO or

8 something? I've got a fireman here whose wife is

9 a paramedic and she's on scene and we are stood by doing

10 nothing and he's getting a bit frustrated."

11 So I'll just put that in context for you and then

12 I would like to go on again to the discussion you had

13 with North West Fire Control at 23.28, which is

14 {INQ041473/49}.

15 It is plain, I would ask you to consider, that that

16 information was in the possession of the fire crews at

17 Philips Park Fire Station on your arrival.

18 A. Yes, sir.

19 Q. So I would like you to think again: do you think it is

20 at least, thinking about it, a real possibility that

21 when the fire crews approached you, as the first NILO to

22 arrive at Philips Park Fire Station, this was part of

23 the information that you were given?

24 A. I think it's possible. My recollection was that the --

25 I was informed that the ambulances were arriving at

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1 Manchester Central and not necessarily the scene itself.

2 Q. Then if we look at the right-hand column on

3 {INQ041473/49}, with the information from the incident

4 logs that was not passed to you in the course of that

5 call, I would like you to consider whether in fact,

6 because of what the fire crews told you, you were in

7 possession by the time of that call of the information

8 that the Ambulance Service was in fact in attendance at

9 the incident in the form of paramedics, and effectively

10 you didn't need this information in the right-hand

11 column to inform you of that because you knew it

12 already?

13 A. As I've said, I don't recall being told that they were

14 at the scene of the incident. I recall being told that

15 they were arriving at Manchester Central Fire Station

16 and the frustration of the crews was that they were

17 leaving there to go to Philips Park whilst other

18 resources were arriving at Manchester Central, not

19 necessarily the scene.

20 Q. That's your recollection?

21 A. That's my recollection, yes, sir.

22 Q. At 23.42, you spoke to Area Manager Etches, I think, did

23 you not?

24 A. Yes, sir.

25 Q. I can take you to the page, it's {INQ041473/55}, if

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1 Mr Lopez could take us there, please. At least

2 I thought it was.

3 (Pause)

4 23.42. Here we are on {INQ041473/55}. The duration

5 of that call was 2 minutes 5 seconds. At that time,

6 I can tell you Mr Etches was still travelling, so

7 he wasn't in the command support room. But was

8 Mr Etches able to give you any information which he may

9 have derived from the incident log, accessing it through

10 his laptop, before he became mobile?

11 A. Not that I recall, sir.

12 Q. Do you recall what you did discuss with Mr Etches in the

13 course of that call?

14 A. I don't recall specifics or the details of the call.

15 I suspect it was a general discussion about what we knew

16 at that time in terms of the resources, where we were,

17 the conversations that had taken place, who was in

18 contact with who.

19 Q. Moving now to page {INQ041473/112}. From 05.52 that

20 morning through until a period after 6 o'clock in the

21 morning, you exchanged a number of text messages with

22 the operations manager at North West Fire Control,

23 Janine Carden, did you not?

24 A. Yes, sir.

25 Q. Did you know the operations manager, Janine Carden?

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1 A. Yes, I'd seen Janine at a few occasions in work.

2 Q. Did you have a good working relationship with her?

3 A. Yes.

4 Q. Are you able to just give us a broad idea of what was

5 the content of those messages passing between you and

6 the operations manager?

7 A. I can't recall the content. I would imagine, given the

8 timings of them, it was a general discussion around

9 welfare and what had obviously occurred during the

10 night.

11 Q. Yes. So if we look, for example, at 05.52, using mobile

12 telephone to mobile telephone, we don't therefore have

13 a transcript of this, Janine Carden called you and the

14 call lasted 2 minutes 48 seconds. During that call, was

15 concern expressed by you about the position you believed

16 you had been put in by the command support room, taking

17 command of the incident, and inhibiting some of the

18 NILOs' decisions to deploy to the incident?

19 A. I think that was likely, but I can't specifically

20 recall.

21 Q. Because one of your principal aims, do you agree, during

22 the course of the night was to attempt to mobilise the

23 SRT and MTFA capability to the arena?

24 A. Yes, sir.

25 Q. Is it right that that remained one of your objectives

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1 throughout your involvement?  
 2 A. Yes, sir.  
 3 Q. And was one source of your frustration that you were not  
 4 permitted to deploy the SRT as you wished to do?  
 5 A. Yes, sir.  
 6 Q. It is the case, isn't it, that the Fire Service operate  
 7 very clearly in a way which requires respect for  
 8 superior orders?  
 9 A. Yes, sir, there's a rank structure and a hierarchy.  
 10 Q. And self-deployment is something that you are taught you  
 11 must not undertake under any circumstances?  
 12 A. Not under any circumstances. I think an example I would  
 13 use -- I don't know if other people will give  
 14 evidence -- is around a running call, that's how we term  
 15 it, so if crews come across an incident where someone  
 16 needs help, whether it be an RTC or something like that  
 17 but they haven't been specifically mobilised to it,  
 18 they're able to get in touch with North West Fire  
 19 Control, create an incident and deal with that incident  
 20 rather than waiting for a member of the public to call  
 21 and then be dispatched, if that makes sense.  
 22 Q. Yes, so I shouldn't have used those words "under any  
 23 circumstances". Looking at your position at the  
 24 material time, you clearly had no authority to  
 25 self-deploy the SRT? I haven't put that very well.

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1 I will put it a little more clearly, if I may.  
 2 You had no authority to direct the deployment of the  
 3 SRT, is that correct, because the incident command had  
 4 been taken over by the command support room?  
 5 A. I think the... Sorry, sir?  
 6 SIR JOHN SAUNDERS: No, I just wanted to know whether that's  
 7 actually right. As I understood the way the structure  
 8 works, the incident commander is Mr Levy.  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: He had the authority to send you there  
 11 or had the CSR essentially said, "You are no longer in  
 12 command, we are the incident commanders here"?  
 13 A. I think Mr Levy will expand on this this afternoon.  
 14 He was the incident commander and would have ordinarily  
 15 the authority to deploy those resources. I got  
 16 a general gist of the conversation he was having,  
 17 I think directly, with the chief fire officer who said  
 18 no and at that point, with that coming directly from the  
 19 chief fire officer, that authority was overruled.  
 20 SIR JOHN SAUNDERS: And he can do that, can he? We've been  
 21 told on a lot of occasions how things are not rank but  
 22 they are positions, so if you're the incident commander  
 23 there may be someone more senior, not necessarily in the  
 24 Fire Service but in other services. So how does it work  
 25 with you? I mean, could Mr Levy have said, "I am not

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1 interested in what you have got to say, whatever your  
 2 position", he may have got it in the neck later, "but  
 3 I'm going to deploy"?  
 4 A. He could potentially but the chief at that time was the  
 5 most senior officer, the principal officer at that time  
 6 ultimately responsible for the organisation as a whole  
 7 and I think obviously once that conversation had been  
 8 had, it was very difficult.  
 9 SIR JOHN SAUNDERS: You had to do what he said, basically?  
 10 A. Yes, sir.  
 11 MR SMITH: On that subject, did you hear comments at  
 12 Thompson Street in relation to calls that Mr Levy was  
 13 making to the chief fire officer, comments by colleagues  
 14 that if Mr Levy wasn't careful he would get the sack?  
 15 A. I believe those comments were made.  
 16 Q. Because he was seeking to resist the instruction from  
 17 the command support room that he was not to deploy the  
 18 SRT; is that correct?  
 19 A. Yes, sir, I believe he challenged that call back.  
 20 MR SMITH: Thank you very much, Mr Meakin.  
 21 MR DE LA POER: Next, Mr Horwell QC on behalf of Greater  
 22 Manchester Police, please.  
 23 Questions from MR HORWELL  
 24 MR HORWELL: Mr Meakin, just two or three topics, please.  
 25 You have already agreed this morning that NWS would

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1 not put its crews in harm's way.  
 2 A. Could you clarify that a bit more, please? Sorry.  
 3 Q. It was a question asked of you earlier by Mr de la Poer.  
 4 You were asked whether you would think NWS would put  
 5 its crews in harm's way and you said no.  
 6 A. Sorry, was that --  
 7 SIR JOHN SAUNDERS: That's in relation to you being at  
 8 Thompson Street.  
 9 A. Apologies, yes, that's correct.  
 10 MR HORWELL: You've already said that if you had known that  
 11 GMP had nominated an RVP, you would have deployed there?  
 12 A. Yes, sir.  
 13 Q. If you had been told that a large number of police  
 14 officers was going to the scene, that ambulance crews  
 15 were going to the scene, and that they were arriving,  
 16 you would have deployed to the scene, wouldn't you?  
 17 A. I believe so, yes, sir.  
 18 Q. If you had been told that the ambulance crews were in  
 19 fact not going to an RVP but straight to the scene, that  
 20 would have indicated to you, would it not, that the  
 21 scene was safe, Mr Meakin?  
 22 A. I think it would have fed into an assessment of risk,  
 23 yes. It was another piece of information to consider.  
 24 Q. And it would also have indicated, would it not, that  
 25 there was an understandable degree of urgency to get

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1 people, ambulance crews and police officers, to the  
 2 scene as quickly as possible?  
 3 A. Yes, sir.  
 4 Q. Hailing Talk Groups. You have no doubt heard during the  
 5 course of the evidence to this inquiry that at the time  
 6 of these events, and indeed now, but at the time of  
 7 these events, there was a police Hailing Talk Group and,  
 8 much more importantly, a multi-agency Hailing Talk Group  
 9 that was monitored by GMP 24 hours a day for fire and  
 10 ambulance to use. Were you aware of that multi-agency  
 11 Hailing Talk Group at the time of this attack?  
 12 A. I don't recall. I could have been. If I think back to  
 13 the conversation with North West Fire Control, I think  
 14 they shared information, they had a line open to the  
 15 police, and I didn't go into the specifics of it.  
 16 I didn't know whether that was a phone line or the Talk  
 17 Group that you're talking about. But it wasn't  
 18 something that crossed my mind at that time.  
 19 Q. Is it not something in which you were trained,  
 20 Mr Meakin?  
 21 A. Not that I recall.  
 22 Q. Do you know now if at the time of this attack, the  
 23 multi-agency Hailing Talk Group to contact GMP was in  
 24 fact available for use on your Airwave radio?  
 25 A. Yes, I believe so.

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1 Q. You believe it was available for use on your Airwave  
 2 radio at the time?  
 3 A. I think so. I can't be certain. If it's the channel  
 4 I'm thinking of...  
 5 Q. If we can just for the moment, and I have very few  
 6 questions left, Mr Meakin, but if we move away from GMP  
 7 Hailing Talk Groups. Does not the Fire Service have  
 8 a Hailing Talk Group?  
 9 A. I think there's a channel that all three services  
 10 monitor in the control room. I could be wrong on that.  
 11 Q. I appreciate you're not putting yourself forward,  
 12 understandably, as an expert on Airwave, and please  
 13 don't think I'm trying to treat you as one. It's just  
 14 that as a NILO, there to advise, there to liaise with  
 15 the other emergency services, you weren't even aware  
 16 what the Fire Service had, let alone what GMP had for  
 17 use on the night of this attack?  
 18 A. I was aware that we had channels available via the  
 19 Airwave. I think there's some reference in statements,  
 20 I don't know if you need me to go into those channels or  
 21 not, and I believe there's an entry -- John Fletcher was  
 22 tasked with monitoring one of those channels.  
 23 Q. All right.  
 24 A. At the time of arriving at Philips Park, it wasn't  
 25 foremost in my mind.

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1 Q. Is this fair to say: your knowledge of what was  
 2 available for use to contact emergency partners was very  
 3 limited on the night of this attack?  
 4 A. No, I disagree with that statement.  
 5 Q. What means of communication did you believe were  
 6 available to you as a NILO to contact the other  
 7 emergency services?  
 8 A. Through North West Fire Control to the other control  
 9 rooms, Airwave Talk Groups, and obviously mobile phone.  
 10 Q. So you were aware that there was an Airwave Talk Group  
 11 through which you could have contacted the GMP control  
 12 room?  
 13 A. I'm trying to recall, because I know we've talked about  
 14 multi-agency sharing channels, but I can't recall at the  
 15 time of the incident.  
 16 Q. Mr Meakin, perhaps I'll leave it in this way: did it  
 17 ever cross your mind on the night of this attack to  
 18 contact the GMP control room through the multi-agency  
 19 Hailing Talk Group?  
 20 A. Not to me specifically but in the context of the call  
 21 that I'd had from North West Fire Control during that  
 22 conversation, it was relayed to me that they had a line  
 23 open with GMP and I was aware that obviously people were  
 24 going to the command support room, but it didn't  
 25 specifically cross my mind to get on to that Hailing

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1 channel at that time.  
 2 MR HORWELL: That's all I ask. Thank you, Mr Meakin.  
 3 Thank you, sir.  
 4 SIR JOHN SAUNDERS: Thank you, Mr Horwell. I think it would  
 5 be helpful at some stage if we did have from GMFRS some  
 6 definitive information about what was actually available  
 7 as far as they knew and what instructions, if any, were  
 8 given to NILOs and information about it.  
 9 MR HORWELL: I couldn't agree more, sir, yes.  
 10 SIR JOHN SAUNDERS: That would be helpful, thank you very  
 11 much.  
 12 MR DE LA POER: Yes. Next, can I turn to Mr Cooper QC on  
 13 behalf of the bereaved families.  
 14 Questions from MR COOPER  
 15 MR COOPER: Thank you.  
 16 As you know, I represent the bereaved families in  
 17 this inquiry on these questions that I'm going to ask.  
 18 I want to ask you a few general questions before we  
 19 go to the night in question. You'll be assisted by  
 20 having your statement in front of you. I know you've  
 21 made two statements. This is the second statement you  
 22 made, which is {INQ026731/1}. Paragraph 18 to begin  
 23 with, please. I just want to clarify a few things on  
 24 that document.  
 25 You indicate there that you left the role of group

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1 manager in August 2017, so this is after the tragedy,  
 2 when you say:  
 3 "I was approached to undertake the role of group  
 4 manager for special projects to lead the Emergency  
 5 Response Hub function through a review and to improve  
 6 the management of the department."  
 7 My first question is: was that very much with 22 May  
 8 in mind and how it functioned?  
 9 A. No, sir.  
 10 Q. Why not?  
 11 A. The management issues that are referred to was around  
 12 non-operational staff. There was a lot of discontent  
 13 within the teams at that time, they're not uniformed.  
 14 Q. A lot of what, sorry?  
 15 A. Discontent amongst the team. But not through  
 16 operational members of staff, it was more around admin  
 17 and...  
 18 Q. You say:  
 19 "Part of the Emergency Response Hub function is the  
 20 command support room. As the lead within the review  
 21 I scrutinised the command support room and have made  
 22 changes to its equipment and layout so it was configured  
 23 correctly to best support the assistant principal  
 24 officer or group manager when in use during the  
 25 incident."

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1 What was the problem with it?  
 2 A. I don't think there was necessarily a problem with the  
 3 command support room function, I think it was about  
 4 improving the layout and what was in there, so I recall  
 5 at the time there was a suite of computer stations  
 6 within there, I think maybe approximately 12, and they  
 7 were separated out across 12 desks. It was like one  
 8 desk to a screen. It was about consolidating the number  
 9 of computers in there. The systems themselves didn't  
 10 change. And then I think we increased the whiteboard  
 11 space but nothing to address a failing of the command  
 12 support room functionality.  
 13 Q. I'm not going to spend too much more time on this, but  
 14 was there any opportunity taken, given your review was  
 15 very close to the events in May, to generally look  
 16 at the function of the room to see whether it could be  
 17 improved? Was any opportunity taken to do that?  
 18 A. It was looked at in terms of what functionality was  
 19 available, but not in the context of the incident in  
 20 May.  
 21 Q. All right.  
 22 SIR JOHN SAUNDERS: I don't know whether there was any, but  
 23 we've seen there's a lot of feedback after 22 May of  
 24 different operations and things like that. Do you know  
 25 whether there was any feedback about how that room had

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1 operated and any problems with it and, if there was, did  
 2 you see it?  
 3 A. Not to my knowledge. I don't think there was anything  
 4 raised in terms of the functionality of the room, which  
 5 was what I was specifically looking at.  
 6 MR COOPER: I'll move on then.  
 7 I want to take you to paragraph 27 now and it's  
 8 a matter that was raised with Mr Berry about a course  
 9 that was undertaken with NILOs, and it looks like you  
 10 were on that course as well. It's the course where it  
 11 was suggested that places like the Manchester Arena and  
 12 Manchester in particular should expect a terrorist  
 13 attack. You too have something to say on the content on  
 14 that course, which is in paragraph 27 of your statement.  
 15 You say:  
 16 "The course is substantial in content. The key  
 17 parts are input from the Counter-terrorism Unit."  
 18 So the first thing I want to establish with you is,  
 19 on that course when Manchester was mentioned, and venues  
 20 such as the arena were mentioned as to expect  
 21 a terrorist attack, part of that lecture or part of that  
 22 course was input from the Counter-terrorism Unit;  
 23 is that right?  
 24 A. To the best of my recollection, yes.  
 25 Q. "JTAC, who talked us through the grading and assessment

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1 of threat levels."  
 2 They were there as well at this course, is that  
 3 right?  
 4 A. I believe so, yes.  
 5 Q. "We covered case studies on counter-terrorism  
 6 operations."  
 7 Again, if I ask you anything which may well be  
 8 sensitive then I will stop immediately. But when you  
 9 say you covered case studies on counter-terrorism  
 10 operations, did that mean looking at recent terrorist  
 11 attacks at the time, for instance in Paris and that sort  
 12 of thing?  
 13 A. I can't recall specifically if that was mentioned.  
 14 There were specific cases covered, but I couldn't  
 15 confirm if those in particular were the ones.  
 16 Q. Can you remember, for instance, whether incidents  
 17 involving so-called lone-wolf operators were dealt with  
 18 in this course?  
 19 A. I think they were covered to the best of my knowledge,  
 20 yes.  
 21 Q. They were, did you say?  
 22 A. I think so.  
 23 SIR JOHN SAUNDERS: They were?  
 24 A. I think they might have been, yes.  
 25 SIR JOHN SAUNDERS: Sorry, I couldn't hear whether you said

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1 not or yes.  
 2 MR COOPER: Here we have this course, it was in 2016, wasn't  
 3 it?  
 4 A. Yes, sir.  
 5 Q. Attended by the Counter—terrorism Unit, JTAC and others,  
 6 stating that Manchester, not just the country, but  
 7 Manchester should expect a terrorist attack and venues  
 8 such as the arena should expect such a terrorist attack.  
 9 SIR JOHN SAUNDERS: Can I just clarify his recollection?  
 10 I have no idea whether this is the same course, you'll  
 11 know the date better than I do, that the last witness  
 12 did.  
 13 MR COOPER: I suspect it is, but it's not my suspicion  
 14 that's important, it's the answer from the witness.  
 15 SIR JOHN SAUNDERS: I quite agree with that. Absolutely  
 16 it is.  
 17 Is your recollection — your recollection — of this  
 18 course, and I know you heard Mr Berry anyway, that there  
 19 was talk about Manchester and it being a potential  
 20 target?  
 21 A. I don't recall specific content on that, sir. I believe  
 22 there was case studies covered and I think the course —  
 23 throughout the passage of time the content gets updated  
 24 and evolves in terms of case studies because you have  
 25 more recent ones, but I don't specifically recall

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1 Manchester being —  
 2 SIR JOHN SAUNDERS: Were you on the same course as the last  
 3 witness, Mr Berry?  
 4 A. No not to my memory. It's a national course but the  
 5 dates are scheduled.  
 6 SIR JOHN SAUNDERS: I think we are trying to get information  
 7 as to the content, definitive information. I just  
 8 wanted to know whether his recollection on a different  
 9 course was the same as Mr Berry's.  
 10 MR COOPER: Of course. And if it helps you, sir,  
 11 paragraph 26 gives a little more information about the  
 12 background:  
 13 "Between the 13th until 22 September 2015,  
 14 I attended the Fire Service College for the National  
 15 Incident Command National Inter—agency Liaison Officer  
 16 course. This was the first step to becoming a NILO."  
 17 And can I just take you on this, finally, to  
 18 paragraph 31, please. If that wasn't the course, I'll  
 19 put another course to you. In February 2016, I attended  
 20 a National Counter—terrorism Awareness training event at  
 21 GMP Headquarters:  
 22 "There was input from the North—west  
 23 Counter—terrorism Unit, who gave a talk on current  
 24 intelligence, threat levels and how the command and  
 25 control for a counter—terrorism incident is configured."

