

OPUS2

Manchester Arena Inquiry

Day 123

June 28, 2021

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Monday, 28 June 2021

(9.30 am)

MR DAVID ELLIS (continued)

Questions from MR DE LA POER (continued)

SIR JOHN SAUNDERS: Thank you for coming back.

MR DE LA POER: Good morning, sir. Before I invite questions on behalf of North West Fire Control from

Mr Smith, there are two short supplementary questions that I am going to ask Mr Ellis so that if anything arises Mr Smith can deal with it.

Mr Ellis, the first is this: were you aware at any stage in the evening of 22 May that there were difficulties contacting the force duty officer at GMP?

A. I was not, no.

Q. Implicit in that answer, but could you just confirm expressly, is that you did not know that the NILO, Station Manager Berry, experienced difficulties contacting the FDO?

A. That's correct, I wasn't aware of that at all.

Q. Thank you. Second topic, the multi-agency Hailing Talk Group. I'm going to ask for a document to come up just because this is a difficult topic to talk about bearing in mind that we are not using the channel numbers.

Mr Lopez, {INQ041227/1}. This is a document

1

prepared on behalf of Greater Manchester Police and produced by one of their witnesses. It is the second row that I'm asking you about. It's described as the multi-agency Hailing Talk Group, and the intended use is described as:

"Enables immediate contact from other agencies, including GMFRS, NWFC and NWS, to GMP's control room. Monitored 24/7 in the GMP control room."

That's the text that somebody else has written. What I'm interested in, Mr Ellis, is what your knowledge was, if anything, of that channel. The first thing is, although it is redacted, do you know which channel I'm referring to?

A. I do, yes.

Q. Did you know about the existence of that channel on 22 May 2017?

A. I was aware of the channel, yes.

Q. Was your understanding about its use in accordance with the text in the box that we can see there?

A. Yes.

Q. At any stage on the night of 22 May, did it occur to you to use that channel?

A. No.

Q. Was it any part of your role on that night, as you understood it, to be thinking in terms of: should I use

2

that channel to contact GMP?

A. If I had any personal difficulty in contacting them via a dedicated line we have I could have used a fallback of that particular Talk Group.

Q. Just so I can understand your answer there, if you had understood it was your job to contact GMP and you were unsuccessful on your first choice, you would have used that channel?

A. That's correct.

Q. At any stage on the night of 22 May, did you receive an instruction to contact GMP yourself?

A. Possibly. I may have contacted them to obtain information or to clarify some information.

Q. Did you experience any difficulties when you did so that you --

A. No.

Q. So does it follow that there was no need for you to use that channel?

A. Not for myself. When I speak for myself, no, it wasn't required for me to use that channel.

Q. Do you recall any discussion generally on the night about the use of that channel?

A. I don't, sir, no.

MR DE LA POER: Mr Ellis, thank you very much indeed. Those are my supplementary questions for now. May I turn to

3

Mr Smith.

Questions from MR SMITH

MR SMITH: Sir, I did indicate on Thursday that I would be about 45 minutes, I thought. I may be slightly longer, but I will still be within the Rule 10 estimate. But the offset is that I will have fewer questions, I hope, for the next two witnesses.

SIR JOHN SAUNDERS: Right. I'm sure you'll be as expeditious as you are able to be Mr Smith. Thank you.

MR SMITH: I will, sir.

Mr Ellis, I would like to begin by asking you about your training and your understanding of the JESIP principles and other aspects of your training. I would like to take you, if I may, to a schedule of training which is {INQ040637/1}.

Have you had an opportunity of looking at this prepared schedule in advance?

A. I have seen this schedule, yes.

Q. Is it either accurate or broadly accurate?

A. I would say it was accurate looking at what's been covered.

Q. I'm sure it's not necessary to go into the detail of the document, but what I would like to do is to run through with you some significant dates for training.

On 12 February 2015, and for these purposes if we go

4

1 to {INQ040637/2}, please, did you undertake a training
 2 course entitled "JESIP training", and again on 1 March?
 3 A. That's correct, yes.
 4 Q. Did those courses involve a PowerPoint presentation
 5 setting out the way in which the JESIP principles were
 6 formulated and intended to be considered?
 7 A. I can't remember. I can't honestly say, it's that far
 8 back, I'm afraid. I know what the current training is,
 9 but I can't honestly say if that was the training
 10 I received in 2015.
 11 Q. Well, I'm just going to say for the assistance of the
 12 inquiry that we do have a PowerPoint which is
 13 {INQ001030/1}, but I am not going to take you to it,
 14 I just refer to it for that purpose.
 15 On 1 July 2015, did you conduct MTF A resilience
 16 training?
 17 A. Yes, sir.
 18 Q. What did that equip you to learn?
 19 A. That reinforced some of the JESIP principles. It also
 20 provided scenario-based examples of MTF A events that had
 21 previously occurred and also the reason behind why JESIP
 22 was created in the first place.
 23 Q. I'm going to ask Mr Lopez to take us to {INQ001304/1},
 24 please.
 25 SIR JOHN SAUNDERS: While that's happening, can I know what

5

1 is meant by ad hoc training?
 2 A. Some training is mandatory, everyone will probably
 3 undergo the same training, but certain things are
 4 absolutely mandatory, everyone has to undergo. I think
 5 they just classify it as ad hoc. I'm not too sure why
 6 they've chosen that phrase. Some training we have to
 7 undergo is mandatory, others we do complete all that
 8 training anyway, I don't quite know why they've used the
 9 term ad hoc.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR SMITH: The MTF A resilience training is classed as ad hoc
 12 training. Could I take you then, as I've asked
 13 Mr Lopez, to a PowerPoint presentation for resilience
 14 training. This was dated 1 July 2015 as well. That's
 15 the document. At page {INQ001304/50}, we can see
 16 a reference, can we not, to Talk Groups? So this is the
 17 subject that Mr de la Poer was asking you about a short
 18 time ago. But I would like to take you to the middle of
 19 the three blocks on that page, please:
 20 "Initial notification may be received by a Hailing
 21 Talk Group from another emergency service or from
 22 a parked or incident Talk Group from operational
 23 personnel. You may need to contact another emergency
 24 service to notify them of such an incident if primary
 25 telephone contact is unavailable."

6

1 Could you assist the chairman, please, about this?
 2 What was the customary and preferred route for the
 3 control room to contact Greater Manchester Police?
 4 A. We would normally contact them via a -- in a sense
 5 a speed dial, so we could directly call them via the
 6 telephone.
 7 Q. Did you find that to be an effective way of contacting
 8 the GMP control room?
 9 A. I did.
 10 Q. Can we go to {INQ001304/53} of this document. At its
 11 conclusion there's a heading "Gazetteer".
 12 It's entitled:
 13 "Listed below are a number of large premises or
 14 premises that have the potential to hold large number of
 15 people. Utilise this time to practice entering these
 16 locations into CAD."
 17 Do you recall whether that was part your training?
 18 A. I can't recall it. Obviously it was part of the
 19 training but I can't honestly say I recall it.
 20 Q. We will see there are two locations showing on that page
 21 of the document. Do you remember whether as part of
 22 your training those two locations were in any way
 23 flagged up as sites to which you should pay particular
 24 attention?
 25 A. Again, I can't say yes because I can't recall that

7

1 particular part of the training, I'm afraid.
 2 Q. Then on 1 July 2015, that training also involved
 3 training to respond to terrorist incidents; is that
 4 right?
 5 A. That's correct, yes.
 6 Q. Could Mr Lopez put on the screen {INQ001283/1}, please.
 7 We see there an email dated 14 November 2015 from
 8 Gemma Kitson. Who is Gemma Kitson?
 9 A. She was a lady that worked in the operations support
 10 team, who also delivered quite a bit of training.
 11 Q. It reads:
 12 "Good morning, all."
 13 And it's dated 14 November 2015 and it makes
 14 reference to the events that had occurred in Paris, and
 15 that will be the attack at the Stade de France and the
 16 subsequent events at the Bataclan.
 17 It says, doesn't it:
 18 "In light of the tragic events it is appropriate
 19 that all staff have an awareness and refresher of the
 20 following?"
 21 Then there's listed a number of items, which
 22 I perhaps needn't read all of those. But there in
 23 highlight on this document, towards the bottom of the
 24 page are the words:
 25 "Please reiterate to all staff the importance of

8

1 being familiar with the emergency call management call
 2 prompts, including bomb threat, explosions, entrapments,
 3 firearms incidents and incidents involving suspect
 4 packages... Training has previously been provided on
 5 the areas listed above. However, it is relevant to
 6 refresh our skills and knowledge regularly.”
 7 This was addressed to team leaders, that team
 8 leaders are provided with a recap of the telephony
 9 degradation by operation managers. Do you have any
 10 recollection of seeing that email at the time?
 11 A. No, with it going — I wasn't a team leader at the time
 12 so I wouldn't have had an visibility of that email.
 13 Q. Do you remember whether there was a response in the
 14 control room at that time to the attack in Paris
 15 generally among you and your colleagues, in terms of
 16 identifying awareness for potential future events?
 17 A. I can't say if we had anything in particular with the
 18 events of the Paris attack, so I can't say absolutely
 19 for definite that I received additional training on the
 20 back of that email.
 21 Q. On 24 April 2016, there was further MTF A resilience
 22 training, ad hoc. From 16 November 2016, a reference to
 23 a JESIP news bulletin, ad hoc. Do you remember that?
 24 A. If it says I've been trained in it — it's too far
 25 in the past, I'm really sorry. I'm not — I'm trying to

9

1 be helpful but I can't recall.
 2 Q. There is certainly no need to apologise to me.
 3 On 16 November 2016, it is recorded that you
 4 underwent training in the use of mutual aid Airwave Talk
 5 Groups. That was ad hoc.
 6 On 28 January 2017:
 7 "Phase 3 maintenance of skills (mandatory). CAD
 8 refresher training."
 9 That's the computerised dispatch system, is it not?
 10 A. It is, yes.
 11 Q. And that was 31 January 2017.
 12 Something entitled "New JESIP application" on
 13 17 March 2017.
 14 10 April 2017, the escalation procedure in the
 15 control room. And after the incident, I think you
 16 underwent training in what was described as a JESIP
 17 aide—memoire on 16 July of that year.
 18 Pulling all that together, do you consider that the
 19 organisation, North West Fire control, had trained you
 20 well to respond to the emergency which confronted all of
 21 the services on the night of the attack?
 22 A. Yes, sir.
 23 Q. Moving on from there, in terms of staffing
 24 availability —
 25 SIR JOHN SAUNDERS: Are we leaving training?

10

1 MR SMITH: We are, sir.
 2 SIR JOHN SAUNDERS: In giving your evidence to start with,
 3 I think what you said about training was:
 4 "I received training, I understood the JESIP
 5 principles."
 6 But you said you could have benefited from more
 7 training. It would have helped to have practised on
 8 mobilisation and greater understanding, you say, which
 9 prompts you to ask for questions and to think outside
 10 the box and not everything falls into scenarios. So you
 11 were saying then that actually you thought you'd have
 12 been helped by more training. Perhaps that's true of
 13 everybody and about everything. Do you still think
 14 that?
 15 A. I do, yes. I think a lot of the training was very
 16 specific, such as the aide—memoire was a desk drop that
 17 we could carry. So when it says training, it might have
 18 been a short discussion from a team leader, it might
 19 have been a new way of working. So it wasn't a full
 20 scenario, it was a small part of what I believe could
 21 have been enhanced on. So as I believe I mentioned the
 22 other day, on Thursday, where we could have benefited
 23 a lot more if we were involved in these exercises to be
 24 able to test the JESIP training we've had, including
 25 mobilisation.

11

1 SIR JOHN SAUNDERS: Okay. We've heard about Paris and team
 2 leaders being sent something. Do you recall having
 3 really any warning about there being this sort of attack
 4 in Paris and that it might happen here?
 5 A. I can't recall, sir.
 6 SIR JOHN SAUNDERS: You can't recall? Fair enough.
 7 Thank you.
 8 MR SMITH: I'll just take up one matter from that, if I may.
 9 One of the matters which the chairman will see was
 10 mentioned in Group Manager Levy's statement, but not
 11 dealt with in evidence, was that he took the view that
 12 Exercise Winchester Accord, which no doubt you've heard
 13 about, missed an opportunity to test the response from
 14 the point of call, in other words the call into the
 15 control room. Do you think that would be helpful?
 16 A. I think it would be extremely helpful, yes.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR SMITH: In terms of the availability of staffing for live
 19 exercises, is the best person to answer these questions
 20 Sarah—Jane Wilson, the head of North West Fire Control,
 21 rather than yourself?
 22 A. Yes, sir.
 23 Q. I want to turn now to the response to a call into the
 24 control room which we know occurred and was received by
 25 you as the first control room operator to handle that

12

1 information. For these purposes, would you go, please,
 2 to the incident log 9074, which is {INQ008376/1}, which
 3 Mr de la Poer took you through on Thursday.
 4 I'm looking, please, at page {INQ008376/3},
 5 Mr Lopez.
 6 We know from the transcript that one of the
 7 questions that you asked the GMP operator was whether
 8 the address had a postcode. That was supplied by GMP at
 9 22.36.55 and it was entered, was it not, on to the first
 10 line of the incident log by you?
 11 A. Yes, that's a record of the search where I'm looking for
 12 the actual address.
 13 Q. Yes. Because one of the consequences of the call and
 14 the identification of the address, is this correct,
 15 automatically generated by the system once the log was
 16 created, would be the identification of the fire station
 17 area for that location?
 18 A. It would be the nearest available resources, so once
 19 we've validated on the actual address and confirmed the
 20 address back to the caller, the system will then begin
 21 to look for nearest available resources. It might be
 22 the nearest fire station or it might be that resources
 23 are actually mobile and available and they may be
 24 quicker to attend than the nearest actual physical
 25 fire station.

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1 Q. We can see in the third line:
 2 "Station area: G16 Manchester Central"?
 3 A. Yes, sir.
 4 Q. And the result of the call and the system operating
 5 automatically, would that generate the pre-alert to
 6 Manchester Central Fire Station which we've heard about
 7 that occurred at 22.38?
 8 A. It would, yes.
 9 Q. The log shows that the location was searched for by you,
 10 the control room operator; is that correct?
 11 A. Yes.
 12 Q. And the search completed at 22.38.49, the same time
 13 roughly as the pre-alert?
 14 A. Yes, sir.
 15 Q. This incident log itself was created at 22.38.48. But
 16 the information that a bomb had exploded at the arena,
 17 clarified on request by you to the control room at GMP,
 18 had been provided at 22.35.50. Do we take it that
 19 in the interim, you would have been typing information
 20 on to the relevant parts of the screen, asking the
 21 control room operator, as we have seen, for information,
 22 in order to create the incident itself with the address
 23 details and then to collect the incident type?
 24 A. Yes, sir. I'd already had incidents on my screen when
 25 the GMP operator was speaking to me, so I would have had

14

1 to have closed the previous incident down to open
 2 a fresh incident. By that point I was receiving quite
 3 a lot of information that I wanted to capture, without
 4 having to have the operator repeat themselves, so
 5 I began to type the information in first, followed by
 6 then the actual address.
 7 Q. Then when we come to the incident type, which is in that
 8 first section, we find it in the fourth line down:
 9 "Type code: explosion. Explosion sub-type code:
 10 EP01 explosion."
 11 Could you assist the chairman, please, what did you
 12 actually have to do by typing into the system to select
 13 the incident type?
 14 A. We can use keywords, so if we're unsure of a particular
 15 incident type to use, we are trained to use particular
 16 keywords, so we can type these keywords into a selection
 17 box which will then present any incidents associated to
 18 that keyword to help us make that decision or we can
 19 just type in the word "explosion" and it will give us
 20 the one line of explosion, which it did in this case?
 21 SIR JOHN SAUNDERS: Which did you do in this case?
 22 A. I believe I just typed "explosion" in.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR SMITH: That's the system then offering next two action
 25 plans; is that correct.

15

1 A. Yes.
 2 Q. Action plan 3072, for a building fire involving an
 3 explosion, a high rise, would that be right?
 4 A. Yes, sir.
 5 Q. And then 3115, the explosion action plan with which the
 6 inquiry is already familiar. Did you have to do
 7 something physically with those two offers, if you like,
 8 to select what you considered to be the appropriate
 9 action plan?
 10 A. No, sir. The action plans are associated to the actual
 11 incident type, so as soon as I've selected the
 12 appropriate incident type and saved those action plans
 13 (inaudible: distorted) selected for me.
 14 Q. What we see on the log is that 22.39.55, the system was
 15 then identifying the resources in terms of appliances
 16 based on the requirements of the action plan; is that
 17 right?
 18 A. The resources —
 19 SIR JOHN SAUNDERS: Sorry, can you tell me the time of this
 20 again?
 21 MR SMITH: Yes: 22.39.55.
 22 SIR JOHN SAUNDERS: Can we move to the next page then? It's
 23 not on our screens.
 24 MR SMITH: {INQ008376/4}.
 25 SIR JOHN SAUNDERS: I have it now.

16

1 A. The proposed resources are based on the actual incident
 2 type and the predetermined attendance agreed for that
 3 particular incident type. They are not linked to the
 4 action plan. The action plan is a separate function
 5 which can be used as a checklist to ensure things are
 6 mobilised or for additional actions as well.

7 Q. Because without going into the detail of this, the
 8 action plan requires a specific number of pumps?

9 A. The incident type requires a specific number of pumps.

10 Q. And the incident type requires a specific number of
 11 pumps.

12 A. Yes.

13 SIR JOHN SAUNDERS: Let's stop. You said the action plan
 14 requires a number of pumps --

15 MR SMITH: I did.

16 SIR JOHN SAUNDERS: -- and you said the incident plan
 17 requires it (overspeaking).

18 A. It's the incident type, sir. It's the incident type
 19 that the predetermined attendance is associated to. So
 20 if there was no action plans presented, we would still
 21 have that appropriate predetermined attendance.

22 SIR JOHN SAUNDERS: Okay.

23 MR SMITH: And the action plan we know also has
 24 a requirement to mobilise a specific number of pumps.

25 A. That's correct.

17

1 Q. But we haven't reached that stage of mobilisation yet,
 2 have we?

3 A. No, the action plans are designed to either be pre or
 4 post--mobilisation and that is chosen by the appropriate
 5 Fire and Rescue Service. If it is pre--mobilisation, as
 6 soon as I save the incident type and address, the action
 7 plan would automatically present on my screen for
 8 something I might have to do. It may be to inform an
 9 officer, it may be to ensure a police rendezvous, it
 10 depends on the actual incident type and actions
 11 required. If it's a post--mobilisation action plan,
 12 we would mobilise resources first and then go into the
 13 action plan to see what else is required.

14 Q. We can also see, can't we, therefore at the top of
 15 sheet 4 on the portal, which is {INQ008376/2} of the
 16 log, that when the resource proposal is viewed, it has
 17 selected the two pumps then available at
 18 Manchester Central; is that correct?

19 A. That's correct.

20 Q. Pumps 1 and 2. And it has also selected the TRU;
 21 is that correct?

22 A. That's correct.

23 Q. Could you help with this, please: is the act of
 24 mobilising, in other words actually dispatching those
 25 appliances to the incident that's been reported,

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1 something that must be done by you rather than the
 2 system?

3 A. Yes, the system will present the nearest appliances and
 4 I have to click on a button to mobilise those resources.

5 SIR JOHN SAUNDERS: Just say that again, you have to do
 6 what?

7 A. I would have to click on the "mobilise" button to
 8 actually mobilise them to the incident.

9 SIR JOHN SAUNDERS: Yes.

10 MR SMITH: So what we can therefore understand is that at
 11 this point or thereabouts, did you then decide to
 12 attract the attention of the team leader, Lisa Owen?

13 A. I'd actually attracted the attention prior to pressing
 14 the "proposed resource" button, so she was aware -- as
 15 soon as the incident type came in and based on the
 16 information I was receiving, I attracted her attention
 17 straightaway.

18 Q. So all this is going on at the same time? Were you
 19 talking, typing, listening, talking to the GMP control
 20 room --

21 A. Yes.

22 Q. -- and attracting the attention of the team leader?

23 A. Yes.

24 Q. What was it about the information that you had received
 25 that caused you to decide to escalate this to the team

19

1 leader, Lisa Owen?

2 A. Because of the additional information I was receiving,
 3 I clarified the reason for the explosion and then, plus
 4 the number of casualties we were receiving, I deemed it
 5 important to escalate that to a team leader. Being
 6 a priority 1 incident as an explosion, we automatically
 7 advise the team leader of that incident type as well so
 8 they can maintain an overview of it.

9 SIR JOHN SAUNDERS: So it's a requirement for you to do it
 10 because it's a category 1 incident, it's not your
 11 decision whether you do it, you've got to do it?

12 A. We have to do if it's a priority 1 incident type
 13 (overspeaking) should notify a team leader, yes, just --
 14 although they are overviewing the entire control room
 15 anyway, we just as a resilience -- we just make them
 16 aware we are dealing with a particular incident type
 17 or -- with the severity of the incident, with the
 18 information coming through, I wanted to make sure she
 19 was aware at the earliest possible opportunity.

20 SIR JOHN SAUNDERS: So that's part of your training?

21 A. Yes.

22 MR SMITH: What I'm going to do in a moment is show you the
 23 escalation procedure to remind you of it and for the
 24 chairman and for all parties to see it. But for the
 25 moment can I just focus on this issue: looking,

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1 therefore, at page 4, where we are, and looking at the
 2 time of 22.40, we've got a proposed resource but we also
 3 know that at 22.40, the team leader, Michelle Gregson,
 4 contacted Station Manager Berry, the duty NILO. So does
 5 it follow that prior to this point, you had attracted
 6 the attention of the team leaders, they had had
 7 a discussion, Lisa Owen had already been to your screen,
 8 and they had decided to make a call to Station Manager
 9 Berry, the duty NILO?
 10 A. That's correct.
 11 SIR JOHN SAUNDERS: Obviously some of that you do know. Do
 12 you know whether the team leaders had a discussion?
 13 A. I wasn't privy to a discussion, no.
 14 SIR JOHN SAUNDERS: So what you know is that Lisa Owen,
 15 anyway, had made the decision to contact the duty NILO?
 16 A. That's correct, sir, yes.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR SMITH: So the result is, and these times are going to be
 19 important, I'm going to submit, the result is that from
 20 the point at which Greater Manchester Police provided
 21 the information that the explosion was caused by a bomb,
 22 22.35.50, to the point at which the resources had been
 23 proposed by the system in response to your actions in
 24 selecting the incident type, and the call commenced to
 25 the duty NILO, just over 4 minutes had elapsed and the

21

1 crews at G16 were on pre-alert, in preparation for
 2 mobilisation?
 3 A. Yes, sir.
 4 Q. As far as the escalation procedure is concerned, that is
 5 {INQ023877/1}, Mr Lopez, Sarah Wilson's statement at
 6 page 63, please {INQ023877/63}.
 7 It's as simple as this, isn't it?
 8 "When CROs need to make TLs aware... all priority 1
 9 incidents"?
 10 A. Yes, sir.
 11 Q. Is that the issue of guidance for control room
 12 operators?
 13 A. Yes, sir.
 14 SIR JOHN SAUNDERS: Just explain to me about priority 1
 15 incidents. Are they automatically decided to be
 16 a priority 1 incident or do you have anything to do with
 17 deciding whether it is or not.
 18 A. No, sir, priority 1 tend to be life-risk incidents.
 19 SIR JOHN SAUNDERS: So an explosion would automatically be
 20 a priority 1?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR SMITH: Having escalated it, is the position that you,
 24 the control room operator, would then need to know what
 25 action was required of you by the team leaders in

22

1 response to that process?
 2 A. Yes, sir.
 3 Q. And you would not mobilise then unless instructed to do
 4 so by the team leader; is that correct?
 5 A. It is. It wouldn't be for all priority 1 incidents --
 6 Q. Of course not, I am so sorry.
 7 A. -- but in this actual incident --
 8 Q. For this incident?
 9 A. This incident, I was advised not to mobilise and to stay
 10 on the open line and to record any information.
 11 SIR JOHN SAUNDERS: That's not actually quite the same
 12 thing. Sorry, I just need to be absolutely sure about
 13 this. A priority 1 incident, coming up on the
 14 explosion, the automatic thing would be: get the
 15 resources then you have to press the button and
 16 mobilise?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Does that mean if it's a priority 1
 19 incident and you've reported it upwards you would not
 20 press the "mobilise" button until given authority to do
 21 so or does it just happen that before you got to
 22 pressing the mobilise button they told you not to do
 23 that?
 24 A. We can mobilise without informing team leaders first on
 25 some priority 1 incidents, such as a persons reported.

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1 We would then make them aware after the fact we have an
 2 incident. In this instance, I did not mobilise on
 3 instruction, so because of the severity of it, I ensured
 4 Lisa came over to my screen to guide me on what she
 5 wanted me to do.
 6 SIR JOHN SAUNDERS: So you thought in this particular
 7 incident it was better to hear what the team leaders had
 8 to say before you mobilised?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR SMITH: Was that the whole purpose of contacting the team
 12 leaders and escalating it?
 13 A. It was due to the severity of this incident, I wanted to
 14 make sure the team leaders were aware of this particular
 15 incident with the information that was coming in quite
 16 quickly.
 17 SIR JOHN SAUNDERS: I am sorry to be pedantic, but you had
 18 to escalate it. It wasn't because it's a mandatory
 19 requirement?
 20 A. It's not, sir, no.
 21 SIR JOHN SAUNDERS: Then you decided it's better for me to
 22 get advice -- have the advice before I mobilise?
 23 A. I wanted the advice on this incident prior to
 24 mobilisation. On other priority 1 incidents, we can
 25 mobilise and just make a team leader aware.

24

1 SIR JOHN SAUNDERS: Thank you. I'm sorry, I'm being
2 a pedant, but I just needed to know.
3 MR SMITH: No need to apologise to me. I'll do my best to
4 ask the questions in a way that assists you.
5 SIR JOHN SAUNDERS: Thank you.
6 MR SMITH: I'd like to look now at the call to the duty
7 NILO, which is the sequence of communications for ease
8 of reference. {INQ041473/5}, please.
9 We can pick it up at the bottom of page 5 and
10 Mr Lopez will take us over to page 6 {INQ041473/6}.
11 There is no need for me to read those words again.
12 Are you familiar with them now, Mr Ellis?
13 A. Yes.
14 Q. You're now a team leader, aren't you?
15 A. Yes, sir.
16 Q. But based on your experience at the time, as a control
17 room operator, and also now using your experience as
18 a team leader, I want to ask you about two possibilities
19 that would arise in the circumstances of the information
20 supplied to the duty NILO at the time of that call.
21 Because this does involve you and your potential
22 response as the control room operator on the night.
23 Had the duty NILO said in that call to
24 Michelle Gregson, "I can understand your concerns and
25 thank you for calling me, but mobilise the nearest crews

25

1 and appliances to the incident in accordance with your
2 mobilising instructions for an exploded bomb and do it
3 now and I'll get back to you with further instructions
4 once I've spoken to the FDO", if that had been the
5 instruction then passed to you, you would have done
6 precisely that, wouldn't you?
7 A. That's correct, yes.
8 Q. Those appliances, G16 P1 and P2, were then stationed
9 800 metres from the arena, were they not?
10 A. I believe so, yes.
11 Q. The crews were still on pre-alert, they'd been put on
12 pre-alert only 2 minutes before that call. And on blue
13 lights, it would have taken a matter of minutes,
14 wouldn't it, to get from Manchester Central to the
15 arena?
16 A. Yes, sir.
17 Q. So once the bells dropped, you could have had crews
18 there probably, I would suggest, in less than 10 minutes
19 from the point at which you were informed that a bomb
20 had exploded at the arena, just if that scenario was
21 followed?
22 A. After we'd contacted the NILO, yes, sir.
23 SIR JOHN SAUNDERS: Actually -- okay, sorry. At any time at
24 which you mobilised, you pressed the "mobilise" button,
25 they would have been there within 10 minutes?