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1 Did you attend that course with Mr Berry, can you  
 2 recall?  
 3 A. I don't recall attending it with Mr Berry.  
 4 Q. All right. That's a course in February 2016 with input  
 5 from North—west Counter—terrorism Unit again. Do you  
 6 recall whether again Manchester was specifically  
 7 mentioned as a place to expect a terrorist attack?  
 8 A. I don't recall, sir.  
 9 Q. All right.  
 10 SIR JOHN SAUNDERS: But you knew that the threat level was  
 11 severe?  
 12 A. Yes, sir.  
 13 SIR JOHN SAUNDERS: And you would have been told that sort  
 14 of thing, it was severe at the time. And you would know  
 15 that crowded places are, as a matter of common sense,  
 16 likely to be a target for terrorists?  
 17 A. Yes, sir. My understanding around the threat level was,  
 18 as you've just explained there, I was aware that because  
 19 of the number of iconic sites in Manchester, that  
 20 there's a high potential for an incident. I don't  
 21 remember specific content around Manchester or the arena  
 22 itself.  
 23 SIR JOHN SAUNDERS: But it's iconic sites that have large  
 24 amounts of people there?  
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Were you also being told about the  
 2 series of attacks in Paris or the multi—site attack, the  
 3 MTFA?  
 4 A. Yes, sir.  
 5 SIR JOHN SAUNDERS: Do you think you came out of that, as it  
 6 were, over—alert to the MTFA, so you were automatically  
 7 expecting that rather than a lone—wolf attack? That  
 8 made you overcautious of it being an MTFA?  
 9 A. I think having the input that we did around those scenes  
 10 and during our training, it was definitely something  
 11 that was in mind that these incidents may start off with  
 12 an explosion and then progress to — (overspeaking).  
 13 SIR JOHN SAUNDERS: And get ambush when you go and answer it  
 14 and deal with it?  
 15 A. Yes, sir.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR COOPER: I'll leave it there, sir, subject to further  
 18 information about the courses.  
 19 SIR JOHN SAUNDERS: Thank you very much. We'll obviously  
 20 try and get what we can for you.  
 21 MR COOPER: Thank you.  
 22 Can I take you to another swift but maybe important  
 23 matter, paragraph 60, please, of your statement. Do you  
 24 say this:  
 25 "The force duty officer, together with the duty

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1 NILO, determines the forward command post and/or the  
 2 RVP. Therefore the purpose of my call to NWFC was to  
 3 ask for the RVP or FCP and any brief?"  
 4 So that decision, that determination, for the  
 5 forward command post or the RVP should be made between  
 6 the force duty officer and the duty NILO; is that right?  
 7 A. Yes, sir.  
 8 Q. And as far as 22 May is concerned, they weren't even  
 9 communicating with each other, were they, at crucial  
 10 moments?  
 11 A. No, sir.  
 12 Q. So who would therefore assume responsibility? Would it  
 13 be simply someone picking up the baton to do that if the  
 14 FDO and the NILO didn't do it?  
 15 A. I think, as I've said before in terms of exercising and  
 16 training, there was an expectation that the FDO would be  
 17 busy but during those scenarios there was never an  
 18 expectation that there would be a complete absence of  
 19 communication. And again, probably going back to JESIP  
 20 slightly, there's an issue around METHANE messages and  
 21 sharing that to try and share situational awareness.  
 22 SIR JOHN SAUNDERS: Let me ask you a bit more about that.  
 23 We know here that it was communicated to NWFC that the  
 24 police had declared an RVP at the cathedral car park.  
 25 A. Yes, sir.

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1 SIR JOHN SAUNDERS: If that happens, you would expect, as  
 2 you have said, for the duty NILO to go on that basis: if  
 3 they've said it, they're the people in charge of  
 4 terrorism occurrences, so you would follow that. In  
 5 what circumstances would a NILO need to agree to it? It  
 6 just seems an odd thing, we have to talk about it, agree  
 7 it or what? You've been told what it is, so what are  
 8 the options for you as a NILO?  
 9 A. Maybe it's a terminology thing. If the FDO has  
 10 determined a rendezvous point, unless there's some  
 11 serious grave concerns around the location of that based  
 12 on some information that you have at the time, I would  
 13 expect that in terms of agreement you'd just be like,  
 14 "Yeah, we'll go to wherever's been nominated".  
 15 SIR JOHN SAUNDERS: Thank you.  
 16 MR COOPER: Paragraph 54 on the same issue, please:  
 17 "I rang North West Fire Control at 23.28 and I was  
 18 on the phone for just under 3 minutes. What I wanted to  
 19 know was whether a forward command post had been  
 20 established. I actually asked about an RVP in  
 21 anticipation that North West Fire Control may not know  
 22 what an FCP is. I was told that the duty NILO had said  
 23 that all resources were to rendezvous at Philips Park.  
 24 I was also told there was no brief. I was informed that  
 25 the CSR was open with the principal officer."

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1 And you go on.  
 2 What do you mean, you were told there was no brief?  
 3 A. Going back to the call, I recall asking the Control  
 4 operator if he'd had any more information and briefing.  
 5 SIR JOHN SAUNDERS: I think you used the word "brief" in the  
 6 call, actually, if my recollection is right.  
 7 A. I would have to see the transcript, sorry. I think it's  
 8 around asking either about deployment instructions or  
 9 briefing.  
 10 MR COOPER: If you want to look, it's {INQ001143/1}, please,  
 11 Mr Lopez. Take your time if that helps you.  
 12 SIR JOHN SAUNDERS: It's halfway down:  
 13 "I've got crews here from OS [REDACTED]. They're getting  
 14 suited and booted. Have we got a brief or any  
 15 instructions?"  
 16 I think the question is: what do you mean by brief  
 17 in that context?  
 18 A. A briefing to deploy.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR COOPER: And they didn't, is that right?  
 21 A. Yes. That is what was communicated.  
 22 Q. Again, is it right that if your paragraph 60 is  
 23 accurate, the initial problem was being caused by the  
 24 fact that there was no contact with the FDO and the FDO  
 25 was not speaking to the duty NILO?

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1 A. Yes, sir.  
 2 Q. And that's what was on the face of it beginning to cause  
 3 these problems. How it escalated later is another  
 4 matter, but that was the kernel of the problem that was  
 5 beginning to happen; is that right?  
 6 A. At that time, yes.  
 7 Q. Did that cause you some concern as an experienced  
 8 officer that already at this early stage things seemed  
 9 to be breaking down?  
 10 SIR JOHN SAUNDERS: I'm not sure it's that early, 23.38.  
 11 MR COOPER: Admittedly, sir, yes. At this late stage,  
 12 things were continuing to break down?  
 13 A. I think at that point, it was, I think,  
 14 22 minutes/23 minutes after I'd been paged by North West  
 15 Fire Control. So my expectation, my mindset then at  
 16 that time was that they'd not had a briefing but  
 17 it would still be dynamic but Andy Berry, as the duty  
 18 NILO, would be on to the force duty officer getting that  
 19 information to then inform a brief.  
 20 Q. Can I suggest to you, Mr Meakin, that all this, as far  
 21 as you're concerned, was more in hope than expectation?  
 22 A. No, that is an expectation, because that is how we were  
 23 trained and exercised at that point and how  
 24 I understood.  
 25 Q. So despite all the training and the exercising, it must

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1 follow, mustn't it then, that despite all that,  
 2 individuals were failing in their duties?  
 3 A. I think there was clearly difficulties that were being  
 4 encountered. I don't think it was for a want of trying  
 5 to get that information. But clearly, not having  
 6 a briefing at that point or a contact with the FDO had  
 7 an impact on the speed at which we were able to deploy.  
 8 SIR JOHN SAUNDERS: You made the point that you had been  
 9 only just paged 20 minutes before this phone  
 10 conversation. Did you by then know when the bomb had  
 11 actually gone off?  
 12 A. No, sir.  
 13 SIR JOHN SAUNDERS: It may seem odd to some people that  
 14 you're actually not trying to find out, because the  
 15 urgency with which you have to act must in some ways be  
 16 relative to the amount of time that's going by after the  
 17 bomb has gone off. You can't just be sitting there and  
 18 say, "It's only 20 minutes, so it's not bad so far",  
 19 when in fact it's a lot longer than that, it's over  
 20 an hour.  
 21 A. I wasn't aware the bomb had gone off at the time it did  
 22 at that stage. When I received the pager message, and  
 23 I spoke to North West Fire Control and got that  
 24 information, my mindset then was I need to get to the  
 25 RVP, as it was, as quick as possible so I still felt it

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1 was in the early stages --  
 2 SIR JOHN SAUNDERS: By the time of this call, as  
 3 I understand it, you've arrived?  
 4 A. At (overspeaking).  
 5 SIR JOHN SAUNDERS: -- you'll have to correct me, I may well  
 6 be wrong about that.  
 7 A. No, I think you're right, sir.  
 8 SIR JOHN SAUNDERS: Can we have it back? Sorry.  
 9 Didn't you at least get the impression from the  
 10 firefighters that they had been actually sitting around  
 11 for quite a long time by now?  
 12 A. I didn't know that they'd been at Philips Park for as  
 13 long as they did. I knew they were frustrated but in my  
 14 mind I thought that was because they'd seen the  
 15 ambulances coming to Manchester Central as they were  
 16 moving further away.  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR COOPER: I'll put it to you straight, Mr Meakin: this  
 19 thing, this whole response from the Fire Service --  
 20 there are other services who will be examined and have  
 21 been examined, it's the Fire Service today -- this whole  
 22 response from the Fire Service either failed because  
 23 people failed or JESIP failed and the procedure failed.  
 24 Which one is it? People or the system? Or a mixture of  
 25 both?

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1 SIR JOHN SAUNDERS: I'm really sorry, if JESIP fails because  
 2 of individuals' failures, it's not a failure of JESIP  
 3 itself, it's a failure of people following it, isn't it?  
 4 A. Yes, sir. I think the principles are quite clear.  
 5 I think the fundamental breakdown in communications  
 6 at the start of the incident was --  
 7 SIR JOHN SAUNDERS: Okay. So in your view were there  
 8 problems in procedures?  
 9 A. I think ... I think the procedures -- are we talking  
 10 about the JOPs at the time for an MTFA?  
 11 SIR JOHN SAUNDERS: I don't mind. The procedures you were  
 12 following that night, were they good enough or not?  
 13 A. I think given how the events unravelled, I think as  
 14 I said in my debrief, they needed a fundamental review.  
 15 SIR JOHN SAUNDERS: So what's wrong with the procedures?  
 16 A. I think from me, as I've said, my experience at that  
 17 time was that we'd exercised and trained at the point of  
 18 co-location and there was no anticipation of  
 19 fundamentally not being able to get hold of the force  
 20 duty officer.  
 21 SIR JOHN SAUNDERS: Okay. Let's forget for a moment about  
 22 the force duty officer because there has to be a plan B.  
 23 But surely one of the major problems is that there was  
 24 no incident commander appointed at a relatively early  
 25 stage. There was no one there just prepared to say,

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1 "I will own this"?  
 2 A. Yes, sir.  
 3 SIR JOHN SAUNDERS: And I'm afraid that includes you,  
 4 doesn't it?  
 5 A. Yes, sir.  
 6 SIR JOHN SAUNDERS: Okay.  
 7 MR COOPER: You understand what I'm putting to you on behalf  
 8 of the families? This isn't just simply, importantly,  
 9 lack of communication, it's more systemic than that,  
 10 isn't it? There was a failure by a lot of people at  
 11 crucial times, wasn't there, to do their job?  
 12 A. I think people were trying to do their job. I think the  
 13 information -- there wasn't a lack of will to get there,  
 14 people wanted to respond, but I think there was such an  
 15 absence of information, it was difficult at that time.  
 16 SIR JOHN SAUNDERS: Let's analyse this a bit more, if you  
 17 don't mind. So there was a failure, wasn't there,  
 18 looking back on it now, for individuals to make the  
 19 right decision at the right time?  
 20 A. Yes, sir.  
 21 SIR JOHN SAUNDERS: That's either caused by the fact that  
 22 the systems just weren't there or it is people's  
 23 mistakes at the time, and if there are people's mistakes  
 24 then Mr Cooper is entitled to say people are not doing  
 25 their duty.

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1 A. Yes, sir .  
 2 SIR JOHN SAUNDERS: So is it right that people were not  
 3 doing their duty on the basis that they were making  
 4 mistakes?  
 5 A. If we're viewing it at this point in time, obviously  
 6 knowing now that an RVP was shared, I think that's  
 7 something that could have been done differently.  
 8 SIR JOHN SAUNDERS: Okay.  
 9 MR COOPER: Forgive me, I don't mean to sound rude, but I'm  
 10 not going to let you get away with this constant use of  
 11 the word hindsight. It's not just hindsight, is it,  
 12 Mr Meakin? At the time you and your colleagues should  
 13 have done certain things which you did not do, which was  
 14 in breach of duty. It's not hindsight. With all the  
 15 training, with all the tabletops, with all the  
 16 Winchesters and so on and so forth, you all had enough  
 17 opportunity to get it right, didn't you?  
 18 A. I think there was more questions we could have asked,  
 19 information that we challenged, and different decisions  
 20 made on the night. But at that time, like I say, there  
 21 was information which wasn't shared, which would have  
 22 fundamentally changed our approach.  
 23 Q. It seems, and let me suggest this to you, that  
 24 justifiably a lot of money and a lot of time and no  
 25 doubt a lot of care and attention had been taken by

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1 a number of responders to arrange exercises, detailed  
 2 exercises, give advice, give training, online or  
 3 offline, and frankly it seems to have gone in one ear  
 4 and out of the other as far as you and your colleagues  
 5 are concerned. Not the general people who went out  
 6 there, the brave individuals, I'm talking about Control,  
 7 I'm talking about leaders here.  
 8 You'll forgive, won't you, the impression that all  
 9 this training and all this money and all this time and  
 10 all these exercises seem to have gone in one ear and out  
 11 of the other, doesn't it?  
 12 SIR JOHN SAUNDERS: Okay, you now answer that.  
 13 A. I disagree with that, if I'm honest. I think the NILOs  
 14 and everybody within the service takes their roles and  
 15 responsibilities seriously. The training in terms of  
 16 undertaking the NILO role wasn't something that was just  
 17 approached in a blasé manner, there was a lot of time  
 18 and effort and resource put into that. As I have said,  
 19 my view is that our response was severely impacted on  
 20 the night by the availability of information.  
 21 SIR JOHN SAUNDERS: Are we not seeing there's a gap in the  
 22 procedure on this particular — what happened on this  
 23 night because there's contact with the NILO, the NILO is  
 24 there as an adviser, he advises what should happen. But  
 25 we have a huge gap in time when there is no incident

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1 commander. Now, shouldn't the NILOs have known that  
 2 that gap just should not be allowed to build up like  
 3 that and someone has to jump in, either appoint an  
 4 incident commander or do it themselves?  
 5 A. I think having no incident commander is something that  
 6 has been changed since.  
 7 SIR JOHN SAUNDERS: It may have been changed, but you might  
 8 have realised on the night, you don't need hindsight to  
 9 know, do you, you need someone to control the situation,  
 10 you need a commander?  
 11 A. Yes, sir .  
 12 SIR JOHN SAUNDERS: Do you need hindsight for that?  
 13 I understand that you can recognise things more easily  
 14 with hindsight, I understand that. But nevertheless,  
 15 when you then say, "Well, that went wrong", you can then  
 16 ask yourself: should that actually have been realised  
 17 at the time?  
 18 A. I think you could argue that it should have been  
 19 realised at the time. I think the dynamics of those  
 20 types of incidents are different from a lot of the  
 21 incidents that we attend.  
 22 SIR JOHN SAUNDERS: I could argue. Would you argue that or  
 23 would you say it shouldn't have been realised at the  
 24 time?  
 25 A. Yes, sir, I think we should have had an incident

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1 commander nominated, but I still believe that in the  
 2 absence of information, I'm not 100% sure it would have  
 3 changed the decisions on the night. Potentially  
 4 it would have.  
 5 SIR JOHN SAUNDERS: Okay. Perhaps you'll leave me to think  
 6 about that.  
 7 But the reality is there should have been an  
 8 incident commander and also NILOs know, don't they, that  
 9 if there is a gap in that command structure, they are  
 10 there to — entitled to fill it and take command  
 11 themselves?  
 12 A. There's potential for that to take place, yes, sir .  
 13 MR COOPER: There's more than potential for it to take  
 14 place, it should take place, shouldn't it? It should be  
 15 part of the job, shouldn't it?  
 16 A. From my perspective, being mobilised as a NILO, my  
 17 understanding was that was my role. Through further  
 18 conversations, an incident commander was appointed at  
 19 a point in time, but at that early stage it wasn't,  
 20 clearly. But I didn't feel that by me appointing myself  
 21 incident commander, for example, at that point without  
 22 that information, it would have been a significant  
 23 difference.  
 24 SIR JOHN SAUNDERS: Why do you think you need three NILOs,  
 25 three advisers?

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1 A. So the three roles ... It was obviously Andy's decision  
 2 to make it three on the night. As I understand it, Andy  
 3 would have been in contact with the FDO and then the two  
 4 NILOs, one would have been having the over—the—bonnet  
 5 conversation with the commanders from the other  
 6 services, and then the third NILO would have been doing  
 7 the tasking. I think because he had those available on  
 8 the night, those resources were requested.  
 9 SIR JOHN SAUNDERS: Right. I'll leave it to you, Mr Cooper.  
 10 MR COOPER: Not at all, sir.  
 11 Was it just a simple and rather unpalatable matter  
 12 as far as you're concerned that you didn't want to take  
 13 responsibility?  
 14 A. No, I disagree with that.  
 15 Q. Just this as well: we've heard a lot about policy and we  
 16 have heard a lot of procedure. Would you accept,  
 17 looking at this globally, that perhaps this adherence to  
 18 policy and procedure has neutered the ability of people  
 19 like you to take the initiative?  
 20 A. I think policy and procedure is there for the right  
 21 reasons, but we have operational discretion, which  
 22 I don't know if it's been touched on already, should we  
 23 need to step outside of procedure. But I don't think it  
 24 removes the ability for people to make decisions.  
 25 Q. Is there a culture, would you accept, that's grown

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1 within the Fire Service, it's alive to risk aversion,  
 2 but it's slightly different, a culture of not being  
 3 willing to make a decision, "Let's stick to policy and  
 4 procedure, let's be protected by policy and procedure,  
 5 and by doing so, we can't be sacked", to use the Mr Levy  
 6 expression? Is there a sort of fear culture, if I can  
 7 put it that way, unintended I'm sure, engendered within  
 8 the Fire Service, discouraging people from making  
 9 decisions?  
 10 A. I would disagree with that. I don't see the service as  
 11 being risk averse. I think we're risk aware that in  
 12 trying to deliver our objectives in terms of saving  
 13 lives, et cetera, there's a degree of risk that comes  
 14 with all of the incidents that we attend. Policies and  
 15 procedures are there to try and minimise those risks  
 16 where possible. But I don't feel like there's a culture  
 17 where we don't take any risks.  
 18 Q. Your reaction in evidence a little earlier that Mr Levy  
 19 was at risk of being sacked — I'm not saying he would  
 20 or wouldn't have been — but that was an instinctive  
 21 thing to say, "You'll be sacked for doing this".  
 22 Is that the sort of thing that goes through people's  
 23 heads sometimes if they might be taking an initiative?  
 24 SIR JOHN SAUNDERS: I think we need — that specific  
 25 example, if you don't mind me saying so, this is

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1 Mr O'Reilly who's on the phone saying, "Do this", and  
 2 Mr Levy says, "I want to do the other", that's the big  
 3 boss and someone saying (overspeaking) —  
 4 MR COOPER: It rather heightens (overspeaking) I see that,  
 5 I see that.  
 6 Let me put a rather more general question: is there  
 7 nonetheless, and that may not be a good example of it,  
 8 a fear that if you step out of line in any way, show  
 9 a bit of initiative, take a bit of responsibility, you  
 10 might actually end up being in some way disciplined for  
 11 it?  
 12 A. I don't think so, sir.  
 13 Q. All right.  
 14 SIR JOHN SAUNDERS: Let's look at a slightly broader level.  
 15 We all know that firefighters are extremely brave people  
 16 and they go to places where most of us would never dream  
 17 of going to help people. Is there a feeling, is it  
 18 taught: you have to hold them back, you don't let them  
 19 go where it's unsafe for them to go if you're  
 20 a commander? And we need to think of health and safety,  
 21 we need to think of corporate manslaughter or the  
 22 consequences that can happen if people do that? Is  
 23 there that feeling?  
 24 A. I don't think so personally, sir. I think it's trying  
 25 to strike the right balance between the information

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1 that's available, the benefits against the risks. So  
 2 obviously, we will take more risks to save saveable  
 3 life. It's having that rationale for the decisions that  
 4 you are making at a point in time.  
 5 SIR JOHN SAUNDERS: I think it may be pointed out that it  
 6 was all about saving life on this particular night and  
 7 actually the Fire Service took no risks at all; is that  
 8 fair?  
 9 A. Yes, sir.  
 10 MR COOPER: I'll move on.  
 11 I want to ask you about the specific questions that  
 12 you've been asked by a number of counsel this morning  
 13 concerning your knowledge as to where NWAS were, whether  
 14 they were in Manchester Central or whether they'd gone  
 15 to the arena. Do you remember you'd been asked on  
 16 a number of occasions? I am not going to repeat those  
 17 questions, but I have some additional matters to put to  
 18 you on that.  
 19 Your settled position at the moment, is it, that you  
 20 were only told that NWAS were at Manchester Central but  
 21 not told that they'd actually gone to the arena?  
 22 A. That's my recollection, sir.  
 23 Q. That's your recollection. Is that a pretty sound  
 24 recollection?  
 25 A. What do you mean by sound, sir?

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1 Q. Are you pretty confident of that recollection?  
 2 A. It's the best that I can recall.  
 3 Q. I'm going to suggest to you that two people, in fact,  
 4 told you, Mr Simister — and I'll evidence it —  
 5 Mr Simister and Mr Mottram both told you that NWAS were  
 6 at the incident and at the arena. I'll take you to the  
 7 evidence in a moment, but does this jog your memory?  
 8 A. The best of my recollection was that they mentioned that  
 9 they were at Manchester Central and ambulances were  
 10 driving there.  
 11 Q. All right.  
 12 A. As they were leaving.  
 13 Q. You'll remember Mr Mottram's partner or wife was  
 14 a paramedic, if it helps jog your memory as to where I'm  
 15 going. Let me take you firstly, if I can, Mr Lopez, to  
 16 real time. Firstly, as far as Mr Simister is concerned,  
 17 Day 69, page 151, lines 7 to 12 {Day69/151:7-12}.  
 18 This is the evidence of Mr Simister. We see this:  
 19 "Question: So in terms of the chronology it was  
 20 very shortly after the end of that call, about I suppose  
 21 23.27, that you will have spoken to Group Manager  
 22 Meakin?  
 23 "Answer: Yes, as soon as I put the phone down I  
 24 went outside through the engine house and the yard and  
 25 he was just there pulling up in his car.

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1 "Question: How long after that do you believe you  
 2 spoke to Group Manager Levy?"  
 3 Go to the page before to get some context, please,  
 4 Mr Lopez.  
 5 So effectively, that's a call timed, line 5  
 6 {Day69/150:5}, at 23.25, dealing with the indication of  
 7 presence at the scene of the incident.  
 8 So I'm just getting some context first before I take  
 9 you to the main evidence. So it seems, would you  
 10 accept, that as soon as the call finished Mr Simister  
 11 was telling you about NWAS being at the arena; is that  
 12 right?  
 13 A. Yes, it seems that after that call he came and spoke to  
 14 me, yes.  
 15 Q. And I'm putting to you: clearly, he came to speak to you  
 16 about a representative from NWAS and therefore NWAS  
 17 being at the arena, telling you that in terms.  
 18 A. As I have said, I don't recall it being at the arena.  
 19 I recall resources going to Manchester Central.  
 20 Q. All right. Let's go now please to Day 70, page 36,  
 21 line 16 {Day70/36:16}, please, and onwards to page 37.  
 22 This is questions from Mr Smith to Mr Mottram.  
 23 Starting at 12:  
 24 "Question: The records provided by North West  
 25 Ambulance Service demonstrate that Mrs Mottram was

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1 at the incident scene at 23.09. You were present when  
 2 Mr Simister made that call at 23.06? His first call to  
 3 North West Fire Control.  
 4 "Answer: I was.  
 5 "Question: So does it follow that you would then  
 6 learn very shortly after that call that your wife was by  
 7 now at the incident.  
 8 "Answer: She was actually at Manchester Central  
 9 when I spoke to her and she was leaving, as she had  
 10 finished the phone call, to go to the incident.  
 11 "Question: Thank you. Is there any doubt in your  
 12 mind [over the page, please] that once you'd received  
 13 this information from your wife, you made it very clear,  
 14 when Mr Meakin arrived, of the situation as you  
 15 understood it from your wife?  
 16 "Answer: We made it very clear. We were asked to  
 17 gather round for a briefing by the NIOs and I made it  
 18 clear then. I tried to tell Carlos Meakin, but he sort  
 19 of waved me off and said he was busy."  
 20 What do you say about that?  
 21 A. As I've said, I don't recall being told that  
 22 Mr Mottram's wife was going to the arena. I recall  
 23 being told that the ambulances were at  
 24 Manchester Central, and in terms of the wording there,  
 25 "He sort of waved me off", it sounds like it was

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1 dismissive, but around what time was that?  
 2 Q. That was just after the telephone call. We can go back  
 3 to it.  
 4 What I'm going to suggest to you is that maybe, I'm  
 5 not accepting it, but maybe you didn't hear what  
 6 Mr Mottram was trying to say to you. But could that be  
 7 because you weren't giving him time to say it, you were  
 8 being dismissive to him?  
 9 A. I don't recall being dismissive to him. I am not sure  
 10 what time that was and what I was doing at that time.  
 11 I recall being told that the ambulances were at  
 12 Manchester Central but not at the arena.  
 13 Q. I'm going to suggest to you that on the evidence we've  
 14 heard, Mr Simister and Mr Mottram at the very least were  
 15 trying to tell you that NWAS were there at the scene and  
 16 either you heard it and didn't do anything about it or  
 17 you dismissively weren't interested; what do you say  
 18 about that?  
 19 A. I disagree. I think if I'd been told that, I believe  
 20 I would have shared it and acted on it. I certainly  
 21 wasn't dismissive. Without knowing the exact time,  
 22 I don't know if I was on a call or there was other stuff  
 23 going on. I certainly don't recall just dismissing  
 24 Mr Mottram.  
 25 Q. Even on your evidence, you were aware that NWAS were

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1 approximately 2 minutes from the scene in any event at  
 2 Thompson Street?  
 3 A. At Manchester Central?  
 4 Q. Central.  
 5 A. Yes, sir.  
 6 Q. So the difference between us, potentially, is (1), you  
 7 were told that they're at the incident or (2), your  
 8 recollection is: in fact, no, I didn't know they were  
 9 at the incident, but I knew they were 2 minutes away  
 10 from the incident?  
 11 A. I had been told they were at Manchester Central, yes,  
 12 I knew they were closer to the arena.  
 13 Q. You knew Manchester and you knew Manchester at the time?  
 14 A. Yes.  
 15 Q. And as you have accepted, had you been aware that NWAS,  
 16 for instance, had deployed at the arena, you would have  
 17 given the instruction to deploy as well; is that right?  
 18 A. I believe that knowing that there were responders on  
 19 scene, it would have added to the information that I was  
 20 considering.  
 21 SIR JOHN SAUNDERS: Would you now like to consider the  
 22 question again and tell us the answer to the question:  
 23 if you had known NWAS were at the scene, would you have  
 24 deployed firefighters there?  
 25 A. I believe I would have done, yes.

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1 MR COOPER: So I'm going to put it to you directly. Had you  
 2 not — if Mr Mottram is right — dismissed what he was  
 3 saying and said you were too busy and listened to what  
 4 he was saying, firefighters would have been deployed  
 5 at the arena?  
 6 A. As I've said, I don't recall dismissing Mr Mottram.  
 7 Q. You may not. Mr Mottram, I'm putting to you, directly  
 8 remembers it.  
 9 SIR JOHN SAUNDERS: Okay. Let's move on.  
 10 MR COOPER: Of course.  
 11 SIR JOHN SAUNDERS: Thanks.  
 12 MR COOPER: Let me move on to something else, if I may, and  
 13 just cover very briefly the issue of Mr Levy saying that  
 14 he was going to be incident commander. Was that because  
 15 there was a lack of faith that Mr Berry could do his  
 16 duty?  
 17 A. I don't believe so, but I think Mr Levy is probably the  
 18 best person to speak to.  
 19 SIR JOHN SAUNDERS: This is heads you win, tails you lose.  
 20 On the one hand, no one is becoming incident commander  
 21 and Mr Berry is not there; does that mean Mr Berry isn't  
 22 doing the job?  
 23 MR COOPER: I will move on.  
 24 SIR JOHN SAUNDERS: It's not just you who's suggested that.  
 25 MR COOPER: You're right, I'll move on.

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1 In paragraph 85 of your statement, you say:  
 2 "It's highly unusual for other emergency service  
 3 responders to request specific GMFRS resources."  
 4 And yet we know that Mr Hynes did and he requested  
 5 12 firefighters; is that right?  
 6 A. I believe so, yes, sir.  
 7 Q. Just help me so we can get this into perspective. How  
 8 many firefighters are usually sent out to a normal house  
 9 fire?  
 10 A. We normally mobilise three fire engines, so depending on  
 11 the crewing level of those fire engines, it would be  
 12 between 12 and 15.  
 13 Q. Mr Hynes was asking for fewer firefighters than usually  
 14 go to a domestic home?  
 15 A. A similar number.  
 16 Q. Right.  
 17 SIR JOHN SAUNDERS: I think the point of what you're saying  
 18 in the statement, in its context, is you're really  
 19 saying Mr O'Reilly shouldn't be asking someone from  
 20 another service —  
 21 MR COOPER: Mr Hynes.  
 22 SIR JOHN SAUNDERS: Sorry, shouldn't be asking Mr Hynes, so  
 23 Mr O'Reilly shouldn't be asking that question of him but  
 24 should be making their own decision on the information  
 25 they have.

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1 A. Yes, sir. When we go to incidents, we don't ask NWAS to  
 2 send us six, seven ambulances, whatever it is, we  
 3 request the attendance of NWAS, they make an assessment,  
 4 and they, as the experts for their area, would tell us  
 5 what — or make the decision what resources they need.  
 6 SIR JOHN SAUNDERS: That's slightly yes and no. If you got  
 7 to the incident first, they might be saying: how many  
 8 casualties are we talking about so we know how many  
 9 ambulances to send? In any event, you think Mr O'Reilly  
 10 should not have been doing that in this situation?  
 11 A. No, sir.  
 12 MR COOPER: Thank you.  
 13 Just a few questions about the conduct of the chief  
 14 around this time. It'll help to go to paragraph 83  
 15 onwards as far as that's concerned. You reference in  
 16 paragraph 83 of your statement lots of conversations  
 17 between GM Levy and the chief around deployment in the  
 18 area and the feelings, as you expressed them and as you  
 19 saw them and interpreted them, of GM Levy at the time.  
 20 Effectively, Group Manager Levy was professing for  
 21 deployment, wasn't it?  
 22 A. That's my understanding, yes.  
 23 Q. Did you agree with him at the time?  
 24 A. Yes.  
 25 Q. And yet the chief seemed to be standing against this;

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1 is that right?  
 2 A. Yes.  
 3 Q. During the course of events on the night of 22 May,  
 4 a number of people, and I'll deal with just a few, had  
 5 certain misgivings about the competency of the chief on  
 6 this occasion. You're aware of that, aren't you, the  
 7 decision—making?  
 8 A. Yes, I think this was around the awareness of trauma  
 9 technicians within the service.  
 10 Q. And indeed you touch on that at paragraphs 87 and 88 of  
 11 your statement. Do you share some of the misgivings  
 12 that others have expressed about the competency of the  
 13 chief on this particular night?  
 14 A. Not necessarily around the competency. I think his  
 15 awareness from what I believe he requested in terms of  
 16 12 firefighters and believing that they were all trauma  
 17 technicians. As a chief fire officer, you're not  
 18 necessarily that close to the detail but the people on  
 19 the ground at Manchester Central were aware that not  
 20 everybody is a trauma technician. Everybody has trauma  
 21 training and what we aim for is for each one of our  
 22 crews to have at least one person who's a trauma  
 23 technician who goes on an additional training course to  
 24 have extra skills in trauma treatment.  
 25 Q. This is paragraph 87 of your statement, and I really do

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1 want to clarify this, please. You say:  
 2 "There followed a discussion as to whether the SRT  
 3 should in fact be sent as opposed to three  
 4 non—specialist appliances. I understand that  
 5 a conversation took place with the chief and he said 12  
 6 firefighters should go because all firefighters are  
 7 trauma technicians."  
 8 You have dealt with that, he was wrong about that,  
 9 you've explained that, and so the chief didn't know  
 10 that. But do I understand from paragraph 87 that the  
 11 chief was suggesting that 12 firefighters should be sent  
 12 to the arena?  
 13 A. Yes, sir, that's my understanding.  
 14 Q. So the chief is suggesting fewer firefighters than he  
 15 might send to a domestic home be sent to the arena?  
 16 A. As I have said, it's a similar number, between 12 and  
 17 15, but it was around that figure.  
 18 Q. All right then. That is shocking, isn't it? That the  
 19 chief is suggesting 12 firefighters, the minimum sent to  
 20 a domestic home, should be sent to the arena to help  
 21 these people?  
 22 A. We had further resources available at the RVP that we  
 23 could have sent.  
 24 SIR JOHN SAUNDERS: I'm not sure it's fair to ask him  
 25 whether it's shocking or not. I think you can leave

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1 that to me and any comments you may wish to make in  
 2 closing.  
 3 MR COOPER: Then I will, sir.  
 4 SIR JOHN SAUNDERS: If that's all right.  
 5 MR COOPER: Thank you.  
 6 If we look through generally your paragraphs 90  
 7 onwards, you deal again with the aftermath of this,  
 8 don't you? But I would like to take you to  
 9 paragraph 105, please:  
 10 "On leaving the arena I returned to Central Station  
 11 and was there when ACFO Harris attended and AM Etches to  
 12 give a hot debrief. However, the crews were very angry  
 13 and ACFO Harris said he was not there to give answers,  
 14 which infuriated them."  
 15 What did he actually say and in what context did  
 16 ACFO Harris after this event say he was not there to  
 17 give answers?  
 18 A. As I recall, after the incident, when we went back to  
 19 Manchester Central, I'd spoken to Paul Etches  
 20 specifically asking for somebody from the command  
 21 support room to come to Manchester Central to discuss  
 22 with the crews what decisions were and weren't made and  
 23 why, because I was conscious that the crews were  
 24 extremely frustrated and angry about what had transpired  
 25 on the night.

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1 ACFO Harris turned up — I can't recall if Mr Etches  
 2 was there as well, but basically the firefighters had  
 3 kind of congregated together at the back of the station  
 4 at Manchester Central. My recollection is that one of  
 5 his opening lines was, "I'm not here to give answers,  
 6 I'm here to listen to your issues and your  
 7 frustrations", and there was a number of questions which  
 8 were fired at him from the crews and no answers came  
 9 back, which in my opinion made the situation even worse.  
 10 The whole point of requesting someone to go there  
 11 was to try and fill in some of the gaps we had about  
 12 what had and hadn't been decided on the night.  
 13 Q. Finally this, and I can hopefully deal with it in short  
 14 order but it has not been referred to and I think it's  
 15 important we do. It's in fact your first statement,  
 16 {INQ004246/1}.  
 17 This in fact was the first statement you made,  
 18 is that right, dated 25 May 2017?  
 19 A. I think it might have been my second one.  
 20 Q. Is it the second one? Have I got my chronology wrong?  
 21 Anyway.  
 22 SIR JOHN SAUNDERS: It's pretty close after anyway.  
 23 MR COOPER: Effectively, is it right, without going through  
 24 the detail of the statement, within that statement you  
 25 list in a considerable degree of detail as to what went

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1 wrong on that night; is that right?  
 2 A. I'd have to read through, but I think yes, there's  
 3 issues there that I have highlighted.  
 4 Q. I don't want to detain the inquiry, I know the chair  
 5 will read it. Let me put it this way: what you say  
 6 in that statement, and you had knowledge that it was  
 7 going to be potentially referred to in this inquiry  
 8 through questioning to you, do you stand by what you  
 9 said in the statement in terms of observations of what  
 10 went wrong on the night?  
 11 A. Again, I would have to read through it because I'm  
 12 conscious that there was a further statement made after  
 13 that, but generally ...  
 14 Q. I didn't think this was going to be controversial.  
 15 You have never, ever said in any of your documents,  
 16 statements or otherwise that there's anything in this  
 17 statement that's wrong?  
 18 A. No, I don't think so.  
 19 MR COOPER: I don't want to take advantage of the witness.  
 20 I notice the time. That was my last question. We are  
 21 approaching a break. If the witness is concerned, can  
 22 I suggest he looks at it over lunch?  
 23 SIR JOHN SAUNDERS: It's a good idea for him to look at it  
 24 again. He's been asked a number of questions which may  
 25 have changed his mind about things. We'll break off for

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1 an hour now. Would you mind taking time to read through  
 2 this statement?  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: And can we make sure it's the same  
 5 statement that you have. Then tell us at the end  
 6 whether you stand by what you said in that when we come  
 7 back at 2 o'clock.  
 8 A. Yes, sir.  
 9 MR COOPER: Thank you, sir.  
 10 (1.00 pm)  
 11 (The lunch adjournment)  
 12 (2.00 pm)  
 13 MR COOPER: Sir, might I ask Mr Meakin whether he's had an  
 14 opportunity of reading that statement of 25 May over the  
 15 luncheon adjournment?  
 16 A. Yes, sir.  
 17 Q. Do you want to add anything to it or do you simply want  
 18 to tell us that it's accurate and you stand by what you  
 19 say?  
 20 A. At the time of writing the statement, those were the  
 21 reflection of my feelings yes, sir.  
 22 Q. And indeed, as it may well have been at the time of  
 23 writing your statement, you endorse them now today;  
 24 is that right?  
 25 A. Yes.

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1 MR COOPER: Thank you. I have no further questions.  
 2 SIR JOHN SAUNDERS: Thank you very much.  
 3 MR DE LA POER: Sir, I have already been informed that there  
 4 are to be no questions on behalf of Greater Manchester  
 5 Combined Authority, so that concludes  
 6 Area Manager Meakin's evidence.  
 7 SIR JOHN SAUNDERS: Thank you very much for coming to give  
 8 your evidence and telling me from your point of view and  
 9 your perspective what happened on the night and helping  
 10 me to understand what did or didn't go wrong there, so  
 11 thank you very much for that.  
 12 A. Thank you, sir.  
 13 MR DE LA POER: Could I invite you to rise just for a couple  
 14 of moments, I don't expect it will be longer than that,  
 15 just while we make the arrangements? Thank you.  
 16 (2.03 pm)  
 17 (A short break)  
 18 (2.07 pm)  
 19 MR GREANEY: Good afternoon, sir.  
 20 SIR JOHN SAUNDERS: Before we start, can I just say this:  
 21 I am going to do something this afternoon which I have  
 22 never done before but I hope I'm not too old to start.  
 23 I have a phone call possibly this afternoon, which  
 24 I really do need to answer. I'm very sorry for that and  
 25 I would certainly not do this unless it was necessary.

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1 You won't hear it ring because it's on silent, but if  
 2 the phone call does happen, I will rise and we'll break  
 3 for 10 minutes, if that's all right, so I can answer  
 4 the phone call. I hope that's acceptable to everybody.  
 5 I wouldn't normally do it, but I really do have to take  
 6 the call.  
 7 MR GREANEY: Sir, thank you for telling us, I'm sure  
 8 everyone will understand.  
 9 Could the witness be sworn, please?  
 10 MR BEN LEVY (affirmed)  
 11 Questions from MR GREANEY  
 12 MR GREANEY: Would you begin by telling us your full name,  
 13 please?  
 14 A. Benjamin Quentin Levy.  
 15 Q. After a short career as a schoolteacher in a school for  
 16 children with a range of learning difficulties, did you  
 17 join the Greater Manchester Fire and Rescue Service in  
 18 1997?  
 19 A. Yes, sir.  
 20 Q. Did you then rise steadily through the ranks?  
 21 A. Yes.  
 22 Q. So that by May 2017, were you a group manager with the  
 23 Fire and Rescue Service?  
 24 A. I was, sir.  
 25 Q. Were you based at the headquarters of the Fire Service?