26

1 A. They would have been there quicker -- if we hadn't made
2 the phone call to the NILO, they would have been there
3 quicker.
4 MR SMITH: The point I'm making, sir, with respect, is that
5 within 10 minutes of the point at which you were
6 informed a bomb had exploded, you could have been given
7 the instruction and they would have been down there
8 at the arena?
9 A. Yes, sir.
10 Q. The second possibility is: had the duty NILO said, "Have
11 you got any pumps available at Manchester Central?", and
12 the team leader had said, "Yes, we've got G16 P1 and 2",
13 and the duty NILO had said, "I want you to mobilise the
14 TRU to G16 and I want you to leave those two appliances
15 there for the time being until I've spoken to the FDO
16 and obtained a better understanding of what's
17 happening", if you had been instructed to do that, you
18 would have done it, wouldn't you?
19 A. Yes.
20 Q. And could that have been achieved?
21 A. Yes.
22 Q. TRU to G16, and both pumps to wait there?
23 A. Yes, sir.
24 Q. In fact, as we know, without going over this ground,
25 acting on the instructions of Station Manager Berry and

27

1 that call at 22.40 was terminated at 22.42.21, Team
2 Leader Michelle Gregson contacted Philips Park
3 Fire Station. I'm just laying the ground for this now.
4 Did you become aware that log 9078 was then created, so
5 the mobilisation of four pumps to Philips Park?
6 A. I am aware now, yes.
7 Q. But at the time you would be dealing with 9074, wouldn't
8 you?
9 A. I was on the call, yes.
10 Q. So you'd be remaining on the call to GMP while these
11 other actions were being carried out by the control
12 room?
13 SIR JOHN SAUNDERS: Were you actually operating on incident
14 log 9074 or is somebody else doing that?
15 A. I was on the initial incident.
16 SIR JOHN SAUNDERS: Which wasn't 9074?
17 MR SMITH: With respect, sir, it was 9074. 9078 is the log
18 for Philips Park.
19 SIR JOHN SAUNDERS: Right, thank you.
20 MR SMITH: 9074 was the incident.
21 SIR JOHN SAUNDERS: Okay. Thank you.
22 What page are you now on, on your sheet?
23 MR SMITH: I've come to the sequence of communications, but
24 going back to the incident log, I'm on page...
25 SIR JOHN SAUNDERS: Okay. On your sheet, is there

28

1 a reference to 9078? The document you prepared.
 2 Because we're on {INQ041473/6} of this at the moment,
 3 which refers to 9074.
 4 MR SMITH: On 9078, sir, I can take you to 9078, if I may.
 5 It's {INQ004284/1}.
 6 So I think Mr Ellis will agree, 9078 has nothing to
 7 do with 9074; it's a separate incident log.
 8 SIR JOHN SAUNDERS: Right.
 9 MR SMITH: That's right, isn't it, Mr Ellis?
 10 A. This is a separate incident that's been created for
 11 mobilisation, yes.
 12 MR SMITH: Michelle Gregson created this log in order to
 13 mobilise the pumps to Philips Park Fire Station --
 14 SIR JOHN SAUNDERS: Okay, I have got that. I think to say
 15 it has nothing to do with it may be a bit...
 16 MR SMITH: It's perhaps advocate's licence.
 17 SIR JOHN SAUNDERS: I do understand anyway. Thank you very
 18 much.
 19 MR SMITH: So it follows, doesn't it, that if, therefore,
 20 the team leaders had come to you at just after 22.42 and
 21 said to you, "We've spoken to the duty NILO, go ahead
 22 and mobilise in accordance with the explosion action
 23 plan and the incident type you've selected", you'd have
 24 done precisely that?
 25 A. Yes, I'd have followed the instruction.

29

1 Q. I would like to turn now to the issue of risk. If in
 2 the course of your work at this time, as a control room
 3 operator, or now as a team leader, you were to identify
 4 from the information provided in a call into the control
 5 room the possibility that, on arrival at the incident,
 6 standard fire crews may face what you considered to be
 7 a serious and obvious risk that they could be killed by
 8 terrorist action following an initial bomb explosion,
 9 would you have the expertise to decide what course you
 10 should take in relation to mobilising or would you
 11 consider that the necessary expertise lies in the hands
 12 of someone else?
 13 SIR JOHN SAUNDERS: Are we talking about it at the time or
 14 about now he's a team leader?
 15 MR SMITH: I'm talking about at the time, I think I said, as
 16 a control room operator, now with his experience as
 17 a team leader.
 18 SIR JOHN SAUNDERS: Yes.
 19 MR SMITH: At the time. If at that time -- do you want me
 20 to go over that again, Mr Ellis?
 21 A. No. Using my experience as a team leader, what actions
 22 would I follow at the actual time?
 23 Q. The chairman, with respect, is quite right. I may have
 24 confused this by adding in the reference to team leader.
 25 So let's just take your position as a control room

30

1 operator at the time. If you considered that standard
 2 fire crews could be facing the risk of fatality from
 3 terrorist action in the form of an exploded bomb and the
 4 possibility of further action, would you have been
 5 equipped in terms of your expertise and experience as
 6 a control room operator to make the decisions as to
 7 whether it would be safe to send those crews to the
 8 scene? Did you have that expertise?
 9 A. I would be able to say at the time, yes, and I would
 10 have defaulted to a team leader at that point.
 11 Q. And what would be the reasons for defaulting to the team
 12 leader?
 13 A. Due to the additional risks of the information I was
 14 receiving at the time. So although I could contact the
 15 NILO myself, I would want the duty team leader or the
 16 team leader on duty to be fully aware what I was dealing
 17 with at the time.
 18 Q. Looking at it from the point of view now as a team
 19 leader with all your experience over these years with
 20 the control room, for the few additional minutes which
 21 would be required to contact the duty NILO, do you
 22 consider that the right course is to seek specialist
 23 advice before sending standard appliances and crews to
 24 the risk of fatality arising from, for example,
 25 a secondary explosive device?

31

1 A. I do, sir.
 2 SIR JOHN SAUNDERS: Right. Do you find that anywhere within
 3 a document? The evidence so far, as I understand it
 4 from some of GMFRS, and by summarising it I'll no doubt
 5 be getting some of it wrong. Some of the evidence we've
 6 heard says it's the explosion card, therefore you send
 7 the appliances to the scene. But they said, in the
 8 circumstances it was a reasonable decision to take.
 9 Are you anywhere instructed that you should do what
 10 you suggested, ie if you think there's a risk, get hold
 11 of your team leader and seek further advice?
 12 A. I wouldn't say it's on a document, but that's something
 13 we are instructed to do: if we think it is something out
 14 of the ordinary or we need to seek clarification, we
 15 must raise it with a team leader.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR SMITH: What circumstances would require clarification?
 18 A. Anything like the information we were receiving on the
 19 night, so multiple casualties, possible MTF, anything
 20 that really wouldn't be the incident types we work with
 21 on a daily basis.
 22 Q. As a team leader now, do you consider that the fire
 23 control room has a duty of care to Fire Service
 24 personnel?
 25 A. Yes, sir.

32

1 Q. And with action plans, in the context of the information
2 such as that provided to you on the drop—down menu on
3 the screen, I'm going to use an advocate's expression if
4 I may, does one size fit all? In other words, if
5 you have an explosion in a house caused by a gas main or
6 a boiler, do you think that the action plan requiring
7 mobilisation for an explosion actually fits the
8 circumstances that confronted the control room on the
9 night?
10 A. No, but I believe that is one of the reasons why
11 we would contact a NILO as well so we could actually —
12 if he wanted to mobilise more appliances in addition to
13 the agreed PDA.
14 SIR JOHN SAUNDERS: One of the problems here may have been
15 that everyone assumed that action cards could actually
16 cover every reasonable possibility, and it may be that
17 what this is demonstrating is that they can't. Was that
18 something that you appreciated before and what training
19 did you have to deal with if you didn't find a suitable
20 action card to cover what had happened? Or was it not
21 contemplated that you wouldn't?
22 A. It's not contemplated. The actions are agreed by the
23 Fire and Rescue Services for each particular incident
24 type. They can differ through the four FRSs we look
25 after. It is a large mine of information which prevents

33

1 the operator having to remember all that information.
2 SIR JOHN SAUNDERS: Yes. Of course.
3 A. It served as a checklist if you will. It is — and
4 I don't like the term one size fits all, but it is
5 generic actions for an incident type. However, we can
6 speak to officers or officers may ask for things not to
7 be completed, they don't think it's relevant at the time
8 or indeed they could require further actions or further
9 mobilisation.
10 SIR JOHN SAUNDERS: Thank you.
11 MR SMITH: So one question may be: if you were required to
12 adhere strictly to the terms of the action plan relevant
13 in this case, why didn't you? What were the reasons
14 which caused you to decide not to mobilise?
15 A. The information coming in that I was receiving and the
16 risk that I perceived to the firefighters. As a rule
17 we would automatically mobilise to the incident type,
18 but because I deemed the severity of the information
19 I was receiving, I wanted further guidance at that
20 point.
21 SIR JOHN SAUNDERS: And is your decision the point at which
22 you get that further guidance? You said to us before
23 you could have pressed "mobilise" and then speak to the
24 team leader after, so that's your choice?
25 A. It is, sir, yes.

34

1 MR SMITH: Were you aware that the duty NILO and the NILO
2 had available to them channels of communication which
3 the control room would not be able to access?
4 A. Yes, sir, they have a radio channel.
5 Q. Were you also aware that NILOs have a degree of security
6 clearance, and I don't want to say any more about that,
7 which you did not have?
8 A. That's correct, sir.
9 Q. And during the course of this incident, as it was
10 unfolding, what did you expect was likely to be taking
11 place behind the scenes of the control room in the hands
12 of the Fire and Rescue Service during the course of the
13 night in terms of communication?
14 A. I would expect that with the different commands being
15 (inaudible: distorted) joint decisions would be made,
16 filtered through each of the commands if required, so
17 what was known as Gold, Silver, Bronze and then they
18 would feed into the control room. But I would expect
19 decisions to be made and filtered down accordingly
20 through each of the commands so everyone was aware what
21 had been made, what decisions had been made, and
22 what was ongoing at the time.
23 Q. If you had been asked at any stage during the course of
24 your duty that night, "Look, I'm having difficulty
25 getting hold of the FDO, will you speak to the GMP

35

1 control room, please, and ask a control room operator
2 there to get a message to the FDO to contact me, the
3 duty NILO?", if you had received that request, what
4 would you have done?
5 A. Contacted the GMP control room and relayed that request.
6 Q. Would you have recognised the importance lying behind
7 that request?
8 A. Yes.
9 Q. I would like to take you — I'm almost at the end of my
10 questions — to paragraph 18 of your statement, which
11 I think is {INQ035431/5}.
12 I would like to ask you a little more of the detail
13 of this paragraph, please, than you gave initially in
14 evidence. It reads as follows:
15 "Duty Team Leader Michelle Gregson immediately stood
16 to the front of the team leader's desk near the centre
17 of the control room."
18 If I could just ask Mr Lopez to go back one page to
19 pick up the context, please {INQ035431/4}. Then on
20 again, please, to INQ035431/5.
21 Look at paragraph 17, please:
22 "Team Leader Lisa Owen immediately informed the duty
23 team leader, Michelle Gregson, who then approached my
24 position to view the initial details being passed, and
25 then confirmed with me to stay on the line with the GMP

36

1 operator."

2 Then paragraph 18 —

3 SIR JOHN SAUNDERS: Just before you go there, how much of

4 that in paragraph 17 is things you knew yourself? Did

5 you know that Lisa Owen immediately informed the duty

6 team leader, Michelle Gregson?

7 A. Yes, she went to the team leader's office behind me to

8 talk to her, knock on the door and pass information.

9 MR SMITH: I think just to clarify that we've seen on the

10 photograph the office at the back of the room, is that

11 correct?

12 A. That's correct.

13 Q. And did you see her make her way and contact

14 Michelle Gregson in that office?

15 A. Yes, it was directly behind where I was sitting.

16 Q. But then going back to paragraph 18, which I would like

17 to focus on, please:

18 "She addressed all of us within the room in a loud

19 voice, reminding everyone of the need to follow the

20 JESIP principles and to remember the importance of

21 sharing information. So far as I am concerned, that

22 meant that there was a need to communicate and share key

23 information such as rendezvous positions, updates on

24 casualties, and any escalation of the incident received

25 via phone or radio. Any new risks or key information

37

1 which may have an impact on strategic decision-making

2 needed to be shared with the police and ambulance

3 services. Because I was on the phone call I was unable

4 to communicate information myself as I received it.

5 However, standard practice was that a team leader or

6 another operator would and could pass on that

7 information. Team leaders have the capability to watch

8 my screen as information is being uploaded or to listen

9 to the call itself, which would allow them to pass

10 information to the police and/or the ambulance services

11 as deemed appropriate."

12 Does that correctly reflect the action that

13 Michelle Gregson took that night in your presence?

14 A. I wasn't aware if she was watching my screen. We can

15 see if somebody's listening to our call. However, we

16 don't have the functionality to see if someone's

17 actually remotely watching our screen. So I can't tell

18 if they were or they weren't. I am aware, as a team

19 leader, that we can and I've used that myself when

20 updating people if an operator's still on the call.

21 Q. And is the account you've given of the announcement she

22 made, the detail of that, correct?

23 A. Yes, sir.

24 SIR JOHN SAUNDERS: It follows, does it, that had you been

25 the person who'd spoken to the duty NILO you would have

38

1 told him about the RVP?

2 A. Yes, that's part of the (inaudible) when we speak to

3 officers, if we have to speak to officers pre or

4 post—mobilisation, we pass as much information as

5 possible.

6 MR SMITH: That's on your log, isn't it, the RVP, 9074?

7 A. Yes.

8 Q. Finally this, please: the call taken by you at 22.32 was

9 closed down at 23.01.11. I would like to take you,

10 please, to {INQ041473/31}. That's the sequence.

11 That reads:

12 "GMP: I'm going to have to clear the line because

13 they said my Silver controllers will be getting back in

14 contact with you."

15 And you said, is this correct:

16 "So your supervisor has told you to clear the line

17 because Silver are taking over?"

18 Why did you ask that question, Mr Ellis?

19 A. I repeated it back — one of the techniques that we use

20 in the control room, sometimes if we can raise our voice

21 or repeat something back, the team leaders will

22 obviously pick up on that, so if they aren't watching

23 our screen at that time, it's providing an update to the

24 team leader (inaudible: distorted) someone to clarify

25 the details as well before coming off the call.

39

1 Q. In the absence of that request from Greater Manchester

2 Police, would you have wanted the line to remain open?

3 A. Yes, sir.

4 Q. For what reason?

5 A. For any more dynamic information that was coming through

6 as we were receiving it.

7 Q. What did you believe, with your experience, would be the

8 result of Silver taking over in terms of sharing of

9 information between emergency responders?

10 A. They would have passed more information, been the

11 contact point from GMP to the control room, potentially.

12 Q. If you had been aware at that time that there would be

13 no representative from Greater Manchester Fire and

14 Rescue Service at Silver command, to co-locate with GMP

15 and NWAS at Silver command, until just after midnight,

16 what action might you have taken?

17 A. With respect to staying on the call or?

18 Q. With respect to staying on the call.

19 A. I would have stayed on the call.

20 SIR JOHN SAUNDERS: Does it mean from that that perhaps you

21 should have checked when GMP gave you this instruction

22 that someone from GMFRS was there?

23 A. We generally take it if they are setting it up, we

24 wouldn't then proceed to check.

25 SIR JOHN SAUNDERS: You'd assume that fire would be there as

40

1 well?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: And you'd have assumed they were there
 4 at 11, would you, because you're coming off the call
 5 then?
 6 A. It depends who's attending and where their coming from,
 7 sir. They're telling me that they're setting up their
 8 Silver control and she was told to release the call,
 9 so ...
 10 MR SMITH: The purpose of releasing the call in order for
 11 Silver control to be in place would be what?
 12 A. So they would take over informing the other agencies of
 13 what's going on.
 14 SIR JOHN SAUNDERS: There is no problem -- as you said you'd
 15 have stayed on the called if you knew that GMFRS were
 16 not there. There's no -- it's not necessary for you to
 17 come off the call, as it were, just because Silver are
 18 taking over if GMFRS still need to be contacted in some
 19 way for you to give them information?
 20 A. Not necessarily, but the GMP operator was instructed to
 21 come off the call herself. So even if I'd said, you
 22 need to stay on, her supervisor might have told her to
 23 come off the call regardless --
 24 SIR JOHN SAUNDERS: I understand you have to follow the
 25 directions of what GMP are telling you.

41

1 MR SMITH: As you have indicated, you could have called up
 2 GMP again at any time?
 3 A. I could have done and I believe I did do throughout the
 4 night.
 5 MR SMITH: Yes. Thank you, sir.
 6 SIR JOHN SAUNDERS: I think you have done it in under
 7 an hour.
 8 MR SMITH: Just under.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR DE LA POER: Sir, unless you have any further questions
 11 for Mr Ellis, that will conclude his evidence. Our next
 12 witness, Ms Haslam, is already in the building. As
 13 we've been going over an hour, can I propose that we
 14 take a short break at this stage just because the
 15 courtroom is going to need to be adjusted?
 16 SIR JOHN SAUNDERS: A five-minute break?
 17 MR DE LA POER: If we take 10 minutes, I expect this will
 18 count for our morning break.
 19 SIR JOHN SAUNDERS: I'm really grateful. You have given
 20 your evidence with great care and you have assisted me
 21 in understanding a lot what was going on at North West
 22 Fire Control, so thank you for that.
 23 A. Thank you.
 24 (10.33 am)
 25 (A short break)

42

1 (10.45 am)
 2 MR DE LA POER: Sir, we are joined now by Ms Haslam. May
 3 she please be sworn.
 4 MS JOANNE HASLAM (sworn)
 5 Questions from MR DE LA POER
 6 MR DE LA POER: Please can you state your full name?
 7 A. It's Joanne Elizabeth Haslam.
 8 Q. Did you join Greater Manchester Fire and Rescue Service
 9 in 2001?
 10 A. I did, yes.
 11 Q. Did you join in the capacity of someone working in their
 12 control room?
 13 A. Yes.
 14 Q. Did you continue to work for GMFRS through to May 2014,
 15 when you transferred to the newly created North West
 16 Fire Control?
 17 A. That's correct, yes.
 18 Q. Was your role, it can be referred to by at least one
 19 term, either that of an emergency file control operator
 20 or more latterly referred to as a control room operator?
 21 A. (No audible answer given).
 22 Q. Did you complete JESIP and MTFA training in
 23 January 2016?
 24 A. I can recall doing the JESIP and MTFA, but I can't
 25 recall whether I actually took part in the physical --

43

1 or whether it was the e-learning.
 2 Q. We'll come to the issue of your training in a different
 3 way. Bearing in mind the responsibilities that were on
 4 you on the night of 22 May 2017, do you think you were
 5 adequately trained to discharge those responsibilities?
 6 A. Yes.
 7 Q. More specifically, had you been trained that information
 8 sharing with partner agencies was extremely important
 9 during an event such as that which was unfolding?
 10 A. Yes.
 11 Q. Had you been trained that accurately capturing what you
 12 were told by partner agencies and recording it on the
 13 log was extremely important?
 14 A. Yes.
 15 Q. And had you been trained that passing on all relevant
 16 information when speaking to GMFRS personnel was also
 17 extremely important?
 18 A. Yes.
 19 Q. Had you been involved in any exercise which involved
 20 mobilisation?
 21 A. I'd been involved in -- we would do -- sometimes GMFRS
 22 and other brigades would do small exercises where
 23 a couple of pumps would be doing an exercise. We would
 24 be asked to just put things on the log, but not carry
 25 out any actions. I have been involved in those, but not

44

1 a big, major exercise, no.
 2 Q. Let's just be very specific about the sort of exercise
 3 that I'm envisaging, although I'm sure you've already
 4 given your answer to it. An exercise that involved
 5 simulating information coming into the control room
 6 including you, the capturing of that information, the
 7 recording of it on the log, and the passing it on to
 8 relevant people and following actions plans, anything of
 9 that type?
 10 A. Not that I can recall of that type. They were more
 11 smaller incidents where we'd just put things on the log.
 12 We would just record it on the log but not carry out any
 13 actions for that.
 14 Q. Do you think that had you been involved in an exercise
 15 of the type that I have just described, that would have
 16 assisted you in any way on the night of the attack?
 17 A. I think being involved in an exercise like that would
 18 have been beneficial, just to keep your actions, your...
 19 Your actions up to date, your information up to date.
 20 Q. You were at the time of the attack a person with
 21 approximately 16 years of experience working in
 22 a control room; is that right?
 23 A. That's correct, yes.
 24 Q. In the course of that experience, had you, because of
 25 that experience, seen a number of significant incidences

45

1 that you were involved in?
 2 A. Yes.
 3 Q. So were you able to draw upon that experience on the
 4 night?
 5 A. Yes.
 6 Q. In terms of specific matters that you had been trained
 7 in, had you received training in the bomb action plan?
 8 A. Not that I can recall. I was aware of the number --
 9 there's a large amount of action plans --
 10 Q. Yes.
 11 A. -- and we would go through training on our teams but not
 12 as a whole that I can recall.
 13 Q. An issue the inquiry is investigating, and I don't think
 14 it is controversial for me to characterise the intended
 15 use of that plan in this way, is that the bomb action
 16 plan was for an unexploded device.
 17 A. That's correct.
 18 Q. Was that your understanding on the night?
 19 A. Um... What, that I was aware that it was...
 20 Q. That the circumstances in which the "Bomb -- general"
 21 action plan would be used --
 22 A. No, I wasn't actually aware on the night, no. I would
 23 have just heard the word "bomb", and thought of the bomb
 24 action card, the action plan.
 25 Q. We'll come back to that when we listen to a small part

46

1 of the audio which has captured in the background the
 2 call you were on.
 3 Can I just tell you where I will be going in my
 4 questions? You've recorded in detail across your
 5 statement your actions on the night. I am just going to
 6 focus upon four calls, and in varying degrees of
 7 details, just so you know what they are and everybody
 8 understands: the call at 22.37 involving NWAS; the call
 9 at 22.52 with Group Manager Nankivell; the call at 23.06
 10 with Group Manager Nankivell; and the call at 23.22 with
 11 Group Manager Fletcher. Those are the ones I'm going to
 12 look at in a little detail.
 13 We will start, please, with the call at 22.37
 14 involving NWAS. Are you all right?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: You must tell me if you're not at any
 17 time.
 18 A. Yes, I'm fine, thank you.
 19 MR DE LA POER: The context for this call is that you were
 20 on duty that night in the control room; is that right?
 21 A. That's correct.
 22 Q. Did you become aware that Mr Ellis had received
 23 a significant call?
 24 A. Not before I started taking mine.
 25 Q. We have received evidence that an announcement was made

47

1 to the control room by Michelle Gregson that it was
 2 important that control room operators remembered their
 3 JESIP training and passed on information; do you recall
 4 hearing her saying that?
 5 A. I don't recall hearing her say that, I was on the call
 6 to the ambulance, but I know it would be something that
 7 would be said in the control room. And I know through
 8 the two team leaders that were on that night that that
 9 would have been said.
 10 Q. So you would have expected -- it doesn't come as any
 11 surprise even though you don't think you heard it
 12 because --
 13 A. No.
 14 Q. -- you were engaged in a call?
 15 A. No, not with those team leaders that were on, I would
 16 not have -- I would have expected -- I know they would
 17 have said that.
 18 Q. So the first you knew of anything very substantial
 19 unfolding was when you answered that call from NWAS at
 20 22.37?
 21 A. That's correct.
 22 Q. We're going to listen to just one small part of it but
 23 otherwise deal with it in summary. Did it quickly
 24 become apparent to you that you were being given
 25 information about a potentially very serious incident?

48

1 A. Yes.
 2 Q. When that became apparent to you, did you make any
 3 effort to draw attention to the call you were receiving
 4 to anyone else in your room?
 5 A. Yes. I could see the team leaders were stood with
 6 David Ellis, so I would have raised my voice to make
 7 them aware, and then I was made aware that David was
 8 actually taking a call as well from the police.
 9 Q. We've heard from Mr Ellis the technique of raising your
 10 voice to ensure others in the room can hear it. Bearing
 11 in mind that their concentration, as you've described
 12 it, appears to be on Mr Ellis, were you confident that
 13 they had heard what you had said?
 14 A. Yes.
 15 Q. And how can you be confident that they heard what you
 16 said?
 17 A. That is the way of working in the control room. You
 18 can't get up off your position to go round and to speak
 19 to them, so I would have made a gesture, they would have
 20 obviously looked over, and I would have explained what
 21 I've got and then repeated -- kept repeating back what
 22 the ambulance were telling me, loud, so they could hear.
 23 And I did have a colleague next to me as well, so --
 24 Q. Who was the colleague next to you?
 25 A. The colleague next to me was Aisha, who was one of the

49

1 CROs. We were both on the Manchester pod -- I know you
 2 showed the plan -- I was on 9, so me and Aisha were
 3 right at the back on the Manchester pod.
 4 Q. In the course of the call, and I hope you'll agree this
 5 is a fair characterisation, that having obtained some
 6 information from NWAS, you started to pass the
 7 information of North West Fire Control back to NWAS;
 8 is that right?
 9 A. Yes, that's correct.
 10 Q. So although it started with them giving you information,
 11 it developed into you giving them information?
 12 A. Yes. I was trying to share as much information as
 13 I could see that David was putting on the log. I was on
 14 that log to try and read what he was putting on and
 15 trying to hear what he was saying to repeat to the
 16 ambulance to make sure I'd given them all the
 17 information we were getting off the police.
 18 Q. Among the things that you informed NWAS of was that you
 19 had recorded, that is North West Fire Control had
 20 recorded, that the rendezvous point was at the cathedral
 21 parking?
 22 A. Yes. I think -- yes.
 23 Q. You can take that from me.
 24 A. Was it? Yes, sorry.
 25 Q. I'm not going to play the whole of the call, but we are

50

1 going to play one part of it to see if you can give us
 2 some help. There's going to be some audio beforehand
 3 and then there's going to be some speaking in the
 4 background. A transcript will be up in front of you and
 5 I'm going to ask you, once we've listened to it, about
 6 that talking in the background. If you need to hear it
 7 again, please let me know.

8 Mr Lopez, the first of the references I gave you,
 9 it's the audio at {INQ004323/1}, and the transcript is
 10 the {INQ001218/1}. So far as the audio is concerned,
 11 we're going to start at 5:10 and so far as the
 12 transcript is concerned, we're going to start at
 13 {INQ001218/4}.

(Audio played)

14 Although we have brought up just page 4, we're
 15 starting a little earlier. You'll see the transcript
 16 catch up, but rather than moving between it, the
 17 relevant part is about a quarter of the way down.
 18 If we just continue, we'll hear you say, "You've got it
 19 come through", in a moment.

20 SIR JOHN SAUNDERS: It looked to me the words were exactly
 21 in correspondence to what we had there, but perhaps I'm
 22 just imagining what I'm hearing. I thought we did start
 23 at the top of that page.

(Audio played)

51

1 Did you catch those voices in the background?

2 A. I put it down as a bomb, yes.

3 MR DE LA POER: Do you know who said that?

4 A. Could you play it again so I can just see whether...

5 SIR JOHN SAUNDERS: If you can't identify the voice, just
 6 say so.

7 MR DE LA POER: We'll note the time is 22.42.20, so it's
 8 after Mr Ellis' short intervention with Lisa Owen and
 9 Michelle Gregson's call. If we can do that one more
 10 time, Mr Lopez, we'll see if we can get to the bottom of
 11 this and then move on.

(Audio played)

12 A. I can't recall who that would be.

13 SIR JOHN SAUNDERS: It's not you?

14 A. No, because if it was me, it would be louder.

15 SIR JOHN SAUNDERS: Okay.

16 A. Because I was on the call.

17 SIR JOHN SAUNDERS: Right. Thank you.

18 MR DE LA POER: Thank you very much indeed.

19 We can take that -- in fact, we'll just leave it up
 20 because what we will see you are next told at 22.43.11:
 21 "We're getting informed of reports of people being
 22 shot."

23 Do you see that?

24 (Pause)

52

1 At 22.43.11, do you see that that information is
 2 passed?
 3 A. Yes, I'm getting informed of the -- yes.
 4 Q. Then there is a discussion between the two of you,
 5 that is the NWAS controller and you, about the nature of
 6 that information; is that right?
 7 A. That's correct, yes.
 8 Q. And do you recall pressing the operator on what the
 9 source of that information was?
 10 A. That's correct, I did, yes.
 11 Q. If we go over the page {INQ001218/5}, we will see that
 12 the operator told you that they had overheard
 13 a colleague; is that right?
 14 A. Yes.
 15 Q. That, as you're reflecting back at 22.45.14:
 16 "A colleague has told you that there's an
 17 active shooter?"
 18 And they repeat:
 19 "That's what I'm getting told."
 20 Then you say:
 21 "But the police have not confirmed that?"
 22 You're asked to repeat it. They ask you to hold the
 23 line. And then they say at 22.45.43:
 24 "I don't know if the police have confirmed it.
 25 I have just been informed that there is an

53

1 active shooter."
 2 A. That's correct.
 3 Q. We can take that down.
 4 SIR JOHN SAUNDERS: Were you making notes of what was said
 5 at the same time on your computer or putting it into an
 6 incident log?
 7 A. I can't recall whether I was putting it on the incident
 8 log at that time.
 9 SIR JOHN SAUNDERS: Would you have been making any sorts of
 10 notes?
 11 A. I would be making notes and I was repeating it loud so
 12 the team -- when he said, "We have had reports of
 13 shots", that's why I've repeated it as well, "You've had
 14 reports of shots", so they could hear.
 15 SIR JOHN SAUNDERS: So you'd expect them to put it on an
 16 incident log or make a note of it or what?
 17 A. It was just to make the team leaders aware of the
 18 information I was getting. There was too much
 19 information -- the ambulance call that they passed, to
 20 me the information was confusing and not... To say
 21 they'd overheard... Where had they overheard somebody
 22 saying that? That's what I wanted to know and that's
 23 why I was pressing.
 24 But regarding the log, I can't recall whether I was
 25 putting it on my incident that I would have created,

54

1 I would have to look -- because I would create an
 2 incident, I would put all the information on and then
 3 I would have closed that incident as a duplicate of
 4 David's, because I knew we were working on David's log
 5 because he had the first call.
 6 SIR JOHN SAUNDERS: Right. I know how important it is for
 7 you to pass on any information that you get --
 8 A. Yes.
 9 SIR JOHN SAUNDERS: -- on to the Fire Service and I just
 10 wondered how you ensured that that actually happened in
 11 practical terms.
 12 A. In a normal incident, if you can call them normal,
 13 we would read what's on the log. But in this case,
 14 because David was getting information, I was getting
 15 information, the team leaders were up there, we were
 16 trying to pass information, I was trying to find out
 17 what the ambulance had got, what the police were saying,
 18 there was a lot of mixed information coming through.
 19 That's how I felt.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR DE LA POER: Maybe I can help. {INQ008376/1}, which is
 22 the log that Mr Ellis opened. We are going to go to
 23 {INQ008376/6}, please.
 24 At 22.47.50, we see an entry against 50032, the
 25 operator. Was that you?

55

1 A. That's me, yes.
 2 Q. And we can see:
 3 "Comment: Call received for NWAS. They had reports
 4 of a bomb and then it has exploded. Reports there are
 5 60 casualties and an active shooter."
 6 A. That's correct.
 7 SIR JOHN SAUNDERS: So that's timed at 22.47.50. Is that
 8 the time you entered the thing on the log?
 9 A. That's when I entered it on this log.
 10 SIR JOHN SAUNDERS: So it's an automatic record of the time
 11 when you put it on the log?
 12 A. Yes, so I would have to look whether I... I would as
 13 normal practice create an incident when I've took a call
 14 from the ambulance and then, like I said, I would have
 15 duplicated it to David's. But I haven't seen the
 16 incident that I did that was duplicated. I haven't seen
 17 that recently, so I can't recall what I actually put on.
 18 But that's what would have been put on, should have been
 19 put on.
 20 SIR JOHN SAUNDERS: Thank you. The time of the call?
 21 MR DE LA POER: That part of the conversation in terms of
 22 the clarification of the active shooter was between
 23 22.43 and 22.44 --
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR DE LA POER: -- the section that we've just looked at.

56

1 Ms Haslam, it may be that others will take you to
 2 other logs, but I just want to focus upon this log.
 3 This is the main incident log, isn't it, so far as
 4 you are concerned?
 5 A. Yes, that's correct.
 6 Q. Clearly it's important to have all relevant information
 7 in one single place, do you agree?
 8 A. Yes.
 9 Q. Because it means that anybody wishing to catch
 10 themselves up about an incident can go to a single place
 11 and find out all that they need to know?
 12 A. That's correct, yes.
 13 Q. We've already been told by Mr Ellis that in fact
 14 accessing this information that's captured here is
 15 rather more user-friendly when you look at your screens
 16 than it is here?
 17 A. Yes, it is.
 18 Q. I want to ask you, and it is a matter of detail, but as
 19 you have recorded it here:
 20 "Reports there are 60 casualties and an
 21 active shooter."
 22 A. Mm.
 23 Q. What you had been told was that there was a report of an
 24 active shooter, do you agree?
 25 A. Yes.

57

1 Q. Initially, it's the person who says "reports", we saw
 2 that to start with, but when you press them, they say
 3 they had overheard a colleague?
 4 A. Yes.
 5 Q. Putting aside the plural and singular, you had thought
 6 to ask the NWAS operative whether or not the police had
 7 confirmed it; is that right?
 8 A. Yes.
 9 Q. We've just seen that, haven't we? Was that important
 10 information to your mind to know?
 11 A. I just felt the information wasn't clear. The call
 12 wasn't... It just wasn't clear to me what the
 13 information — he was panicking, which I understand, but
 14 it just wasn't a clear... And I understand in these
 15 circumstances it's not going to be clear, I do
 16 understand that, but if he'd mentioned an
 17 active shooter, I would have — obviously, I've put it
 18 on the log because that's what I understood.
 19 Q. Just reflecting upon the conversation we've just seen
 20 you had, the fact that you thought it was important to
 21 press the operative from NWAS and establish whether the
 22 police had confirmed it, do you think that the fact that
 23 the police had not confirmed or it was not known whether
 24 the police had confirmed that there was an
 25 active shooter was something that you should have

58

1 recorded on the log?
 2 A. Perhaps looking back, yes, perhaps I should have put
 3 "police have not confirmed". But as we're all emergency
 4 services, I would have thought if the ambulance might
 5 have got information perhaps that the police hadn't
 6 got... I was just putting what information I had on the
 7 log and, to me, that was the worst case so I wanted to
 8 make sure that it was on.
 9 SIR JOHN SAUNDERS: It makes little difference, doesn't it,
 10 because it's only a minute later it goes on the log what
 11 the police say about it? Just so you're reassured about
 12 that.
 13 MR DE LA POER: Absolutely. All I am trying to get to the
 14 bottom of is you have used the phrase worst case, but
 15 the risk of baldly stating the worst case without
 16 providing perhaps the uncertainty that was existing
 17 in the call is that somebody reading a log might react
 18 differently to if they had the more nuanced picture; do
 19 you agree.
 20 A. Yes.
 21 Q. I'm just wondering in terms of your training, how
 22 important was it in the 16 years that you had for you to
 23 capture that sort of subtlety or were you told to put
 24 the worst case because then we know what we will be
 25 dealing with?

59

1 A. No. We would always go off the worst case for any sort
 2 of incident. And I'm not saying that in this because
 3 obviously it was an awful night, but perhaps I should
 4 have put on, "An active shooter, police have not
 5 confirmed", but to me the ambulance could have got that
 6 information from their colleagues that there was an
 7 active shooter and it may not have been passed to the
 8 police. So I wasn't... You know, to me there could
 9 have been. We understood that there was from the call.
 10 I would have done from the information he passed me.
 11 SIR JOHN SAUNDERS: If it hadn't been the police were
 12 contacted a minute later for some information, did you
 13 appreciate at the time that the result of putting that
 14 down would be that fire engines, appliances would not
 15 attend until such time as that had been sorted out?
 16 A. I... I... I know that with the word, with the bomb,
 17 we would have done what we did. Whether we would have
 18 mentioned an active shooter or not, we would have
 19 contacted the duty NILO straightaway for him to liaise
 20 with the police.
 21 SIR JOHN SAUNDERS: So you're always assuming that the duty
 22 NILO's got through to the force duty officer?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: And would be getting the best
 25 information?

60

1 A. Definitely that he would have more information by
2 speaking to the police than we would. He would get it
3 quicker.
4 SIR JOHN SAUNDERS: Thank you.
5 MR DE LA POER: The call ended at 22.49. In the course of
6 the call, you didn't ask the Ambulance Service whether
7 or not they had any METHANE information?
8 A. No, I didn't ask that.
9 Q. Was it part of your training that that was something
10 that you should ask for in a situation like this?
11 A. Perhaps looking back I should have asked if they had
12 METHANE, but it's not something I would have done.
13 I wouldn't have done that at the time --
14 Q. Why --
15 A. -- but perhaps looking back, obviously I should have
16 done, but I didn't ask for a METHANE.
17 Q. Why do you think it's something at the time that you
18 wouldn't have done?
19 A. I just felt ... I felt like the operator I was speaking
20 to was panicky and I felt like the questions I was
21 asking, I wasn't getting clear answers back. I don't
22 know where he was getting his information from and to
23 me, to say I've just overheard it, it's not ...
24 That's... I didn't quite understand that.
25 Q. Had it formed part of your training up to May 2017 that

61

1 in circumstances where it might be a major incident and
2 that there was going to be a multi-agency response, that
3 a sharing of METHANE messages was important?
4 A. Yes. It wasn't used as much as it is now, I'll be
5 honest, but we did -- I was aware of the METHANE, but it
6 wasn't used as much as it is now.
7 Q. My final question on this topic: help us as best you
8 can, why do you think it didn't come into your mind to
9 ask NWSA? Was it just that they were panicking or was
10 there some other --
11 A. I think it was the panic. I wasn't quite clear what was
12 going on at that time. I knew David was getting an
13 incident. I was just trying to get all the information,
14 trying to liaise with -- trying to listen to what David
15 was doing, trying to listen to the team leaders, what
16 they wanted, were doing, so it didn't come into my mind.
17 I just wanted to get that information, find out what was
18 going on, and what we were going to do.
19 Q. At about the time your call was ending, Michelle Gregson
20 was creating what I am going to call the Philips Park
21 incident log. We're just going to bring that up now,
22 {INQ004284/1}.
23 SIR JOHN SAUNDERS: While we're just waiting for that to
24 come up, had it been part of your training to be asked,
25 whenever you had these sort of calls, always ask whether

62

1 there's been a METHANE message?
2 A. Um... We didn't have the training on as such. If we
3 had done things more regular, it would have been second
4 nature as such to ask these things.
5 SIR JOHN SAUNDERS: So as far as you were concerned you had
6 never actually had the training to do that?
7 A. I have had the training, I was aware of the METHANE, I
8 was aware of the message, but it did not come into my
9 mind to ask. I was too busy trying to get that
10 information.
11 SIR JOHN SAUNDERS: Is the training different about METHANE
12 messages now?
13 A. No, I think we're just more aware.
14 SIR JOHN SAUNDERS: As a result of this incident?
15 A. Well, just ... I can't ... I'm not sure whether...
16 SIR JOHN SAUNDERS: Okay.
17 A. We're just more aware of METHANE now. We're more aware
18 of the way, the procedure of things, I think. The thing
19 as well on that night, I was job share, so I was only in
20 a day and a night. Sometimes, going off the training,
21 sometimes I missed the training because I wasn't in.
22 That's no excuse, we would do a lot of the training --
23 SIR JOHN SAUNDERS: We're really not being critical about
24 it.
25 A. We would catch up on the e-learning. That's how I would

63

1 go through. But yes I should have asked about METHANE,
2 but I was trying to get the information to find out
3 what was going on. I could tell he was panicking and
4 I didn't want him to panic like that, the operator.
5 SIR JOHN SAUNDERS: Thank you.
6 MR DE LA POER: This is the Philips Park incident created by
7 Michelle Gregson and she will give her explanation
8 either later today or tomorrow about why she did so.
9 What I wanted to ask was for your perspective on the
10 idea that there are two incident logs running at the
11 same time, not of the sort that you've described where
12 you create it and then add something, but a parallel
13 incident log.
14 A. That's right.
15 Q. Was it common practice for there to be more than one
16 incident log for an incident?
17 A. For incidents like this?
18 Q. For incidents like this, yes.
19 A. If they were going to stand by somewhere, yes.
20 Q. So that was well understood, was it?
21 A. Yes.
22 Q. So far as a person accessing a terminal was concerned to
23 see what's happening, obviously if you only look at one
24 there's a risk that if it doesn't have all the
25 information from the other on that you'll miss

64

1 information, so what prompts or information would be
 2 available to a user if they accessed one to see that
 3 there was another incident log for the same incident?
 4 A. In a case like this, this is what -- this was the way of
 5 working.
 6 Q. Yes.
 7 A. We would always do that, we would create an incident of
 8 what were the -- where the incident was and because the
 9 pumps weren't going in, we would create a standby which
 10 would be the nearest station. So we would still have
 11 two incidents going because the pumps would have been on
 12 the Philips Park.
 13 Q. I think that the incident log that Mr Ellis created, and
 14 I'll make sure I'm right about this, continued to
 15 receive entries after Michelle Gregson had created this
 16 second incident log. So it did continue to be a live --
 17 A. Yes, you would put information on there regarding the
 18 incident. Anything regarding the standby you'd put on
 19 that log. They would be what we would call
 20 cross-referenced --
 21 Q. That's exactly what I wanted to --
 22 A. Not duplicated but they would be what we would call
 23 cross-referenced.
 24 Q. So a user would be able to see that when they log on to
 25 one there is a click-through to see the other or --

65

1 A. I'm not sure whether you'd see that. I think you would
 2 if you looked through the log. I think if you looked
 3 through the log you'd see there was another but that was
 4 the way of working, that was -- we've always done it
 5 that way.
 6 Q. So somebody in Group Manager Nankivell's position trying
 7 to understand, assuming his terminal operates in
 8 a similar way to yours, if he became aware once there
 9 were two logs in existence, the one created by Mr Ellis,
 10 the one created by Ms Gregson, would it be apparent to
 11 him coming fresh, once those two were in existence, that
 12 there were two?
 13 A. Yes, I would think so, yes. He would know that there
 14 were two. It would be on the incident header for the
 15 Philips Park, this was the standby and the additional
 16 information would be in there as to what it would be.
 17 Q. At about this time, the time your call is ending, the
 18 time that Ms Gregson is creating that log, Mr Casey,
 19 your colleague, was speaking to the FDO. Were you aware
 20 at any stage of the evening that the NILO was having
 21 difficulty contacting the force duty officer?
 22 A. No. I think I might have been aware later on in the
 23 evening when I realised how long the incident had been
 24 ongoing, but not at the time, no.
 25 Q. The second of my four calls, shorter than the last one,

66

1 I hope in terms of my questions. This is the call
 2 involving Dean Nankivell, group manager, at 22.52.
 3 Mr Lopez, the audio is at {INQ004364/1}, the
 4 transcript is at {INQ001224/1}.
 5 (Audio played)
 6 I think the only piece of significant information
 7 that you didn't pass on in that call, as we saw towards
 8 the start, was the precise location of the rendezvous
 9 point --
 10 A. Yes.
 11 Q. -- given Mr Nankivell cut across you and then the
 12 conversation took a different turn.
 13 A. It did, yes.
 14 Q. But we can see that at 22.55, you say in clear terms
 15 that the paramedic Bronze commander is on scene.
 16 A. Yes, I was looking through the log and looking at all
 17 the information that had gone on because it was the
 18 first time I'd contacted him, as the duty group manager,
 19 and I was making sure that everything on the log --
 20 he was given that information.
 21 Q. I think that entry was put on seconds before you
 22 spoke it, so this was all happening in real time.
 23 I wanted to introduce the content of that call because
 24 we're going to hear from Mr Nankivell later this week.
 25 I'm proposing to move on to the third of the calls

67

1 that I want to ask you about. We're going to deal with
 2 this just by way of the summary of sequence of
 3 communications prepared by North West Fire Control.
 4 It's at 23.06 and it involves Mr Nankivell again.
 5 Mr Lopez, {INQ041473/34}. We see the entry at the
 6 bottom there, the salient parts are captured. You
 7 indicate to Mr Nankivell that Control had been on to
 8 Andy Berry, Mr Nankivell says that he has spoken to
 9 Andy Berry, and there's a -- and you report what
 10 Mr Berry had said:
 11 "He has asked for three NILOs and the MTF A vehicles
 12 which we've sent. Do you still want the TRU?"
 13 To which Mr Nankivell says:
 14 "Yes, I do, they've got the fire capability, so
 15 yeah, get it all down there."
 16 "Do I have to check with Andy Berry or just do it?"
 17 "No, I have spoken to Andy Berry, just told him what
 18 we're doing, so just get them down there."
 19 And then this:
 20 "He's asked for three NILOs but there are only two
 21 coming up, Carlos Meakin and Ben Levy. I cannot find
 22 another, do you want us to go over the border?"
 23 And Mr Nankivell says:
 24 "Just leave it with those three for now including
 25 Andy Berry and we will take it from there once we've got

68

1 a bit more information."
 2 Again, the content of the call largely speaks for
 3 itself. What was the purpose in your mind behind
 4 speaking to Mr Nankivell at this stage?
 5 A. He was the duty group manager, so he would have been
 6 informed.
 7 Q. Is this the follow-up call because on the 22.52 call he
 8 said he was going to phone the APO and then phone back?
 9 A. Yes. I think I would have called him to confirm that
 10 information, to let him know that information.
 11 Q. I think you were concerned that Andy Berry had said he
 12 wanted three NILOs and you had only identified two.
 13 A. Yes.
 14 Q. We see that towards the back-end of the call.
 15 A. Yes.
 16 Q. And Mr Nankivell takes the view that Mr Berry can be
 17 counted in that number?
 18 A. That's correct, yes, he did.
 19 Q. We'll just have a look at what's going on in the log.
 20 We're going to go to {INQ004284/8}.
 21 This is the Philips Park incident log, so the one
 22 created by Michelle Gregson. At 23.05.21, we can see
 23 that at about the time that call is occurring, against
 24 your log number:
 25 "GM Meakin and Levy are mobilised as nearest NILO."

69

1 That's just 1 minute before the call with
 2 Mr Nankivell begins.
 3 Then we can see at 23.08.40, again by phone:
 4 "Control inf: GM Nankivell, duty GM, a request for 3
 5 NILOs and MTS capability has been requested. There are
 6 only 2 NILOs available and they have been mobilised."
 7 That appears to be an entry you have made just
 8 confirming that those are the NILOs that are to be
 9 mobilised.
 10 A. Yes.
 11 Q. Thank you very much indeed, Mr Lopez.
 12 I'm going to turn just to deal with the fourth of
 13 the calls that I want to look at the detail with you
 14 in relation to -- and that's involving Group Manager
 15 Fletcher at 23.22, the audio is at {INQ004413/1} and the
 16 transcript at {INQ001186/1}.
 17 (Audio played)
 18 SIR JOHN SAUNDERS: Clearly, a lot of operationally
 19 sensitive stuff appears to have been --
 20 MR DE LA POER: I have sent a message while that was taking
 21 place so I'm sure that will be attended to and I'm sure
 22 that Ms Haslam understands that we are not going to
 23 refer to those channels directly.
 24 I'm going to refer to the latter one, the
 25 multi-agency one, as the tactical multi-agency Talk

70

1 Group channel.
 2 MR COOPER: Before my learned friend continues, if that
 3 could be clarified before I rise because that's
 4 a document that I would like to go as well so perhaps we
 5 could have clarification before.
 6 SIR JOHN SAUNDERS: The document is not a problem, it's just
 7 the speaking. If you were to restrict yourself to the
 8 document, if that was possible, rather than the audio,
 9 that would be good.
 10 MR DE LA POER: Thank you.
 11 So Mr Fletcher contacted North West Fire Control and
 12 found himself speaking to you. He asked to be booked on
 13 duty and asked to go to the CSR. In your role as
 14 a control room operative do you have any discretion to
 15 give him instruction about what he should be doing or as
 16 a group manager is for him to tell you what he is doing?
 17 A. It's for him to tell me.
 18 Q. There was a discussion about the tactical multi-agency
 19 Talk Group --
 20 A. Yes.
 21 Q. -- at the end of that conversation. Did you have any
 22 discussion about that with anyone in the control room
 23 following the call?
 24 A. Yes, I informed Janine.
 25 Q. That's Janine Carden?

71

1 A. Yes, who then -- we put it straight on then. It was
 2 done. I didn't do that, I just handed it over to Janine
 3 to do.
 4 Q. What was your expectation that Janine would put into
 5 place?
 6 A. I just remember informing her to say that John Fletcher
 7 had mentioned the channel and I just left -- that's all
 8 I did, I just informed her.
 9 Q. We're going to have a look at a third log now,
 10 {INQ004290/1}. This log I am going to refer to as the
 11 CSR log. Do you see why I describe it in that way?
 12 A. Yes.
 13 Q. We can see that this one appears to have been created,
 14 at -- would I be right in interpreting as 22.44.32? Is
 15 that the top reference or a cross-reference to an
 16 earlier log and is it in fact created at 23.13.50?
 17 A. It looks like it was created at 23.13.50 where it says
 18 "incident created".
 19 Q. Yes. If we go over the page, please, {INQ004290/2} and
 20 one more and one more {INQ004290/4}. 23.36.08. There
 21 is an entry under 50002. Do you know who that is?
 22 A. No.
 23 Q. "Comment (other): from GM Fletcher can we monitor police
 24 [in that tactical multi-agency channel], monitoring on
 25 SANJ."

72

1 So whoever put that on, that's a capture, do you
 2 agree, of what you were told at 23.22 by Mr Fletcher?
 3 A. Yes.
 4 Q. Thank you very much. Will you take that down, Mr Lopez?
 5 The final matter I want to raise with you, because
 6 you specifically mention it in your witness statement
 7 at the conclusion, is what your perspective was
 8 in relation to the team leaders that night. Could you
 9 please just tell us how you think they performed?
 10 A. I think they performed really well on the night. They
 11 are both good team leaders with experience and, to me,
 12 we followed the actions what we were supposed to follow,
 13 what we were... what we're supposed to do.
 14 Q. What was the atmosphere within the control room as this
 15 was unfolding?
 16 A. Upset. A lot of ...
 17 Q. Please just take a moment.
 18 (Pause).
 19 SIR JOHN SAUNDERS: Do you want me to go away for a bit for
 20 you to compose yourself?
 21 A. No, I'm sorry. It's just shock.
 22 They kept coming round, doing like a welfare to
 23 check we were all all right -- I'm sorry.
 24 SIR JOHN SAUNDERS: Shall we take a break? Let's have
 25 a 10-minute break.

73

1 A. I'm so sorry.
 2 SIR JOHN SAUNDERS: There's absolutely no reason to
 3 apologise.
 4 MR DE LA POER: Thank you, sir.
 5 (11.38 am)
 6 (A short break)
 7 (11.46 am)
 8 MR DE LA POER: Sir, that concludes my questioning of
 9 Ms Haslam for the time being. Before I --
 10 SIR JOHN SAUNDERS: Before you do, I have a question to ask.
 11 This is a very open-ended question and if you would
 12 prefer to think about it and give me your answer in
 13 writing, then that's absolutely fine.
 14 You experienced both forms of the control rooms, ie
 15 the one just for GMFRS and then the NWFC one, and there
 16 are certain differences in the way they work, I have no
 17 doubt; I am not asking you to go through them. What
 18 I would like to know is whether you think there are any
 19 disadvantages in the way NWFC works as opposed to the
 20 old GMFRS one, but only in relation to things that are
 21 relevant to this particular night on 22 May.
 22 You may want time to think about that and I'm quite
 23 happy for you to have that.
 24 A. I think, as in the procedures of what we did, would have
 25 still been the same in Manchester, we would have

74

1 contacted the duty NILO to find out more information.
 2 But I do think -- obviously at North West Fire Control
 3 we're dealing with four brigades. That's a lot with the
 4 number of staff.
 5 SIR JOHN SAUNDERS: Right.
 6 A. We did have other incidents going on on the night that
 7 we were working on. We were getting other phone calls,
 8 crews ringing up, other things generally going on in
 9 other brigades. So that is hard, whereas in the old
 10 GMFRS, Control was just Manchester.
 11 SIR JOHN SAUNDERS: So tell me how in practice, having the
 12 reduced staff, as it were, to deal with it made
 13 a difference on this particular night? Were you not
 14 able to do things you'd otherwise have done?
 15 A. No, we wasn't on the night because we worked well and we
 16 wasn't on the night, we all fit into doing our -- what
 17 we could do.
 18 SIR JOHN SAUNDERS: You don't think a shortage of staff on
 19 the night was actually a handicap?
 20 A. No. No, I don't on the night, no. But more staff in
 21 obviously took the pressure off, making sure everybody
 22 was informed. It was hard --
 23 SIR JOHN SAUNDERS: So other people came in?
 24 A. -- but I know one person came in. So of course, more
 25 people coming in, you know, we could have gone through

75

1 the logs, to me, we could have looked more deeply into
 2 some, we could have done more things. So more staff
 3 would have definitely been --
 4 SIR JOHN SAUNDERS: Are you talking about more staff being
 5 there every night or are you talking about more staff
 6 being available to come in at a moment's notice?
 7 A. I think more staff because you do not know what is going
 8 to happen. That's the nature of the job: we do not know
 9 what incidents, it can be quiet, like it was, and then
 10 this happened.
 11 SIR JOHN SAUNDERS: Has staffing changed since 22 May? Have
 12 you got more staff than you had?
 13 A. Not that I'm aware of, no. I don't work there any more.
 14 SIR JOHN SAUNDERS: Sorry, okay.
 15 A. But it's still -- the minimum is still seven at night
 16 for four brigades.
 17 SIR JOHN SAUNDERS: Right.
 18 A. The other thing as well is in the old GMFRS, the command
 19 support room was in the next --
 20 SIR JOHN SAUNDERS: Yes. That's actually the next thing
 21 I was going to ask you. So how would that have helped
 22 on the night?
 23 A. It would have helped. In Manchester, in the old days,
 24 when we would go into the control, if they opened the
 25 command support -- you were in and out of that room, you

76

1 were going and saying: do you want us to send relief,
 2 shall we do this? It was definitely team work. But
 3 obviously the command support room wasn't in Warrington,
 4 it was --
 5 SIR JOHN SAUNDERS: One of the critical things is phoning
 6 the duty NILO. Would you still have done that if you'd
 7 been working in the control room for GMFRS?
 8 A. From what I can recall, yes, but I wasn't a rank.
 9 SIR JOHN SAUNDERS: So you wouldn't be going in and finding
 10 someone where you worked, someone who was a member of
 11 GMFRS to get their advice, as it were, you'd still be
 12 doing it on a phone call to the duty NILO?
 13 A. At that time of night, yes. It could be different
 14 during the day, but like I said, I wasn't a rank,
 15 I wasn't on that top desk, as we called it, I wasn't, so
 16 I wouldn't know their procedure. From what I can
 17 recall, from what I can remember, we would contact the
 18 duty NILO, but I could be wrong, but as far as I am
 19 aware, that's what we would have done: we would have
 20 created a job for the standby pumps at the nearest
 21 station. From what I can recall, that's what we would
 22 have done. I'm sorry if I'm wrong there.
 23 SIR JOHN SAUNDERS: No, don't worry. The other possibility
 24 that has been raised is actually having an experienced
 25 firefighter of rank to have there in the control room so

77

1 if things do arise where advice is needed, they are
 2 there to give it on the spot. Would that have helped,
 3 do you think, on the night?
 4 A. Um... It would always have been...
 5 SIR JOHN SAUNDERS: Anyone extra is useful?
 6 A. Yes. It would always have helped because they could
 7 have had further numbers to contact than perhaps
 8 we would have or that I was aware of in my role as an
 9 operator.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR DE LA POER: One point which I'm very grateful to
 12 Ms Gilmour for, the junior for North West Fire Control,
 13 is the operator number 50002 is that of Janine Carden's.
 14 SIR JOHN SAUNDERS: Thank you very much.
 15 MR DE LA POER: Can I now turn to Mr Warnock QC on behalf of
 16 GMCA.
 17 Questions from MR WARNOCK
 18 MR WARNOCK: Two short matters. First of all, could you
 19 assist: where a fire officer is mobilised in response to
 20 an incident, is that something that would appear on the
 21 log?
 22 A. Yes, they would be mobilised, yes.
 23 Q. Would that include where a fire officer was mobilised to
 24 attend the Greater Manchester Police headquarters?
 25 A. We would create an incident and we would put them on.