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1 A. Yes, sir .  
 2 Q. Was the particular role that you performed twofold:  
 3 first of all, as the single point of contact for North  
 4 West Fire Control?  
 5 A. Yes, sir .  
 6 Q. And secondly, were you responsible for a project  
 7 relating to a new shift duty system within the Fire and  
 8 Rescue Service?  
 9 A. That's correct, sir .  
 10 Q. Were you at that stage, in May of 2017, an operational  
 11 firefighter ?  
 12 A. I was a supervisory officer attending a wide range of  
 13 incidents, as incident commander and tactical adviser.  
 14 Q. So although you had a role at headquarters in a command  
 15 role, you would attend incidents?  
 16 A. That's correct, most officers at the rank of station  
 17 manager and above — in fact all, but a very small  
 18 number — are operational officers on a 24-hour system.  
 19 Q. You may be asked other questions about this. So we have  
 20 no doubt you were an operational firefighter and did  
 21 commonly attend operations?  
 22 A. Regularly.  
 23 Q. We'll come back to this towards the end of your  
 24 evidence, which may be today or tomorrow morning, your  
 25 evidence in answer to my questions, but after May of

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1 2017, were you promoted from the rank of group manager  
 2 to the rank of area manager?  
 3 A. Yes, sir .  
 4 Q. In May 2017, were you a trained commander?  
 5 A. Yes, sir .  
 6 Q. And I do know that the Fire and Rescue Service don't use  
 7 precisely these terms or at least not in the same way,  
 8 but we are very familiar with the structure of  
 9 Bronze/operational, Silver/tactical, and Gold/strategic.  
 10 A. Mm—hm.  
 11 Q. Were you trained as a commander at each of those tiers  
 12 or any of them?  
 13 A. Yes, so at all those tiers. The Fire and Rescue Service  
 14 also have — we align ourselves with the national  
 15 operational guidance and there's tiers and levels of  
 16 incident command from 1 through to 4 and I'd operated  
 17 previously at level 1, which is initial incident  
 18 command. Our watch managers on our fire appliances is  
 19 level 2 —  
 20 Q. Might we call level 1 Bronze?  
 21 A. You could, but equally any officer could be Bronze at  
 22 a certain stage of an incident.  
 23 Q. Yes.  
 24 A. And then there's supervisory incident command, our  
 25 station managers, for example, at level 2. Then coming

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1 through levels 3 and 4 gets towards our group managers  
 2 and our area managers, and there's also (inaudible)  
 3 Skills for Justice and the like, so at the time, so far  
 4 as the question more simply, although I had trained,  
 5 absolutely, sir .  
 6 Q. Not only were you trained, had you operated as  
 7 a commander in each of those respects prior to the night  
 8 of the attack?  
 9 A. Yes, sir . And I'd also attended, represented fire at  
 10 police-led Gold events on behalf of the principal  
 11 officer and strategic commander.  
 12 Q. I believe one such incident that you were heavily  
 13 involved in in that way was a policing operation that  
 14 we will all remember, the manhunt for Dale Cregan.  
 15 A. Very much so, sir .  
 16 Q. In December 2009, did you attend and pass the NILO  
 17 course?  
 18 A. No, I think December 2009 I applied — there was  
 19 a selection process, I can't remember the exact date but  
 20 in early December —  
 21 Q. I'm reading from your —  
 22 A. Forgive me.  
 23 Q. You don't need to put it that way, but I'm reading from  
 24 your witness statement.  
 25 A. It'll be correct, sir .

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1 Q. In your witness statement, at paragraph 14, you say:  
 2 "I was first appointed as a NILO following  
 3 a rigorous interview and selection process in  
 4 December 2009."  
 5 A. No, sir, the rigorous interview and selection process,  
 6 that was a process to be considered as a NILO, so it was  
 7 an interview, tabletop exercise, practical examination,  
 8 and the like. So that took place in December 2009.  
 9 I think I actually attended the course, because I was  
 10 successful, some time early in 2010.  
 11 Q. So thank you for that clarification. It may not matter  
 12 a great deal because the reality is that by May 2017,  
 13 you were a long-experienced NILO; is that correct?  
 14 A. Yes.  
 15 Q. And we heard from Mr Berry yesterday that he believed  
 16 that you were the longest experienced NILO within GMFRS;  
 17 do you agree?  
 18 A. No, sir. I would have most likely have been the most  
 19 experienced on duty at the time of the event on the  
 20 night, but there are others at the time who were more  
 21 experienced than I.  
 22 Q. But at all events, do you quibble with my suggestion  
 23 that you were a long-experienced NILO by May 2017?  
 24 A. Yes, sir, I'd been a NILO and incident commander and  
 25 other tactical adviser for a number of years.

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1 Q. In 2011 were you involved in what you describe in your  
2 statement as the initial training and development of  
3 command and control arrangements for an emerging MTFA  
4 capability?  
5 A. Yes, sir. If I could expand slightly on that, when  
6 I say emerging, we were the UK Fire and Rescue Service,  
7 UK police services and other emergency services  
8 co-responding to the emerging threat of multi-sited  
9 firearms terrorist attacks, and as part of that, there  
10 was the -- I know you've already heard from a witness,  
11 Mr Gaskell, there was a portion of funding made  
12 available at government level, as I understand it, to  
13 develop a capability. Manchester was one of the first  
14 areas to access that capability, but it also required  
15 development because it was so new.  
16 Q. This is post--Mumbai, which as we know is November 2008?  
17 A. Mm--hm.  
18 Q. Funding was made available for the development of  
19 an MTFA capability. That was happening in Manchester  
20 and you were at the forefront of that in Manchester?  
21 A. Not at the forefront but as one of the NILOs, so  
22 multi-agency, both from North West Ambulance Service,  
23 from Greater Manchester Fire and Rescue Service and  
24 Greater Manchester Police firearms commanders and  
25 firearms officers, between those three agencies there

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1 was the development of those protocols around that time  
2 on behalf of Greater Manchester --  
3 Q. So --  
4 A. Sorry, sir.  
5 Q. You carry on?  
6 A. As a NILO from the fire NILOs and ambulance NILOs and  
7 AITCs, as they term some of their staff, my recollection  
8 was they were the main people involved in the  
9 development of those response capabilities.  
10 Q. So at that time in 2011, as these capabilities are being  
11 developed, are we talking about the development of the  
12 SRT within the Fire and Rescue Service?  
13 A. Yes, sir, the SRT and the control and command mechanisms  
14 that surround that capability.  
15 Q. So let me see if I've got this right, I probably  
16 haven't: were you involved right from the beginning then  
17 in the development of the SRT?  
18 A. I believe so, yes.  
19 Q. So it would seem to follow therefore that by May 2017,  
20 that was a resource that you were very familiar with?  
21 A. Yes, sir.  
22 Q. Also that you had a lot of confidence in, I believe?  
23 A. Yes, sir, in the Fire and Rescue Service's capability.  
24 Q. Were you yourself at any stage SRT trained?  
25 A. I was a NILO and at station manager rank and above

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1 throughout the existence of the SRT capability and as  
2 part of that development then I had the same skills that  
3 the firefighters and appliance commanders would have,  
4 the team commanders, so we could deploy alongside should  
5 we be required --  
6 Q. I understand.  
7 A. -- because principally the role of a NILO is in  
8 a command and control capability, but we trained our  
9 NILOs to the same. So for example, the advanced trauma  
10 care that you've heard about, the NILOs were trained to  
11 the same level.  
12 Q. That's a very helpful clarification for me at least. So  
13 not only were you familiar with the capabilities of the  
14 SRT, you actually shared those capabilities?  
15 A. At the time, sir, yes.  
16 Q. What about the TRU? As of May 2017 were you familiar  
17 with their capabilities?  
18 A. Yes, sir.  
19 Q. Had you as a NILO, between 2011 and 2017, regularly  
20 trained and exercised alongside the SRT and TRU?  
21 A. Yes, sir, both as a command and control officer but  
22 also -- remotely, but also on scene as a deploying  
23 officer, as a NILO and as a fire commander on scene.  
24 I trained a number of exercises, tabletop, but also  
25 practical, the airport, other venues around

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1 Greater Manchester.  
2 Q. Did much of the training that you undertook as a NILO  
3 relate to MTFAs?  
4 A. No, sir, there was much wider training than that.  
5 Q. Did some of it relate to training in MTFAs?  
6 A. A lot of it. I think I had logged maybe 47 or so days  
7 personally around MTA training prior to the date of  
8 22 May.  
9 Q. And indeed that's what I was driving at. You have  
10 looked at the records and identified that between 2010  
11 and the night of the attack, you had undertaken, as you  
12 just told us, 47 days of MTFA-related training?  
13 A. Yes, sir.  
14 Q. That training, am I right, involved working not just  
15 alongside the specialist capabilities of the Fire and  
16 Rescue Service, but also alongside the HART of NWS and  
17 the firearms teams of GMP?  
18 A. Yes, sir, and also national capabilities -- of other  
19 Fire and Rescue Services, I mean.  
20 Q. So it would seem to follow, therefore, that as of  
21 May 2017, you were familiar not only with the  
22 capabilities of the specialist resources of the Fire and  
23 Rescue Service but also the specialist resources of your  
24 emergency service partners?  
25 A. Yes, sir.

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1 Q. And you had experience of working alongside them, both  
2 in exercises and actually on the ground?  
3 A. Yes, sir.  
4 Q. Among those 47 days of MTFA related training, was there  
5 included Exercise Winchester Accord?  
6 A. Yes, sir, I was an observer at Winchester Accord.  
7 Q. Your witness statement identifies, as you've just said,  
8 that your role was one of observation and was it in  
9 particular to observe and support NILOs in development?  
10 A. Yes, sir, one in particular was my recall. There was  
11 a second element of my attendance, that is not in my  
12 statement, forgive me, but there was also a multi-agency  
13 JESIP assurance with regard to that exercise and  
14 certainly some of our Fire and Rescue Service  
15 participants in that were not as familiar with MTA  
16 capability as some others might be, so I was also on  
17 hand to point out, guide and advise the stages that  
18 would be expected.  
19 Q. What your statement doesn't deal with, and I don't mean  
20 that in any way critically, is what you discovered or  
21 learned from your involvement in Exercise  
22 Winchester Accord. And as you will appreciate, we have  
23 heard a good deal of evidence about learning points, but  
24 I need to ask you about it to see to what extent it  
25 informed or should have informed your actions on the

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1 night.  
2 Did you, during your work of observation during  
3 Winchester Accord, observe that for a prolonged period  
4 the Fire and Rescue Service and Ambulance Service were  
5 not called forward?  
6 A. Yes, sir. I was with those resources that weren't being  
7 called forward.  
8 Q. Did you observe or discover that the FDO had become  
9 overwhelmed during the course of Winchester Accord?  
10 A. No, sir. That wasn't my recollection.  
11 Q. Did you become aware of that fact, if it is a fact, at  
12 any stage?  
13 A. Yes, and if I think most pertinently through the course  
14 of this inquiry I became aware of that.  
15 Q. Can I just be clear about it? Many people knew before  
16 May 2017, the chairman may find, that there was a risk  
17 of the GMP FDO being overwhelmed in the event of  
18 a real-life Plato event. Was that knowledge that you  
19 had at the time?  
20 A. Not that I recall, not before I think the release of  
21 Kerslake, because I think it was mentioned there, but my  
22 recollection on the night was more with regard to the  
23 location of other agency incident commanders and their  
24 potential knowledge and capability to bring forward the  
25 ambulance teams and the fire teams to scene.

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1 Q. So you knew that there was a problem, one which was to  
2 repeat itself on the night of the 22nd?  
3 A. Yes.  
4 Q. But you were unaware prior to Kerslake that part of that  
5 problem was the overwhelming of the FDO?  
6 A. I don't recall that being the case to me, sir.  
7 Q. Finally, before we turn to 22 May -- unless, sir, you  
8 want to ask any questions about Winchester Accord --  
9 SIR JOHN SAUNDERS: No thank you.  
10 MR GREANEY: Finally, before we turn to 22 May, I would like  
11 please to ask you what your understanding was, based  
12 upon the training and experience that you had, of how  
13 the emergency services would respond to a terror-related  
14 incident. So as to help you, I am looking in your  
15 witness statement dated 24 November 2019, so that's the  
16 statement which is 26 pages in length, at page 6,  
17 paragraphs 24 and 25. Would you help us with that?  
18 What was your understanding of how the emergency  
19 services would respond to a terror-related incident?  
20 A. Generally, in the broader sense, these events I would  
21 expect always would be police-led. When I mean police,  
22 I also include within that the Counter-terrorism  
23 Policing divisions, locally, regionally and nationally,  
24 but police as a broader term. Led by police, not  
25 necessarily would these incidents and events always have

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1 fire and ambulance because most, I would suggest, are  
2 probably not, but clearly where there are hazards  
3 present, injuries or potential for either of the above,  
4 then they become multi-agency incidents quite quickly.  
5 Q. So let's focus it in to an even greater extent: in a  
6 terror-related incident but an incident in the course of  
7 which Operation Plato has been declared, what was your  
8 expectation as of 22 May of how that would be dealt with  
9 by the emergency services?  
10 A. Well, any agency could declare, if I recall correctly,  
11 it would declare a potential for an MTA event developing  
12 or emerging, but only the police could categorically  
13 declare that.  
14 Q. That's our understanding. Any agency could draw  
15 attention to what they thought was such a situation but  
16 the declaration had to be made by the police.  
17 A. And that would be -- that could come across in any  
18 sense. The most formal way could potentially be in  
19 a METHANE message you've heard about, but that's quite  
20 a long-winded way of getting across a very early quick  
21 message of, "We're dealing with this type of  
22 incident" -- wait out -- so the police would take -- the  
23 police would be the ones who would be required to  
24 declare and they probably could not do that, I expect,  
25 until they are on the ground.

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1 Q. And you've hinted at this along the way of your answer  
2 but it seems that you would expect, as indeed was the  
3 position, that on Operation Plato being declared, the  
4 other emergency services would be informed of that  
5 declaration?  
6 A. Without a doubt and it's enshrined within the JOPs 3, as  
7 we refer to them now, absolutely enshrined through  
8 those.  
9 Q. Were you familiar as of May 2017 with the concept of  
10 a forward control or command point?  
11 A. Yes.  
12 Q. What did you understand the purpose of such an FCP was?  
13 A. Can I clarify that an FCP doesn't relate only to an MTFA  
14 event? It exists across all incident command arenas and  
15 it's the point at which agencies, either single agencies  
16 or ideally if it's a multi-agency event multi-agency  
17 agencies command and control their resources on the  
18 ground. This is not the same as an RVP.  
19 Q. No. That, I hope, we are all clear about now. There is  
20 undoubtedly a difference between the two. But the FCP  
21 is something certainly one would expect in the event of  
22 a declaration of Operation Plato, but not only then, one  
23 would expect one in a wider range of situations and  
24 that is where the on-scene commanders from each agency,  
25 if a number of agencies are involved, should gather in

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1 order to share their experiences, gain situational  
2 awareness and jointly assess risk?  
3 A. I think more than you suggested would be expected,  
4 I think it's essential.  
5 Q. As we are going to come on to discuss, that was  
6 a problem on the night of 22nd?  
7 A. Yes, sir.  
8 Q. And what about zones? Were you familiar with the  
9 concept of Plato zones on the night of the attack?  
10 A. Yes, sir.  
11 Q. What did you understand about them?  
12 A. Well, in my mind and my understanding, zones do not  
13 exist until they've been declared as such. So I know  
14 the chairman's heard much evidence of the situation on  
15 the night of the arena, where members of the public were  
16 in what we now -- or was soon to become known as a warm  
17 zone. It can only become a warm zone if somebody's  
18 declared it. So I would expect police to be the ones to  
19 declare warm zones and, in the sense of Plato, warm zone  
20 is not the same as warm zones in other incidents. Here,  
21 I believe it to be particularly with regard to firearms,  
22 ballistic or unexploded IED threats, as was the case  
23 with JOPs 3 at the time.  
24 Q. What you're describing, I think, are concepts we are now  
25 very familiar with. A hot zone, that is an area within

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1 which there is an active terrorist threat and you would  
2 expect -- or where only firearms officers or the  
3 military should operate?  
4 A. Yes.  
5 Q. Warm zone is a zone in which the specialist resources of  
6 the Ambulance Service and the Fire and Rescue Service  
7 can operate.  
8 A. Except in exceptional circumstances.  
9 Q. And save in those exceptional circumstances,  
10 non-specialist resources should not be?  
11 A. Correct.  
12 Q. And the cold zone where any of the other resources can  
13 operate?  
14 A. Yes.  
15 Q. Let's turn then to 22 May. So you know where I'm going,  
16 there are two broad issues that I am going to seek your  
17 assistance on. I'm not asking you to give us your  
18 answers at the moment, we will develop them. The two  
19 broad issues won't take you by surprise. They are as  
20 follows: (1), why it took the Fire and Rescue Service so  
21 long to arrive at the arena; (2), why, when they did,  
22 the specialist resources of the Fire and Rescue Service  
23 did not form part of that deployment.  
24 A. Yes, sir.  
25 Q. So that's where we're going. I'm sure you'll agree that

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1 you have an insight into both of those issues and you  
2 perhaps have a unique insight into the second, but we'll  
3 get there in due course.  
4 Before we turn to the first that you knew of an  
5 incident at the arena, I want to tell you, although you  
6 probably know already, about how GMCA, which as you will  
7 know, represents the Fire and Rescue Service's  
8 interests, summarised its position when it made its  
9 opening statement. I'm going to be doing that for two  
10 reasons.  
11 First of all, out of fairness to GMCA and the Fire  
12 and Rescue Service, because it will provide some context  
13 to the evidence that we heard yesterday, which on  
14 occasions was tense. And secondly, because it will give  
15 you an opportunity to either agree or disagree with the  
16 position advanced by GMCA.  
17 So at the very beginning of the opening statement of  
18 GMCA, Mr Warnock said this:  
19 "In relation to the Fire Service response on the  
20 night, we say at the outset that GMFRS accepts and  
21 agrees with the conclusions of Fire and Rescue expert  
22 Mr Hall that its initial actions in response to the  
23 arena bombing were neither adequate nor effective.  
24 It is unacceptable that it took over 2 hours for the  
25 Fire and Rescue Service to attend the arena. On behalf

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1 of GMFRS, we would like to say to the families and  
 2 victims that we are sorry that this happened. The  
 3 inquiry will hear evidence..."

4 Pausing for a moment, we have heard evidence:  
 5 "... from many individual GMFRS witnesses who still  
 6 have profound feelings of frustration and deep anguish  
 7 that they were not there to help."

8 So may I ask you, do you agree that the response of  
 9 the Fire and Rescue Service on the night was neither  
 10 adequate nor effective?

11 A. Yes, sir.

12 Q. Do you agree that it was unacceptable for it to take  
 13 over 2 hours for the Fire and Rescue Service to reach  
 14 the scene?

15 A. Wholly unacceptable, sir.

16 Q. And do you yourself have, to use Mr Warnock's phrase,  
 17 profound feelings of frustration and deep anguish that  
 18 you were not there to help at the relevant time?

19 A. Yes, sir.

20 Q. Let's turn to the events of 22 May. That day and night,  
 21 were you on a 24-hour shift and one of four duty NILOs?

22 A. I believe so, but having preparing (sic) for today, I'm  
 23 not sure if there was four or three, there were  
 24 certainly three. I can't tell you who the fourth was.

25 Q. Thank you very much. So three or four.

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1 And at 11 pm, were you at home?

2 A. Yes, sir.

3 Q. At 11.06 did you receive a pager message from North West  
 4 Fire Control?

5 A. Yes, sir.

6 Q. As some in this room will know, pagers were a very  
 7 common method of communication in the late 20th century,  
 8 but perhaps not so much by 2017. Are you able to help  
 9 with why pagers were in use by North West Fire Control  
 10 and the Fire and Rescue Service?

11 A. I understand them to be still very common within the  
 12 Fire and Rescue Service for the simple reason that they  
 13 are resilient in the sense of -- and this doesn't intend  
 14 to come across as a technical response and I may  
 15 misspeak here, but my understanding is they are more  
 16 resilient over the mobile airwaves. They are also  
 17 backed up by mobile phone messages, so it's all part of  
 18 the resilient nature of our mobilising system and we  
 19 still have pagers today because they're quite effective.

20 Q. That answers the question. At all events, at 11.06 you  
 21 received a message on your pager from NWFC. We saw it  
 22 on the screen earlier today with Mr de la Poer but let's  
 23 put it on the screen again. Let's just read it out.  
 24 It's the top of page 8 of your witness statement. Did  
 25 the message read:

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1 "Proceed to admin/administration..."

2 And then a postcode was given:

3 "... Philips Park Fire Station, Briscoe Lane,  
 4 Manchester. Role BG NILO. NILO three and MTS  
 5 capability two to RVP at Philips Park."

6 Is that the message that you received?

7 A. Yes. I can explain in more detail elements of that than  
 8 may not have been explained so far if it helps.

9 Q. Yes, it may help, please do.

10 A. Why does it say admin and administration, some might  
 11 want to know, and not an incident type? Normally, an  
 12 officer would -- or crews would be mobilised to an  
 13 incident type, for example, "Proceed to building fire,  
 14 persons reported". This says proceed to  
 15 admin/administration because that's not the address of  
 16 the incident, that's the address of some other element  
 17 related to the incident. So that's why, it's just  
 18 a terminology used by North West Fire Control.

19 Obviously the postcode and the address to where to  
 20 respond to.

21 The reference G18 is the station nomination. It  
 22 will have a Talk Group in there, assigned to that  
 23 particular -- the role BG NILO, clearly NILO -- BG  
 24 refers to Greater Manchester officers within the  
 25 national call -- Fire Control officer call signs. NILO

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1 three is clear to us. MTS --

2 Q. Sorry, I missed --

3 A. "NILO three" I understood that to be three NILOs. It  
 4 might say "pumps three" or words to the effect of.  
 5 "MTS" I assumed a typo -- because with the phrase  
 6 "MTS capability" can only mean one thing to me: MTA or  
 7 MTFA capability.