78

1 Q. The second matter I wondered if you could help me with
 2 is this. Mr Lopez, could you put up INQ004348/5,
 3 please. It's the log for Philips Park.
 4 SIR JOHN SAUNDERS: Looks good!
 5 MR WARNOCK: It doesn't look very good at all. I must have
 6 the wrong reference.
 7 {INQ004284/5}. Just before I ask you about this, if
 8 Mr Lopez could leave that on the screen for a moment,
 9 Ms Haslam, I don't know if you're aware but at about the
 10 time you were having your call with Mr Nankivell,
 11 Mr Berry had a call with one of your colleagues,
 12 Vanessa Ennis, in which he asked for three NILOs to be
 13 mobilised to Philips Park. I don't know if you were
 14 aware of that, were you?
 15 A. Yes.
 16 Q. I just wondered if you could help with this. We see
 17 at the bottom of page 5, there's an entry at 22.56.41
 18 where it says:
 19 "Incident updated."
 20 And at the bottom of that entry it says:
 21 "NILOs three and MTS capability to RVP at
 22 Philips Park."
 23 Do you see that?
 24 A. Yes.
 25 Q. And then if we go to {INQ004348/8} we see, at 23.05.21,

79

1 Group Manager Meakin and Group Manager Levy were
 2 mobilised as nearest NILOs. Are you able to throw any
 3 light on this as to why it took until 23.05 for the two
 4 NILOs to be mobilised?
 5 A. No, I'm unable to answer why they've... I would only
 6 think it would be informing, you know, the time
 7 difference. I mean I don't know what time on the
 8 call ... I'm not sure whether we rang them to tell them
 9 they'd be mobilised or whether we just paged them.
 10 I think we just paged them. I think we just paged.
 11 Q. Yes, the evidence is they were paged at 23.06.
 12 A. I don't know why the time difference -- I can't answer
 13 that, I'm afraid. Sorry.
 14 Q. If you can't help, thank you.
 15 SIR JOHN SAUNDERS: Presumably we can find actually the time
 16 of the paging?
 17 MR WARNOCK: It's 23.06.
 18 SIR JOHN SAUNDERS: It is that time, okay? Thank you very
 19 much.
 20 A. All I can think is that he's asked for the NILOs from
 21 Vanessa, just passed it over to us on the Manchester
 22 pod, we've checked with the team leaders, we're sending
 23 three NILOs, there's not three NILOs on, having a search
 24 through, there's definitely not three NILOs available,
 25 and then putting them on. That's all I can think but

80

1 that's just going off experience of what we could --
 2 MR WARNOCK: You don't personally know?
 3 A. No, sorry, no.
 4 MR WARNOCK: In that case I will leave it there, thank you
 5 very much.
 6 MR DE LA POER: Next, please, Mr Horwell on behalf of GMP.
 7 Questions from MR HORWELL
 8 MR HORWELL: Thank you.
 9 There were three NILOs on their way to Philips Park
 10 and each of them was on their own, travelling to
 11 Philips Park by car. That was your understanding?
 12 A. That's correct, yes.
 13 Q. Did your training and experience teach you that
 14 situational awareness is vital, especially during the
 15 early stages of a spontaneous emergency?
 16 A. Yes.
 17 Q. How were the NILOs to obtain situational awareness on
 18 their way to Philips Park in their respective cars?
 19 A. We would inform them, but I believe they rang us.
 20 I think Carlos Meakin rang because his pager hadn't come
 21 through from what I gather from what I saw, so he was
 22 informed in that way, but normally we would inform them
 23 en route to tell them that information and I think
 24 Mr Levy, I think he rang as well.
 25 Q. I just -- I'm attempting to determine whether it was the

81

1 responsibility of NWFC to pass on all of the relevant
 2 information that was coming through to it. And it seems
 3 from your answer that you are accepting that it was the
 4 responsibility of NWFC to update the NILOs as they were
 5 driving to Philips Park.
 6 A. We would normally, in a normal incident, inform the
 7 officers en route if we had any information that wasn't
 8 put on the incident type. If I'd got any other
 9 information, I would inform them.
 10 On the night in question, it was hard because there
 11 was a lot -- it's no excuse, but there was a lot of --
 12 what we were doing was ringing a lot of people, we were
 13 receiving a lot of calls in, we were working through the
 14 logs, we were dealing with other incidents, other
 15 brigades, but I know they rang us.
 16 Now, obviously looking back, we should have rang
 17 them straightaway, but it was a -- it's no excuse, it
 18 was a difficult night with all the information that was
 19 going on, but that is no excuse. We should have --
 20 SIR JOHN SAUNDERS: It's all right, you just need to tell us
 21 what happened. We know you're not making excuses, okay?
 22 MR HORWELL: So I hope it's clear, I'm not seeking to
 23 apportion blame; I am simply trying to understand
 24 what was happening that night.
 25 You have already been asked by Mr de la Poer as to

82

1 whether you were aware that night that the NILOs, in
 2 particular Mr Berry, were having difficulty contacting
 3 the FDO, and you have said that you weren't aware of
 4 such difficulties.
 5 A. I wasn't aware straightaway. I think as the night went
 6 on, I was obviously aware because we hadn't gone in to
 7 the incident. But at the time I wasn't aware, it's not
 8 something I would have got involved with as such.
 9 Q. If you had been told that the NILOs, in particular
 10 Mr Berry, could not contact either the FDO or the GMP
 11 control room, what, if anything, would you have done?
 12 A. Well, between us as a team we would have -- I would
 13 think we would have tried to contact the police to try
 14 and find out where the FDO was and why he couldn't get
 15 in touch.
 16 Q. What means of -- I'm sorry, sir.
 17 SIR JOHN SAUNDERS: Can you just help me? This is just me
 18 forgetting, no doubt. What evidence do we have that
 19 Mr Berry and the other NILOs were having difficulty
 20 contacting the control room as opposed to direct with
 21 the FDO?
 22 MR HORWELL: I'm basing this, sir, on the evidence of
 23 Mr Berry that he made multiple calls on the FDO's number
 24 and none of them were answered.
 25 SIR JOHN SAUNDERS: Okay. It was just you were saying he

83

1 couldn't get through to the control room.
 2 MR HORWELL: Eventually he did get through to the control
 3 room and spoke to Mr Myerscough.
 4 SIR JOHN SAUNDERS: I think that was the FDO's phone number.
 5 MR HORWELL: It was the FDO line, yes.
 6 SIR JOHN SAUNDERS: I'm only asking this because it may be
 7 that NWFC could get through to the control room. Did
 8 you have any difficulty that night, as far as you
 9 remember, getting through to the GMP control room?
 10 A. Not that I was aware, getting through to GMP, no.
 11 SIR JOHN SAUNDERS: Continue your questioning, Mr Horwell.
 12 I just wanted to make sure I hadn't misunderstood the
 13 evidence.
 14 MR HORWELL: On that basis did you have the FDO's number
 15 available to you?
 16 A. No, not that I was aware of.
 17 Q. So if you wanted to contact the FDO, how would you have
 18 done that?
 19 A. I would have rung the duty NILO. I knew he had the
 20 numbers, he had the direct numbers. So far as I was
 21 aware he had the direct number so that's what I'd have
 22 done in any other incident.
 23 Q. What, take the number from the NILO, you mean?
 24 A. No, to ask the NILO to ring the --
 25 Q. Right, that's what I thought you meant. So on

84

1 22 May 2017, the FDO's telephone number was not
 2 available to anyone in NWFC as far as you understood it?
 3 A. As far as I'm aware.
 4 Q. All right. The multi-agency Hailing Talk Group, a Talk
 5 Group that is monitored by GMP 24 hours a day for the
 6 other emergency services to use to contact the control
 7 room at GMP. Were you aware of that Talk Group on the
 8 night of this attack?
 9 A. I was aware there was a Talk Group, but it didn't come
 10 into my mind until I spoke to John Fletcher and then
 11 I mentioned it to Janine Carden, but it's not
 12 something — normally we would not have any trouble
 13 getting through to the police. As far as I'm aware, we
 14 didn't have any trouble getting through to the police
 15 control room. And it would — as far as I'm aware as
 16 well, we've never had any trouble with the NILO getting
 17 in touch with the FDO. We've never had that.
 18 Q. All right. I just want to ask you about two very short
 19 aspects of two of the calls that you have been asked
 20 about. I'll take you to the transcript of the first
 21 just in case it helps you. The transcript is
 22 {INQ001218/1}.
 23 I'm sure you're familiar with this document. This
 24 is the call from NWS to NWFC that you answered; yes?
 25 A. That's correct, yes.

85

1 Q. The one part of it that I wish to ask you about, please,
 2 is at {INQ001218/5} and it's at the top of that page.
 3 If we could look at that top section.
 4 This is 22.44. NWS are telling you — just after
 5 it had been said that there were reports of a shooter,
 6 NWS said this:
 7 "I was originally informed that there's been
 8 a shooter. There's something coming up on British
 9 Transport Police. Have nothing regarding an
 10 active shooter. I can't confirm that because I've heard
 11 different things."
 12 It's the fact that at 22.44, and we can take that
 13 down, please, NWS are passing on to you information
 14 that they have had from BTP, and BTP were saying that
 15 they had nothing about a shooter. I just want to ask
 16 you about that. Did you know that the arena was next
 17 to/above Victoria Railway Station in Manchester?
 18 A. Yes.
 19 Q. Therefore it is likely, would you agree, that BTP might
 20 have been the very first police officers to attend the
 21 scene?
 22 A. Yes.
 23 Q. And did you appreciate at the time the importance of
 24 that information, that BTP had nothing regarding
 25 a shooter?

86

1 A. Yes, but then after that, he said, "I can't confirm".
 2 So to me, that wasn't... He wasn't confirming anything
 3 to do with whether it was an active shooter or not. He
 4 said, "I can't confirm". So then —
 5 Q. Now we know —
 6 A. — (overspeaking) where he'd heard it from, he just
 7 said, "I've overheard". To me, that wasn't good enough
 8 to say there wasn't an active shooter. That's just my
 9 personal — I wasn't...
 10 Q. And we know that you didn't put that in the incident
 11 log.
 12 A. Yes, I just put there was an active shooter.
 13 Q. And so you didn't enter into the incident log that BTP
 14 had nothing regarding an active shooter?
 15 A. No, I just — on what I can see on the log, that's what
 16 I entered on to it.
 17 Q. I want to ask you about one more call, if I may, and
 18 it's a call which you have been referred to. I'm not
 19 going to put the transcript up, but if you want it up,
 20 please say so. There's only one part of it that I wish
 21 to ask you about.
 22 This is your call at 22.52 to Dean Nankivell.
 23 Towards the end of that call, 22:55, you told
 24 Mr Nankivell that:
 25 "There's a paramedic Bronze commander at the scene."

87

1 Do you remember that?
 2 A. Yes.
 3 Q. Did you at the time appreciate the importance of that
 4 information?
 5 A. Not at the time, no. I was just making sure he had
 6 everything that I could see on the log.
 7 Q. I suggest that the importance of that information
 8 is that if it's safe for a paramedic Bronze commander to
 9 be at the scene, some might say it's safe for the Fire
 10 Service to be at the scene. Did you think of that
 11 connection at the time?
 12 A. Not at the time, no. I was just concerned about giving
 13 him that information.
 14 MR HORWELL: All right. That's all I ask. Thank you, sir.
 15 SIR JOHN SAUNDERS: Thank you very much.
 16 MR DE LA POER: Mr Cooper QC.
 17 Questions from MR COOPER
 18 MR COOPER: As you may realise, Ms Haslam, I ask questions
 19 on behalf of the bereaved families.
 20 I want to ask you to begin with, if I may, some
 21 questions about your training that was offered to you.
 22 To begin with, can I take you to paragraph 3 of your
 23 substantive statement, which is {INQ035432/1},
 24 paragraph 3, please. We'll have it on screen so you can
 25 see it.

88

1 Just remind yourself of it. And going down to the
 2 third line in the middle of it:
 3 "In addition, we are all required to do annual
 4 refresher training."
 5 Let me take you to it point by point. How is it
 6 checked up on that you do -- not necessarily you
 7 personally, but you and your colleagues do the annual
 8 refresher training?
 9 A. The annual refresher training, you would all be
 10 programmed in to attend on a certain day at a certain
 11 time and we would attend.
 12 Q. Is that a physical attendance or --
 13 A. Yes. You would go, we would go out to do the training
 14 as in -- like it says, just refreshing over certain
 15 points of the training that you weren't sure. You could
 16 suggest, "I would like refresher training, can we
 17 include carrying out incidents on the motorway", working
 18 through things like that and we would just go through.
 19 Q. And you went to these trainings?
 20 A. Yes.
 21 Q. How long did they last for?
 22 A. I can't recall how long they actually lasted.
 23 Q. A day or an hour or 2 hours?
 24 A. I can't recall.
 25 Q. You went to one each year, did you?

89

1 A. Yes. I don't think we had one this year due to --
 2 Q. I understand. I'm asking about the time leading up to
 3 22nd.
 4 A. We did, we had the annual refresher training, yes.
 5 Q. And that covered a wide range of issues, did it, or did
 6 it focus upon JESIP or METHANE?
 7 A. At first it was refresher training -- I can't recall
 8 what the first one was, but then after that, the North
 9 West Fire Control would ask us what we would like
 10 refresher training in and we could put forward: can we
 11 include this, can we include that, et cetera.
 12 Q. So it didn't necessarily include refresher training for
 13 instance in JESIP or METHANE or anything like that, it
 14 could be absolutely anything?
 15 A. It could be anything. I can't recall whether we did
 16 JESIP or METHANE in the refresher training. I'd have to
 17 look back at my --
 18 Q. It certainly wasn't obligatory to have refresher
 19 training on JESIP or METHANE or any of those sort of --
 20 A. As far as I'm aware, no, we did refresher training on --
 21 on the main things but, like I said, after we'd done it
 22 a couple of times, they then asked what would you like
 23 refresher training on, so people would put forward, like
 24 I said, motorway incidents...
 25 Q. I understand. Reading on from your statement:

90

1 "I completed computer-based JESIP training through
 2 PDR Pro via e-learning which I completed on my own."
 3 How often did you do that computer-based JESIP
 4 training? I'm talking again about before 22 May.
 5 A. I can't recall how often. The PDR Pro was a system that
 6 we would complete and every month there would be
 7 different tasks for us to do and we would do them and
 8 then sign off what we'd done.
 9 SIR JOHN SAUNDERS: I just want you to help me about JESIP.
 10 So your job is to take in calls from the Fire Service
 11 and get them to the relevant place, to have the relevant
 12 vehicles and people there to deal with the incident.
 13 How in practice did JESIP affect the way you did your
 14 job? What's the relevance of it to you?
 15 A. To share information. That was the main thing for
 16 JESIP.
 17 SIR JOHN SAUNDERS: Did that mean that when you got a call
 18 in to the fire officer, you would then ring the police
 19 or NWS to tell them?
 20 A. It would depend on what was on the action plan.
 21 We would follow the action plan.
 22 SIR JOHN SAUNDERS: So if the action plan said get to hold
 23 of NWS.
 24 A. We would, yes.
 25 SIR JOHN SAUNDERS: Was that there on a number of them?

91

1 A. Yes, it was on number of them, and to inform the police.
 2 Sometimes -- I know with the action plans we would use
 3 our own -- if we took an incident that was not the
 4 normal incident, we weren't sure, we would then inform
 5 just -- you know, inform the police, we're just letting
 6 you know due to this incident type. We would do things
 7 like that. But for the majority, we followed the action
 8 plan. We had to --
 9 SIR JOHN SAUNDERS: On the explosion action plan, does that
 10 include that you should get hold of the Ambulance
 11 Service?
 12 A. I would have to look. Off the top of my head I'm not
 13 100% sure, I'm sorry. I would think so but I'm not
 14 100%. I would have to look at the action plan.
 15 SIR JOHN SAUNDERS: We can have that checked, that's not
 16 a problem.
 17 MR COOPER: Going back to the question I had of you on the
 18 e-learning, give us some idea what this was. Was it
 19 a sort of multiple choice tick-box sort of exercise?
 20 A. Some of them, you would go through and you would answer
 21 questions at the end. And you had to get so much
 22 percentage so you passed it. Some was just going
 23 through and then acknowledging that you'd had the
 24 training, but it was e-learning. But you could also ask
 25 if you wanted further input.

92

1 Q. Yes.
 2 A. So if I did the training and thought, I'm not happy
 3 about this, I don't feel -- I could ask for an input.
 4 Q. That would be because you're a conscientious individual
 5 and you would do that. But it is left, is it then, for
 6 the individual undergoing the training to do it
 7 properly?
 8 A. As far as I am aware, yes. I don't know whether -- if
 9 people haven't done it, I don't know what that procedure
 10 would be.
 11 Q. You don't know whether there's any process in checking
 12 and verifying whether people --
 13 A. I think it would be checked and verified, yes, but --
 14 Q. You know that, do you?
 15 A. I don't know that for sure.
 16 Q. You're assuming that?
 17 A. Yes, I'm assuming that, but...
 18 Q. Can we read on in your paragraph, please:
 19 "I completed computer-based JESIP
 20 training/e-learning. I carried out this e-learning on
 21 16 December 2018."
 22 Can you help us, when you carried it out before
 23 22 May 2017, can you remember when you did it?
 24 A. I can't recall when I did that, I would have to look
 25 at the training, the signing-off sheets that I think

93

1 North West Fire Control would have. But I can't
 2 remember the dates when I did do that, I'm sorry.
 3 Q. Again, it may be that I'm remiss on this, I don't think
 4 I've seen those sheets. I'm sure in the plethora of
 5 material we've had they may exist, but if they don't,
 6 you have them, do you?
 7 A. I don't have the sheets but North West Fire Control
 8 would have the signing-off sheets that were signed off
 9 to say that we've had the training.
 10 Q. And they would tell us how soon before 22 May 2017 you
 11 had undergone this self-assessment?
 12 A. Yes, I think there is one training sheet, but I can't
 13 recall -- I haven't got it with me in here.
 14 Q. Obviously if it exists I'll be reminded of it. Then you
 15 go on:
 16 "I completed METHANE/JESIP training also on
 17 30 January 2016."
 18 So can I assume from that that the last
 19 METHANE/JESIP training you received before 22 May 2017
 20 was on 30 January 2016?
 21 A. That's what I can recall. I can't -- sorry, not what
 22 I can recall. I can't recall when I had it, if I've had
 23 it since.
 24 Q. That training, what did that consist of?
 25 A. I can't recall whether the METHANE and JESIP training

94

1 was e-learning or was training that I attended. At the
 2 time, like I said, I was on job share so you did miss
 3 certain things with being on job share, unfortunately.
 4 Q. I can assume I know the answer but it's not for me to
 5 assume the answer. Why did you miss it perhaps when you
 6 were on job share?
 7 A. It could have been. I'm not saying I did miss any
 8 training. I can't recall when I did the training.
 9 Q. And job share, is that a process which has been put in
 10 place since North West Fire Control came into existence?
 11 A. No, I was in job share at Greater Manchester and then we
 12 transferred over and I stayed job share with my same
 13 partner, so we worked together. But since then, in 2018
 14 I did go back full-time.
 15 Q. On the subject of METHANE and of training, you told the
 16 chair today that -- I'm speaking to you of METHANE
 17 now -- that you weren't used to it as much as you are
 18 now? Do you remember saying that?
 19 A. That's correct.
 20 Q. And you referred to a knowledge and appreciation of
 21 METHANE?
 22 A. Yes. It wouldn't have... When I was on the night doing
 23 all the actions, it wouldn't have sort of come into my
 24 mind to make sure -- not at the time. As the night went
 25 on, yes, obviously, but it wasn't something I would have

95

1 asked the ambulance at that time. We would do now
 2 because things have changed, it would be --
 3 Q. Because of the tragedy at Manchester Arena?
 4 A. I'm not sure, but I know things have changed.
 5 Q. Let me deal with what the situation was at the time
 6 because you're aware, aren't you, certainly the inquiry
 7 is, from the evidence of Brigadier Hodgetts, that
 8 METHANE was introduced, if not invented by him, in 1995?
 9 Now, we hear, for instance, that NAWAS, for instance,
 10 I've got the reference if needs be, were training in it
 11 at least since 2013.
 12 A. Yes.
 13 Q. I would like to examine a little further with you what
 14 training you were receiving in METHANE.
 15 A. I was aware of METHANE.
 16 Q. I'm sure you were, but what training were you receiving?
 17 A. Just the training as what I've mentioned. I can't
 18 recall what dates I did have the training.
 19 Q. I see.
 20 A. Sorry, I can't recall those actual dates.
 21 Q. Because this particular -- you'll accept it's a very
 22 important tool, isn't it, in situations that were
 23 developing in Manchester Arena?
 24 A. Yes, of course.
 25 Q. Which, because of the pressure that you were no doubt

96

1 under at the time, you forgot about?
 2 A. It's not that I forgot about it, we were just trying ...
 3 There was so much information coming in.
 4 Q. We're going to come to that in a moment, but I am
 5 suggesting to you — and this is not a criticism of you,
 6 it's trying to drill down into what happened that night,
 7 to help you and your colleagues in the future, so please
 8 look on it as a positive exercise. But because of the
 9 pressure that we will ask you about in a moment, that
 10 was happening on the night, you forgot about METHANE?
 11 A. I didn't ask about METHANE, no, I didn't.
 12 SIR JOHN SAUNDERS: There are two aspects of METHANE which
 13 may be relevant to you. First of all, getting any
 14 METHANE message which has been supplied to one of the
 15 other agencies, like the Ambulance Service, and as
 16 a matter of course, or a matter of training, would you
 17 be expected when you get a contact from them to say,
 18 "Have you had a METHANE message? If so can you pass it
 19 on?"
 20 A. I wouldn't have asked that at the time.
 21 SIR JOHN SAUNDERS: Okay. The second part of it is that you
 22 may get a METHANE message from someone who rings in.
 23 What would you then do with that?
 24 A. I would pass that on.
 25 SIR JOHN SAUNDERS: To other agencies?

97

1 A. Yes, definitely.
 2 SIR JOHN SAUNDERS: Okay.
 3 A. To our officers and to other — but on that night at
 4 that time —
 5 SIR JOHN SAUNDERS: I do —
 6 A. I didn't ask for — I should have done.
 7 SIR JOHN SAUNDERS: I really do understand. I can
 8 understand that the man, the most important thing
 9 is that you pass it on when you've been given one.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: And it could be said, well, it was the
 12 obligation of the NWSA person to actually bring that
 13 information to your attention rather than you having to
 14 say, "You haven't given me one, have you got one?" But
 15 you would normally now, if they didn't give you one,
 16 you'd say, "Do you have a METHANE message?"
 17 A. Yes, I would have asked now.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR COOPER: Could it be perhaps that the reason METHANE was
 20 perhaps not immediately in your mind at the time was
 21 because the training in METHANE at the time that you
 22 were given wasn't prevalent, wasn't given to you
 23 sufficiently? It wasn't highlighted enough? I got
 24 there in the end.
 25 A. It could have been that or, like I said, a lot of it was

98

1 the pressure on the night.
 2 Q. I'm instructed, and I'm aware, that for instance the
 3 police did and may be still do, carry what's called
 4 a pocket METHANE action card. Are you aware of that?
 5 A. Yes, we did have.
 6 Q. And did you have a pocket METHANE action card on the
 7 night?
 8 A. I don't know whether I had it on the night.
 9 Q. You have them now, do you?
 10 A. Yes.
 11 Q. And what are on those action cards?
 12 A. It's a little card which says about JESIP, co-locating,
 13 all the actions, the circle of what the procedure would
 14 be, what you'd need.
 15 Q. And —
 16 A. And it is on the workstations as well now.
 17 Q. Would that pocket action card, as I'm instructed it's
 18 called, have been helpful on the night?
 19 A. Not just the pocket action card.
 20 SIR JOHN SAUNDERS: Where are these put? Do you have them
 21 up in front of you?
 22 A. No, they were stuck on the desk.
 23 SIR JOHN SAUNDERS: They were actually visible to you?
 24 A. Now they are. No, the cards were just given us. Mine,
 25 for example, was in my headset bag.

99

1 SIR JOHN SAUNDERS: And you didn't have them on the night?
 2 A. I can't recall when I got the card. I can't recall when
 3 I got the card.
 4 SIR JOHN SAUNDERS: When you say they're on the desk, what
 5 is on the desk?
 6 A. There's, I think from what I can remember, a JESIP plan
 7 sort of stuck on the desk, from what I can remember,
 8 I think that is what is stuck on.
 9 SIR JOHN SAUNDERS: But it doesn't include METHANE?
 10 A. I'm not sure. But that wasn't on at the time. It's on
 11 now but it wasn't on at the time. I can't recall now
 12 what was actually on it, sorry.
 13 MR COOPER: Is that one of the improvements that have taken
 14 place since Manchester Arena?
 15 A. Yes, that's been put on since.
 16 Q. What other improvements or changes have been made since
 17 Manchester Arena as far as METHANE, for instance, is
 18 concerned?
 19 A. METHANE is definitely something that's at the forefront
 20 now, definitely.
 21 Q. Is what?
 22 A. It's definitely something that would be asked.
 23 SIR JOHN SAUNDERS: At the forefront.
 24 A. Yes, it's definitely — something would be asked.
 25 There's stickers on the desk now. It's there. There

100

1 are posters up.
 2 MR COOPER: Training. Is there more training? Have you had
 3 significantly more training in METHANE since, for
 4 instance?
 5 A. I have left now.
 6 Q. And up until you left, perhaps?
 7 A. It would be on the e-learning, which I can't recall how
 8 many times during the year from April to April that it
 9 was on. I can't recall how many times it should be on
 10 or it was on, I'm sorry.
 11 Q. All right. Thank you.
 12 You told the chair again today in your evidence that
 13 you and your colleagues were not directly included in
 14 any exercise involvement. Winchester was an example of
 15 it.
 16 A. Mm.
 17 Q. Would you accept that had you been included a little
 18 more wholesomely or fully in those exercises it would
 19 have help you perhaps integrate more efficiently within
 20 the overall team of people, all services in such
 21 a situation that happened on 22 May?
 22 A. I think being involved in the exercises would be a great
 23 advantage definitely.
 24 Q. And help the chair if you can, I put to you that one of
 25 the advantages would be giving you a greater sense of

101

1 integration into the overall effort, as it were. What
 2 other advantages would it give?
 3 A. It would just get you more into ways of working through
 4 that. Like I said, the night was hard because of the
 5 different information. I know you can do exercises and
 6 say: this is what happens, this is what happens. To me,
 7 the night was -- there was too much different
 8 information coming in. But the exercises -- I think
 9 being involved in any sort of exercise, any sort of
 10 training, is an advantage. It's the best thing.
 11 Q. This is not just -- I take your point that any form of
 12 education or training, we're never too old to learn as
 13 it were, but this is a more important thing, a more
 14 proactive thing. It's not just any training is
 15 useful --
 16 A. Of course.
 17 Q. -- this would be extremely useful, wouldn't it?
 18 A. Of course, yes.
 19 Q. You've touched upon the difficulties of the night, which
 20 everyone can appreciate, and I want to take you to
 21 paragraph 25 of your statement and touch upon that.
 22 You commend your team leaders and you have given
 23 that evidence. You go on, you say:
 24 "On reflection I think we worked well as a team on
 25 the night, trying to manage a very difficult situation

102

1 with conflicting and sometimes confusing messages being
 2 relayed to us through multiple individuals."
 3 I wonder if you can assist the chair by giving
 4 a little more information about those three lines. What
 5 do you mean by:
 6 "A very difficult situation with conflicting and
 7 sometimes confusing messages being relayed through
 8 multiple individuals"?
 9 Let's break it down into three. We have conflicting
 10 messages, confusing messages and multiple individuals.
 11 Firstly, conflicting message --
 12 A. The conflicting messages was mine to the ambulance, the
 13 ambulance to me. The different --
 14 SIR JOHN SAUNDERS: The gunshot wounds?
 15 A. Yes, the gunshot wounds, "I've heard it from somebody",
 16 "Where have you heard it from?", trying to get that
 17 information. That to me was conflicting, I wasn't quite
 18 sure.
 19 SIR JOHN SAUNDERS: Is this really unusual?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: If you have any serious incident, don't
 22 you get lots of calls from lots of different people
 23 often giving you different information?
 24 A. Yes, of course.
 25 SIR JOHN SAUNDERS: Is it just that this was a much bigger

103

1 incident?
 2 A. Yes, it was a bigger incident and --
 3 SIR JOHN SAUNDERS: You get more conflicting information?
 4 A. I can't answer for the gentleman I spoke to.
 5 SIR JOHN SAUNDERS: No, no. I just expect that --
 6 A. We do get lots of different information, yes, and that's
 7 where our call challenge comes in, where we would
 8 challenge the callers, get that information out, to find
 9 out what incident type we should put it as. In this
 10 case --
 11 SIR JOHN SAUNDERS: So you are taught to challenge, are you?
 12 A. Yes, we do challenge the callers, yes, to try and get
 13 more information out that we need to determine what
 14 incident type it would be and whether we would attend,
 15 yes.
 16 SIR JOHN SAUNDERS: So the difference in this is it's
 17 a bigger incident than you normally deal with, therefore
 18 you're getting more information, more of which is likely
 19 to be conflicting; is that fair or not?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR COOPER: Conflicting because it's being given by members
 23 of the public, the media, the emergency services, or
 24 conflicting simply between the emergency services?
 25 A. I can only go off my call, I haven't heard the other

104

1 calls, I haven't heard David's call, but if I can just
 2 go off mine, it wasn't... I just ... I just felt like
 3 the information I was getting wasn't concrete, and
 4 I know it can't be in that instance, I understand that.
 5 Q. But you were dealing purely with, and correct me if I'm
 6 wrong, the emergency services, weren't you?
 7 A. At that time I was just speaking to the ambulance, yes.
 8 Q. So your evidence is that the information the emergency
 9 services were giving you, the ambulance -- in fact we're
 10 just talking about ambulance or is it ambulance and
 11 fire?
 12 A. I just spoke to the ambulance. I can only go off my
 13 call. That's why I was repeating it loud to make sure
 14 the team leaders heard so I could try and listen to what
 15 David was getting. But in these circumstances, it is
 16 hard because obviously there's a lot of information
 17 coming through. You're getting -- the police are
 18 getting calls from members of the public who are telling
 19 them all different things --
 20 Q. I do understand.
 21 A. -- and they are trying to pass -- yes, that was the
 22 conflicting -- the confusing messages to me was we'd
 23 informed the duty NILO and then I had informed the duty
 24 group manager, which is what we should have done. And
 25 it was just the duty group manager was telling me to

105

1 mobilise the TRU, then I was checking, am I all right to
 2 mobilise the TRU, Mr Berry has asked can we send four
 3 pumps.
 4 Q. I understand. So the conflicting information that was
 5 coming to you, you have mentioned some of it was coming
 6 from NWAS.
 7 A. Yes.
 8 Q. And some of it indeed was coming from the Fire Service
 9 itself, with different individuals, such as Mr Berry and
 10 others, giving conflicting instructions to you?
 11 A. Well, it wasn't so much that, it was -- obviously
 12 Mr Berry was speaking to somebody else, I was speaking
 13 to Mr Nankivell. It was just making sure -- then they
 14 spoke together which was great, but then it was just
 15 making sure we all that same information that I was
 16 passing. You know, I was letting the team leaders
 17 in the room know, "Dean Nankivell's just asked for TRU",
 18 "Just hold on, Andy Berry's just" -- it was just making
 19 sure we had everything set correctly. That's what
 20 I meant by that. It wasn't confusing as in somebody
 21 confusing a message by saying something wrong. I am
 22 aware of Mr Nankivell, I know the information
 23 (overspeaking) from the officer he was.
 24 Q. Would it be fair to say then overall that the problem
 25 was a lack of coordination?

106

1 A. I think it was just ... Just on the night, trying to get
 2 the further information as to exactly what was going on
 3 from the FDO for Mr Berry, and then to find out our next
 4 procedure. I was an operator, I didn't have any --
 5 Q. I do understand that. Please don't think I'm piling in
 6 on you.
 7 A. I didn't have any authority to --
 8 Q. A lack of communication? We have heard it suggested
 9 before. Are you endorsing that that that is another
 10 example perhaps of a lack of communication between
 11 services?
 12 A. I just feel that there was a lot of information coming
 13 in. I wouldn't say it was a lack of communication
 14 because the police were on to us, the ambulance had rung
 15 us straightaway, we were all speaking. But I just feel
 16 that the information coming through, there was so much
 17 information coming through. That's how I felt on the
 18 night.
 19 Q. We may have crossed over to the second part of your
 20 statement. We've dealt with conflicting messages.
 21 You have said and sometimes confusing. To save time,
 22 are there any other messages there that you want to tell
 23 us about that were confusing or do you join conflicting
 24 and confusing together as the same sort of thing?
 25 A. Yes, it was just trying to get the information, trying

107

1 to find out exactly what was going on.
 2 Q. Thank you. And being relayed through multiple
 3 individuals, again have you touched on that? You have
 4 told us about Mr Berry and you had calls from NWAS and
 5 so on and so forth.
 6 A. Just passing the information and making sure who had got
 7 it and which -- what information we had received.
 8 Q. This next question is not meant in any way to be
 9 critical of the work that you and your colleagues were
 10 trying to do on a very difficult night, but would you
 11 accept that certainly in the first part of the night,
 12 you were overwhelmed?
 13 A. Overwhelmed in?
 14 SIR JOHN SAUNDERS: I think it means that you were having so
 15 much to do that you were not able to do the job
 16 properly.
 17 A. I felt like we did do the job properly, what we were
 18 supposed to do. But yes, there was a lot of ... A lot
 19 to do.
 20 MR COOPER: I use the word overwhelmed because again I don't
 21 want you to think that I'm on the attack. I'm not.
 22 A. I understand.
 23 Q. I was careful in using the word overwhelmed. But the
 24 chair is right to say that within that suggestion to
 25 you, with all the best intentions you weren't able to do

108

1 the job you wanted to do, particularly in the early part
2 of that evening.

3 A. To me, we'd got the information, we passed the
4 information on as far as I'm aware. We then did what
5 we were supposed to do, contact the duty NILO, and
6 we are waiting for instruction. That is how
7 I understood it. Like I said, we were still dealing
8 with the other brigades, so it is hard. It can be hard.

9 SIR JOHN SAUNDERS: One of the problems is, isn't it, on
10 this evening that from the Fire Service point of view
11 things drifted?

12 A. Mm.

13 SIR JOHN SAUNDERS: As we know, it was a very long time
14 before they actually got there. The drift, at least in
15 part, was caused by the inability of the NILO to contact
16 the FDO.

17 A. Mm—hm.

18 SIR JOHN SAUNDERS: Do you think that it ought to be more
19 apparent to you at NWFC that things were drifting and
20 that it required you to be more proactive? Rather than
21 just reacting to calls coming in, you needed to be more
22 proactive, saying: what's happening, what's going on?

23 A. I don't know whether those above me do that.

24 SIR JOHN SAUNDERS: Okay. So it's a team leader's
25 responsibility that?

109

1 A. I don't know whether they were doing that when Janine
2 was in, Sarah Wilson, Tessa — I'm not sure who they
3 were speaking to and what they were doing, I wouldn't
4 know that.

5 SIR JOHN SAUNDERS: Thank you.

6 MR COOPER: Again following, on from my questions about
7 whether you and your colleagues were perhaps overwhelmed
8 so much you couldn't do the job you wanted to do, would
9 that why explain, for instance, matters such as METHANE
10 were forgotten about or the NILOs weren't contacted and
11 important things that you would have done in the normal
12 course of events, I'm sure? But because this matter was
13 absolutely overwhelming, the job that you would have
14 wanted to have done was not done? Would that be fair?

15 A. With the informing of Mr Meakin and Mr Levy, I don't
16 know the time difference from us mobilising to them
17 ringing up. They could have rung up — I'm not using it
18 as an excuse but they could have rung up just before we
19 was going to inform them as such. But yeah, the
20 METHANE, I don't know whether anybody else — I should
21 have asked that question.

22 Q. You've been very fair and the families have heard you
23 say that. Please, I don't want you to get upset about
24 it. You have given us the evidence on that and we are
25 grateful for it.

110

1 A. It is hard in there with the amount of people with what
2 you've — sometimes that's the nature of the job.

3 Sometimes there's lots going on. That's the job.

4 Q. You told the chair, again today, that on the night
5 people were coming into the control centre who for
6 instance were off duty to help out.

7 A. Yes, they did a recall for duty.

8 Q. Had they not been recalled, would you accept that the
9 control room certainly wouldn't have been able to cope?

10 A. No, I think we would have coped because that's what we
11 did.

12 Q. I'll put it rather inelegantly, because everyone got
13 stuck in, they saved the day or it might be considered?

14 A. I just think we tried our best. Obviously anyone that
15 could come in was — would have been... would have been
16 good, but...

17 Q. All right. The chair has touched upon questions
18 concerning the change from a regional to more
19 centralised, I'm not going to go there, but that's where
20 I would have gone into it.

21 I want to very briefly now ask you about two
22 disparate sections of your statement just to get some
23 clarification. Paragraphs 18 to 19, please. You say
24 you contacted Moss Side Fire Station. You were:
25 "... seeking to confirm mobilisation to the

111

1 Manchester Central Fire Station, not Philips Park
2 Fire Station as has already been stated on the turnout
3 sheet. That information was acknowledged. I cannot
4 offer any explanation as to why the turnout sheet
5 contained the incorrect information."

6 A. That's correct.

7 Q. "That information was acknowledged. I cannot offer any
8 explanation as to why the turnout sheet contained the
9 incorrect information."

10 SIR JOHN SAUNDERS: Just to get some context, we're talking
11 about 00.30?

12 MR COOPER: Yes, about 00.30.

13 Is there anything else you want to add to that to
14 assist?

15 A. No. Obviously the station, Philips Park, it was changed
16 then to them proceeding into Manchester Central. So we
17 mobilised the fire engine and then I realised that the
18 incident header hadn't been changed, so I was just
19 ringing them to tell them, to confirm where they were
20 going, just to make sure they were aware, which they
21 were, but I was just making sure.

22 Q. There's one question I want to ask you about and it's
23 a difficult one but it would be wrong for it not to be
24 put to you. I want you to go to paragraph 13, please.
25 This concerns the loss of one appliance because of

112

1 a firefighter getting understandably worried about his
2 family.
3 A. Yes, that's correct.
4 Q. You say this:
5 "At 23.24, I contacted SM Topping due to an
6 appliance at Hollins Fire Station going off the run due
7 to an officer proceeding to the arena to collect his
8 wife and daughter who had been at the concert. I was
9 seeking assistance from Topping to deal with that issue
10 and he asked to do so. I therefore provided him with
11 the appropriate contact details ... transcript of
12 conversation..."
13 I think I can leave it there for the purpose of my
14 question: clearly, and quite understandably, this
15 firefighter was concerned about his family being at the
16 arena when this atrocity concerned.
17 A. Mm—hm.
18 Q. But as a result of one firefighter, understandably,
19 I emphasise again, going to the arena, how did that
20 totally disable the provision of a whole fire engine?
21 A. How can it?
22 Q. Yes.
23 SIR JOHN SAUNDERS: How many are there on a crew?
24 A. On a fire engine, I think there's four or five.
25 SIR JOHN SAUNDERS: So if you go down from four to five to

113

1 three or four, does that mean it just won't go?
2 A. You will have to ask somebody... I would not just
3 say... I would not say to him, "Yes, you go" — I was
4 getting off somebody —
5 SIR JOHN SAUNDERS: The relevance is for whatever reason on
6 this night because one person wasn't there, a fire
7 engine didn't go to the scene?
8 A. Yes. Well, he was asking — telling us that somebody
9 was leaving to go and I was just getting — it's not for
10 my position to say, "Yes, you go".
11 MR COOPER: I understand that.
12 A. So I was checking with Mr Topping that he would speak to
13 them and he would arrange because what they would do,
14 I would think, was get somebody else to come in and
15 cover that fire engine so it wouldn't be off the run.
16 Q. The only reason I am asking the question, obviously it's
17 strictly in terms of this inquiry and the arena, because
18 fire didn't turn up, really. It's slightly a side
19 issue, but the only reason I'm asking about the issue is
20 in the future, the presence of appliances might be
21 vital.
22 A. Mm—hm.
23 Q. And if one is simply taken out of action because one
24 person can't get on it, that's concerning, isn't it?
25 SIR JOHN SAUNDERS: Mr Cooper, shall we try and get the

114

1 detail of this from someone who knows? It would help,
2 I think. Obviously it's something that's capable of
3 being significant and we can find out exactly what
4 happened.
5 MR COOPER: Then those are my questions, sir. Thank you.
6 SIR JOHN SAUNDERS: Thank you, Mr Cooper.
7 MR DE LA POER: Before I invite Mr Smith to ask his
8 questions, can I just indicate that there is a phone
9 call that I omitted to ask Ms Haslam about. The fault
10 is entirely mine. I won't trouble people with the
11 explanation for it. But I am conscious in asking the
12 witness to have a look at this that I don't believe this
13 is a call that she has been asked to consider before.
14 It is not mentioned in her witness statement and in the
15 evidence proposal the transcript is not listed. It is
16 just one page.
17 SIR JOHN SAUNDERS: I fear this witness is going to go over
18 lunch in any event.
19 MR DE LA POER: I think that's right.
20 SIR JOHN SAUNDERS: It's very difficult to look at
21 a document in the witness box to think about it. If
22 that's all right, we'll get you to look at this document
23 over lunchtime so you can familiarise yourself with it
24 and then you can deal with it at a later stage. If
25 anyone wants to come back on it then we will allow them

115

1 to do it.
2 MR DE LA POER: I do wish to make clear the fault is
3 entirely mine and I'm very sorry.
4 SIR JOHN SAUNDERS: You're forgiven.
5 MR DE LA POER: Well, I don't know whether then, sir, we
6 want to proceed with Mr Smith's questions now and leave
7 that over lunch or whether you wish to take the lunch
8 break 15 or so minutes early.
9 SIR JOHN SAUNDERS: Mr Smith, how long are you likely to be?
10 MR SMITH: Well, certainly not as long as I was earlier this
11 morning. I really won't be very long at all.
12 SIR JOHN SAUNDERS: Would you finish shortly after 1.00?
13 MR SMITH: Oh yes.
14 SIR JOHN SAUNDERS: Shall we do that then and then take
15 a break for lunch? If you need to come back on whatever
16 Mr de la Poer is going to raise, you can.
17 MR SMITH: No doubt any core participant can come back as
18 well.
19 SIR JOHN SAUNDERS: Of course.
20 Are you happy to carry on until around 1 o'clock?
21 A. Of course.
22 Questions from MR SMITH
23 MR SMITH: I don't know whether this can prompt you to try
24 to recall the situation when you were at North West Fire
25 Control, but if a crew manager is taken off an

116

1 appliance, is it your recollection that the standing
 2 instruction is that that appliance cannot operate
 3 without a crew manager?
 4 A. Yes, we would take the appliance off if there was no
 5 officer in charge on -- yes.
 6 Q. So in the context of what you were just being asked by
 7 Mr Cooper --
 8 A. I'm not sure whether he was a crew manager that was
 9 going to the arena, I can't recall that. If a fire
 10 engine was going off or something was wrong with
 11 a member of the crew, we would speak directly to the
 12 duty group manager. That was his role being the duty
 13 group manager. Because Mr Nankivell was doing what
 14 he was doing, I went to the next nearest station
 15 manager, Mr Topping, who I knew would be helpful.
 16 Q. The next point is that there has to be a minimum number
 17 of crew for an appliance; is that correct?
 18 A. Yes.
 19 Q. So in either instance, crew manager or minimum number of
 20 crew for the appliance, if one of them goes off, that
 21 appliance cannot run, can it, until that crew member has
 22 been replaced?
 23 A. I would not know definitely for sure. You would need to
 24 speak to an officer of exactly how they would manage
 25 that.

117

1 Q. Could I take you to your training records, please. The
 2 relevant document is {INQ040640/2}, 2 April 2015. It is
 3 recorded that you underwent JESIP training on that date
 4 at a training course.
 5 A. Right.
 6 Q. In a moment I'm going to show you the sign-off sheet
 7 because you were asked by Mr Cooper about whether this
 8 is evidenced. But before we do that, so as not to shift
 9 between documents, could I also take you down the page,
 10 please, the same page, to 30 January 2016. Does that
 11 show that you underwent ad hoc training in relation to
 12 JESIP and METHANE?
 13 (Pause)
 14 We've got 30 January 2016 towards the bottom of
 15 page 2.
 16 SIR JOHN SAUNDERS: That's actually recorded in your
 17 statement.
 18 A. Yes. Is that what's on the screen or?
 19 SIR JOHN SAUNDERS: 30 January.
 20 MR SMITH: Can you see it all right?
 21 A. Yes, JESIP and METHANE, 30 January, yes.
 22 Q. Does that help you to remember at all?
 23 A. Yes. I can't remember the actual training -- recall the
 24 actual training from 2016.
 25 Q. Then, as I said we would, if we go to {INQ001012/1} --

118

1 SIR JOHN SAUNDERS: Is that the last training on the record
 2 to do with JESIP and METHANE before the incident?
 3 MR SMITH: It is, sir, yes.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR SMITH: Yes. {INQ001012/1}. We've got the sign-off
 6 sheet here. It goes down in alphabetical order.
 7 Joanne Haslam, ticked for 2 April. That's the sign-off
 8 sheet for that 2 April JESIP training. Have you any
 9 reason to disagree with any of that?
 10 A. No, no. 2 April, yes, 2015.
 11 Q. Just dealing with some minor issues that you've been
 12 asked about, by the chairman first of all. If we go to
 13 the explosion action plan, {INQ004404/1} --
 14 SIR JOHN SAUNDERS: I think it was you calling it a minor
 15 issue that I was asking about has caused some hilarity.
 16 MR SMITH: With great respect to you, sir, I was trying to
 17 point out that it was a small point.
 18 SIR JOHN SAUNDERS: You have provided entertainment for
 19 Mr Cooper.
 20 MR SMITH: If course. I try to sometimes.
 21 SIR JOHN SAUNDERS: I think I've started something unwise.
 22 I think we'll stop that. Thank you very much.
 23 MR SMITH: You were asked the question about whether the
 24 action plan requires you to advise police and ambulance.
 25 I think we can see there that it does.

119

1 A. Mm.
 2 Q. Is that correct? Does that help you to remember?
 3 A. Yes.
 4 Q. And then we perhaps needn't turn to this, but the "Bomb
 5 -- general" action plan also requires advice to
 6 ambulance and police if the call hasn't originated from
 7 the police?
 8 A. From them, yes.
 9 Q. As far as communications are concerned, I would like to
 10 take you, if I may, in the sequence of communications,
 11 which is a document prepared by North West Fire Control,
 12 to {INQ041473/21}.
 13 This is the 22.52 call that you made to Duty Group
 14 Manager Dean Nankivell. Then if we move on, we've got
 15 the context there, the bottom of page 21, into page 22,
 16 please, Mr Lopez {INQ041473/22}.
 17 I'd just like you to look, please, at the
 18 information you were passing to Mr Nankivell at that
 19 time. You did say:
 20 "We've been trying to pass information back to the
 21 ambulance of what we've got."
 22 Then you ran through a number of items; is that
 23 correct?
 24 A. Yes.
 25 Q. "The ambulance have got that it was a bomb first of all.

120

1 Then he said it had exploded, which he was getting
 2 through at the same time from the police. Reports of
 3 60 casualties. There's an active shooter but he can't
 4 confirm that. The police are looking for a secondary
 5 device."
 6 And then you made reference to the information
 7 concerning shrapnel. Did you believe at that time that
 8 you had provided Mr Nankivell with all the information
 9 that he required to manage the incident from his point
 10 of view as duty group manager?
 11 A. Yes, I believed that I'd told him everything that
 12 I could see on the log, yes.
 13 SIR JOHN SAUNDERS: I'm sorry, just looking at the top, you
 14 were in the process of telling him where the rendezvous
 15 point was?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: That's the car park of the cathedral,
 18 presumably you're talking about, that's on the log?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Then he cut you off and, perhaps
 21 perfectly understandably, you didn't go back to it.
 22 A. I didn't realise that until I'd seen --
 23 SIR JOHN SAUNDERS: You thought you had told him that?
 24 A. I just didn't realise I'd been cut off. I thought all
 25 the information --

121

1 SIR JOHN SAUNDERS: Had gone?
 2 A. Yes, I'm sorry, yes.
 3 SIR JOHN SAUNDERS: Really, you have no need to apologise.
 4 MR SMITH: Then if we just move on to the bottom of this,
 5 where you made reference to the Bronze commander,
 6 paramedic Bronze commander, towards the end of the
 7 message.
 8 SIR JOHN SAUNDERS: Are we over the page?
 9 MR SMITH: I'm so sorry, it's the following page, sir,
 10 {INQ041473/23}.
 11 Had that information suddenly appeared on the log
 12 because we do --
 13 A. Yes.
 14 Q. If we wanted to do the exercise we would see that that
 15 information came on to the log at the same time.
 16 A. Yes, it did come on the log, I was flicking through
 17 trying to look what was on to make sure he had the
 18 information, yes.
 19 Q. Can you give the inquiry just a little idea of just what
 20 it's like to manage an incident like this with the
 21 incident log being constantly updated, you having to
 22 manage on the telephone with somebody who's giving you
 23 information and also the importance of other people in
 24 the room who are managing the situation as team leaders
 25 and their involvement? What's it like?

122

1 A. For this incident, it's hard because you're trying to
 2 look through the log, other people are putting things on
 3 the log, it's flicking about while you're trying to read
 4 it. You put the information on straightaway as it's
 5 coming through, but you still have to think about
 6 what -- the wording, the way you're putting it on is
 7 going to come across as you type it while you are
 8 listening. But obviously we are trained to listen to
 9 the calls and type as we are doing it. But yeah, you've
 10 got this incident, you've had another incident, and then
 11 by the end of the night we had the command support room
 12 incident, and then we had another incident for, I think
 13 it was, the train station.
 14 SIR JOHN SAUNDERS: So you've got all these incident logs?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: You can only look at one at a time
 17 presumably, can you?
 18 A. Yes. We know through our experience and the initial
 19 training, obviously, that you can flick about through
 20 the jobs and you can have a look and you can do that.
 21 MR SMITH: And you can switch between incidents, can't you?
 22 A. You can look between incidents, yes.
 23 Q. The point I'm coming to is that you've passed comment in
 24 answer to Mr Cooper in relation to the management of the
 25 situation by the team leaders.

123

1 A. Mm.
 2 Q. Despite the pressures that the control room was under
 3 and the personal pressure placed on you, do you consider
 4 that North West Fire Control managed the incident that
 5 night in a calm and professional manner?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Did you feel calm?
 8 A. While the job was ongoing, we were obviously --
 9 SIR JOHN SAUNDERS: Concerned?
 10 A. Yes. But you do sort of go into that mode of: right,
 11 getting on with the job. It was only as time went on
 12 that we started saying to each other, are you okay, and
 13 hearing different stories of different things. And that
 14 was...
 15 SIR JOHN SAUNDERS: Difficult?
 16 A. Very.
 17 MR SMITH: So bearing in mind the content of your telephone
 18 call to the duty group manager, would it ever have been
 19 appropriate in the light of that information for you to
 20 say in any call that you made to a Fire and Rescue
 21 Service officer, "I can tell you there is no
 22 active shooter"?
 23 A. I would not have said there is no active shooter. Not
 24 off the information I was getting, no.
 25 Q. Because in effect, are you in a position to determine

124

1 the accuracy of what you are being told?
 2 A. No. That's why on the call to the ambulance, when he
 3 said, "I can't confirm that" — to me, if you can't
 4 confirm there's an active shooter or British Transport
 5 Police have told him there's not an active shooter, to
 6 me that's not... I would not make that decision. I was
 7 just going off ... I would have just included that as
 8 I did if that makes sense.
 9 Q. You made reference, didn't you, to the fact that an
 10 aspect of this couldn't be confirmed when you spoke to
 11 Mr Nankivell?
 12 A. Yes, I did, yes.
 13 Q. So far as situational awareness is concerned, Mr Horwell
 14 asked you about that on behalf of Greater Manchester
 15 Police. Were you aware that there were avenues of
 16 communication between Fire and Rescue Service officers
 17 that North West Fire Control would not have access to?
 18 A. No, I wasn't aware of that.
 19 Q. That's not something you —
 20 A. No, that's not something I would have been aware of.
 21 Q. Finally this, please. I would like to take you to the
 22 incident log 9074, just to clarify one matter.
 23 {INQ008376/5}.
 24 To answer the question about the other incident log
 25 that was cancelled that you created, if we go to

125

1 22.46.04, the time, and see an entry under your code
 2 50032:
 3 "Cross-referenced to incident 9075."
 4 And just run down that, we can see that that
 5 incident 9075 was cancelled at the end of that entry.
 6 A. Cancelled?
 7 Q. We see just two lines before the end of that entry:
 8 "Duplicate incident data is ... Incident [9075]
 9 cancelled."
 10 A. Yes, because it was duplicated.
 11 Q. Would that be the incident that was cancelled?
 12 A. It wouldn't be cancelled, that's incorrect, that's not
 13 the right terminology, it was duplicated. So I got the
 14 call from my ambulance, filled in my information, then
 15 I would have duplicated it to the main one that we were
 16 working off.
 17 Q. Following on from there, incident 9075 would never be
 18 worked with after that? It would be —
 19 A. Unless it was re-opened for some reason, but no, and
 20 then it says duplicated, and it was duplicated to — and
 21 that's what we would do. If we got other calls coming
 22 in that was the same, we would duplicate it to the main
 23 one which we were working off. You can still see them
 24 and you can still go in and look at the duplicated in
 25 the system, you can do that.

126

1 Q. But all the work would be going 9074, would it?
 2 A. Yes, it would be going on that log and then the log
 3 connected to the Philips Park, that would be going on
 4 that log.
 5 MR SMITH: Thank you very much.
 6 SIR JOHN SAUNDERS: Thank you.
 7 Is that it, apart from this one matter?
 8 MR DE LA POER: Yes and I was just going to let the core
 9 participants know which document it was which is being
 10 printed out and given to Ms Haslam over lunch. It's
 11 {INQ001177/1}.
 12 SIR JOHN SAUNDERS: Right. I'm sorry to ask you to come
 13 back after lunch. I am sure you would much prefer to be
 14 finished and the last thing I want for you to do is not
 15 have a proper opportunity to look at it.
 16 A. Okay, thank you.
 17 SIR JOHN SAUNDERS: So I think it's important that we do
 18 that.
 19 2 o'clock. Thank you very much.
 20 (1.02 pm)
 21 (The lunch adjournment)
 22 (2.00 pm)
 23 (Delay in proceedings)
 24 (2.07 pm)
 25 MR DE LA POER: Thank you very much indeed. And thank you,

127

1 Ms Haslam, for rejoining us.
 2 The document I would like your assistance with,
 3 please, is {INQ001177/1}. We're not going to play the
 4 audio of this, following the pattern that Mr Greaney QC
 5 adopted with Station Manager Berry, but I know that
 6 you've had an opportunity to refresh your memory from
 7 this call.
 8 Let's set it in its context. You had a few moments
 9 before this call spoken to Group Manager Dean Nankivell;
 10 is that right?
 11 A. That's right, yes.
 12 Q. I think at 22.54 you had provided him with the relevant
 13 information from the log; is that right?
 14 A. Yes.
 15 Q. So this call occurs hot on the heels of that, but before
 16 you speak to him again just after 11.00; is that right?
 17 A. Yes.
 18 Q. So this is a call between those two calls with Group
 19 Manager Nankivell and it's with Station Manager Berry.
 20 We can see that it begins with:
 21 "Hi Control."
 22 So Mr Berry appears to be answering your call;
 23 is that right?
 24 A. Yes.
 25 Q. "Just to let you know I've informed the duty group

128

1 manager, Dean Nankivell."
 2 That fits absolutely with what you'd done a moment
 3 or two before. You raise with Mr Berry, don't you, what
 4 Mr Nankivell had said about the TRU?
 5 A. Yes, that's correct.
 6 Q. Is it right that, in your mind, there was a degree of
 7 uncertainty about whether or not the TRU needed to be
 8 mobilised to Philips Park?
 9 A. I knew that Mr Berry had been informed as the duty NILO
 10 and I just wanted him to know what Dean Nankivell had
 11 asked me to do, just to confirm with Mr Berry.
 12 Q. He says:
 13 "Yes, if it's available."
 14 And you indicate where the nearest one is. And he
 15 indicates what he has already specified that he wants by
 16 way of an MTFA capability.
 17 He makes it clear that:
 18 "Muster rendezvous and Philips Park."
 19 Is what he's recorded as saying at 22.57.37. And he
 20 says after you've said:
 21 "Oh right. So you've already asked them to proceed
 22 to the rendezvous point have you?"
 23 And he says:
 24 "I should have, yes. So can you just confirm that
 25 that's happened?"

129

1 And then you enter into the discussion about three
 2 NILOs, which we saw you pick up with Group Manager
 3 Nankivell subsequently, is that right --
 4 A. Yes, that's correct.
 5 Q. -- as to whether there were three available?
 6 That, briefly, then is a review of the contents of
 7 what is a relatively short call at just before
 8 11 o'clock. What I want to ask you about it is this:
 9 a couple of minutes earlier, you had provided what some
 10 may describe as a comprehensive review of the content of
 11 the log to give to Mr Nankivell.
 12 You don't provide Station Manager Berry with any
 13 information from the log, do you agree?
 14 A. Yes, I do agree, yes.
 15 Q. Was it or was it not your responsibility in this call to
 16 provide Station Manager Berry with an update from the
 17 log?
 18 A. I was not aware at the time that he didn't know that
 19 information. The Bronze commander -- I was not aware of
 20 that, that he didn't know, or else I would have informed
 21 him.
 22 Q. It's certainly right to say that he doesn't ask you for
 23 an update, does he?
 24 A. No, he doesn't ask. I thought he had got that
 25 information, he was aware of that information at the

130

1 time.
 2 Q. And on what basis did you think that he had all that
 3 information that just moments ago you'd provided to
 4 Mr Nankivell?
 5 A. I was telling Mr Nankivell for the first time, so as
 6 a duty group manager, so I was informing him everything.
 7 I just was not aware -- I thought Mr Berry knew about
 8 that additional information, I wasn't aware that he
 9 didn't know.
 10 Q. Would it be correct to describe you as having an
 11 assumption that he knew?
 12 A. Yes, I thought -- because it was on the log and somebody
 13 had took that information, I thought he was aware.
 14 I should have -- looking back, I should have checked
 15 with him but I thought he was aware of the information.
 16 Q. Considering all the training and experience that you had
 17 had up to the point of this call, would any of that have
 18 been supportive of you telling him that? In other
 19 words, had you been told before this call: when you
 20 speak to somebody in the NILO position you need
 21 proactively to be giving them an update whether or not
 22 they ask for it?
 23 A. Yes, I would have told him. I would have gone through
 24 the log to tell him. If I had known he hadn't got it or
 25 he needed to be kept up to date, I would have told him

131

1 the information.
 2 Q. It was a terrible question by me. I'm just going try
 3 again. Not your fault at all.
 4 Had you been trained before 22 May 2017 proactively
 5 to provide an update to people in Mr Berry's position
 6 rather than waiting for them to ask for it?
 7 A. Yes. If you take the message, you take the information.
 8 You either pass it on or you tell somebody else. I was
 9 not aware that he did not know that information. I told
 10 Mr Nankivell because it's the first time I'd spoken to
 11 him and I knew he did not know of information because
 12 I was informing him so I was just not aware that
 13 Mr Berry did not know.
 14 Q. Had your training up to that point been to the effect:
 15 don't assume, tell everybody that you speak to what the
 16 latest information is, or had your training not been --
 17 A. Yes. If I took a message, I would pass that message on.
 18 If I couldn't pass that message on, I would ask somebody
 19 to pass that message on because I wasn't able to do it.
 20 I was not aware that he hadn't got that information.
 21 SIR JOHN SAUNDERS: Right, it's a problem. You don't know
 22 who else Mr Berry may have spoken to?
 23 A. No.
 24 SIR JOHN SAUNDERS: He may have spoken to the FDO, who had
 25 perhaps have more information than you had. So you

132

1 don't know who's told who what?
 2 A. Yes, I wasn't -- yes.
 3 SIR JOHN SAUNDERS: It's equally important that you pass on
 4 all the information that you have to relevant people?
 5 A. Of course.
 6 SIR JOHN SAUNDERS: So does your log record -- do you record
 7 in the log if you give people information what you have
 8 told them and when?
 9 A. It should be on the log, yes. You should put on the
 10 log -- yes, "Informed of the above" or "Informed of",
 11 et cetera.
 12 SIR JOHN SAUNDERS: So when you gave Mr Nankivell his
 13 information, did you record that on the log, what you'd
 14 recorded, what you'd told him?
 15 A. I ... I ... I would think so. I'd have to look at --
 16 SIR JOHN SAUNDERS: You'd hope so?
 17 A. I would. It would be my procedure to make sure he was
 18 informed of everything, yes.
 19 SIR JOHN SAUNDERS: So on the running log, there should be
 20 an indication of who has been told what?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: So if you looked at the log when you
 23 were on the phone to Berry or before you rang him, you
 24 would have been able to see who from NWFC had told him
 25 what?