8 Q. So you and Mr Meakin are agreed about that, that was  
 9 a typo and should have read MTFA?

10 A. That was my guess at that point yes. And go to  
 11 Philips Park.

12 On that, without seeking any further information, my  
 13 understanding at that point was I was being mobilised to  
 14 a marauding terrorist firearms attack incident as part  
 15 of a specialist response capability as one of a number  
 16 of NILOs.

17 Q. Prior to receipt of that message on your pager, had you  
 18 discovered anything about any incident at the arena?

19 A. No, I was just at home, I was up, I was probably doing  
 20 some work, but no.

21 Q. Indeed was this the first you knew of any incident that  
 22 was occurring in Manchester?

23 A. Absolutely.

24 Q. Did you think that you were being deployed to an  
 25 incident that had occurred some time earlier, as we know

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1 35 minutes earlier, to some incident which was occurring  
 2 at that moment or had just occurred, or did you not  
 3 know?  
 4 A. When one's mobilised to an incident, as firefighters,  
 5 fire officers, one assumes the incident has only just  
 6 happened. You know, you picture someone ringing 999  
 7 asking for the Fire Service, and we go out the doors.  
 8 As incidents develop -- if I was to attend an  
 9 incident tonight to a very large fire, you understand  
 10 large fires don't happen immediately. But for something  
 11 like this, where -- I imagined at this point somebody  
 12 has declared, and it can only be the police, a marauding  
 13 terrorist firearms attack, and we're being amassed to  
 14 support that.  
 15 Q. You thought you were being deployed as part of the  
 16 response to a live MTFA incident; is that correct?  
 17 A. I did consider whether this was an exercise a no-notice  
 18 exercise that we've run in the past, but I did consider  
 19 -- I'd probably know if there was a no-notice  
 20 exercise --  
 21 Q. So you thought about that but discounted it, so --  
 22 A. It would make no difference, I would mobilise, I would  
 23 get going quickly any way and then find out on the way.  
 24 Q. So as you read it, I don't wish to put words in your own  
 25 mouth, but you thought the likelihood was that you were

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1 deploying to a live Operation Plato incident? Were  
 2 those your thoughts?  
 3 A. Yes, sir, and I think I was sat in my car within about  
 4 4 minutes, ready to go.  
 5 Q. As you were about to pull away from the driveway of your  
 6 home, did you see a message on your mobile telephone?  
 7 A. Yes. On the home screen. I didn't answer it because  
 8 I could realise that there wasn't much detail in there.  
 9 Q. Did you read that at any stage that message?  
 10 A. Later.  
 11 Q. Was that a WhatsApp message on a chat group that had  
 12 been set up amongst the NILOs?  
 13 A. Yes, sir. It was from Assistant Chief Fire  
 14 Officer Keelan and it was -- I think the -- I think it  
 15 was Sky News. It was the early notification of some  
 16 emerging reports of something happening in  
 17 Greater Manchester.  
 18 Q. Shall we look at that on the screen? You said that you  
 19 looked at it later. How much later do you believe you  
 20 looked at it?  
 21 A. I think as I arrived at Philips Park.  
 22 Q. We know that that was at about 23.35 as we are going to  
 23 see. We'll have that message on the screen, Mr Lopez.  
 24 I gave you this reference a moment ago erroneously and I  
 25 will give it to you for the correct purpose now. It is

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1 {INQ019040/1}.  
 2 We can see this is from Dave Keelan, who is the  
 3 assistant chief fire officer. You're nodding your head.  
 4 A. Yes.  
 5 Q. If you wouldn't mind saying yes or no. It is a post  
 6 from the Sky News news desk:  
 7 "Greater Manchester Police warning people to stay  
 8 away from Manchester Arena as officers respond to  
 9 incident amid reports of an explosion."  
 10 It's timed at 11.02.  
 11 Then at 11.08:  
 12 "Any update?"  
 13 That too, I think, is from Mr Keelan. We will read  
 14 through the balance of the messages because all of them,  
 15 save for the final three, will have been received at  
 16 a time at which you looked at them.  
 17 Phil Nelson. Who was Phil Nelson?  
 18 A. Phil Nelson is -- I think he may have been a station  
 19 manager at the time, a group manager now, also a NILO.  
 20 Q. "Just on iNet."  
 21 Does that mean anything to you?  
 22 A. That is iNet. That is the North West Fire Control's --  
 23 an element of North West Fire Control's mobilising  
 24 system that fire officers have got access to, iNet.  
 25 Q. "Dave [presumably a reference to Dave Keelan], it looks

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1 really bad. Police are reporting a minimum number of 18  
 2 fatalities."  
 3 "Dean [that's Dean Nankivell in context] is DGM..."  
 4 Did you understand that to be duty group manager?  
 5 A. I would understand that -- duty group manager.  
 6 Q. "... and I think opening CSR. Andy Berry in (sic) NILO  
 7 and stepping up MTFA capability."  
 8 We don't need to read the next message. We then  
 9 have Dave Keelan:  
 10 "CFO [so that would be Mr O'Reilly] is PO..."  
 11 So principal officer?  
 12 A. Yes, sir.  
 13 Q. "... and is heading to command support room."  
 14 A. Yes, sir.  
 15 Q. So am I correct that all of those messages up to and  
 16 including 23.33 are messages that you will have read as  
 17 you arrived at Philips Park?  
 18 A. Yes, sir, I'd have been driving throughout all those.  
 19 Q. And so as you pulled up and read this message, you would  
 20 have known that there was an incident at  
 21 Manchester Arena?  
 22 A. Yes, sir.  
 23 Q. You would have known that it was being reported that  
 24 officers were responding to it?  
 25 A. Yes, sir.

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1 Q. And you will have known that some parts of the command  
2 structure were being put in place and in particular  
3 a CSR was being put in place; do you agree?  
4 A. Yes, sir, but to add, that wasn't the primary source of  
5 that same information.  
6 Q. I do appreciate that and I'm going to come to the  
7 primary source. But one of the things that you will  
8 have known, and I think did know, even if it hadn't been  
9 for the other source of information, was that it was  
10 being reported that officers were responding to an  
11 incident at the arena?  
12 A. Yes, sir, and I'd expect that to be the case.  
13 Q. In fact before, as we now know, you read those messages,  
14 you called North West Fire Control; is that correct?  
15 A. Yes, sir.  
16 Q. That call was timed at 23.12?  
17 A. Yes, sir.  
18 Q. So that's 6 minutes after you received the pager  
19 message?  
20 A. Yes.  
21 Q. And by that stage are you in your car and on your way to  
22 Philips Park?  
23 A. Yes, I'd have in effect got off my housing estate, I was  
24 on blue lights, and I was on the road.  
25 Q. We can hear that recording and read the transcript.

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1 Mr Lopez, the recording is {INQ004395/1}. The  
2 transcript is {INQ004418/1}.  
3 (Audio played)  
4 In a moment I'm going to identify the core aspects  
5 of what you were told and the core aspects of what you  
6 weren't told by NWFC, but which they knew, but for the  
7 time being I just want to ask about one aspect which  
8 I don't think we've encountered before and that takes us  
9 back to {INQ004418/2} of the transcript, the bottom  
10 half.  
11 We can see that you are told by Michelle Gregson:  
12 "Can do hazard zone around — how far does he want  
13 it going out? Janine just asked me to ask you we've  
14 been instructed to... no mobilisations to city centre.  
15 If we do a hard zone around that, how wide do we go?  
16 Janine is asking."  
17 Let me read the relevant part again:  
18 "We've been instructed to... no mobilisations to  
19 city centre. If we do a hazard zone around that, how  
20 wide do we go? Janine is asking."  
21 So the reference to being instructed to "no  
22 mobilisations to city centre", we'll have to explore  
23 that with the witnesses, but that may well be  
24 a reference to the decision that had been made by  
25 Mr Berry that there was not to be mobilisation to

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1 cathedral car park or even to Thompson Street.  
2 What I would like to you help us with is this  
3 reference to a hazard zone. Did you know what she was  
4 referring to and, if so, could you help us, please?  
5 A. Yes, absolutely. Hazard zones are not unusual in Fire  
6 and Rescue Service command and control. I don't expect  
7 them to be that unusual within other emergency service  
8 control rooms. So with a view — they're on North West  
9 Fire Control and Fire and Rescue Service — hazard zones  
10 are in effect — they are an element that can be placed  
11 on a map within the mapping element of North West Fire  
12 Control's CAD system, their computer-aided dispatch  
13 system. A hazard zone can be a polygon of any given  
14 shape, pre-drawn on to a map, or it can be a circular  
15 point radiating from a point.  
16 So for example, a hazard zone might be used for  
17 a hazardous materials event where we want to circle a  
18 15-metre cordon around a particular hazard, just to let  
19 people be aware of it or something.  
20 Another use of a hazard zone in a polygon sense  
21 could be, for example, on Bonfire Night when we get  
22 a lot of small fires in the open caused by young people  
23 in the streets and the Fire and Rescue Service may come  
24 under attack in those places as they try and put fires  
25 out. We may put a hazard zone around a number of

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1 streets to say that if we mobilise a fire engine there,  
2 send two at a minimum.  
3 The point there is the hazard zone comes with  
4 additional information. That's the purpose of the  
5 hazard zone: it allows information to be displayed to  
6 the control room operator at the point of creating an  
7 incident within that hazard zone, and that's the key  
8 element of the hazard zone, it is the information that  
9 goes — it's not there to restrict mobilisations —  
10 Q. I am going to ask you to pause because this is exactly  
11 what I want to understand.  
12 In other words, a hazard zone is a hazard zone, as  
13 simple as that. What you were not doing, as I've  
14 understood it, is seeking to identify that that zone was  
15 hot, warm or cold within a Plato sense?  
16 A. No.  
17 Q. Were you seeking to impose any rules as to whether  
18 resources could be mobilised into that zone and, if so,  
19 what resources?  
20 A. Yes, and it's not clear there because, like I say, it's  
21 reasonably straightforward for Control. I won't go into  
22 the detail in case it's operationally sensitive, but had  
23 this been declared an MTF incident at this point, which  
24 I suspected it had been, I'd have expected North West  
25 Fire Control to have elements of the Operational Plato

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1 (sic) action cards in front of them --  
 2 Q. Yes.  
 3 A. -- on the screen which would have detailed hazard zones  
 4 for that type of incident. So within that type of  
 5 incident there's a predetermined hazard zone for that  
 6 type of incident, rendezvous points, forward control  
 7 points, et cetera, may or may not be inside that zone --  
 8 rendezvous points are normally outside.  
 9 Q. You're giving us a lot of information and I just want to  
 10 make sure I've understood. I fully recognise that if  
 11 Plato had (a) been declared, which in fact it had been,  
 12 and (b) been communicated to North West Fire Control,  
 13 then there was a particular action card that ought to  
 14 have been deployed, but those facts didn't arise or that  
 15 combination of facts didn't arise.  
 16 Here you were being asked a question by a person who  
 17 was unaware that Plato had been declared, you were  
 18 informing them of a hazard zone. On the face of what  
 19 you said, you did not impose any rules as to which  
 20 resources could or could not enter that zone. Would you  
 21 have expected that NWFC would have imagined from what  
 22 you were saying that there were such rules?  
 23 A. Well, actually I was asked to -- Janine asked to put  
 24 a hazard zone in, I wasn't sure who asked, I assumed the  
 25 duty NILO or from some other route.

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1 Now, the hazard zones in a situation like this are  
 2 quite common. They go -- the information goes with  
 3 them, something like you know: mobilise to life-risk  
 4 incident, that's an incident where life is immediately  
 5 at risk, house fire, person reported, the like. Other  
 6 incidents, just hang on a minute and just wait for  
 7 further information or seek advice. So it doesn't  
 8 restrict movement of incidents to life-risk incidents.  
 9 Importantly, though, if this was an incident that  
 10 was a police-led multi-agency incident where there was  
 11 some additional hazards and threats, it also allows any  
 12 appliances being mobilised to be notified of those  
 13 incidents before they proceed.  
 14 Q. So it ensures that information is given, but the simple  
 15 answer -- and I don't say this in any way to be  
 16 offensive to your helpful answer -- is that the  
 17 imposition of that hazard zone was not intended to place  
 18 restrictions on mobilisation, and would not be  
 19 understood as imposing a restriction on mobilisation?  
 20 A. I wouldn't expect the control room operator to  
 21 understand it that way, no, sir.  
 22 Q. There, we've reached there. I said that we would deal  
 23 with the key aspects of what you were told and what you  
 24 weren't told in that conversation. You have helpfully  
 25 digested what you were told, as you understood the

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1 important aspects to be, at the top of page 9 of your  
 2 principal witness statement.  
 3 You were told that there had been an explosion  
 4 at the arena?  
 5 A. Yes, sir.  
 6 Q. You were told that there were also reports of gunshots?  
 7 A. Yes, sir.  
 8 Q. You were told that there were 18 fatalities and that  
 9 number was rising?  
 10 A. Yes, sir.  
 11 Q. And indeed you were also told there were injuries?  
 12 A. Yes, sir.  
 13 Q. You were told that three NILOs were proceeding to muster  
 14 at Philips Park Fire Station on the instruction of  
 15 Mr Berry, who was the duty NILO?  
 16 A. Yes, sir.  
 17 Q. You were told that four appliances had been mobilised as  
 18 well?  
 19 A. Yes, sir.  
 20 Q. And in fact one additional thing that you were told,  
 21 which might be of importance, was that attempts were  
 22 being made to set up a line of communication with the  
 23 police so that JESIP could be maintained?  
 24 A. Yes, sir.  
 25 Q. What we are able to see from the chronology or timeline

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1 prepared by North West Fire Control, which Mr de la Poer  
 2 applauded this morning, is what you were not told. So  
 3 could we have, please, on the screen {INQ041473/40}.  
 4 This is dealing with that call. I don't know  
 5 whether this is a document that you have seen?  
 6 A. Yes, sir.  
 7 Q. That's very helpful:  
 8 "The following information had by this time been  
 9 entered on to incident log 9074 but was not conveyed to  
 10 Group Manager Ben Levy in the following order in terms  
 11 of proximity to the call."  
 12 So the most proximate to the 23.12 call first:  
 13 "1. All the ambulances have been directed to the  
 14 booking office. Minimum of 15 fatalities at this time."  
 15 And that was entered into the log at 22.58.08.  
 16 May I ask you, if you had been told at 23.12 that  
 17 all the ambulances had been directed to the booking  
 18 office, first, would you have understood that that meant  
 19 that ambulances were attending the scene of the  
 20 explosion?  
 21 A. Yes.  
 22 Q. Secondly, would that have made any difference to the  
 23 action that you took when you arrived at Philips Park?  
 24 A. Yes, probably.  
 25 Q. What difference do you think it probably would have

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1 made?  
 2 A. Well, I suppose — can I also highlight something that  
 3 I don't think is covered on this document from North  
 4 West Fire Control or another omission on my part that  
 5 I didn't take account of on the night? There were two  
 6 errors I see personally in receiving that call from  
 7 North West Fire Control. The first was, briefly, they  
 8 told me that they'd received the report at 22.38.  
 9 Q. Right.  
 10 A. I failed to notice that. Whether I heard it and didn't  
 11 consider what time it actually was because I wasn't  
 12 watching the clock, I was just up and about at home, the  
 13 22.38, and I have spoken to them at 23.12, that  
 14 countered the view that I immediately took, which was  
 15 this incident had only just happened, which is why  
 16 I understood there wouldn't be anybody on scene yet.  
 17 This would have confirmed it further if I'd have known  
 18 this, that there was other agencies on scene. And when  
 19 the phrase there, "All ambulances have been directed",  
 20 that doesn't read to me Hazardous Area Response  
 21 Team/Special Response Team, that reads random — regular  
 22 and — ambulances.  
 23 Q. That's a fair observation. I think you said there were  
 24 two things you wanted to draw to our attention. What  
 25 was the second?

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1 A. Yes. The second one — and if I can be candid, I hadn't  
 2 noticed it until I just heard for about — the numerous  
 3 times I've heard it there that actually Michelle Gregson  
 4 I'm speaking to, I interrupted her at some point as she  
 5 was going to look at the incident log and had I not  
 6 interrupted her, maybe she would have been able to find  
 7 some of this information for me. So I regret that  
 8 I interrupted her.  
 9 Q. Well, that is no doubt a very decent observation for you  
 10 to make. I'm not seeking to identify or apportion  
 11 culpability, I'm really just seeking your simple and  
 12 straightforward answer to factual issues, namely  
 13 whether, had you been told about these things, whoever's  
 14 fault it was, if it was anyone's that you weren't told,  
 15 whether it would have made any difference to your  
 16 decision-making.  
 17 But have I understood that if you had been told at  
 18 23.12 that all ambulances had been directed to the  
 19 scene, that it probably would have resulted in you  
 20 advising upon a deployment of your resources to the  
 21 scene much earlier than in fact occurred?  
 22 A. Yes, sir, without a doubt.  
 23 Q. Item 2 that you weren't told about in that call:  
 24 "A Bronze paramedic is on scene."  
 25 That information was entered on to the log at

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1 22.55.22. Without, again, putting words in your mouth  
 2 it would seem that if you had been told that, it would  
 3 have confirmed you in your view that a deployment of  
 4 your resources was appropriate?  
 5 A. Yes, sir.  
 6 Q. (3):  
 7 "In the booking office, looking over the main  
 8 bridge, approximately 30 casualties. All ambulances to  
 9 proceed to this park."  
 10 Again, this really would have just been building up  
 11 a picture in your mind; am I right?  
 12 A. Yes, sir.  
 13 Q. (4):  
 14 "From police, not gunshot wounds, look like  
 15 shrapnel."  
 16 At 22.48. I think there is at least one over the  
 17 page as well. Two over the page:  
 18 "Police advise more officer (sic) arriving on  
 19 scene."  
 20 So had you been told that, you would have known that  
 21 both of your emergency service partners were at or  
 22 intending to be at the scene?  
 23 A. Yes.  
 24 Q. And then (6), further information about ambulances.  
 25 Had you been told that at 23.12, what would you have

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1 done at that stage? That's question 1. And question 2,  
 2 what would you have done on arrival at Philips Park?  
 3 A. Okay. What I wouldn't have done, sir, is, in that  
 4 telephone call to North West Fire Control, to Team  
 5 Leader Gregson, I would not have said, "Okay, just send  
 6 people straight there", because if you recall, my  
 7 understanding was I'd been mobilised to a marauding  
 8 terrorist event.  
 9 Q. Yes.  
 10 A. And my understanding was an officer who we had the faith  
 11 in, and rightly so, to make those initial conversations  
 12 with the police, to get additional information specific  
 13 to that, namely Andy Berry, was getting that additional  
 14 information. So between the information that Andy Berry  
 15 would have got direct with regard to the nomination of  
 16 Plato, et cetera, and that information, that would have  
 17 given us all the situational awareness we needed in  
 18 order to attend very promptly indeed, albeit from what  
 19 I understand, still 20 minutes after the notification of  
 20 the explosion or more.  
 21 Q. So my phrase, what you wouldn't have done, bearing in  
 22 mind you knew that there was a duty NILO, what you would  
 23 not have done would have been to have taken over and  
 24 made your own decisions, you'd have assumed he was  
 25 making those decisions?