133

1 A. I would have done, yes.
 2 SIR JOHN SAUNDERS: Is that something you ought to do?
 3 A. Um...
 4 SIR JOHN SAUNDERS: Again we're looking at procedures to try
 5 and --
 6 A. The procedure would be if I took a message off somebody,
 7 I would be the one to inform them. If I couldn't,
 8 I would make sure somebody else knew and would inform
 9 them. So perhaps I should have looked on that log and
 10 said to Mr Berry, have you got --
 11 SIR JOHN SAUNDERS: But is it just information you've got or
 12 is it the information that is on the log generally?
 13 A. I would have passed information I had got, but in this
 14 instance with Mr Nankivell, I did go through the log to
 15 check that he had got everything because it was the
 16 first time I'd spoken to him.
 17 SIR JOHN SAUNDERS: Okay. But you didn't do that in
 18 Mr Berry's case?
 19 A. No, I rang Mr Berry with the TRU because I didn't want
 20 it crossing over what he had asked for.
 21 SIR JOHN SAUNDERS: The procedure which you have been
 22 taught, would that procedure require you to look through
 23 the log before speaking to Mr Berry and give him an
 24 update on everything, or was that not clear to you or
 25 what?

134

1 A. In an incident like this because there was so much on
 2 the log, so much going on, I didn't know who had
 3 informed him, who was informing him. So I wouldn't
 4 really have looked through the log to see. But if I'd
 5 known he hadn't got that information, then I would have
 6 obviously gone through the log and checked what else
 7 he hadn't got, but I wasn't aware, so I didn't go
 8 through the log to check, I just wanted to get the
 9 appliance mobilised, if that was the case.
 10 SIR JOHN SAUNDERS: I do understand, but to an extent you
 11 can rely on him to ask you, but actually he won't know
 12 what he doesn't know, will he?
 13 A. Of course, yes, sir.
 14 SIR JOHN SAUNDERS: So some procedure has to be there, which
 15 it doesn't look like there was, to make sure the
 16 critical people, of which Mr Berry was one, are kept
 17 informed by NWFC of everything they know when they know
 18 it?
 19 A. Yes. You would shout up to say, "I've put some
 20 information on the log, can somebody make sure
 21 such--and--such a body knows", but I didn't hear that and
 22 I wasn't aware he didn't know that so...
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR DE LA POER: But in a situation as substantial and
 25 quickly evolving as this, it is inevitable that everyone

135

1 in the control room is going to be busy?
 2 A. Yes.
 3 Q. Would you agree?
 4 A. Yes.
 5 Q. And so the usual expectations that you might have about
 6 being able to discuss it with your colleagues and
 7 checking, they just don't apply in this sort of
 8 situation; do you agree?
 9 A. It's hard to do that, yes.
 10 Q. As the chair has identified, and do you agree, what
 11 seems to be missing is a procedure at that time which
 12 catered for circumstances in which it was extremely
 13 busy, that ensured that, at every single opportunity,
 14 control room operatives gave a latest update to the key
 15 people at GMFRS?
 16 A. Yes. I should have gone through -- we should have gone
 17 through and checked whether he had all that information,
 18 but I thought he had got the information.
 19 Q. What I just want to be clear about, you say, "We should
 20 have gone through." Had you been trained in that
 21 procedure as at 22 May 2017?
 22 A. I was trained to take the message, to inform of the
 23 message, or to pass that message on to somebody to
 24 inform them. In general incidents, obviously the logs
 25 are not this long, so you can go through and say, "Have

136

1 you got this, did you know -- yeah you know everything,
 2 right that's great". In this case it was harder to look
 3 through the logs with all the information and duplicate
 4 calls that were going on the log.
 5 SIR JOHN SAUNDERS: Even if it's just actually saying to
 6 him, "Do you want an update from" --
 7 A. Yes.
 8 SIR JOHN SAUNDERS: -- would be a way of dealing with it?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Has the system changed to cater for what
 11 looks like may have gone wrong on the night?
 12 A. Um... We would definitely make sure that all the
 13 information is passed.
 14 SIR JOHN SAUNDERS: Why? Just because you've learned your
 15 lesson or because someone has actually put a procedure
 16 in place?
 17 A. We did do that before. I know it sounds like it's an
 18 excuse but it was difficult to --
 19 SIR JOHN SAUNDERS: I understand. I really understand the
 20 difficulties on the night, but in a way, doesn't any
 21 procedure need to cater for the difficulties --
 22 A. Yes, of course.
 23 SIR JOHN SAUNDERS: And it didn't, did it?
 24 A. We should have said to him, "Have you got all the
 25 information, have you got everything?", and then --

137

1 SIR JOHN SAUNDERS: I'm not seeking to blame you, actually,
 2 because I'm seeking to say the procedures didn't appear
 3 to provide for it when it should have done and what
 4 I would like to know is what has been done about it now.
 5 A. We would go through, as individuals, now -- the way of
 6 working is we would make sure all the information is
 7 passed on. I couldn't say anything has been changed as
 8 in a procedure.
 9 SIR JOHN SAUNDERS: So it means those who were there on
 10 22 May 2017, and who therefore know what has gone wrong,
 11 will be aware of what's gone wrong? Maybe I'm concerned
 12 about the future and people in the future, whether there
 13 are procedures set down for them to know what to do
 14 because of the problems of 22 May.
 15 A. I mean, we... When new recruits come in, new operators,
 16 they are informed to make sure you inform everybody of
 17 every bit of information. For this one, I did think he
 18 knew about the information, so that's --
 19 SIR JOHN SAUNDERS: I understand.
 20 A. I shouldn't have just thought, unfortunately, but I did
 21 think he knew the information.
 22 MR DE LA POER: Sir, there are no further questions I want
 23 to ask Ms Haslam. Can I turn to GMCA? Thank you very
 24 much, Mr Warnock.
 25 SIR JOHN SAUNDERS: Can we just ask people to volunteer if

138

1 they want to ask any questions?
 2 Further questions from MR SMITH
 3 MR SMITH: Sir, I would like to ask some questions to assist
 4 you if I may.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR SMITH: I'll ask the witness if I may, even if she
 7 doesn't know the answer, to take you, sir, to the point
 8 that you were raising just a moment ago.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR SMITH: I cannot ask for the document to be put on the
 11 screen because it does contain operationally sensitive
 12 material relating to Airwave.
 13 SIR JOHN SAUNDERS: Okay.
 14 MR SMITH: But the document reference for everybody is
 15 {INQ000932/1}.
 16 The effective date of this, of its implementation,
 17 is February 2018.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR SMITH: This document was devised by the head of North
 20 West Fire Control following discussions at the ops group
 21 meetings after the attack in order to try to avoid some
 22 of the complications and problems that are just being
 23 referred to.
 24 I don't know whether you recall that a major
 25 incident action plan was then prepared by North West

139

1 Fire Control after the attack, which, as I've said, came
 2 into force in February 2018, as an instruction to the
 3 control room. Do you remember that?
 4 A. I know that some action plans did change. I can't
 5 recall the exact ones, but due to the incident I know
 6 some did change, yes.
 7 Q. This wasn't a Fire and Rescue Service action plan, it's
 8 one that was devised by North West Fire Control to try
 9 to improve multi-agency communication in particular --
 10 A. Yes.
 11 Q. -- in the light of the lessons learned from the
 12 incident. So it may be that you have difficulty
 13 remembering it, which is perfectly understandable.
 14 A. Yes.
 15 Q. But the chairman now knows the reference --
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR SMITH: -- in question.
 18 Could I take you next, if I may, to incident log
 19 9074 in the context of your discussions with Mr Berry
 20 which you were just being asked about by Mr de la Poer.
 21 If we look at {INQ008376/7}, we'll see against the
 22 time, 22.54.07, that the control room operator
 23 Vanessa Ennis, 50091, has put an entry on the log:
 24 "GS098 [which is Station Manager Berry] by phone.
 25 NILO three and MTS capability to RVP at Philips Park."

140

1 Then on the page before that, {INQ008376/6}, we can
2 also find that at 22.49.02, Mr Berry as GS098 was
3 mobilised.

4 My question is: would that information therefore
5 have been available to you when you spoke to Mr Berry
6 subsequently a few minutes later in the course of that
7 call so that you could read it from the log, those
8 entries?

9 A. Um... So looking at the log, I didn't know that he had
10 asked -- reading the transcript, sorry, I didn't realise
11 that he had asked for what he'd asked for. I think our
12 calls had sort of overlapped. He'd come on, Mr Berry,
13 and asked for three NILOs and then I was speaking to
14 Mr Nankivell -- and then rang Mr Nankivell, but he
15 wanted -- I rang Mr Berry to let him know. Is that what
16 you mean, sorry?

17 Q. What I mean is that there's information on the log which
18 explains that Station Manager Berry's been mobilised --

19 A. That's correct.

20 Q. -- and there's also been a telephone call involving
21 Vanessa Ennis, which has also provided information which
22 has gone on to the log.

23 A. Yes.

24 Q. So in answer to Mr de la Poer, when you were dealing
25 with the telephone conversation that you had with

141

1 Mr Berry, at that time did you look at the log to see
2 what information was on the log relating to Mr Berry?

3 A. No. I didn't look at the log, only because -- obviously
4 this transcript is the way I've listened to it and
5 I remember it. The way I've said, "Oh right, you've
6 asked for three NILOs", I didn't know it was on the log,
7 I wasn't aware that he had asked for that. I must have
8 been speaking to Mr Nankivell and going through the log
9 at that time.

10 Q. So if we look now at the sequence of communications,
11 {INQ041473/28}, on the right-hand side in the right-hand
12 column, there's a list, which goes over to
13 {INQ041473/29}, of information that was then on the log
14 but was not passed to Station Manager Berry by you
15 at the time of that call.

16 A. Mm.

17 Q. Do you think that --

18 SIR JOHN SAUNDERS: Can we go over the page to see the rest
19 of it to remind me?

20 Thank you.

21 MR SMITH: Having seen that, and bearing in mind the
22 procedures that you were used to following at that time,
23 do you consider that you were in error in not giving
24 that information to Station Manager Berry or is there
25 another reason why you didn't pass it on?

142

1 A. No, I didn't -- I... I admit I made an error. I should
2 have looked through the log. I shouldn't have just
3 presumed he'd just got that information that I had just
4 passes to Mr Nankivell, which is what I did. I thought
5 he had got that information and obviously he hadn't. So
6 I should have checked with him. But in that
7 conversation, I was just trying to find out what he had
8 asked for and to get the TRU there. So I apologise,
9 I should have asked, I should have checked he had got
10 that information.

11 Q. The assumption you made was what?

12 A. I thought he had got it. I thought the information had
13 been passed on to him. I wasn't aware he didn't know
14 that information.

15 MR SMITH: Thank you, sir.

16 SIR JOHN SAUNDERS: I'm very grateful, I know it has been
17 a distressing experience for you to come to give
18 evidence. We do need to understand these things and we
19 need people like you to give evidence in order to do
20 that.

21 A. I'm sorry for getting upset.

22 SIR JOHN SAUNDERS: I don't think you should be sorry for
23 getting upset.

24 MR DE LA POER: Sir, if I can ask you to rise for 2 minutes,
25 we'll make the necessary adjustments and then Mr Casey

143

1 is ready to go.

2 (2.29 pm)

(A short break)

4 (2.33 pm)

5 MR DE LA POER: Sir, we are joined by Mr Casey. May he be
6 sworn, please:

7 MR DEAN CASEY (affirmed)

8 Questions from MR DE LA POER

9 MR DE LA POER: Can you state your full name, please?

10 A. Dean James Casey.

11 Q. Mr Casey, we'll start with your involvement with North
12 West Fire Control, please. Did you join North West Fire
13 Control in August of 2016?

14 A. I did.

15 Q. Were you deemed competent to operate independently as
16 a control room operator about 8 months before the
17 attack, so in the autumn of 2016?

18 A. I was deemed competent from the training, but then we
19 had three phase books that we needed to do to be classed
20 as a fully competent control room operator.

21 Q. Did you achieve that --

22 A. I was only on phase book 1.

23 Q. You were only on phase book 1?

24 A. Yes, because you do it over a 12-month period.

25 Q. Right. So you in fact had not been fully qualified

144

1 at the time of the arena incident?
 2 A. No.
 3 Q. Despite the fact that you were not fully qualified, were
 4 you able to operate without supervision?
 5 A. I was, yes. I would ask people for assistance if
 6 I needed, but I was able to take the calls.
 7 Q. I am trying to deal with your training. As at May of
 8 2017, had you received training in JESIP?
 9 A. That was covered in the 4-week initial training
 10 programme that we was on.
 11 Q. So that was in August of 2016?
 12 A. Yes.
 13 Q. Had you received training in a marauding terrorist
 14 firearms attack?
 15 A. Again, that would have been in the 4 weeks of initial
 16 training.
 17 Q. You were involved in a number of significant calls on
 18 the night of 22 May, we're going to look together at
 19 three of them. Do you regard yourself as having been
 20 adequately trained as at May 2017 in order to be able to
 21 deal effectively and competently with those telephone
 22 calls?
 23 A. Yes and no. I do think that --
 24 SIR JOHN SAUNDERS: That's a good answer.
 25 A. Sorry, but...

145

1 SIR JOHN SAUNDERS: Do the yes bit and then the no bit.
 2 A. I did answer the calls and I was able to answer the
 3 calls. But no, I think the training could have had
 4 a lot more involvement in the control room for me to get
 5 more experience and confidence.
 6 MR DE LA POER: Can you just expand on that?
 7 A. Because in the 4 weeks' training, you're classroom
 8 based, so it's not real life. You are doing it on the
 9 system but it's not real life. You go in and shadow but
 10 I think it would have been more beneficial if I was
 11 in the control room doing a lot more training.
 12 Q. Let's just understand a little bit more about your
 13 progress through North West Fire Control. So you
 14 qualified in order to be able to join the call centre
 15 after 4 weeks?
 16 A. Yes, and then you do 2 weeks of shadowing.
 17 Q. Those 2 weeks of shadowing, is that where you sit and
 18 take the calls or is someone else taking the calls and
 19 you're observing?
 20 A. No, we take the calls and we have a competent member of
 21 staff listening in and then because they can listen to
 22 your calls at the same time and talk you through what to
 23 do.
 24 Q. And at the end of that 2 weeks of shadowing, are you
 25 then effectively on your own to handle the calls with

146

1 the option of asking for help if you need it?
 2 A. Yes.
 3 Q. But nobody is listening to your calls or listening to
 4 you to ensure that you are doing it correctly?
 5 A. The team leaders would have been listening.
 6 Q. In every call that you --
 7 A. Not every call, I don't think, no. I couldn't tell you
 8 which ones they listened in on.
 9 Q. You describe three phases which you said you were still
 10 in the first phase. At the end of that first phase what
 11 level of qualification or training standard would
 12 you have achieved?
 13 A. I would have just completed my phase 1 booklet and then
 14 moved on to phase 2.
 15 Q. What is contained within the booklets? Are they
 16 a series of competencies?
 17 A. It's different scenarios, questions. It's basically
 18 a research book, you research different areas for all
 19 different of the four FRSs we covered.
 20 Q. Is that self-guided? Do you have to do that research
 21 yourself?
 22 A. Yes, you do, and then your team leader -- you have your
 23 designated team leader -- they check it and mark it,
 24 technically, for you.
 25 Q. Once you completed that you would do phase 2?

147

1 A. Yes.
 2 Q. Is that more of the same or is it different?
 3 A. I think so. I didn't move on -- I finished with North
 4 West Fire Control by the time of phase 2.
 5 Q. Let's have a look at the calls that you dealt with,
 6 Mr Casey, and we will bear in mind your level of
 7 experience and your comments about the training, both
 8 yes, as you put it, and no.
 9 On the night of 22 May 2017, you were on duty at
 10 North West Fire Control as a control room operative.
 11 Were you aware of David Ellis receiving a significant
 12 call?
 13 A. Yes. I was positioned next to David that evening.
 14 I don't know what I was doing at the time David took
 15 a call, but you do tend to hear a few of the control
 16 room operators talking.
 17 Q. Do you have a recollection of there coming a point where
 18 you noticed that he was engaged in something
 19 significant?
 20 A. Yes. I think it was more the address, because I was
 21 from around that area locally, living, growing up, so
 22 you tend to, when you pick something, when you hear
 23 something, you listen in. So... I kind of listened
 24 that way and then I did, when I heard him saying a lot
 25 more listening to his call, but only for a couple of

148

1 seconds because either an admin line or a 999 line came
2 through.
3 Q. There are you describing a facility where you can hear
4 both sides of the conversation by effectively listening
5 in on your headset?
6 A. Yes.
7 Q. And you did that for part of his call, did you?
8 A. Yes, it would have -- it was only seconds, up to
9 a minute, because other calls were coming in.
10 Q. We know a call came in that you answered, a 999 call, at
11 22.41.
12 A. Yes.
13 Q. As far as -- was that the call that interrupted you
14 listening in to Mr Ellis?
15 A. I don't recall, sorry.
16 Q. Were you aware of Lisa Owen, one of the team leaders,
17 taking an interest in what Mr Ellis was doing?
18 A. Yes, Lisa, when David got her attention, and Lisa came
19 over to our pod, she did listen through my headset.
20 Q. Again, did that impress upon you that this might be
21 a significant matter given that the team leader had come
22 over and listened in?
23 A. Not really because they did come over and listen in to
24 a few calls, just to get the idea of what was going on.
25 It was when she gave it back and then went to get the

149

1 other team leader, Michelle.
2 Q. So you were aware of Lisa Owen going to find
3 Michelle Gregson?
4 A. Yes, because it was right behind where I was sat.
5 Q. And did you overhear any of the conversation between the
6 two of them?
7 A. No.
8 Q. We know that by the time you started on the call with
9 the member of the public who called that there was
10 a call which had just started between Michelle Gregson
11 and the NILO. Were you aware of that --
12 A. No.
13 Q. -- at the time it was happening?
14 A. No, no.
15 Q. Had you looked at the log that Mr Ellis had created by
16 the time you took the call from the member of the
17 public?
18 A. I'm unsure, I'd have to look at the call log, sorry.
19 Q. We're going to have a look at the call that you
20 received. We are not, Mr Lopez, going to play the
21 audio. We are just going to look at the transcript as
22 this is a telephone call made from the NCP car park
23 at the arena, just 10 minutes after the explosion. But
24 we will look at the transcript, please, just to remind
25 ourselves. I think you've had an opportunity to refresh

150

1 from your memory this?
2 A. Yes.
3 Q. It's {INQ001165/1}.
4 If we could just briefly consider it, there are some
5 distressing details in it which I am not going to read
6 out. Is it fair to summarise that the caller was
7 describing people as having received very serious
8 injuries?
9 A. Yes.
10 Q. And used the term "shrapnel"?
11 A. Yes.
12 Q. The part of this that I want to ask you about is right
13 at the bottom of the first page where the caller at the
14 time that's ascribed 22.42.25 says:
15 "It sounded like a big blast and looking at the
16 people, I would suggest it's a dirty bomb of some
17 description."
18 Thank you, we can take that down now.
19 When the caller said that to you, Mr Casey, did you
20 know what a dirty bomb was?
21 A. No.
22 Q. Given that you didn't know what a dirty bomb was, did it
23 occur to you to ask the member of the public what they
24 meant by that term?
25 A. No, because he'd given me information of people that was

151

1 injured, the bomb technically had already gone off, so
2 my main concern, I thought, was to get the details of
3 the casualties, so one of us in Control could pass that
4 on to NWAS.
5 Q. Are you aware now that a dirty bomb, as it's used
6 generally, can pose a very grave threat to responders
7 amongst a number of categories of people?
8 A. I am now, yes.
9 Q. You didn't ask what it was. We are going to have a look
10 at the log entry that you created just so that we can
11 see what you put about it. But was anybody aware of you
12 taking this call from the member of the public?
13 A. Yes, I pressed my help button and put my hand up for
14 a team leader to come over or listen in from the top
15 desk.
16 Q. Did anybody come over?
17 A. Michelle Gregson.
18 Q. Did she listen in on the call?
19 A. Yes.
20 Q. And about -- it's only a couple of minutes of call.
21 About how much of the call did she listen into, bearing
22 in mind that having taken the call, you'd have to
23 activate your help button and, as you have described,
24 she walked over --
25 A. She only listened to the last part of the call by the

152

1 time she had her headset on and was listening. It was
 2 only a couple of seconds. It weren't ...
 3 Q. The reference to dirty bomb occurs about halfway through
 4 the call. Are you able to say with any confidence
 5 whether she was or she was not listening at the point
 6 that the caller said that?
 7 A. I'm unsure, sorry.
 8 Q. When you took this call and saw the descriptions, did
 9 you connect it in your mind to the call that Mr Ellis
 10 had received? Did you realise they might be the same
 11 incident?
 12 A. Yes. I think when he said the car park that he was in
 13 I knew straightaway that it was the same incident.
 14 Q. We're going to have a look at a log entry which
 15 corresponds to this call. {INQ004288/1}.
 16 If we go down to the bottom, please, this is
 17 captured in this form, which is -- there should be
 18 a second page, Mr Lopez. If we can crop into that.
 19 {INQ004288/2}.
 20 It's in a slightly different format to the one the
 21 inquiry has been looking at so far, but can you
 22 recognise in the centre, around rows 13 and 14, the
 23 entry that you made?
 24 A. Yes.
 25 Q. Do you agree that there is no indication, and take your

153

1 time, on there about the fact that the caller told you
 2 it was a dirty bomb?
 3 A. Yes.
 4 Q. Is that because at the time you just didn't know what
 5 that was, so its significance or potential significance
 6 didn't mean anything to you or is there some other
 7 reason?
 8 A. I'm unsure, sorry.
 9 Q. Thank you very much, we can take that down.
 10 SIR JOHN SAUNDERS: Is that the same incident log as was
 11 already been --
 12 MR DE LA POER: No, it's not Mr Ellis'.
 13 SIR JOHN SAUNDERS: So it is new and it will have a new
 14 number?
 15 MR DE LA POER: Yes.
 16 SIR JOHN SAUNDERS: They obviously relate to the same
 17 incident and you knew it. Do they get put together at
 18 some stage?
 19 A. That incident log would have been duplicated with
 20 (overspeaking).
 21 SIR JOHN SAUNDERS: Okay, thank you.
 22 MR DE LA POER: That's all I would like to ask you about
 23 that first call. But there could be no doubt in your
 24 mind, Mr Casey, having concluded that call, that
 25 you were involved in a very serious incident, do you

154

1 agree?
 2 A. Yes.
 3 Q. The second of the three calls that I want to ask you
 4 about involved Station Manager Andy Berry. We're going
 5 to bring up, please, the transcript, Mr Lopez, as I've
 6 given it to you, {INQ001215/1}, and the audio is at
 7 {INQ004367/1}.
 8 (Audio played)
 9 Thank you, Mr Lopez, we can take that down for just
 10 a moment.
 11 We are going to go through the content of that call
 12 by reference to a number of different approaches, but
 13 the first question I have for you about it is this: when
 14 Station Manager Berry said MTF A, you asked him to repeat
 15 himself.
 16 A. Yes.
 17 Q. Do you think in May 2017 you knew what an MTF A was?
 18 A. I had an understanding of it. I don't know whether
 19 I asked him to repeat it because I had missed what he'd
 20 said or whether at that time I was just a bit confused
 21 of what he was saying to me. I'm not too sure.
 22 Q. We will have a look at the log entry that you can
 23 clearly be heard to be making and which you say you're
 24 making at the time of the call. It is {INQ008376/6}.
 25 This is the log created by Mr Ellis. We need to go to

155

1 the very bottom of that page just to capture the start
 2 of that entry. 22.51.26. We see the call operator,
 3 50085, and it says:
 4 "By phone from SM Berry: Pete Buckley, he's
 5 releasing the [operationally sensitive] crew from the
 6 other incident. They are going to pick up the vehicle
 7 capability of [and then over the page] MTF A. Going to
 8 RVP at Philips Park until instructed on more informative
 9 (sic)."
 10 Do you recognise that?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: That's your number, is it?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR DE LA POER: We'll leave the log up for a moment because
 16 we will need to go back to it. Mr Berry, do you agree,
 17 asked you this question in the course of the
 18 conversation:
 19 "I just want you to tell me now what other
 20 information we've got about this incident"?
 21 A. Yes.
 22 Q. The first thing is you didn't mention to him the fact
 23 that somebody had said to you that they thought it might
 24 be a dirty bomb; do you agree?
 25 A. Yes.

156

1 Q. And why do you think it was that you didn't say that?
 2 A. I honestly can't recall, sorry.
 3 Q. Can we go back, please, to page 3 of the log
 4 {INQ008376/3}?
 5 Mr Casey, let me assure you I'm going through this
 6 just to help your memory, not in any sense to be
 7 gratuitous. Can we see the first point at 22.39.53, if
 8 we go over the page {INQ008376/4}, at the top, we will
 9 see that the RVP car park area outside the cathedral
 10 appears on the log there?
 11 A. Yes.
 12 Q. The first question and then I'm going to give you
 13 a piece of information.
 14 Do you agree you didn't tell Andy Berry that?
 15 A. Yes.
 16 Q. Just for your reassurance, he had in fact been told that
 17 piece of information when he spoke to Michelle Gregson.
 18 Next, 22.41.11, which is about two-thirds of the way
 19 down, do you see that there is an indicator that the
 20 British Transport Police have a log for the incident?
 21 A. Yes.
 22 Q. Do you agree that you didn't tell him that BTP had a log
 23 for the incident?
 24 A. Yes.
 25 Q. I'm going to go through the other ones and it may be

157

1 different answers are required for each.
 2 Next, 22.43.03 the comment is:
 3 "Pol have not got numbers of casualties. Several
 4 officers allocated and making way. Two more patients
 5 located at Victoria Station reported by a PCSO."
 6 Do you agree that you did not convey to Mr Berry
 7 "officers allocated and making way"?
 8 A. Yes.
 9 Q. Over the page {INQ008376/5} at 22.44.26, the comment by
 10 the operator ending 61:
 11 "Amb have five vehicles en route. Pol advised
 12 officer landing on scene."
 13 So two of the partner emergency services each
 14 indicating, one that they are on their way to the scene,
 15 another that they have someone at the scene; do you
 16 agree?
 17 A. Yes.
 18 Q. And you didn't pass that on to Mr Berry.
 19 Next 22.45.41:
 20 "Pol have confirmed a gunshot to leg outside
 21 station."
 22 We have that fact although it's right to say that
 23 that is subsequently countermanded. Then it says:
 24 "Transport police log number. Ring back with
 25 appliance information when available."

158

1 So the fact that BTP were asking for information
 2 about the appliances, you didn't convey that?
 3 A. Yes.
 4 Q. Then 22.46.17:
 5 "Pol advise more officer arriving on scene."
 6 Again, you didn't tell Mr Berry that.
 7 We know from your call that you mentioned that
 8 Deansgate had been closed; do you remember that?
 9 A. Yes.
 10 Q. So if we go over the page {INQ008376/6} to 22.47.52,
 11 we can see where that entry is. Do you see that, 22.47?
 12 A. Yes.
 13 Q. So you did review the log to that point, do you agree?
 14 A. Yes.
 15 Q. We can see that the next entry at 22.48.33 is
 16 a statement from the police:
 17 "Not gunshot wounds, look like shrapnel."
 18 And although that is after the final entry you spoke
 19 to when you spoke to Mr Berry, that was before the call
 20 was ended between the two of you.
 21 A. Okay.
 22 Q. We know that because at 22.48.49, we can see the entry
 23 that your operator number has viewed the log;
 24 do you see?
 25 A. Yes.

159

1 Q. As I said when I started those questions, because I do
 2 appreciate that you have assisted by agreeing with all
 3 of them and I have not yet given you an explanation that
 4 in no way is it intended to be gratuitous, but do you
 5 agree there was a substantial amount of information that
 6 you did not give Station Manager Berry?
 7 A. Yes.
 8 Q. Have any of the items that I have drawn attention to not
 9 been obviously relevant?
 10 A. No.
 11 Q. Why is it, given that Station Manager Berry asked you to
 12 give him an update, that you did mention the information
 13 that you did give him but you omitted all of those
 14 facts?
 15 A. I've not got an excuse for not passing that on, so
 16 I apologise. I don't know if I was reading the front of
 17 the log and not going in and refreshing the information
 18 that was being uploaded as it was live. I don't know if
 19 I've just looked at the main log screen and given the
 20 information from the front. When looking back at it
 21 now, I should have gone into the log more.
 22 SIR JOHN SAUNDERS: We know that what you're seeing isn't
 23 like this, is that right --
 24 A. Yes.
 25 SIR JOHN SAUNDERS: -- on your screen?

160

1 A. It was slightly different .
 2 SIR JOHN SAUNDERS: How easy is it to rapidly get the
 3 information from the screen?
 4 A. You had to scroll through it and it did jump each
 5 someone else was putting in, but you could type keywords
 6 in and it would bring up all the information that was
 7 regarding the keyword that you put in.
 8 SIR JOHN SAUNDERS: So when he made this request to you, you
 9 had to go through the log and pick up as you were going
 10 through it what was the important information?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: How easy is that?
 13 A. On a day-to-day incident, it is easy. But on this one,
 14 the incident was quite a busy incident so it was --
 15 SIR JOHN SAUNDERS: Quite a?
 16 A. A busy incident.
 17 SIR JOHN SAUNDERS: That means there's more to look through
 18 than normal?
 19 A. Yes, but it's not an excuse for not passing that on.
 20 SIR JOHN SAUNDERS: No, I understand, but I need to
 21 understand the circumstances. I understand you're not
 22 making excuses.
 23 MR DE LA POER: Perhaps you can amplify one part of your
 24 answer for us. You described there being, my word,
 25 a front screen and then information that lies behind

161

1 that.
 2 A. Yes.
 3 Q. And this is very much in accordance with what Mr Ellis
 4 told us about the fact that he put, for example, the
 5 rendezvous point on the front screen so that it was very
 6 readily accessible. Do you think that you just looked
 7 at that front screen or do you think that you just moved
 8 at speed through the log and just failed to identify
 9 those other entries?
 10 A. I honestly don't recall, sorry.
 11 SIR JOHN SAUNDERS: We're obviously fairly highlighting this
 12 in the course of this inquiry as you're aware. Was it
 13 something which was picked up very soon after by NWFC as
 14 being a potential problem or is it something that's only
 15 come to light over time?
 16 A. It's only -- well, I didn't stay long after the incident
 17 so I don't know when they picked it up. I was only made
 18 aware of it once I met up with Sarah Wilson.
 19 SIR JOHN SAUNDERS: How long did you stay before you went?
 20 A. It was roughly about 5 months.
 21 SIR JOHN SAUNDERS: Five months?
 22 A. I think so and no one ever raised that.
 23 SIR JOHN SAUNDERS: So it hadn't been identified as
 24 a problem in 5 months, thank you.
 25 MR DE LA POER: Was the training that you had received

162

1 relevant, do you think, to the fact that you didn't
 2 mention those key pieces of information?
 3 A. In what way, sorry?
 4 Q. Well, do you feel that your training made it
 5 sufficiently clear to you and instilled in you the
 6 necessary presence of mind in a situation like this
 7 that, when a NILO is asking you a direct question in the
 8 middle of an unfolding incident, that you knew this is
 9 what you needed to do, that was clear in your mind and
 10 you felt competent to do it?
 11 A. It gave you an understanding of the training but I think
 12 if we would have done training, like a practice run --
 13 I can't remember the word they use for it now because
 14 it's been so long ago, but if I was involved in
 15 something like practice scenarios --
 16 Q. A live exercise?
 17 A. Yes, I think that would have helped a lot more as part
 18 of the training, instead of just classroom-based because
 19 it's not real life and you don't get that sense of the
 20 rush, like everyone needing information straightaway.
 21 Q. And do you think the amount of experience that you had
 22 at that point was in any way relevant to your ability
 23 to, at speed, identify the relevant information and pass
 24 it on?
 25 A. No, I don't think it was. I think it was just a miss

163

1 from myself, sorry.
 2 Q. Could you repeat that?
 3 A. I think it's just a miss from me.
 4 Q. Thank you very much indeed.
 5 We can just move to the bottom of the page where we
 6 see the log entry that you have made, which records in
 7 summary form the key parts of the information. We've
 8 looked at that already. Because it helps people
 9 watching, we'll ask for that to be taken down but it's
 10 from that log entry that I'm going to ask you this final
 11 question about that call.
 12 One of the things that Station Manager Berry told
 13 you was that you had not succeeded in getting hold of
 14 the force duty officer. Do you remember him saying
 15 that?
 16 A. Yes.
 17 Q. That was not something that you recorded on the log, do
 18 you agree?
 19 A. Yes.
 20 Q. Did you tell anybody at North West Fire Control that
 21 he had told you that he was having that difficulty?
 22 A. I would have told the Greater Manchester pod.
 23 Q. You would have told the Greater Manchester?
 24 A. Yes. When you're there, once an incident's happened,
 25 I was always taught and trained not to -- once you've

164

1 took the messages, you pass it on to the pod that the
 2 area covers, so not too many people are actually
 3 involved in the incident, so then it gets messy and
 4 confused.
 5 I would have passed it on but I can't recall who I
 6 told, but I haven't logged on the log.
 7 Q. Did you understand at the time that the plan that was
 8 being followed by North West Fire Control and
 9 Greater Manchester Fire and Rescue Service involved not
 10 mobilising anyone, calling the NILO, the NILO contacting
 11 the FDO, and then a decision about mobilisation
 12 following that? Did you understand those steps were
 13 being sought to be taken that night?
 14 A. Not until I spoke to one of the team leaders and then
 15 they came over to explain what was going on.
 16 Q. At what stage in the evening did they --
 17 A. I couldn't tell you what time. It was part of while the
 18 incident was going on.
 19 Q. Was it before or after this call with --
 20 A. I couldn't tell you, sorry.
 21 Q. I suppose another way of looking at it is that we know
 22 that Mr Berry's inability to contact the force duty
 23 officer caused, and I hope I won't be criticised for
 24 using this word, something of a stall in the response.
 25 People were still sent to Philips Park, I make clear.

165

1 So his inability to contact the FDO was in fact
 2 extremely important on the night. Did you have any idea
 3 when he told you that he was having difficulty
 4 contacting the FDO that what he was conveying to you was
 5 extremely important information?
 6 A. No.
 7 Q. Did you have a clear understanding of, for example, the
 8 "MTFA -- standby phase" action plan?
 9 A. We'd covered it in the training, but I didn't have
 10 anything in front of me for me to remember it all.
 11 Q. Had anybody told you that night which action plan was
 12 being followed?
 13 A. No.
 14 Q. Were you clear in your own mind when you spoke to
 15 Mr Berry that no units had been mobilised to the scene?
 16 A. No. I was under the -- I thought they would have gone
 17 to the arena and I know we had a rendezvous point, but
 18 I thought they were still mobilising to the scene. It's
 19 only when I would have spoken to David or listening in
 20 then I found out. Like I say, it was
 21 a Greater Manchester incident, you don't get involved
 22 too much until you need to so I didn't, but...
 23 Q. So this is a concept that no other witness has
 24 introduced. Because of the pod that you were sitting
 25 in, you effectively played your part with the calls that

166

1 came your way, but you regarded it as a different pod's
 2 responsibility to manage?
 3 A. Yes, and I think that was just so that not too many
 4 people was getting involved and taking over the action
 5 plan. Because if they've not opened the action plan but
 6 they were following it and then others tried doing
 7 that --
 8 Q. Given that your experience and the evidence you have
 9 candidly given us -- do you think it's important for all
 10 control room operators to know which action plan is
 11 being followed when faced with an event of this size?
 12 A. Yes.
 13 Q. Because if, for example, you had known at the time that
 14 you spoke to Mr Berry that the next step in the action
 15 plan was him speaking to the FDO, that presumably would
 16 have helped you to understand what he was saying was
 17 important?
 18 A. Yes, and that's where maybe I could have looked into the
 19 incident to see what action plan was being followed or
 20 asked the Greater Manchester pod do they need any help.
 21 SIR JOHN SAUNDERS: Looking at the transcript, it's apparent
 22 that Mr Berry never asked for help, did he, in
 23 contacting the FDO?
 24 MR DE LA POER: No. He simply says, "I'm having
 25 difficulty". That's certainly right.

167

1 That was, if I may say so, Mr Casey, a generous
 2 concession that you could have looked through the log.
 3 What you'd have seen is the explosion action plan was
 4 selected, it was then closed, and no other action plan
 5 was assigned to the log.
 6 A. Yes.
 7 Q. Just because it fits into the chronology with other
 8 things that we've heard from other witnesses, can you
 9 confirm that at 22.53, so shortly after this call, you
 10 made an attempt to call Group Manager Nankivell but were
 11 unable to get through?
 12 A. Only from reading -- having things sent through to me,
 13 but a recollection from the night, no.
 14 Q. But you have seen records which confirm that is what you
 15 did?
 16 A. I have seen that, yes.
 17 Q. It's perhaps unsurprising you don't remember it because
 18 you didn't get through.
 19 So the third and final call for us to consider took
 20 place at 23.42. The audio, Mr Lopez, is {INQ004392/1}.
 21 The transcript is {INQ001236/1}.
 22 (Audio played)
 23 Thank you very much indeed, Mr Lopez.
 24 Just a little bit of context for you. We know from
 25 Mr Ellis that Group Manager Nankivell had asked him to

168

1 get the contact details of the NILOs and that was just
 2 a few minutes before this call that you participated in.
 3 The majority of the questions are in fact for
 4 Mr Nankivell about this from whom we will hear later in
 5 the week we hope. But you presented Mr Nankivell with
 6 two possibilities, didn't you? One, that the NILOs
 7 would monitor a Talk Group and the other that they
 8 should simply stand by their pagers?
 9 A. Yes.
 10 Q. Did you understand that the option of monitoring the
 11 Talk Group would mean that the NILOs would all be able
 12 to speak to each other?
 13 A. Yes.
 14 Q. And they would be able to speak to anyone else on that
 15 Talk Group, which may include the CSR?
 16 A. Yes.
 17 Q. So that there could be an immediate two-way dialogue;
 18 is that right?
 19 A. Yes.
 20 Q. That's what you're meaning by:
 21 "Do you want them to monitor a particular Talk
 22 Group?"
 23 A. Yes.
 24 Q. So far as the pager option is concerned, we have
 25 received some evidence about this, but is your

169

1 understanding that the pager option is very much the
 2 conventional use of a pager, in other words that it is
 3 a device that is capable of receiving messages in text
 4 form, but it is not one which is capable of broadcasting
 5 back?
 6 A. Yes.
 7 Q. So it's a one-way form of communication?
 8 A. Yes.
 9 Q. As we saw, do you agree that the upshot was that, you
 10 having given Group Manager Nankivell these two
 11 possibilities for him to consider, he instructed you to
 12 inform the NILOs that they should simply stand by their
 13 pagers?
 14 A. Yes.
 15 Q. Given your role as a control room operative at that
 16 time, Mr Casey, was it any part of your function to say
 17 to a group manager having given the group manager those
 18 choices, "Don't you think it would be better if they
 19 were all on a Talk Group so that they could speak to you
 20 in the CSR?"
 21 A. No.
 22 Q. Was that in your remit or part of the expectation of
 23 your role?
 24 A. No, sorry. I would have asked that question -- the team
 25 leaders would have asked me to ring to ask him that

170

1 question, I wouldn't have just rung him and asked him
 2 that question, it would have been a request from the
 3 team leader for me to do that.
 4 Q. That's perhaps another piece in our chronology.
 5 Mr Ellis gets the request at 23.33, you think there was
 6 then a team leader intervention which led to you
 7 asking --
 8 A. Asked me to do that, yes.
 9 Q. -- that very specific question?
 10 A. Yes.
 11 Q. And that's what your task was and that's what you did?
 12 A. Yes.
 13 MR DE LA POER: Thank you very much indeed, Mr Casey. That
 14 concludes my question. Before I turn to turn core
 15 participants, do you have any questions, sir?
 16 SIR JOHN SAUNDERS: No.
 17 MR DE LA POER: Can I first invite GMCA to ask their
 18 questions.
 19 MR WARNOCK: I don't have any questions. Everything has
 20 been covered from my perspective.
 21 MR DE LA POER: Thank you, Mr Warnock.
 22 Could I then turn to Greater Manchester Police,
 23 please. Mr Horwell.
 24 Questions from MR HORWELL
 25 MR HORWELL: Mr Casey, you knew that three NILOs were on

171

1 their way to Philips Park, each travelling on their own
 2 in a car?
 3 A. Yes.
 4 Q. They obviously didn't have access to the incident log in
 5 their cars?
 6 A. Okay.
 7 Q. That's right?
 8 A. Yes, while they're driving, yes.
 9 Q. Did you know why there was mobilising at Philips Park
 10 and not the scene?
 11 A. No, sorry.
 12 Q. No one had told you that there was a lack of situational
 13 awareness?
 14 A. No.
 15 Q. No one had told you that it was vital to obtain as much
 16 information as possible as to what was happening at the
 17 scene?
 18 A. No one had directly said that, no.
 19 Q. Did you understand the importance of the other emergency
 20 services, either going to or being at the scene?
 21 A. Yes.
 22 Q. What was that importance, Mr Casey?
 23 A. They are there to help, they're going to do their job.
 24 You know...
 25 SIR JOHN SAUNDERS: I'm not sure that's what Mr Horwell had

172

1 in mind.
 2 A. I don't understand then, sorry.
 3 MR HORWELL: I'll put it more clearly. Did anyone ever tell
 4 you or did it ever appear to you that the fact that the
 5 police and the Ambulance Service were either going to
 6 the scene or were at the scene mean that if it was safe
 7 for them, it surely must have been safe for fire? Did
 8 that thought ever cross your mind?
 9 A. After a while, when I found out that there was no pumps
 10 at the scene, I did wonder why, but I wasn't in
 11 a position to question that myself.
 12 Q. But did anyone ever tell you the importance of not only
 13 finding out such information but of passing it on?
 14 A. No.
 15 Q. And how did you think the NILOs were going to gain
 16 situational awareness?
 17 A. Through communication with Control.
 18 Q. Which control?
 19 A. North West Fire Control.
 20 Q. And who was going to give them that information from
 21 North West Fire Control?
 22 A. It was my understanding the team leaders and then
 23 Janine Carden when she was in.
 24 Q. You have been taken to that call from Andy Berry to you
 25 at 22.48, when he told you that he'd been trying to get

173

1 hold of the force duty officer but they're not picking
 2 up for obvious reasons. And Mr Casey, just that call
 3 for the moment, please. If Mr Berry had asked you
 4 either to contact the FDO or the GMP control room, but
 5 in particular the FDO, what would you have done?
 6 A. I would have looked on the system to see if we had
 7 a contact number for the FDO. If not, I would have
 8 spoken to a team leader, how we get hold of the FDO or
 9 directly rung police control.
 10 Q. Did you know whether the telephone number for the FDO
 11 was on your system?
 12 A. No.
 13 Q. Did you know if the telephone number for the FDS was on
 14 your system?
 15 A. No.
 16 Q. Did you know about the multi-agency Hailing Talk Group,
 17 Mr Casey?
 18 A. Yes.
 19 Q. A channel through which fire and ambulance could contact
 20 the GMP control room because it was monitored by GMP
 21 24 hours a day? You knew about that channel?
 22 A. I'd heard about that channel, yes.
 23 Q. What do you mean by that, you'd heard about it?
 24 A. I'd been told about that channel in some training. On
 25 that evening, I'd not been made aware of it.

174

1 Q. I'm sorry, was the training before the night of the
 2 attack or was the training afterwards?
 3 A. It would have been part of the 4 weeks' initial
 4 training.
 5 Q. Right. Mr Casey, had you simply forgotten about the
 6 existence of that channel?
 7 A. It's not that I'd forgot, I just didn't think about it
 8 because of the way he said he couldn't get hold of him,
 9 I thought he was doing it through phone.
 10 Q. So what about the channel?
 11 A. I'll take it that I must have forgot.
 12 MR HORWELL: All right. Mr Casey, that's all I ask.
 13 Thank you.
 14 SIR JOHN SAUNDERS: Mr Cooper QC, please.
 15 Questions from MR COOPER
 16 MR COOPER: Mr Casey, I ask questions on behalf of the
 17 bereaved families.
 18 I'll get straight to the point on training: it just
 19 wasn't adequate enough for you, was it, to deal with an
 20 event that was happening?
 21 A. No.
 22 Q. It wasn't adequate, was it?
 23 A. No.
 24 Q. No. In what way was it inadequate?
 25 A. Like I say, I think being involved in a live exercise

175

1 would be a massive help. It's all right doing
 2 classroom-based learning, but if you're not actually
 3 doing the live systems...
 4 Q. And you, to be fair to you, and your colleagues can only
 5 do what you are given the chance to do, aren't you, when
 6 it comes to training? You can only take up the
 7 opportunities when they're given to you, and
 8 I presume — we'll go through some of the opportunities
 9 in a moment. But had the opportunities been given to
 10 you to have training in certain areas, being
 11 a conscientious man, you'd have taken them, wouldn't
 12 you?
 13 A. Yes.
 14 Q. And who is responsible at North West Fire Control for
 15 providing these opportunities?
 16 A. I think you'd have to — I would have gone to my team
 17 leader. But I don't know who was responsible. I think
 18 it would have been an ops manager, but you'd have to
 19 check that with one of them, sorry.
 20 Q. So obviously, the appropriate questions will be asked of
 21 those people, but that's how training is put together,
 22 is it, as far as you're aware? They decide on what is
 23 to be trained?
 24 A. Yes.
 25 Q. How often it is to be trained?

176

1 A. Yes.
 2 Q. And who gets that training?
 3 A. Yes.
 4 Q. In terms of training, are you all offered, people doing
 5 your job, the same training, the same opportunities, or
 6 are different people offered different sorts of
 7 training?
 8 A. I think all the time, everyone was offered the same
 9 training. I think more competent members of staff will
 10 get more training until people like me that was classed
 11 as not competent have completed phase work.
 12 Q. Rather a harsh word, not competent. Would that be
 13 better as simply "not as thoroughly trained"?
 14 A. If that's how you'd like to put it, yes, but it was
 15 classed as you're not competent.
 16 Q. Not competent?
 17 A. Yes.
 18 Q. All right then. I was trying to be kind. So when this
 19 tragedy was unfolding, were you considered competent?
 20 A. I'd completed my initial training and not completed all
 21 three phrase modules, which then you're classed as
 22 a competent CRO.
 23 Q. So were you doing any work on the night of the 22nd that
 24 you were not competent to do?
 25 A. I'd had training, I couldn't point out what I'm not

177

1 competent to do, sorry.
 2 Q. No.
 3 A. But obviously there's areas where I've missed, so I'd
 4 say those areas.
 5 Q. Pardon?
 6 A. I'd say those areas that I missed personally. That's
 7 the only way I can --
 8 Q. And do you know what areas you missed personally?
 9 A. Well, the information.
 10 Q. I see.
 11 SIR JOHN SAUNDERS: I think you're talking about what went
 12 wrong as far as you're concerned on the night?
 13 A. Yes (overspeaking).
 14 SIR JOHN SAUNDERS: So not passing on the information, you
 15 say you weren't competent to do it because you didn't do
 16 it (overspeaking) and that had something to do with
 17 the -- you obviously hadn't had enough practice in live
 18 situations. Thank you.
 19 MR COOPER: Was there an opportunity or did you feel there
 20 was an opportunity on the night, given that you were
 21 relatively inexperienced, to say to your team leaders,
 22 "Look, I think I am out of my depth here and I need
 23 help"?
 24 A. No.
 25 Q. No.

178

1 SIR JOHN SAUNDERS: I think in fairness, you did actually
 2 raise your hand and (overspeaking) in the normal way.
 3 A. Yes. The team leaders did come over and when
 4 Janine Carden came in, she walked round to see if we was
 5 all okay.
 6 MR COOPER: I understand that --
 7 A. Like you said, sorry, I did raise my hand when I needed
 8 help.
 9 Q. I understand raising your hand if something occurred, it
 10 was normal procedure to do that. I'm asking a more
 11 general question, as it were, about feeling whether you
 12 were out of your depth -- that's not a criticism because
 13 we all have to start somewhere -- whether there was or
 14 whether you felt there was an opportunity to say
 15 generally, "Look, this thing is too big for me to handle
 16 and I feel I'm out of my depth"? Did you feel that that
 17 opportunity was there for you if you'd have wanted to
 18 take it?
 19 A. No, I wouldn't.
 20 Q. I know you wouldn't --
 21 A. Looking back, I couldn't -- I didn't see a point where
 22 I could have done that. Looking back now, as you've
 23 said it, you know, it would have been a good idea to say
 24 that.
 25 Q. You think it would have been a good idea?

179

1 A. Yes, but I wouldn't have thought of that myself.
 2 Q. No, but some of the things the chair is dealing with
 3 here is the future.
 4 A. Yes.
 5 Q. And you feel that it would have been good for you to
 6 have known, firstly, I take it stage by stage, it would
 7 have been good for you to have known you could have
 8 said, "Look, this whole thing is too much for me now"?
 9 A. Yes.
 10 Q. And do you think that had that opportunity been
 11 available, you'd have taken it?
 12 A. In a way, I wouldn't have wanted to not be involved
 13 because I would have wanted to stay and help where
 14 I could. I would never --
 15 SIR JOHN SAUNDERS: Okay, let's just try and look at this
 16 realistically. We know that you have said you were not
 17 properly trained, you're obviously very new at the job.
 18 So when you get a call through and your first indication
 19 you're being involved in something like this, you do
 20 actually raise your hand, we do get Michelle Gregson
 21 coming. Would it have been possible for you to say to
 22 her, "Look, I am really not coping with this, can I have
 23 someone here to help me"? Would it be possible for you
 24 to say that?
 25 A. It would, but at the time it was only like the first

180

1 call , so I think that would have been --
 2 SIR JOHN SAUNDERS: So at that time you wouldn't have
 3 thought it necessary to do that?
 4 A. No.
 5 SIR JOHN SAUNDERS: Did there come a stage when you did
 6 think it was necessary to do that.
 7 A. No, I think -- like I say, I think it's just looking
 8 back at what was going on and where I was not as
 9 informed (overspeaking) --
 10 SIR JOHN SAUNDERS: Looking back now, you would, if you'd
 11 had the opportunity, have said to someone, "Look, this
 12 has put me out of my depth, I need someone to help me do
 13 this or take it over"?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Would you have been able to do that if
 16 you had thought it necessary at the time?
 17 A. Yes, the team leaders would have taken that.
 18 SIR JOHN SAUNDERS: Okay.
 19 MR COOPER: Right.
 20 SIR JOHN SAUNDERS: Sorry, (overspeaking) slightly in
 21 circles , I know.
 22 MR COOPER: If I can just try yo double back on the circle
 23 slightly , just to make sure that we have completed it.
 24 I thought you were saying to me --
 25 A. Sorry.

181

1 Q. Please don't apologise because it's where you settle in
 2 your evidence that's important, not how we get there.
 3 I thought you were saying to me in answer to my
 4 questions that on the night in question, you would have
 5 benefited from knowing that if you're in difficulty , you
 6 could have said, "This is all too much for me, I need
 7 either help or I need to step out of my seat and allow
 8 someone more experienced to sit in it", and I thought
 9 you'd said to me that on the night, you would have liked
 10 to have known that that facility was available to you.
 11 A. Yes, but I wouldn't -- knowing how busy the control room
 12 was, I wouldn't have wanted to have said that with them
 13 gathering information.
 14 Q. I'm going to come to that and then I thought you said to
 15 me -- my second question was, had that been available or
 16 had you thought it had been available to you, you would
 17 have taken it?
 18 A. I would have done, yes, just to take a step back to get
 19 back into ...
 20 Q. Right.
 21 A. I don't know what I'm trying to say, sorry.
 22 Q. Don't worry.
 23 SIR JOHN SAUNDERS: Okay, just take a moment when you listen
 24 to the question to actually say what you mean if you
 25 can.

182

1 MR COOPER: I'll shut up. You tell us.
 2 A. I think I would have, just because it was overwhelming.
 3 I had not and not many people have been involved in such
 4 a serious incident like that and it would have been good
 5 to have stepped back and maybe worked with a closer
 6 operator for that bit of back-up and then I'm not taking
 7 the attention from the team leaders that are needed
 8 in the room more.
 9 SIR JOHN SAUNDERS: I don't think anyone is doubting,
 10 particularly looking back, that you wish you could have
 11 said, "Look, I'm out of my depth, I need someone else to
 12 come and help me". The question really is: did you
 13 think that you couldn't do that if you really wanted to?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Could you not have said to a team
 16 leader? And if you thought you couldn't, why not?
 17 A. Um... I think just because of how busy the evening was,
 18 I don't think I would have felt comfortable doing that
 19 and putting more pressure on the room, the team, and the
 20 rest of the staff that was already working.
 21 MR COOPER: So you just didn't want to let anyone down?
 22 A. Yes.
 23 Q. All right. Can I look at, please, your training
 24 records. Please, Mr Lopez, can we go to {INQ040638/1}.
 25 Let's go to the bottom, I think, if we can, please,

183

1 the last page {INQ040638/2}. I'm not quite sure this
 2 goes in chronological order. Let's start from the
 3 bottom and go up.
 4 If we look at this, and you've had an opportunity,
 5 haven't you, Mr Casey, of looking at it?
 6 A. Yes.
 7 Q. And obviously so I have. I've made a few notes from it
 8 which may hurry the process up. Would it be right to
 9 say, looking at those pages, so far as your training is
 10 concerned, we would see for instance that you had what
 11 you call JESIP training or JESIP, it's put as, on
 12 30 September 2016? Could we go to that, please?
 13 30 September 2016.
 14 There it is right at the top:
 15 "JESIP training. 30 September 2016."
 16 That's put in as "training courses". Is that the
 17 4-week training course or something different?
 18 A. That's the 4 weeks.
 19 Q. That's the initial 4-week training course?
 20 A. Yes.
 21 Q. In amongst that training course of 4 weeks, virtually
 22 everything else is dealt with as well, isn't it?
 23 A. Yes.
 24 Q. Can you remember how much time was given to JESIP then
 25 during that training on 30 September 2016?

184

1 A. No, sorry.
 2 Q. All right. Then let's go to the other JESIP reference
 3 here, which in fact is 16 November 2016. So if we
 4 scroll down and we see "JESIP news bulletin". You'll
 5 just cast your eye down, "JESIP news bulletin".
 6 A. Yes.
 7 Q. 16 November 2016. That's that word ad hoc training.
 8 You've dealt with that. In relation to JESIP news
 9 bulletin, in what way is that ad hoc training? Are you
 10 just receiving a bulletin effectively and reading it?
 11 A. You get taken to the back of the control room with your
 12 team leader — you'll all have a separate team leader,
 13 so whoever's under that team leader, you'd go and they
 14 do like — like the bulletin, they would have gone
 15 through the bulletin and spoke to us about it.
 16 Q. So what, 10 minutes, 15 minutes at the back of the room,
 17 that sort of thing?
 18 A. And if the control room ended up really busy with
 19 emergency lines we would have to leave that training
 20 until it had quietened down again.
 21 Q. So pretty minimal as far that's concerned?
 22 A. Some of it, yes.
 23 Q. And the only other JESIP reference in this document at
 24 all as far as I can see is 16 July 2016. It's called
 25 "JESIP aide—memoire".

185

1 (Pause)
 2 SIR JOHN SAUNDERS: While we're trying to find it —
 3 MR COOPER: I've written it down from somewhere.
 4 SIR JOHN SAUNDERS: JESIP bulletin. Do you have any idea
 5 what there would be in a JESIP bulletin?
 6 A. No, sorry.
 7 MR COOPER: Thank you, Mr Lopez, you can come and sit next
 8 to me — there it is. Right at {INQ040638/2}, "JESIP
 9 aide—memoire", 16 July 2016.
 10 Is that French for JESIP bulletin or is it something
 11 different or what?
 12 A. I'm not sure, sorry.
 13 Q. What's a JESIP aide—memoire?
 14 A. I can't recall that far back with the training.
 15 Q. Would it be a document, do you think?
 16 A. Yes, I think it would have been a document that we read.
 17 Q. Looking at your training documents there, that's all
 18 I can see that you were provided with specifically, it
 19 seems, on the subject of JESIP prior to 22 May. Would
 20 you accept that — again, this is no criticism of you
 21 because I was deliberately starting by saying you don't
 22 provide the training, you just take the opportunity.
 23 Would you accept you weren't given much opportunity to
 24 get JESIP training prior to 22 May?
 25 A. I think I would have liked to have had a lot more

186

1 training.
 2 SIR JOHN SAUNDERS: In JESIP?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Okay.
 5 A. I wasn't offered the opportunity, but I'm not saying
 6 that I couldn't have it. But I would have liked a lot
 7 more of it.
 8 MR COOPER: Absolutely. I keep saying you can only take
 9 what you're given.
 10 And since this atrocity, have you been offered any
 11 JESIP training?
 12 SIR JOHN SAUNDERS: I don't think he was there for very long
 13 afterwards.
 14 MR COOPER: Forgive me, of course.
 15 A. Yes.
 16 Q. And when you were offered JESIP training, were you given
 17 any training in METHANE?
 18 A. It would have been part of it.
 19 Q. So your evidence therefore will no doubt be identical
 20 that you would have wanted more, have liked the
 21 opportunity of more?
 22 A. Yes.
 23 Q. Were you aware, for instance, of the provisions of
 24 METHANE on the night of the 22nd?
 25 A. No, I won't say I was, no.