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1 A. Absolutely.  
 2 Q. But if once you had arrived at Philips Park, armed with  
 3 that information, you had discovered that there had been  
 4 no mobilisation to scene, at that stage what would  
 5 you have done?  
 6 A. Well, that's what I discovered at the arrival of at  
 7 Philips Park, that we hadn't mobilised and there was no  
 8 mobilisation.  
 9 Q. But the additional component I am inviting you to  
 10 consider is: you arrive at Philips Park, you discover  
 11 what you actually discover, namely the appliances are  
 12 there, but you also know when you see that, all of this  
 13 information about your emergency service partners being  
 14 at the scene.  
 15 A. I think at that stage we'd have just driven straight  
 16 towards the city centre, not gone via  
 17 Manchester Central — forgive me, sir, when I say  
 18 we would have driven, I don't mean send every resource  
 19 I had available to me, we'd have sent somebody down and  
 20 maybe some capability, most likely the special response  
 21 capability at that point.  
 22 Q. So you'd have sent someone down so you gained your own  
 23 situational awareness?  
 24 A. Speak to that Bronze commander.  
 25 Q. But likely accompanied by your specialist resources —

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1 A. Yes, to supply immediate support to those that needed  
 2 it, the wounded.  
 3 Q. I'm now at paragraph 37 of your witness statement. As  
 4 we know, you had assumed that you were responding in the  
 5 midst of a marauding terrorist firearms attack, and  
 6 in the circumstances were there a number of things that  
 7 you would have expected to have received information  
 8 about?  
 9 A. Yes, sir. Can I just correct what may be — forgive me.  
 10 I assumed I was mobilising to a marauding terrorist  
 11 attack. I'd been mobilised as such, so it was less of  
 12 an assumption, more that's what I understood it to be.  
 13 Q. I understand. Bearing in mind the terms, the MTS, that  
 14 was not just an assumption, there was an evidence base  
 15 for it. Am I correct that there were a number of  
 16 matters that you expected to receive information about?  
 17 A. It would be a major incident. I'd expect further  
 18 information coming from other agencies in order to  
 19 support shared situational awareness, a forward control  
 20 point or forward command point, rendezvous points, if  
 21 there was zones in place and if there was, areas of hot  
 22 zones because that would support our approach to the  
 23 incident, hence the role — the point of the hazard  
 24 zones in place at North West Fire Control. And whether  
 25 any other hazards had been assessed or considered by

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1 those attending, such as secondary events or secondary  
 2 devices.  
 3 Q. So one of the things that you would have expected to be  
 4 told about was the location of a rendezvous point, and  
 5 by that do you mean a multi-agency rendezvous point?  
 6 A. Yes.  
 7 Q. You weren't told in the call that we just heard, but are  
 8 you now aware that on calling the duty NILO, Mr Berry,  
 9 at 22.40, NWFC gave him an RVP of the car park at the  
 10 cathedral?  
 11 A. I'm now aware of that.  
 12 Q. When did you become aware of that?  
 13 A. Probably 2 or 3 months following the event.  
 14 Q. So not at any stage on the night of the attack?  
 15 A. No, sir.  
 16 Q. You won't have been able to watch it all because during  
 17 some of it you spoke to me, but did you see some of the  
 18 evidence of your colleague, Carlos Meakin, this morning?  
 19 A. A small amount, sir.  
 20 Q. Only a small amount. Well, he was asked by the chairman  
 21 a question that I'm going to and was always going to ask  
 22 you about, which is that: if you had been duty NILO, and  
 23 at 22.40 had received an RVP of the car park at the  
 24 cathedral, what would you have done?  
 25 A. There's another element, sir: so having been notified of

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1 an RVP, the other element of that question or the issue  
 2 was that there was an RVP and we were not at that point  
 3 mobilising to it. So I think, and I cannot answer on  
 4 behalf of my colleague, Andy Berry, I can answer on  
 5 behalf of myself, and I have heard the call now through  
 6 the course of the inquiry, if Team Leader Gregson has  
 7 picked the information up and for some reason has not  
 8 mobilised, there's something in her training that  
 9 suggested to her this is not just a random explosion.  
 10 And if she'd given me the information that, "This is  
 11 what we've got, do you want to see if you can get any  
 12 more information?", absolutely, I would accept that,  
 13 quick conversation with the force duty officer, but if  
 14 I don't get any confirmation or anything back, we have  
 15 to go to that rendezvous point. And that, you know —  
 16 I appreciate some of the considerations around that  
 17 rendezvous point, and it may be a poor choice, it may  
 18 be, as the chairman recognises, nobody went there in the  
 19 end, but it was the authority to proceed to the city  
 20 centre. And eventually, the point and the frustrations  
 21 were my understanding and my — the echo chamber we were  
 22 in developing through the night was nobody asked us to  
 23 attend the arena and I now know that is not the case.  
 24 Q. I am going to come on to all of that in due course, as  
 25 you understand, and you mustn't apologise.

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1 But what you're saying, I believe, is that had you  
 2 been put in the position that Mr Berry was put in, you  
 3 would have made a different decision?  
 4 A. Yes, sir.  
 5 Q. I'm not going to ask you where you live, but how many  
 6 miles do you live from the fire station at Philips Park?  
 7 A. It's about 18 miles I should think, sir.  
 8 Q. Ordinarily, on a Monday night, at just gone 11 o'clock,  
 9 how long would you expect it to take you to travel from  
 10 your home to Philips Park?  
 11 A. Without blue lights or with blue lights.  
 12 Q. With blue lights.  
 13 A. I wouldn't know how long I would expect, without  
 14 measuring it or ... Less than half an hour, I'd guess.  
 15 Q. That sounds like quite a long time to take for  
 16 an 18-mile journey on blue lights.  
 17 A. I don't know how long it would take, sir, forgive me.  
 18 Q. Shall we say no longer than 30 minutes?  
 19 A. No, no longer.  
 20 Q. Did you that night travel on blue lights?  
 21 A. Yes, sir.  
 22 Q. As you have told me already you did.  
 23 But did you recognise as you set off that, given  
 24 what was happening in the city centre, it might not be  
 25 a straightforward journey?

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1 A. Yes, sir, so my -- the easiest route may have been --  
 2 and not necessarily quicker, but the route I was most  
 3 familiar -- I live in the Bolton area -- would have come  
 4 down along the motorway network, right through the city  
 5 centre of Manchester, via the Mancunian Way, to Philips  
 6 Park. I don't think there was much distance different,  
 7 but it was a little bit more unfamiliar to me, I went  
 8 round the north of the city, round the ring road as an  
 9 alternative.  
 10 Q. And was that because (overspeaking) --  
 11 A. Forgive me, to avoid the city centre, only in the sense  
 12 of the information still I had was: ongoing marauding  
 13 terrorist or developing incident, because that's what  
 14 I'd been mobilised to, and I just avoided that area.  
 15 Wed had the conversation around the hazard zone, I had  
 16 in the back of my mind somewhere that somebody had had  
 17 the conversation with North West Fire Control around an  
 18 ongoing threat and the deployment of hazard zones. All  
 19 that sounded reasonably confident to me so I just kept  
 20 out of the way to go round, to in effect come in the  
 21 back way.  
 22 Q. In no sense am I criticising what sounds like  
 23 a reasonable decision, but you were worried that there  
 24 would be congestion or even road closures within the  
 25 city centre and you were determined to avoid that?

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1 A. Yes. But also with regard to I didn't know who was  
 2 attending the city centre and blue lights going through  
 3 an ongoing police operation is not always that welcome,  
 4 I don't think.  
 5 Q. On your way to Philips Park from home, did you make and  
 6 receive a series of telephone calls?  
 7 A. I was continually engaged in telephone calls until  
 8 I arrived.  
 9 Q. In just a sentence or two, what was your purpose in  
 10 engaging in those calls?  
 11 A. To gather the situational awareness that others had and  
 12 to form it to mine(?). I considered I was most likely  
 13 to be one of only a few officers actually attending the  
 14 scene, I needed to get what they had. I spoke to --  
 15 after speaking to North West Fire Control, I think the  
 16 first telephone call I made was to Andy Berry. I had a  
 17 reasonably confident conversation with Andy Berry --  
 18 Q. I am just going to ask you to pause for one moment  
 19 because what I have the benefit of, which I'm not  
 20 confident you did at the time you provided your  
 21 statement, are the detailed billing records relating to  
 22 your work phone, so I am able to take the calls in the  
 23 right order and tell you when they were made and how  
 24 long they were. What you can help me with is what the  
 25 content of those calls was.

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1 The first call was a call at 23.18, which was, as  
 2 you've just told us, a call to the duty NILO, Mr Berry,  
 3 which lasted for 1 minute and about 40 seconds. You  
 4 deal with this at paragraphs 45 to 47 of your witness  
 5 statement, but would you just tell us in your own words  
 6 what passed between the two of you, please?  
 7 A. Yes, sir. So I was quite conscious that Andy Berry was  
 8 reasonably new in this role and this was not an incident  
 9 he was going to -- none of us were going to be able to  
 10 deal with by ourselves so I got on to him next quite  
 11 importantly. I spoke to Andy. He told me that he -- he  
 12 gave me the reasoning for moving to Philips Park because  
 13 he didn't have a rendezvous point or words to the effect  
 14 of. He hadn't got hold of the force duty officer yet,  
 15 he would keep trying, and because that was quite a key  
 16 point of developing situational awareness, I came off  
 17 the phone from him quite quick. It wasn't a long  
 18 telephone call.  
 19 But I did concur with his decision to go  
 20 Philips Park based on the information he gave me.  
 21 Q. That's the first thing I want to ask you about. I think  
 22 you said to me that he told you that there wasn't  
 23 a rendezvous point. Did he tell you in that call that  
 24 he had been given cathedral car park and had rejected  
 25 it?

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1 A. No, and you'll have to forgive me, the exact wording --  
 2 I don't think I asked him I think I said why -- maybe  
 3 potentially why are we going to Philips Park, "Without  
 4 a rendezvous point I've moved them away from the city  
 5 centre slightly", and Philips Park is not that far away,  
 6 it is reasonably close, it is not the closest fire  
 7 station, obviously, to the arena but it's not that far  
 8 away and certainly on blue lights. He knew the area  
 9 better than I did. He sounded perfectly reasonable for  
 10 the moment and I had in the back of my mind previous  
 11 training where sending -- if we'd have sent the four  
 12 fire engines that we also had mobilised, I imagined if  
 13 they are moving ahead to the explosion element of the  
 14 incident, they arrive fully dressed with the exception  
 15 of the driver who's driving, obviously, and he doesn't  
 16 have full gear on, and the officers, whereas the special  
 17 response team need to don somewhere at a small distance  
 18 from the incident. So it all made perfect sense in the  
 19 absence of a rendezvous point at this point.  
 20 Q. As you're making plain, it made perfect sense on the  
 21 basis of what he told you. You also said to me that he  
 22 made plain that he had made a number of attempts to get  
 23 in contact with the FDO but had not been successful?  
 24 A. No, sir, not made plain that he had made a number of  
 25 attempts. I was aware that he had not yet spoken to the

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1 force duty officer but I suppose in context it's  
 2 probably important to recognise that I'm now aware that  
 3 it's potentially in excess of 45 minutes that we've been  
 4 aware of the incident. I have only just become aware of  
 5 the incident and I made the assumption, wrongly on my  
 6 part, that Andy had been notified of this incident  
 7 around the same time as I had, if only just immediately  
 8 previous.  
 9 Q. Right. The reason why I suggested to you that he had  
 10 told you about a number of attempts to contact the FDO  
 11 is because in the final sentence of paragraph 45 of your  
 12 sentence in the final two lines of page 10 you say:  
 13 "I understood from this conversation that Station  
 14 Manager Berry was continually trying to obtain the  
 15 information we needed, specifically a location for  
 16 an RVP."  
 17 But have I misunderstood?  
 18 A. Only slightly, sir. My phraseology is poor there,  
 19 "continually", "continued until he got through", he had  
 20 not got through at that point, which is understandable.  
 21 Q. So the point then is: did you understand that he was  
 22 experiencing a real problem of getting through to the  
 23 FDO?  
 24 A. No, sir.  
 25 Q. So at that stage, did you think that there was any need

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1 for you to intervene, either to make your own attempts  
 2 to contact the FDO or to develop some other way of  
 3 achieving situational awareness?  
 4 A. No, sir. And I'd been a NILO for many years at that  
 5 point and made many telephone calls to the force duty  
 6 officer. I had two telephone numbers for the force duty  
 7 officer on my phone and I think with the experience I've  
 8 had, had another NILO said to me, "I cannot get through  
 9 to the force duty officer, please will you try", I'd  
 10 have considered that quite significant and that would  
 11 have been quite an early warning sign.  
 12 Q. You probably -- did you hear Mr Berry's evidence?  
 13 A. I'm aware that his recollection is different.  
 14 Q. So by that you mean he recalls that he did ask you to  
 15 make efforts?  
 16 A. Yes.  
 17 Q. But that's not your recollection?  
 18 A. No, sir. That would have been quite a significant issue  
 19 on the night to not be able to get through to the force  
 20 duty officer.  
 21 Q. And do you think you'd have recalled such a significant  
 22 thing being said to you?  
 23 A. Most certainly.  
 24 Q. The next call was at 23.21, which was a call lasting for  
 25 nearly 3 minutes, again by you to Mick Lawlor. Just

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1 remind us, please, who Mick Lawlor is?  
 2 A. Mick Lawlor is a station manager within the Contingency  
 3 Planning Unit and the lead NILO and our link to Greater  
 4 Manchester Police, CT, et cetera.  
 5 Q. And as we know, and I think my recollection is correct,  
 6 he is the NILO who goes to GMP force headquarters?  
 7 A. On that night, yes.  
 8 Q. On that night. Are you able to recall, because I don't  
 9 think you deal with it in your statement, what the  
 10 purpose of that call was and what its content was?  
 11 A. No, sir. But at some point in that evening I've become  
 12 early -- aware quite early that Mick Lawlor's recalled  
 13 to duty and is heading to police headquarters and maybe  
 14 that was the outcome of that conversation.  
 15 Q. At all events --  
 16 A. Forgive me, sir, I interrupted you -- I don't recall the  
 17 initiation of that telephone call and the impetus to  
 18 make that telephone call but it seems perfectly  
 19 reasonable that I'd try to get hold of Mick given his  
 20 role and the incident that was developing.  
 21 Q. At all events, it's bound to have been connected with  
 22 the events of the arena, do you agree?  
 23 A. I had no other reason to call him.  
 24 Q. At 23.25, so probably immediately after you come off the  
 25 phone to Mr Lawlor, you made a call to Carlos Meakin

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1 that appears unlikely to have connected given its  
 2 length. Do you recall making that contact or attempted  
 3 contact?  
 4 A. No, sir.  
 5 Q. But again, should we proceed on the basis that that  
 6 inevitably was connected with the unfolding events  
 7 at the arena?  
 8 A. (No audible answer.)  
 9 Q. Then at 23.26 there was a call again by you to  
 10 Dean Nankivell, who you knew by that stage was the duty  
 11 group manager. That lasted for 3 minutes.  
 12 A. Yes, sir.  
 13 Q. That is, I know, a call you do recall because you deal  
 14 with it in your witness statement. Would you tell us  
 15 what the content of that call was, please?  
 16 A. Yes, sir. I think that telephone call there was more of  
 17 a sharing what we knew, the information we had,  
 18 reasonably brief, but part of it was also with regard  
 19 to — again, I had the understanding that — sorry,  
 20 mobilising to an emerging MTFA—style incident and  
 21 we were probably going to need additional resources at  
 22 that and one of the early considerations is additional  
 23 resources. But part of that conversation, as I recall,  
 24 was additional officers, including NIOs, available.  
 25 I think part of that conversation was also not to

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1 mobilise anything immediately but get people stood up  
 2 and ready and listening.  
 3 Q. At 23.30, there was another call that again isn't  
 4 mentioned in your witness statement. Again, that's not  
 5 a criticism. It lasted 18 seconds and was a call to  
 6 Janine Carden. In fact, that 23.26 call was a call to  
 7 you by Dean Nankivell, so may I correct that, please.  
 8 Back to 23.30. You call Janine Carden and the call  
 9 lasted 18 seconds. First of all, who is or was  
 10 Janine Carden?  
 11 A. I now know — well, I became aware in my first telephone  
 12 call that Janine was in attendance at North West Fire  
 13 Control. Janine Carden was the duty operations manager  
 14 for North West Fire Control that night.  
 15 Q. Do you recall making that call to Janine Carden?  
 16 A. Forgive me, no, sir, I don't. It will have been  
 17 incident—related though again.  
 18 Q. As it happens, 23.30 was the time at which the CSR was  
 19 being opened. At about that time you received, although  
 20 I appreciate you didn't read it quite at that moment,  
 21 a message on WhatsApp to say that the CFO, Mr O'Reilly,  
 22 was on his way there and we saw that earlier. What role  
 23 did you, at that stage when you discovered that he was  
 24 on his way there, think that the CFO was going to  
 25 perform?

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1 A. Well, even before we are mobilised, the duty principal  
 2 officer is the strategic commander for the organisation  
 3 and a role as significant as this would need strategic  
 4 command on behalf of Greater Manchester Fire and Rescue  
 5 Service, so he would be the duty principal officer, the  
 6 duty Gold, for want of a better phrase, duty strategic  
 7 commander, whatever terminology we want, and he would be  
 8 available to provide that level 4 command for the whole  
 9 organisation, not necessarily incident command, not  
 10 operational/tactical command, but strategic.  
 11 Q. You have just hit upon what I was interested in.  
 12 Obviously the Fire and Rescue Service, certainly at that  
 13 time, operated a different approach, I'm not saying  
 14 worse or better, but a different approach to command  
 15 structures from other emergency services.  
 16 The strategic commander, as you understood it within  
 17 the Fire and Rescue Service, is that the person that  
 18 should be taking the operational decisions? I'm not  
 19 asking you about what happened on the night; I'm asking  
 20 you about what ought to happen.  
 21 A. No, sir.  
 22 Q. But I think what we're going to learn from you is that  
 23 isn't how it played out on the night, is it?  
 24 A. Maybe not, sir.  
 25 Q. I'm going to ask you about one final topic which will

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1 take us to your arrival at Philips Park and, having  
 2 asked you about that topic, I will suggest to the  
 3 chairman we take a break.  
 4 As we saw with Mr Berry yesterday, and tell me if  
 5 you need to listen to any of this, British Transport  
 6 Police declared a major incident at 22.39, and a METHANE  
 7 message was passed within that organisation a relatively  
 8 short time afterwards, which was in classic METHANE  
 9 form. Are you aware of those facts?  
 10 A. I heard it played to the inquiry, sir.  
 11 Q. You did? And NWSA declared a major incident at 22.46,  
 12 and thereafter, at 22.54, Advanced Paramedic Paddy Ennis  
 13 passed, while not a classic METHANE message, certainly  
 14 relevant information to his organisation.  
 15 All of that, as will be obvious to you, happened  
 16 before you received your message on the pager and  
 17 therefore before you mobilised. At any stage that  
 18 night, were you aware of those METHANE messages?  
 19 A. No, the first I learned of those METHANE messages was  
 20 when Lord Kerslake released his report.  
 21 Q. If you had known that night and at a stage that was  
 22 relevant to decision—making about those messages or  
 23 either of them, what difference, if any, would it have  
 24 made?  
 25 A. A significant — sir. I think we are almost

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1 wait where they were.  
 2 SIR JOHN SAUNDERS: Could you explain to me a bit more so  
 3 I understand it? You say for the MTFFA element, the  
 4 commander was the duty NILO?  
 5 A. Well, the on-scene fire commander for fire would be  
 6 a NILO, would take the role of the --- for the MTFFA  
 7 element. But I suppose --- and I think the inquiry ---  
 8 I have followed you, sir, as you've taken us through the  
 9 inquiry and I think some of the learning is what is not  
 10 being trained for potentially or was not clear in the  
 11 JOPs was how does the --- for example, on behalf of fire,  
 12 the fire on-scene commander, where does that fit into  
 13 a larger overarching incident command structure. That  
 14 we have now addressed in (overspeaking) ---  
 15 SIR JOHN SAUNDERS: At the moment I am struggling, and it is  
 16 just entirely my fault, and I mean that, unlike most  
 17 people, I suspect, that the MTFFA on-scene commander is  
 18 different from another sort of on-scene commander.  
 19 A. I suppose --- there's a lot of phrases around tactical  
 20 adviser --- can I give an alternative?  
 21 SIR JOHN SAUNDERS: Please, do.  
 22 A. As a --- at the time of this incident, I was a group  
 23 manager, I was a NILO. I could have been mobilised to  
 24 a range of incidents that night as the incident  
 25 commander for some of the larger incidents that we would

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1 attend. I may have also attended a smaller incident  
 2 that was a hazardous material incident. As a group  
 3 manager, as, but as a hazardous materials officer, as  
 4 a tactical adviser to a much junior officer I could have  
 5 attended that incident. They would have still been the  
 6 incident commander. So we are having a conversation  
 7 around whether be it Mr Meakin or Mr Berry or I being  
 8 tactical advisers, we advise a number of partners and a  
 9 number of agencies on the capabilities.  
 10 JOPs declare that the NILO will be a fire on-scene  
 11 commander. That is in effect a Bronze role in the large  
 12 multi-agency structure. You cannot --- you know, it may  
 13 have been a forthcoming or a short-sightedness, you  
 14 cannot control an MTFFA incident only from, the  
 15 colloquial term you hear, the bonnet of the car, there  
 16 has to be something more tactical and strategic above  
 17 that and I'm not sure we were clear on that on the  
 18 night.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR GREANEY: And certainly just to boil it down further,  
 21 when you arrived at Philips Park at 23.35, so just over  
 22 an hour after the explosion, and exactly an hour,  
 23 really, after NWFC had become aware of it, at that stage  
 24 there was no one in operational command from a fire  
 25 point of view?

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1 A. No.  
 2 Q. When you arrived at Philips Park, did you learn that  
 3 Station Manager Berry was still on his way?  
 4 A. He wasn't at Philips Park, so I assumed so.  
 5 Q. Did you discover that Group Manager Meakin was there?  
 6 A. Yes, and that didn't surprise me. Neither of those two  
 7 surprised me. Mr Meakin lives much closer to that area  
 8 than I do, and I knew that Andy Berry lived much further  
 9 away, so it seemed rational, had we all set off at the  
 10 same time, which I wasn't aware that we hadn't.  
 11 Q. And immediately upon your arrival, were you surrounded  
 12 by firefighters?  
 13 A. Yes, sir.  
 14 Q. I'm going to draw your attention to what some of those  
 15 firefighters have said in a short time but for the time  
 16 being can you tell us what your recollection is of,  
 17 first of all, how they were and, secondly, what they  
 18 said to you?  
 19 A. So there was firefighters amassing --- there was --- there  
 20 --- I've heard the phrase regular fire appliances with  
 21 firefighters partially donned and fully donned in normal  
 22 firefighting kit. And there was the SRT teams ready to  
 23 get deployed with some appliance commanders.  
 24 Principally, quite a number of those firefighters  
 25 took an immediate beeline to me and clearly very

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1 agitated and I suppose the amassed information that came  
 2 my way then was the first indication I realised that  
 3 this incident is --- much --- has been going on much  
 4 longer than I anticipated.  
 5 Q. Right.  
 6 A. I thought I had developed (inaudible) immediately  
 7 notified of a developing incident. So within that melee  
 8 of conversation and agitation, quite rightly so on  
 9 behalf of those who had been waiting for somebody to  
 10 arrive to give them the authority to move forward, I can  
 11 probably appreciate why firefighters felt the way they  
 12 did and they were very, very anxious. So there was  
 13 a lot of information.  
 14 I couldn't pin down any significant elements of that  
 15 information but I generally got the quick understanding  
 16 that the incident was pretty much an hour old, some  
 17 firefighters may have heard the event, I wasn't aware of  
 18 pre-alerts I didn't consider that at the time, I was  
 19 aware that they were aware of something going on, and in  
 20 amongst all that, there was some indication that  
 21 ambulances were arriving on --- at Thompson Street  
 22 Fire Station, Manchester Central Fire Station, as our  
 23 crews were pulling away.  
 24 Q. That's the issue, really, upon which I'm going to press  
 25 you a little bit later, but certainly we are able to

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1 agree that you were told something about the  
 2 Ambulance Service and, at the very least, you knew that  
 3 as your resources moved from Thompson Street, the  
 4 resources of the Ambulance Service were arriving there?  
 5 A. Yes, I've learned that at some point on arrival at  
 6 Philips Park.  
 7 Q. So you have learned that at some early stage  
 8 (overspeaking) --  
 9 A. I couldn't tell you exactly how I learned it or where  
 10 but I have learned that as part of that I, suppose,  
 11 quite informal briefing from firefighters I have learned  
 12 that, I believe.  
 13 Q. And the firefighters, to put it in very simple terms,  
 14 were desperate to get to the arena?  
 15 A. And rightly so.  
 16 Q. And why at that stage did you, as the NILO, not deploy  
 17 them to the arena?  
 18 A. So I have been mobilised to a marauding terrorist  
 19 firearms attack with quite a confident briefing so far,  
 20 inadequate we now know because there was missing  
 21 information that might have been available to us, but  
 22 quite a confident briefing of: four fire engines and  
 23 an MTA specialist response capability and a number of  
 24 officers and quite a well establishing (sic), wider  
 25 structure, including the strategic commander, tactical

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1 command, everything was all coming together to support  
 2 an incident. It all sounded reasonably confident and  
 3 the bit we were missing was actually an invite to the  
 4 incident as I understood it: here is the rendezvous  
 5 point, everybody come there.  
 6 The only rational explanation an hour into the  
 7 incident I could consider was that we were not -- we  
 8 were required not to attend because of the extent of the  
 9 risks that the police were dealing with, ie some sort of  
 10 uncontrolled firearms threat. There would be no other  
 11 reason not for the Fire and Rescue Service to be clearly  
 12 requested to attend for an explosion.  
 13 Q. Did you feel at that stage that you were missing some  
 14 part of the information that you needed before you could  
 15 make a decision to deploy to the scene?  
 16 A. It was either that -- either I was missing it because  
 17 somebody hadn't give it or it had not been provided so  
 18 far, hence all we needed was a forward command point.  
 19 A forward command point would be outside of a -- would  
 20 be in a cold zone normally or towards -- closer to the  
 21 warm zone, but it would be in a cold zone so we could  
 22 attend. Unprotected officers and appliances to  
 23 a forward control point, an FCP, that's what we needed  
 24 and at that point I didn't have that nor a rendezvous  
 25 point.

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1 Q. At that time, on arrival, realising that your  
 2 firefighters wanted to deploy, what did you do  
 3 personally, if anything, to obtain that important piece  
 4 of the jigsaw?  
 5 A. I think there's a 10-minute period here, I suppose, in  
 6 my timeline of quite a melee of quite a lot of  
 7 information rapidly coming where -- I thought at this  
 8 point everything was in hand. You have to appreciate at  
 9 this point, until my arrival at Philips Park, although  
 10 I considered I was attending a significant event, I'd  
 11 already been informed of 18 fatalities and rising,  
 12 significant numbers, I pictured a concert venue,  
 13 I didn't know who was playing -- although the  
 14 significance of all that, actually it all seemed  
 15 reasonable what was being put in place and the fact that  
 16 we had a forward control point and everything. It  
 17 wasn't until -- and I don't attend incidents assuming  
 18 they are going wrong. People sounded very confident in  
 19 the conversations I had with them. North West Fire  
 20 Control, very confident. Andy Berry, very confident.  
 21 Everybody seemed very, very confident in their  
 22 assertions of the night.  
 23 When I arrived, that clearly didn't match the  
 24 picture. So there was no incident commander, I had --  
 25 immediately in my head that needed an incident commander

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1 and that was going to be me. I knew I was going to be  
 2 one of the most or the freshest to attend that incident  
 3 and most capable or most experienced, forgive me. And  
 4 we needed to get close, but what we couldn't do was just  
 5 drive towards the city centre because, if I take you  
 6 back to that rational explanation I had in my head,  
 7 there's a reason we've not been asked to attend this  
 8 incident and there's only one reason for that, sir, and  
 9 that is the uncontrolled firearms threat.  
 10 Q. I mean, I'm not sure that's an answer to the question  
 11 I posed.  
 12 A. Sorry.  
 13 Q. Don't be sorry. Perhaps you were trying to help. My  
 14 question was: believing that there might be an  
 15 uncontrolled firearms threat, but that not having been  
 16 confirmed, so that there was a missing piece of the  
 17 jigsaw, at that early stage, on your arrival, did you  
 18 take any steps personally to gain further situational  
 19 awareness?  
 20 A. Yes, sir. So one of the first calls I made was to Andy,  
 21 Andy Berry, to see what he'd got because now time had  
 22 passed and time passes quite quickly when you're driving  
 23 on blue lights on continuous phone calls and I think  
 24 quite early on he said, "I'm nearly there", or, "I'm  
 25 here", he was getting out of his car. So, "What have

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1 you got Andy?", "Not very much", and at that point  
 2 I realised he's not got hold of anybody yet.  
 3 Q. So let me just be clear, I think therefore the answer to  
 4 my question is that you didn't take any step yourself  
 5 but that is because you believed that Andy Berry, the  
 6 duty NILO, would imminently arrive and that he would  
 7 have further information?  
 8 A. There's a step before there, sorry, sir. So upon my  
 9 arrival, there was a quite a rapid download of the  
 10 information that the firefighters had to me. My next  
 11 action, I believe, was to call Andy to say, what  
 12 information have you got because there's something  
 13 missing, and he says I'm here. So we end the call and  
 14 I meet him at the back of his car or he meets me, one or  
 15 the other.  
 16 Q. So that is the step that you took in order to find out  
 17 more information --  
 18 A. One of them, sir.  
 19 Q. -- about the situation?  
 20 We now understand your reasoning for not immediately  
 21 deploying the firefighters to the scene. There is one  
 22 other step that could have been taken at that stage,  
 23 save for leaving them at Philips Park, and I want your  
 24 explanation for why this wasn't done.  
 25 You knew very shortly after you arrived that

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1 ambulances were at the Thompson Street Fire Station.  
 2 A. Mm.  
 3 Q. One of the key principles, indeed the first principle,  
 4 of JESIP, is to co-locate, is it not?  
 5 A. Yes, sir.  
 6 Q. So at that stage, on discovering that one of your  
 7 partners at any rate was at your fire station, why not  
 8 deploy your resources there?  
 9 A. I did eventually, sir. Immediately not though. It was  
 10 a while before I saw absolute confirmation, that I had  
 11 that confirmed by North West Fire Control that there was  
 12 ambulances there. But still Manchester Central, if I go  
 13 back to -- wrongly now, I know -- my understanding of  
 14 the situation was a marauding terrorist firearms attack,  
 15 and the only rational explanation for us not to have  
 16 been given a rendezvous point or be asked to attend was  
 17 that there was a threat so great the police did not want  
 18 us to attend that incident. So to drive towards  
 19 Manchester Central, I didn't know whether  
 20 Manchester Central had been assessed as a rendezvous  
 21 point, but clearly there was a desire to get there and  
 22 hence we eventually got there.  
 23 SIR JOHN SAUNDERS: You didn't need to deploy everybody, did  
 24 you? You could either have gone there yourself  
 25 (overspeaking) --

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1 A. No, I could (overspeaking) have done that, sir.  
 2 SIR JOHN SAUNDERS: -- or you could have sent someone there  
 3 to find out what was going on?  
 4 A. Ideally all the way to the arena, sir.  
 5 SIR JOHN SAUNDERS: Yes, absolutely.  
 6 A. Error.  
 7 MR GREANEY: Can I just assist you in relation to one thing?  
 8 You explained in answer to my first question, namely  
 9 what positive step did you do to get the piece of the  
 10 jigsaw that you needed, and you explained that you made  
 11 a call to Mr Berry who was just arriving. Sir, I can  
 12 confirm that there is on the call records a call at  
 13 23.41 by Mr Levy to Mr Berry lasting for 13 seconds. So  
 14 that will no doubt provide you with some comfort for  
 15 your answer.  
 16 A. Yes, sir.  
 17 Q. You were hoping and expecting further information from  
 18 Mr Berry. And when he did arrive at 23.41, did he have  
 19 any further information that was material?  
 20 A. No, sir. He couldn't get hold of the force duty officer  
 21 at that point.  
 22 Q. Did he tell you that he had been making attempts  
 23 a number of times to get in touch with the FDO?  
 24 A. He would have done.  
 25 Q. And he explained that he had not been able to get

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1 through?  
 2 A. Yes, sir.  
 3 Q. Did you even witness him making attempts to contact the  
 4 FDO?  
 5 A. I can't categorically say I did witness that, but  
 6 I think there must have been a conversation around,  
 7 "Keep trying". And then there were -- then we had to  
 8 explore other avenues.  
 9 Q. So by now it's gone 23.40 and so it's 70 minutes  
 10 post-explosion and you know it's a long time since the  
 11 event has occurred. Do you agree that these kind of  
 12 situations are ones in each every minute can count?  
 13 A. Without doubt, sir.  
 14 Q. And when you discovered that it had not been possible to  
 15 speak to the FDO, and recognising the importance of  
 16 prompt action, what were your feelings?  
 17 A. Quite some horror. It can't compare with those that are  
 18 in attendance and certainly not those affected, but the  
 19 chairman has questioned JESIP and I think the phrase was  
 20 throw it away and start again. If we were to start  
 21 again we would come back to the same principles: get  
 22 together, we'll call it co-locate, talk to each other,  
 23 we'll call it communicate, et cetera. So there was  
 24 a total absence of all that. So we can't just -- I say  
 25 "we can't just", we don't just attend incidents, sir.

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1 If you see on the news — you'll see on the news channel  
 2 there's a major incident on the motorway round the  
 3 corner. Fire services don't look at the news channel  
 4 and immediately respond to that major incident, that's  
 5 not how it works, because not all major incidents or  
 6 major road traffic collisions require the attendance of  
 7 the Fire and Rescue Service. Clearly, an explosion at  
 8 a public venue within the city centre of Manchester is  
 9 going to require a Fire and Rescue Service attendance.  
 10 It was inconceivable why we had no rendezvous point,  
 11 no forward control point. I appreciate why we hadn't  
 12 just mobilised to an address because if there is a gun  
 13 battle, as colleagues have called it, you could pick the  
 14 wrong door very easily notwithstanding, and you'd get it  
 15 right eventually, but we've got to move forward to  
 16 something, and that's made very easy by the nomination  
 17 of a rendezvous point and we attend a rendezvous point.  
 18 Q. I just want to capture in just a small number of words  
 19 what your feelings were at that moment. I can't  
 20 remember the exact description you gave, but your sense  
 21 at 23.41 when you realised there was no further  
 22 information was one of something akin to horror and that  
 23 you recognised that JESIP just was not working at that  
 24 time more than 70 minutes after the explosion?  
 25 A. A total absence of information, sir. Not a total —

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1 that's probably too harsh, I did have some information.  
 2 Q. To be fair to you, I want to be clear that there were  
 3 things that you did or sought to do at that stage to  
 4 improve the situation, and I'm now at paragraph 72 of  
 5 your statement.  
 6 A. Yes, sir.  
 7 Q. Page 16. Can we run through those? Did you take steps  
 8 to monitor a particular radio channel, the name for  
 9 which we will not identify?  
 10 A. I did, sir.  
 11 Q. Is that a multi-agency Talk Group?  
 12 A. For tactical commanders, and there was — there didn't  
 13 appear to be any of the services using that Talk Group.  
 14 Q. So that proved in the result not to be a source of  
 15 further situational awareness?  
 16 A. Not at that point, no.  
 17 Q. We have heard about something called a Hailing group  
 18 and, as of 22 May, did you know of this Hailing group?  
 19 A. Yes.  
 20 Q. What did you understand it to be?  
 21 A. I was aware — and I've considered this, I'm not sure  
 22 how I was aware, I am not sure where I have been  
 23 trained, but I was aware of the Hailing Talk Groups.  
 24 I was aware that police had a police Hailing Talk Group  
 25 and I was aware of the multi-agency Hailing Talk Group.

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1 I could use it to contact a police control room,  
 2 continually monitored, and they'd answer it, and if  
 3 I tried it now it would work.  
 4 I am not aware of any fire officer ever using that  
 5 Hailing Talk Group in any situation. What did  
 6 I consider it was used for in the absence of any policy  
 7 or protocol? An example would be I'd mobilise as part  
 8 of national response to major events out of county, to  
 9 Surrey for example. I knew I could use the  
 10 Surrey Police Hailing group, shared Hailing group to  
 11 contact the police should I want because the only reason  
 12 I would need to do that is I didn't have my own control  
 13 room with me.  
 14 Here I don't need it, sir, I've got a control room,  
 15 that's their job. They've got direct communication  
 16 between the other tri-service control rooms, there's no  
 17 need for me to pick up the phone direct to the police  
 18 control room.  
 19 Q. So I said we were going to deal with things that you did  
 20 do and we have stopped off on one that you didn't do and  
 21 I just want to understand a bit more about it because  
 22 plainly you have a strong view. You were aware of the  
 23 existence of the Hailing group. Implicit in your answer  
 24 is that you didn't use it that night?  
 25 A. It never entered my head, sir, forgive me.

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1 Q. So do you think it should have entered your head?  
 2 A. In hindsight, great, I suppose, yes, but at the time had  
 3 I used the Hailing Talk Group I don't think — I don't  
 4 see how we would have been in any better position  
 5 because I had no trouble getting through to North West  
 6 Fire Control, they didn't give me any indication they  
 7 had trouble getting hold of North — Greater Manchester  
 8 Police and using the shared — other Hailing Talk Group  
 9 for me is no different than speaking to North West Fire  
 10 Control and getting them to record their conversation.  
 11 SIR JOHN SAUNDERS: Do we know whether North West Fire  
 12 Control were ringing the FDO and saying, "Please get  
 13 hold of the NILO?" We can find it out from North West  
 14 Fire Control, of course, when they come.  
 15 MR GREANEY: And indeed from their schedule. I don't want  
 16 to give an answer off the cuff (overspeaking) the answer  
 17 (overspeaking).  
 18 SIR JOHN SAUNDERS: — something which will arise when they  
 19 give evidence.  
 20 A. Generally, sir, the only people who have access to that  
 21 number, which is reasonably restricted, is the NILOs and  
 22 a few other key people. I'm not even sure if North West  
 23 Fire Control have access but that was — they have  
 24 a direct line to the —  
 25 SIR JOHN SAUNDERS: So the NILOs have the direct line to the

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1 FDO --  
 2 A. One of two.  
 3 SIR JOHN SAUNDERS: What I was actually thinking was that  
 4 the control rooms can ring each other and say: please,  
 5 get the FDO. No doubt the police control room would  
 6 have the number to contact the FDO and get him to ring  
 7 the NILO. But we'll find out.  
 8 MR GREANEY: Sir, this is an issue in fact I did --  
 9 SIR JOHN SAUNDERS: Mr Smith is about to give the answer,  
 10 I think, or a provisional one anyway.  
 11 MR SMITH: (Inaudible: no microphone) is that the fire  
 12 control room can contact the GMP control room by using  
 13 the means of communication which Laura Lewis was asked  
 14 about, but on the night the fire control room did not  
 15 speak to the police control room and ask the police  
 16 control room to locate the force duty officer. I think  
 17 that answers the first question that you asked of  
 18 Mr Greaney.  
 19 SIR JOHN SAUNDERS: Thank you very much.  
 20 MR GREANEY: Thank you, Mr Smith, that's most helpful.  
 21 I am going to come to, having identified things you  
 22 did do, to look at some things that it may be you didn't  
 23 do and that will be one of them.  
 24 So you monitored the multi-agency Talk Group but  
 25 no one appeared to be speaking on it?

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1 A. Can I be clear that when I say monitored it, it wasn't  
 2 case of tuning it on and just sitting there listening to  
 3 it, it was more a case of turning it on and attaching it  
 4 to one's body and it's there in case there is something  
 5 on it (overspeaking) activities.  
 6 Q. Did you speak over that Talk Group?  
 7 A. No, sir.  
 8 Q. Is there a reason why not?  
 9 A. Again, I've got a North West Fire Control -- North West  
 10 Fire Control are always on that Talk Group. They  
 11 generally will do the comms between the different  
 12 control rooms, so I don't expect there is to be a police  
 13 commander on the end of that line unless somebody's  
 14 nominated it as such.  
 15 I considered that if there was a developing  
 16 significant event somebody would dedicate **OS** to be the  
 17 tactical command channel, forgive me.  
 18 Q. That can be sorted out.  
 19 SIR JOHN SAUNDERS: You're not the only one who did it; I  
 20 did it earlier.  
 21 A. They can nominate that channel to be used by the  
 22 tactical commanders prior to them arriving on scene.  
 23 I didn't understand that to be a role that the Fire and  
 24 Rescue Service could do.  
 25 MR GREANEY: At all events you saw whether there was

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1 anything on the multi-agency Talk Group. I think at  
 2 23.41 you also sent a WhatsApp message on the group that  
 3 we looked at earlier, we saw this message, to say that  
 4 you had initiated a Talk Group for free discussion of  
 5 the incident, and you knew that that would result in  
 6 other NILOs accessing that Talk Group.  
 7 A. Yes, sir. That was my response to having read that line  
 8 of WhatsApp messages that you displayed earlier. It was  
 9 an easy response to that, really. There was a lot of  
 10 people looking for information including the assistant  
 11 chief fire officer, who had access, and there is a Talk  
 12 Group there should we need to have a free conversation  
 13 outside of the incident Talk Group.  
 14 Q. That would not just the NILOs it would also necessarily  
 15 be your colleagues in the CSR --  
 16 A. Correct.  
 17 Q. -- via Group Manager Fletcher?  
 18 A. Correct.  
 19 Q. I am not going to suggest for a moment that that was a  
 20 sensible thing to do, but the reality is that that was  
 21 a WhatsApp (sic) group that firefighters would have  
 22 access to, not that other emergency services would have  
 23 access to?  
 24 A. Sorry not -- did you mean the radio Talk Group?  
 25 Q. The radio Talk Group you said you were setting up.

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1 A. Yes, yes.  
 2 We have now got -- if I can assist -- there is now  
 3 three radio channels, Talk Groups, assigned to this  
 4 incident in effect: there's the original Talk Group for  
 5 the incident, there's the -- potentially the tactical  
 6 multi-agency Talk Group, and there's a NILO-specific one  
 7 which can have free passage of sensitive information on.  
 8 Q. Although in the result, none of those measures generated  
 9 the situational awareness that --  
 10 A. No, sir.  
 11 Q. The other thing that you did was to intervene in a call  
 12 between Mr Berry and North West Fire Control.  
 13 A. Yes, sir.  
 14 Q. This was a call at 23.46, and we did listen to it  
 15 yesterday, but it's only short, we'll listen to it again  
 16 and look at the transcript.  
 17 Mr Lopez, the recording is {INQ004358/1}. The  
 18 transcript is {INQ004398/1}.  
 19 (Audio played)  
 20 We have now listened to that. I'm just asked on  
 21 behalf of the stenographer if you could slow down the  
 22 delivery of your answers to a little bit, so bear that  
 23 in mind.  
 24 A. Will do, sir.  
 25 SIR JOHN SAUNDERS: Can you help me? It may be that the

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1 person answering you from North West Fire Control had  
 2 not heard of a forward control point as a phrase before  
 3 and what the purpose of that was. Would it help,  
 4 particularly when communications need to be quite  
 5 smooth, if perhaps there was more training of people in  
 6 NWFC about the things like forward control points which  
 7 you say happens on a lot of occasions or is that not  
 8 your impression?  
 9 A. It's not my impression that they don't know that. I'm  
 10 sure North West Fire Control would be able to answer.  
 11 Part of my understanding, only because I have been  
 12 involved with regard to the training of control room  
 13 operators, is they can't do their job if they do not  
 14 understand our incident command, so we do everything  
 15 with them, from, "This is a fire engine" -- we take one  
 16 down to the control room at Warrington -- all the way up  
 17 to, "This is how the incident command structure works".  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 A. I suppose, even if that control room operator was  
 20 unclear, the request was clear: go and ask the police  
 21 for a forward control point to which we can co-locate.  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR GREANEY: I entirely understand why you asked that  
 24 question given the term that was used, and the operator  
 25 was Rochelle Fallon and it would be fair to say to her

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1 and to the witness's answer she certainly understood  
 2 sufficiently to cause the inquiry to be made of GMP.  
 3 SIR JOHN SAUNDERS: It may just be the bad line or whatever,  
 4 so difficult to pick up?  
 5 MR GREANEY: We'll hear probably tomorrow that at 11.52,  
 6 North West Fire Control do get back in touch with  
 7 Mr Levy and give him an answer.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR GREANEY: Or attempt to do so.  
 10 We listened to that and your intervention, saying,  
 11 "Can you get an answer to a single question", or  
 12 whatever phrase you used. Would we be right to detect  
 13 a degree, perhaps even a significant degree, of  
 14 agitation in your voice when you said that?  
 15 A. Yes, and I suppose on my part, the request of, "Have you  
 16 got any more information?", is not specific enough.  
 17 The bit I'm missing is a forward control point or  
 18 a rendezvous point, as clear as that.  
 19 Maybe I wasn't clear and this is so late into an  
 20 incident now that to be asking for that is  
 21 unforgivable --  
 22 Q. Do you mean unforgivable to you or to the circumstances?  
 23 A. Unforgivable to me and unforgivable to the Fire and  
 24 Rescue Services, and to other people involved by this  
 25 incident. So yeah, I suppose this is the first time

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1 I've started to show that openly that -- it's obvious  
 2 this incident is not going according to plan -- I now  
 3 believe -- I am not counting the clock, but it's been  
 4 a long time since we probably became aware of this  
 5 incident and we probably became aware late. I wasn't  
 6 aware that one of us has been aware of it for much  
 7 longer than others. So this is the point really where  
 8 I've tried to say: we need a different command structure  
 9 to this, we need a command structure for all these  
 10 resources that are here, because we are going to start  
 11 to, in my mind, break the rules. I know we have heard  
 12 a lot about process, policy and such but there is  
 13 a policy in place that says I cannot drive towards a hot  
 14 zone knowingly without any consideration of risk and  
 15 hazard. And that's what I'm about to do.  
 16 Q. It's clear, I don't believe I'm about to say anything  
 17 controversial, that you recognised very quickly after  
 18 you arrived at Philips Park that there was a major,  
 19 major problem?  
 20 A. Yes, sir.  
 21 Q. And also that you sought to do some things to remedy it.  
 22 Again, I don't believe that will be controversial. What  
 23 I am going to do next is to ask you to consider whether  
 24 there were things that you could have done that you  
 25 didn't do. So I'm just going to go through a list and

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1 ask you whether you did them, I'm confident you didn't,  
 2 and if I'm right, ask you why not.  
 3 First of all, did you speak to North West Fire  
 4 Control and not just ask them if there was further  
 5 information but tell them they should seek out further  
 6 information?  
 7 A. I didn't use those words, no, sir.  
 8 Q. Should you have done so?  
 9 A. It may have helped but I think it was implicit in the  
 10 communications I was having with North West Fire Control  
 11 and implicit in the role they do on my behalf as an  
 12 incident commander or supervisory officer.  
 13 Q. Secondly, I appreciate that in due course your  
 14 communications with the CSR were far from satisfactory  
 15 from your point of view, but did you at an early stage  
 16 or at any stage after arriving at Philips Park speak to  
 17 the CSR, say that the FDO was not able to be contacted,  
 18 and insist that they do what they could to gain  
 19 situational awareness?  
 20 A. No, sir, and I probably should have been able to do that  
 21 earlier, I don't think I contacted the CSR for another 5  
 22 or 10 minutes.  
 23 Q. Because would they within the CSR have had access to the  
 24 North West Fire Control log?  
 25 A. Yes, they would have done. They had computers and

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1 access to the iNet that we referred to earlier ,  
 2 iNet Viewer —  
 3 MR COOPER: Sorry to interrupt my learned friend. There  
 4 seems to be a problem with the real time and the  
 5 stenography. It froze a few minutes ago, certainly as  
 6 far as we are concerned. I don't know whether the  
 7 inquiry are aware of this.  
 8 MR GREANEY: I certainly wasn't, so I'm grateful to  
 9 Mr Cooper.  
 10 (Pause)  
 11 Where we were, you didn't speak to the CSR at this  
 12 stage. I had asked you, but if you answered I didn't  
 13 hear, whether within the CSR they would have had access  
 14 to the North West Fire Control log.  
 15 A. Yes, sir.  
 16 Q. And although you didn't know at the time, I'm certain  
 17 you will know now that the log contained much more  
 18 information than you had?  
 19 A. Yes, sir.  
 20 Q. And in particular, it contained information making plain  
 21 that other emergency services were at the scene?  
 22 A. Yes, sir.  
 23 Q. Whilst you didn't contact the CSR to seek that  
 24 information from them, on the other hand was there any  
 25 reason why the CSR couldn't contact you and/or the other

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1 NILOs to say, "Can we just make sure that you know about  
 2 these features?"  
 3 A. No, sir.  
 4 Q. Should they have done so?  
 5 A. Yes, sir, I suppose they or any — you know, there's  
 6 other people, not just the CSR. That might be the  
 7 formal structure. If you recall I, in effect, used the  
 8 phrase "stood up additional NILOs who were off duty".  
 9 Q. Yes.  
 10 A. And one of them makes reference early on in the evidence  
 11 you've shown today about looking on iNet. All those  
 12 officers had access, they were all eyes on to iNet, even  
 13 Sky News, social media, there would have been a wealth  
 14 of information there, which could have been shared,  
 15 which would have given me an overall picture.  
 16 SIR JOHN SAUNDERS: I've forgotten the time as well, but  
 17 Mr Lawlor arrives at the Silver control room at some  
 18 time.  
 19 MR GREANEY: He does.  
 20 SIR JOHN SAUNDERS: Is he there by now?  
 21 MR GREANEY: I can't remember, but I will find out.  
 22 A. I don't recall, sir.  
 23 SIR JOHN SAUNDERS: Would you have expected someone —  
 24 sorry.  
 25 MR WARNOCK: (Inaudible: no microphone).

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1 SIR JOHN SAUNDERS: Past midnight, thank you very much.  
 2 MR GREANEY: I had it in mind it was a little earlier than  
 3 that, but I'm sure Mr Warnock is correct.  
 4 But in any event, you're seeking to be fair to the  
 5 CSR by saying that there were others who were interested  
 6 who could have given that information, but those within  
 7 the CSR have a formal role, do they not, within the  
 8 command structure?  
 9 A. Yes, sir.  
 10 Q. And after all, the big boss is there: Mr O'Reilly?  
 11 A. Yes, sir, and I suppose that adds to my frustration and  
 12 developing appreciation of "Something's gone badly wrong  
 13 here, but there must be a really good reason for it",  
 14 because if nobody has got the simplest information about  
 15 attending this incident, it cannot be that we've been  
 16 forgotten about. It cannot be that somebody does not  
 17 want us to attend other than: the threat is so great,  
 18 it's not yet controlled.  
 19 So I had a picture in my mind of ambulances amassing  
 20 at Thompson Street. I certainly didn't at that point  
 21 consider that ambulances were attending Manchester Arena  
 22 without the Fire Service because that's just not an  
 23 experience I've — you know, my 20 or so years of  
 24 incident command experience. That doesn't happen.  
 25 Q. Well, such a situation would be a nonsense, would it

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1 not, that —  
 2 A. It was irrational.  
 3 Q. — that the police would say that the Ambulance Service  
 4 can go in but the Fire and Rescue Service can't, and as  
 5 you say, it would be irrational.  
 6 SIR JOHN SAUNDERS: Perhaps even more reason for you to  
 7 contact the CSR in a way? You're on the scene, suddenly  
 8 you realise there's something seriously wrong.  
 9 A. Yes, sir.  
 10 SIR JOHN SAUNDERS: They might know what was seriously  
 11 wrong.  
 12 A. Potentially, sir, but there was — I suppose the scenes  
 13 were different. On the ground at Philips Park it was  
 14 very fraught, intense, lots of people.  
 15 SIR JOHN SAUNDERS: I'm sure.  
 16 A. It's probably a bit different in the command support  
 17 room, maybe they're a bit calmer, I don't know. But if  
 18 I could come back to the previous point, sir, about —  
 19 you came back around. It would be irrational that the  
 20 police would be dealing with something and not ask for  
 21 the Fire Service. Equally, if the ambulance were  
 22 attending the scene, to notice that there was no Fire  
 23 and Rescue Service here. After all, take out the  
 24 perceived MTFA element, this was an explosion that would  
 25 have had different hazards and risks that — it's the

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1 Fire and Rescue Service that control those risks so that  
 2 other agencies can work safely in that area.  
 3 MR GREANEY: Let me just finish off this point about the CSR  
 4 and then we'll move on to other things that you may not  
 5 have done. By the time you arrived at Philips Park,  
 6 you were entering a fraught environment?  
 7 A. Yes, sir.  
 8 Q. That, inevitably, would have been a different  
 9 environment from the environment of the CSR?  
 10 A. I wasn't in the CSR that night, so I don't know how it  
 11 was.  
 12 Q. Would it be fair to say it certainly ought to have been  
 13 a calmer environment?  
 14 A. Yes, sir.  
 15 Q. And on the face of it, it is unsatisfactory that those  
 16 within the CSR had, or had ready access to, the very  
 17 information that you needed?  
 18 A. Yes, sir.  
 19 Q. The third thing. We know that you had worked closely  
 20 with colleagues from the police and from the  
 21 Ambulance Service in relation to training and  
 22 exercising. As a result, did you have available to you  
 23 the telephone number of, for example, the NWS NILO?  
 24 A. Yes, sir.  
 25 Q. Did you that night, when you had not gained situational

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1 awareness, make any attempt to speak to the NWS NILO?  
 2 A. No, sir, I regret that it didn't enter my head.  
 3 SIR JOHN SAUNDERS: Does the duty and NWS NILO always have  
 4 the same number?  
 5 A. No, sir. I believe the NWS NILO that night was  
 6 Mr Steve Taylor.  
 7 SIR JOHN SAUNDERS: And you had his number?  
 8 A. I've had his number in my phone for many years.  
 9 SIR JOHN SAUNDERS: Do you have all of them?  
 10 A. Yes, sir, I would have collected them over the time.  
 11 SIR JOHN SAUNDERS: Did you know who the duty NWS NILO was  
 12 that night?  
 13 A. Not at that time, no, sir.  
 14 SIR JOHN SAUNDERS: So it would have been a matter of  
 15 checking through?  
 16 A. No.  
 17 SIR JOHN SAUNDERS: That's a real mistake, isn't it? Not  
 18 you personally, but just the way that the system  
 19 operates.  
 20 A. I hate to use the phrase, sir, but in hindsight, yes.  
 21 But actually, it shouldn't rely on such informal means  
 22 of a command and control system. We have formal command  
 23 and control arrangements that work effectively with  
 24 tri-service control rooms all speaking to each other,  
 25 really effectively, and that information should come

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1 down easy. As the incident develops, I appreciate  
 2 I would — if I saw Steve Taylor, I'd know I've got his  
 3 number in my phone and I'm almost 100% sure he's got my  
 4 number in his phone from the days of old when we were  
 5 both NILOs.  
 6 SIR JOHN SAUNDERS: Okay, thank you.  
 7 MR GREANEY: I have entirely understood that answer. You do  
 8 have procedures in place that ought to work. But as I'm  
 9 certain you will agree, experience indicates that  
 10 sometimes they don't work?  
 11 A. Yes.  
 12 Q. And it's a phrase, the chairman's phrase, that's been  
 13 used a number of times now: that's why you need a plan  
 14 B?  
 15 A. Yes, sir. I suppose I was that unexpected (sic) that  
 16 plan A wouldn't work and all the other elements in it,  
 17 a random call to Steve Taylor — forgive me — didn't  
 18 enter my head, I'm sorry.  
 19 Q. Fifthly, Mr de la Poer this morning was very careful,  
 20 for understandable reasons, because the location of the  
 21 FDO has at one stage been thought to be operationally  
 22 sensitive, but Greater Manchester Police have been good  
 23 enough to indicate that they no longer regard it as  
 24 such. So the fifth thing that I'm going to ask you to  
 25 consider whether you didn't do it and, if so, why not,

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1 is that the FDO was based that night at the  
 2 Clayton Brook Police Complex. That, I think, is about  
 3 a mile and a half from Philips Park. You're nodding  
 4 your head.  
 5 A. Yes, sir.  
 6 Q. On blue lights, you could have been there in just  
 7 a couple of minutes, couldn't you?  
 8 A. Yes, sir.  
 9 Q. Did you deploy anyone there to speak to the FDO, FDS, or  
 10 anyone in the OCR, and say, "What's going on"?  
 11 A. No, sir, it's nothing I've ever considered doing and  
 12 there's never been a need to do that. We have a command  
 13 structure, we have communication structures. To drive  
 14 to somebody that I can get on either a direct telephone  
 15 line, via my control room to their control room, or even  
 16 by radio — the fact of getting in a car and driving to  
 17 see them, even on blue lights, did not enter my head.  
 18 Q. I'm not suggesting that you should have done, but —  
 19 A. Or send somebody.  
 20 Q. I do appreciate that we are here years later, poring  
 21 over these events with the benefit of hindsight, but  
 22 this was the kind of thing which, had there been true  
 23 dynamic decision-making, should have occurred, do you  
 24 agree?  
 25 A. Yes, it would have helped.

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1 Q. Against that background, I just want to look at  
 2 something that occurred during the course of the  
 3 discussion that Andy Berry, Carlos Meakin, and  
 4 Paul Etches had with the Kerslake process. I know that  
 5 you have had an opportunity to refresh your memory from  
 6 this. I'm only going to take you -- certainly I'm only  
 7 going to take you to one part of this because it bears  
 8 upon this issue because you may recall Mr Deeming asked  
 9 you about this, didn't he?  
 10 A. Yes, sir.  
 11 Q. So could we go, please, to {INQ023508T/1}.  
 12 SIR JOHN SAUNDERS: Is it Dr Deeming?  
 13 MR GREANEY: Did I say Mr?  
 14 SIR JOHN SAUNDERS: I think you did, but I'm sure he doesn't  
 15 mind.  
 16 MR GREANEY: Well, I wouldn't want to be disrespectful to  
 17 Dr Deeming.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 MR GREANEY: I'm just going to pick it up at a particular  
 20 point because this was not really a question and answer,  
 21 it was quite discursive. No criticism intended. Let's  
 22 pick it up from Mr Meakin saying "silent":  
 23 "Silent. There was no communication on it."  
 24 That is the multi-agency Talk Group, so he's talking  
 25 about the thing that we discussed just a short time ago:

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1 "Andy had made numerous attempts to ring the FDO to  
 2 try and establish if there was an SGP(?) or get more  
 3 information. There was nothing doing. I think, just  
 4 scanning over my statement, I made a call when it  
 5 arrived at Philips Park to control to ask if there was.  
 6 I can't remember whether you used the term 'RVP' or  
 7 'FCP' and there's nothing there."  
 8 In fact, he seems to be recalling what you said  
 9 during the course of that call at 23.46:  
 10 "So beyond trying to scan social media, what else  
 11 can you reasonably do within that early stage? What was  
 12 the expectation?"  
 13 So he was basically adopting a position a little  
 14 different from that which he adopted today of saying  
 15 there wasn't any more that could have been done.  
 16 Just pausing for a moment, was anything done at an  
 17 early stage at Philips Park to scan social media?  
 18 A. I have a recollection of firefighters showing me images  
 19 of the -- that had been sent from the scene, which --  
 20 and it's hard to recollect what those images were  
 21 compared to what I've seen since. But my memory is of  
 22 people leaving the scene in distress, not necessarily of  
 23 an emergency service response, other than the note I'd  
 24 seen on the Sky News that police were attending. So  
 25 I pictured people running away. It confirmed there was

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1 an event at Manchester Arena for sure.  
 2 Q. But I think what you're saying is even if the social  
 3 media that you saw did reveal the attendance of  
 4 emergency services, and I'm not in a position to suggest  
 5 it did, that wasn't something that registered with you?  
 6 A. No, it wasn't.  
 7 Q. So Mr Meakin asks:  
 8 "What was the expectation?"  
 9 And Dr Deeming says:  
 10 "Well, you could go to Clayton."  
 11 Carlos Meakin, over the page, replies:  
 12 "Clayton Brook."  
 13 And Dr Deeming replies:  
 14 "One of you could have gone to Clayton Brook, to the  
 15 force control room."  
 16 And you then said:  
 17 "You could, but that's extreme initiative. We've  
 18 got training. We've got arrangements in place. We've  
 19 got standard operating procedures."  
 20 I'm just going to pause for a moment. You were  
 21 drawing attention to the procedures. Do you think  
 22 it would be fair to say that you were too bound by the  
 23 procedures that night and that you exercised  
 24 insufficient initiative?  
 25 A. We clearly could have applied more initiative, sir.

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1 I don't think we were bound by procedures then and  
 2 I think that paragraph there, what we're trying to -- or  
 3 what I'm trying to explain there is: you start with  
 4 standard operating procedures, things stop working, you  
 5 carry alternatives. So you'll have seen I've tried to  
 6 ask North West Fire Control for a forward control point.  
 7 I shouldn't have had to have done that an hour into an  
 8 incident, it should have already been provided.  
 9 I've started to ask -- monitor additional radio  
 10 channels to see if there's anything else on there.  
 11 That's what I mean by I tried a number of things in the  
 12 stress and in the melee that was there and the fraught  
 13 situation described, going to Clayton Brook did not  
 14 enter my head as an example. So that is an element of  
 15 initiative that I did not apply.  
 16 Q. Dr Deeming observes in relation to the standard  
 17 operating procedures, and they didn't work, you say:  
 18 "No, the random -- but it's -- now we know how much  
 19 they didn't work. An hour into it, we didn't realise  
 20 what wasn't working."  
 21 And do you think, now you look back, that that is an  
 22 accurate observation, that, an hour in, you didn't  
 23 realise what wasn't working? Was it not absolutely  
 24 plain that the procedures were not working to generate  
 25 situational awareness?

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1 A. Again, I don't like using the word "hindsight". Yes,  
 2 it's obvious, at the time the rational -- the only --  
 3 there was no rational explanation that all procedures  
 4 that we had in place -- and I don't mean we  
 5 Greater Manchester Fire and Rescue Service, I mean  
 6 Greater Manchester. None of them worked to provide the  
 7 Fire and Rescue Service with an opportunity to attend  
 8 that incident. I now know that's not the case because  
 9 we did have some of that information.  
 10 MR GREANEY: Sir, I said that I would pick a time round  
 11 about 4.30. Would that be a convenient moment?  
 12 SIR JOHN SAUNDERS: Yes. Can I indicate -- tomorrow we are  
 13 starting at 9.30, are we?  
 14 MR GREANEY: We are, sir.  
 15 SIR JOHN SAUNDERS: Is that all right for you?  
 16 A. Yes, sir.  
 17 SIR JOHN SAUNDERS: We will certainly not go beyond 4.30  
 18 tomorrow, just so everyone knows, but we are likely to  
 19 go anywhere between 4.00 and 4.30 because I am told that  
 20 we are unlikely to finish the witnesses who are coming  
 21 tomorrow, so we're likely to go part heard with at least  
 22 one of them.  
 23 MR GREANEY: I'm afraid that is now correct, sir, yes.  
 24 SIR JOHN SAUNDERS: Just so people know in advance and can  
 25 make their arrangements. Thank you very much.

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1 (4.31 pm)  
 2 (The inquiry adjourned until 9.30 am  
 3 on Thursday, 24 June 2021)  
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I N D E X

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