187

1 Q. Not at all?
 2 A. I can't recall that, so...
 3 Q. Would you accept, and again I'm prefacing everything
 4 with this, that this is not having a go at you, would
 5 you accept really the training that you were provided to
 6 do your job on the night, particularly in relation to
 7 JESIP and METHANE, was pretty minimal?
 8 A. Yes.
 9 Q. I want to take you now, on a couple of other matters
 10 when it comes to training in relation to terrorist
 11 bombs. Paragraph 11, please, of your statement,
 12 {INQ035441/1}.
 13 There's two paragraphs I want to take you to
 14 in relation to training in relation to terrorist bombs
 15 and then training in relation to terrorist attacks.
 16 Firstly, paragraph 11. We see the detail that you
 17 were given. Let's take it down. Cast your eye down the
 18 lines and you'll see a line beginning with the word
 19 "me".
 20 A. Yes.
 21 Q. You say this:
 22 "The training I received did not involvement an
 23 assessment as to the different types of bomb which could
 24 be used in a terrorist attack and we received no
 25 instruction or training which would have required me to

188

1 have questioned the caller as to the meaning of that
 2 phrase."
 3 The phrase is "dirty bomb"?
 4 A. Yes.
 5 Q. Again, you're indicating there, aren't you, in
 6 paragraph 11 that really more training would have helped
 7 you perhaps asking the right sort of questions?
 8 A. Yes.
 9 Q. Indeed, we heard this morning from Joanne Haslam when
 10 she was saying that more experienced operatives are
 11 trained to ask questions and to test and to interrogate.
 12 A. Yes.
 13 Q. And that, I presume, was the sort of skill which comes
 14 with experience?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Did you not have any training to ask
 17 questions from callers to get detail?
 18 A. Yes, we did. Like I say, I did ask questions most of
 19 the time. On this one, when it refers to the dirty
 20 bomb, I didn't question it because the caller was giving
 21 me information on people that was injured and me in my
 22 own thoughts were that they were the more important
 23 things at the time, to get that information to pass on.
 24 SIR JOHN SAUNDERS: So you didn't ask what a dirty bomb was,
 25 what he meant by the word "dirty bomb"?

189

1 A. Yes, it didn't ring any bells to me.
 2 SIR JOHN SAUNDERS: If it doesn't ring any bells, in fact it
 3 may be more important to ask the question.
 4 Nevertheless, you required questions about the
 5 casualties to be really what you needed to know rather
 6 than the question about a dirty bomb?
 7 A. Yes.
 8 MR COOPER: I think I know the answer to the question, but
 9 were you not alerted in any way in your training to ask
 10 questions about bombs and other threatening devices
 11 that, perfectly possibly, you'd be called about?
 12 Because the nation was at severe level, we remind
 13 ourselves. So it's not that it's unexpected, sadly, to
 14 get a call about a bomb. Would you have expected, given
 15 the state of the nation at the time and indeed some time
 16 afterwards, that maybe a bulletin about bombs might have
 17 been arranged for 15 minutes at the back of the office
 18 at the very least to explain terms and terminology?
 19 A. I honestly -- yes.
 20 Q. It would have helped, wouldn't it?
 21 A. Yes.
 22 Q. The nation's in a state of severe alert. The chair's
 23 heard all the evidence about Manchester itself expecting
 24 to be at the receiving end of these murderous attempts.
 25 And round about this time, you would have expected,

190

1 wouldn't you, to have been given at least 15 minutes on
 2 the back row about bomb terminology?
 3 A. Yes, but on that, we were trained to question and I can
 4 only apologise that I didn't question more.
 5 SIR JOHN SAUNDERS: I don't think you need to apologise.
 6 I think there are two phases to this, maybe more.
 7 When members of the public ring in, you need to know
 8 what's required and this person is saying actually,
 9 "I want ambulances because we've got a lot of injured
 10 people here", and obviously you need to take details
 11 about that so you can pass it on to the ambulance.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: But there is another aspect, isn't
 14 there, that you'd be concerned about? Whichever of the
 15 rescue services you are going to send out or arrange to
 16 be sent out, are you not concerned as well with being
 17 trained to ask questions which may relate to their
 18 safety as and when they arrive?
 19 A. Looking back now, yes, but at the time we'd already had
 20 some calls in regarding what was going on. Like I say,
 21 I was more interested in the casualties, helping them,
 22 than -- unfortunately, the bomb had already gone off.
 23 SIR JOHN SAUNDERS: Okay. As we know (overspeaking) if it
 24 had been a dirty bomb then it could have affected it,
 25 but that was nothing that passed through your mind?

191

1 A. No, I'm sorry, no. Like I say, I was more interested in
 2 getting --
 3 SIR JOHN SAUNDERS: Okay.
 4 MR COOPER: I hope I'm not asking anything particularly
 5 sensitive, but during the short time that you were
 6 there, had you ever had a call before about a bomb?
 7 A. No.
 8 Q. Let me take you to paragraph 21 then if I can:
 9 "The training which I had received in regard to
 10 potential terrorist attacks was clear in the sense that
 11 if such an incident was reported to the control room,
 12 the duty team leaders were to be immediately informed,
 13 allowing them to take the appropriate actions, allowing
 14 ourselves to undertake our specific mobilisation
 15 responsibilities."
 16 What do you mean by "specific mobilisation
 17 responsibilities"?
 18 A. So that would have been anything along the lines of the
 19 action plan, so when you've got the incident up, looking
 20 at the action plan to see if it says don't mobilise
 21 until you've spoken to, maybe, a NILO --
 22 Q. I see.
 23 A. -- or send certain pumps.
 24 SIR JOHN SAUNDERS: Is this because it's a priority 1
 25 incident?

192

1 A. Yes.
 2 SIR JOHN SAUNDERS: So you inform them so they can confirm
 3 with you what the appropriate mobilisation is to have?
 4 A. Yes.
 5 MR COOPER: I understand. thank you.
 6 A very self – contained question here, please. When
 7 Mr Berry, the NILO, said he was unable to get hold of
 8 the force duty officer , as you tell us in your
 9 paragraph 14, no need to go to it, did it strike you to
 10 make any attempt yourself to get hold of the force duty
 11 officer ?
 12 A. No, I would have passed that over to the
 13 Greater Manchester pod for their -- I would have...
 14 I think there might have been three on the
 15 Greater Manchester pod that night. I would have spoken
 16 to them and told them they can't get hold of him.
 17 Q. So you wouldn't have interpreted it as your
 18 responsibility --
 19 A. No, I was always told you pass that information on to
 20 the pod that's dealing with that area, so we're not --
 21 because one of them may --
 22 Q. Would you?
 23 A. I would have passed it over.
 24 Q. {INQ001149/1}. You took this call, didn't you?
 25 A. Yes.

193

1 Q. Let's just remind ourselves of it . You are introduced
 2 to the caller . Looking further down:
 3 "NWAS Control, hello. You're through to Michelle."
 4 And then a conversation goes on. When that
 5 conversation was going on and you had put it through to
 6 Michelle Gregson, were you listening in on it?
 7 A. No.
 8 Q. Perfectly properly, I am, not suggesting you
 9 eavesdropping.
 10 A. No.
 11 Q. No, once those calls are put through, then that's
 12 (overspeaking) --
 13 A. -- the line, yes.
 14 Q. In that case I won't ask you questions about it because
 15 the moment you put it through, you'd left it, hadn't
 16 you?
 17 A. Yes.
 18 Q. Then I won't deal with that.
 19 Can we go finally, please, to {INQ001165/1}.
 20 This is a call very early on in the process at
 21 22.41. Do you take this call?
 22 A. I'm not too sure, sorry.
 23 Q. Can we take you to the top, please, Mr Lopez. Because
 24 I may be wrong but I've got this down certainly as
 25 a call that you took.

194

1 A. Yes, this is (overspeaking) the member of the public,
 2 yes.
 3 Q. Absolutely. So we don't need to go through it all, but
 4 here is a member of the public.
 5 A. Yes.
 6 Q. It's the dirty bomb conversation.
 7 A. Yes.
 8 Q. In detail there, without us needing to go through it,
 9 giving graphic detail at times as to what had happened,
 10 it was clear that something very, very bad had happened;
 11 is that right?
 12 A. Yes.
 13 Q. Indeed, if we look at the top, the caller was originally
 14 looking for the ambulance --
 15 A. Yes.
 16 Q. -- wasn't the caller, and was wrongly put through to the
 17 Fire Service?
 18 A. Yes.
 19 Q. So you're effectively one of the first people, perhaps,
 20 to be aware of what happened at the arena?
 21 A. Yes.
 22 Q. You're getting a call at 22.41. In the first group of
 23 people?
 24 A. Yes.
 25 Q. And you immediately know from speaking to this member of

195

1 the public at 22.41 the enormity of what had gone on?
 2 A. Yes.
 3 Q. Were you immediately communicating to your colleagues in
 4 the control room, "We need emergency services, all of
 5 them, down there as quickly as possible, fire ,
 6 ambulance, police, particularly fire " ?
 7 A. I on this call -- I think this was the call that
 8 I requested Michelle Gregson.
 9 Q. And then you relied on her to make whatever appropriate
 10 decisions --
 11 A. I didn't know which -- where to go, yes.
 12 MR COOPER: Thank you, I have no further questions.
 13 MR DE LA POER: Mr Smith QC, please.
 14 Questions from MR SMITH
 15 MR SMITH: In relation to your training, Mr Casey, may
 16 I take you, please, as well to {INQ001304/1}, please, to
 17 be put on the screen. If we could go to 2 April 2017.
 18 {INQ001304/2}.
 19 We can see that you undertook resilience training at
 20 that time; is that correct?
 21 A. Yes.
 22 Q. Can you remember any of the detail of that training?
 23 A. No.
 24 Q. Do you remember whether you looked at a PowerPoint
 25 presentation at that time?

196

1 A. I don't remember the training, sorry.
 2 Q. Might it help you to see the PowerPoint that I'm
 3 referring to? If you tell me that you have absolutely
 4 no recollection, that's one thing, but I could show it
 5 to you. That might help.
 6 A. I honestly can't say yes or no whether it will make
 7 anything come back, so whatever you think you need to
 8 do.
 9 Q. The point I want to come to is that training in relation
 10 to JESIP and METHANE, METHANE messages, was all
 11 contained within that PowerPoint presentation. Do you
 12 still have no recollection of that?
 13 A. Honestly, no.
 14 Q. Thank you. The second matter I want to ask you about is
 15 in relation to some evidence you gave a short time ago
 16 about refreshing the screen or refreshing the incident
 17 log screen in front of you. Could you explain that in
 18 a little more detail, please?
 19 A. So if I was to look -- when the NILO rung up and I was
 20 looking at the incident log and David Ellis is typing,
 21 he's got the message box open, so when you're typing
 22 some of that information, it doesn't automatically go
 23 straight on the log while he's typing because he's not
 24 saved it. But because I had already had the incident
 25 open, even when he has saved it, it wouldn't have shown

197

1 up on my screen because I had not refreshed the screen.
 2 So that's where -- my point where I was saying I should
 3 have refreshed the screen more.
 4 Q. Are you therefore saying that in relation to the call
 5 involving yourself and Station Manager Berry, and please
 6 tell me if I've misunderstood this, one possibility
 7 that's occurred to you is that you may not have
 8 refreshed the screen?
 9 A. Yes.
 10 Q. Which might explain, no doubt due to inexperience, why
 11 you didn't go through the information and be in
 12 a position to pass it on?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: You won't be the first person or the
 15 last, no doubt, not to have done that. It happens on
 16 computers all the time, particularly with people like
 17 me. But is there no way, do you know, you may not know,
 18 of actually refreshing even though it's up on your
 19 screen?
 20 A. From what I can remember back, I think a button on the
 21 screen does change colour for you -- to let you know you
 22 need to refresh but I don't recall --
 23 SIR JOHN SAUNDERS: Some more information has come on --
 24 A. Yes, I don't recall seeing the button that had changed
 25 colour because it is quite bright, so I would have --

198

1 SIR JOHN SAUNDERS: Thank you.
 2 MR SMITH: The third point is that you've been asked by
 3 Mr de la Poer, of course quite properly, about whether
 4 it would be important for you to know which action plan
 5 was being followed. Were you aware that no action plan
 6 was being followed?
 7 A. No because, like I say, it was a Greater Manchester
 8 incident, so it went over to their pod and we would have
 9 only done sections of that if asked to do so.
 10 Q. If at any time in the course of the call involving
 11 Mr Berry, Station Manager Berry had gone on to say to
 12 you, "Look, I've been trying to get hold of the force
 13 duty officer, they're not picking up for obvious
 14 reasons, I would ask North West Fire Control to help if
 15 they can, could you speak to the control room at GMP and
 16 ask them to get a message to the force duty officer for
 17 me?", if you'd been asked that, is that something you
 18 would have done?
 19 A. Yes, straightaway.
 20 Q. Did you appreciate the significance and importance of
 21 the need for the duty NILO to be in contact with the
 22 force duty officer?
 23 A. I did, but I would have presumed but I would have
 24 presumed -- I did presume that they'd already spoke and
 25 he knew what was going on. So I wouldn't have took it

199

1 into my own hands to try and ring him to say, "You've
 2 had a missed call".
 3 Q. As far as that call is concerned, I think you've agreed
 4 that given your experience, or lack of experience, if
 5 you like, and the extent of the training that at that
 6 stage you'd had, your training was incomplete; is that
 7 right?
 8 A. Yes.
 9 Q. Because the next stage would have been the second phase
 10 and the third phase of your training; is that right?
 11 A. Yes.
 12 Q. Are those all mandatory training courses?
 13 A. Yes.
 14 Q. As far as -- once you have reached the third phase, were
 15 you at that time aware that it was necessary then to
 16 refresh the phase 3 mandatory training?
 17 A. No, I'm not going to say I was, no.
 18 Q. You can't remember?
 19 A. No.
 20 Q. Anyway, so far as that call at 22.48.01 is concerned,
 21 you were on the Lancashire pod, isn't that correct?
 22 A. Yes.
 23 Q. And based on your inexperience, would it be fair to say
 24 that one option available to you would have been, if
 25 you'd thought it through and had more time to think

200

1 about it, that you could have contacted or made contact
 2 with one of the team leaders and said, "I've got the
 3 force duty officer on the line here and I really don't
 4 feel equipped to deal with this"? Now, we know you
 5 didn't do that, and you tried to handle it yourself, but
 6 knowing the way the control room operated, if you had
 7 said that, do you believe that the team leaders would
 8 have helped you and been supportive?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: I'm really sorry, this is no doubt
 11 entirely my fault, but you said he should ring and say,
 12 "I've got the FDO on the line", the force duty officer?
 13 MR SMITH: I meant the duty NILO.
 14 SIR JOHN SAUNDERS: Right. When people are doing a job for
 15 which they might not be completely trained, sometimes
 16 some organisation will give them a mentor. Did you have
 17 such a thing as a mentor?
 18 A. Yes, for 2 weeks.
 19 SIR JOHN SAUNDERS: But not at this time?
 20 A. Not at that time.
 21 SIR JOHN SAUNDERS: You'd gone past the mentor stage?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR SMITH: The chairman is quite right. "I've got the duty
 25 NILO on the end of the line".

201

1 A. Yes.
 2 Q. "I really don't -- I think this is too much for me",
 3 Michelle Gregson or Lisa Owen would have helped you out,
 4 wouldn't they?
 5 A. Yes.
 6 Q. Finally this: you've been asked questions about the
 7 management of calls and asking questions of the caller.
 8 Did you see a distinction between information coming
 9 into the control room from GMP or North West Ambulance
 10 Service and information coming into the control room
 11 from a member of the public in terms of the extent to
 12 which you might question the information?
 13 A. That depended on the information that was coming through
 14 and what we would question or what I would have
 15 questioned.
 16 Q. Do you remember --
 17 A. (Overspeaking) look through log and think what
 18 information was coming through and look at the questions
 19 that was asked.
 20 Q. So if GMP gave you certain information, would your
 21 approach be that this is likely to be reliable
 22 information?
 23 A. If it was coming from another emergency service, I'd
 24 think it was more reliable than a member of the public.
 25 Q. That's the point I've slowly got to and forgive me,

202

1 Mr Casey, that's the point I'm asking you. As far --
 2 SIR JOHN SAUNDERS: Sorry, whoever the information is coming
 3 from, you need to understand it?
 4 A. Yes. You'd still question.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR SMITH: But then you were provided, do you remember, with
 7 a series of what are called emergency call management
 8 call prompts, ECM call prompts, do you remember that?
 9 A. Yes.
 10 Q. And did they have real value when it came to dealing
 11 with the public?
 12 A. They did in some circumstances. They was really good
 13 for -- say if a person's reported -- some of them were
 14 really good, but we didn't use them for every call.
 15 Q. So for example, and I'm sure we don't need to look at it
 16 again, the explosion action plan that was in place
 17 at the time, made reference to call prompt 6, explosions
 18 and entrapment. Nothing to do with bombs. Is that the
 19 type of call prompt that would be available to you if,
 20 for example, it was your understanding that a building
 21 had experienced a gas explosion and there was the risk
 22 that members of the public or occupiers might be trapped
 23 in the building?
 24 A. Yes.
 25 Q. So that's the sort of situation in which, given your

203

1 answer, that it would depend on the circumstances and
 2 the information, that's the sort of situation where
 3 those call prompts have value; is that right?
 4 A. Yes.
 5 Q. And likewise, with the "Bomb -- general" action plan,
 6 I can read at the moment, just to inform you, a call
 7 prompt was required when the hazmat officer had assessed
 8 the situation. So that again would be asking for more
 9 information, using the call prompt that had been
 10 supplied to you by North West Fire Control; is that
 11 correct?
 12 A. Yes.
 13 Q. And are they readily -- were they readily available to
 14 you so you could bring them up on the screen?
 15 A. Yes, or you could get a file, they was in -- some pods
 16 had a file that you could get them on to look it up.
 17 But at that time I wouldn't have got up from my desk and
 18 gone and got one when I've got someone on the line with
 19 casualties.
 20 Q. No. Did it appear to you that this wasn't a situation
 21 where you would be asking the sort of questions that
 22 there were in the ECM call prompts, given the
 23 information that you were receiving and reading on the
 24 log?
 25 A. What do you mean, sorry?

204

1 Q. Given the information you were receiving, and the
 2 information on the log and the seriousness of the
 3 situation as it was being explained, both in writing and
 4 verbally, did it appear to you that this wasn't
 5 a situation for you to be asking questions using the ECM
 6 call prompts?
 7 A. At that time, yes.
 8 MR SMITH: Thank you, sir.
 9 SIR JOHN SAUNDERS: Thank you very much, Mr Smith.
 10 MR DE LA POER: Sir, do you have any more questions for
 11 Mr Casey?
 12 SIR JOHN SAUNDERS: No, thank you.
 13 MR DE LA POER: In which case that will conclude his
 14 evidence. I think the plan is, subject to your
 15 approval, that we make a start on the next witness, who
 16 is outside. I will need a few moments because I'm yet
 17 to speak to her.
 18 (4.00 pm)
 19 (A short break)
 20 (4.10 pm)
 21 MR DE LA POER: Can Ms Gregson please be sworn.
 22 MS MICHELLE GREGSON (sworn)
 23 Questions from MR DE LA POER
 24 MR DE LA POER: Can you please state your full name?
 25 A. Michelle Louise Gregson.

205

1 Q. You're going to be with us beyond today, and we are
 2 going to go beyond 4.30, but probably not a very
 3 substantial period beyond. So let's make a start.
 4 Did you join Lancashire Fire and Rescue Service in
 5 May of 2004?
 6 A. Yes, I did.
 7 Q. Did you join in the capacity as a control room operator?
 8 A. Yes, I did.
 9 Q. Were you promoted to the rank of crew manager in 2009?
 10 A. That's correct.
 11 Q. Is crew manager the equivalent of team leader?
 12 A. Yes.
 13 Q. Please expand.
 14 A. As a crew manager in Lancashire Fire and Rescue Service,
 15 you were the — what was classed as a junior rank, so
 16 you couldn't be solely in charge of a shift, you would
 17 always have a watch manager with you. When we
 18 transferred to North West Fire Control, the team leader
 19 role became the role where you could run the shift with
 20 another team leader and, I believe, on the training
 21 system, it was that you were then classed as a watch
 22 manager A. So it was classed as — there was more
 23 responsibility once we got to North West Fire Control.
 24 Q. You sat in a direct line management above the control
 25 room operators as team leader?

206

1 A. That's correct.
 2 Q. And you wouldn't ordinarily be the subject of
 3 supervision as team leader; is that correct?
 4 A. That's correct.
 5 Q. But as you say, there would be two of you at the same
 6 rank?
 7 A. Yes, that's right.
 8 Q. On duty at the same time?
 9 A. Yes, sir.
 10 Q. Let's just consider that for a moment. Those two
 11 positions were that of the duty team leader and the
 12 administrative team leader; is that right?
 13 A. That's right.
 14 Q. Was the way it operated that the duty team manager was
 15 effectively the person who was primarily expected to
 16 manage the control room operatives, but the
 17 administrative manager was on hand to assist?
 18 A. Yes, it and it also made it clearer to the room to who
 19 the operators could direct mobilising queries to first,
 20 so that the duty team leader would maintain the overall
 21 activity of the room.
 22 Q. You plainly had in excess of a decade's experience
 23 working in a control room by the time we get
 24 to May 2017. Had you ever had experience of involvement
 25 in a spontaneous major incident?

207

1 A. Yes, I'd had involvement in major incidents, but not of
 2 the nature that I'm here to discuss today.
 3 Q. I use the word spontaneous in particular because
 4 sometimes there are planned major incidents, aren't
 5 there?
 6 A. Yes.
 7 Q. And there are some which occur without notice, the
 8 category that we're talking about when we come to
 9 22 May, so something entirely unexpected happens and
 10 a reaction is required. Had you had experience of such
 11 incidents on a large scale albeit not perhaps the nature
 12 of 22 May?
 13 A. Yes.
 14 Q. So you had experience, had you, of information coming in
 15 from multiple sources, a picture being built up and that
 16 information being disseminated?
 17 A. Yes.
 18 Q. Had you had experience of such incidents in your
 19 capacity as a supervisor, whether as a crew manager or
 20 a team leader?
 21 A. Yes.
 22 Q. So again that was something that was not new to you
 23 in the sense of having to oversee multiple calls coming
 24 in to multiple of your operators and then coordinate
 25 that and liaise?

208

1 A. That's right.
 2 Q. A general question about discretion. You dealt with
 3 this in your second witness statement. We can turn up
 4 it if you want to but I'm sure you'll have in mind the
 5 passage. Speaking generally, do team leaders have
 6 a discretion when it comes to mobilisation?
 7 A. Are we talking about when we got to North West Fire
 8 Control?
 9 Q. Yes. As a team leader, sorry. Yes, I'm being specific
 10 now to your role from May 2014.
 11 A. To a certain extent, there was some discretion that
 12 could be applied in some scenarios but it would all
 13 depend on what sort of incident we were dealing with.
 14 Q. Would the most helpful way to look at that issue be to
 15 look at the specifics of the night of 22 May and analyse
 16 the situation as it unfolded?
 17 A. Yes.
 18 Q. That's what we will --
 19 SIR JOHN SAUNDERS: It may be the most helpful, but I'm not
 20 sure I'm entirely prepared to go down that line. You
 21 must have some instructions. I know you've got action
 22 cards and things like that. So as a team leader, what
 23 are you told about your ability to depart from, as it
 24 were, the strict rule if you consider it necessary?
 25 A. It kind of all depended -- with North West Fire Control,

209

1 looking after four Fire and Rescue Services, each Fire
 2 and Rescue Service took a different approach into how
 3 happy they were about discretion for managers. So
 4 I could perhaps apply an example to you about another
 5 incident if you wanted me to.
 6 SIR JOHN SAUNDERS: Okay. I think it must be difficult for
 7 you when they're actually applying different principles.
 8 But in terms of Manchester, how do they rank on the
 9 discretion?
 10 A. Manchester didn't want discretion. As I understood it,
 11 we were to try to follow action plans as much as we
 12 possibly could.
 13 SIR JOHN SAUNDERS: Is that how it's put, try to follow them
 14 as much as you can, or is it put you must follow the
 15 plan? Sorry, I just need to --
 16 A. There was never to my mind or I was never involved in
 17 any direct discussions but the way that North West Fire
 18 Control developed -- you know, it set out as a new
 19 private company in 2014, so it was very much a work in
 20 progress. But to my mind and as a manager of the
 21 control room, from the experience that I was learning as
 22 we developed there, there was no discretion and there
 23 was a couple of times where I experienced having tried
 24 to apply discretion and being told, no, you must follow
 25 the action plan.

210

1 SIR JOHN SAUNDERS: I stopped you giving your example.
 2 Do you want to give your example now?
 3 A. Yes, I can. So for example, completely unrelated to
 4 this incident, we have an incident type at North West
 5 Fire Control called rescue of person at height. I came
 6 from Lancashire, as you know. So for example, if we had
 7 that incident type in Lancashire, Lancashire were happy
 8 for us to reduce the attendance because to a rescue of
 9 person at height, you'd have a lot of resources, rope
 10 rescue, various appliances proceeding.
 11 A rescue of person at height could be a person on
 12 a 6-foot-high flat roof, which, if you deem that not
 13 appropriate, you know that a firefighter or two
 14 firefighters can apply a procedure to climb a ladder and
 15 rescue the person; you don't need rope rescue.
 16 SIR JOHN SAUNDERS: Right.
 17 A. We were allowed to apply that discretion in Lancashire
 18 but in Manchester we were not allowed to apply that
 19 discretion and we had to send the full attendance.
 20 SIR JOHN SAUNDERS: That's helpful. Thank you.
 21 MR DE LA POER: We have, in a highly summarised way,
 22 introduced you at North West Fire Control and the role
 23 of team leader. We'll come back to aspects of that, but
 24 just to complete your involvement with North West Fire
 25 Control, you no longer work for North West Fire Control;

211

1 is that right?
 2 A. That's correct, sir.
 3 Q. When did you leave North West Fire Control?
 4 A. I think it was 3 March this year.
 5 Q. Did you leave at the rank of team leader or had you been
 6 promoted after the event?
 7 A. I had done a 6-month temporary promotion to operations
 8 manager, but when I left I was back to the role of team
 9 leader.
 10 Q. I'm going to read out a short passage from your first
 11 statement. If you need to turn it up, please feel free
 12 to, but you may find this is sufficient assistance.
 13 What you say is of your time there:
 14 "I maintained my professional and experience and
 15 skills by attending training annually and this includes
 16 training such as JESIP, which focuses on the sharing of
 17 information amongst agencies, resilience training, MTFA
 18 training and NILO presentations."
 19 So that's your training regime in a nutshell. I've
 20 asked this question of a number of witnesses and we'll
 21 see if it's a helpful way to explore your training with
 22 you. You were expected to perform particular
 23 responsibilities on the night of 22 May of 2017; do you
 24 agree?
 25 A. Yes, I agree.

212

1 Q. Do you regard yourself as having been adequately trained
2 to perform those responsibilities to a competent level?
3 A. I agree that I was trained to a good standard in MTFA,
4 JESIP and resilience training, because I had had the
5 presentation that I know Mr Gaskell in his evidence has
6 alluded to. I had that training, so I felt confident
7 with my training and my knowledge. What I didn't feel
8 confident in is perhaps applying that practically
9 because we had never had the chance to do that in
10 a simulated situation, for example.
11 Q. That's perhaps a helpful segue into what you say in your
12 second statement. Again, you'll turn it up if you need
13 to:
14 "I confirm that I played no part in the
15 Winchester Accord training exercise nor, to the best of
16 my knowledge, did anyone from NWFC. We have never been
17 invited to participate in any joint agency MTFA, JESIP
18 or Plato exercise, something I think is extraordinary.
19 It seems to me that the control room is overlooked in
20 these types of exercises, almost an afterthought. There
21 is no recognition that almost every single incident
22 starts with a phone call to a control room."
23 You wrote that statement some time ago but does that
24 reflect your current way of thinking about it?
25 A. Absolutely, sir, yes.

213

1 Q. Is that relevant in any way to the answer that you gave
2 me before I read that out to you in terms of your
3 confidence around dealing with it practically?
4 A. Yes.
5 Q. If there was one recommendation that you would make
6 around training to assist the chairman, what would it
7 be?
8 A. I could make a couple of recommendations.
9 Q. Don't confine yourself to one. Tell us now based upon
10 all of your learning and reflection based on the
11 incident, how could it be improved?
12 A. More time to train staff and to include the Fire and
13 Rescue Services in that.
14 SIR JOHN SAUNDERS: So you told us you need live exercises
15 of some sort, you need to practice all the theory you're
16 given to actually work it in practice. Are you saying
17 in addition more time for training?
18 A. Yes.
19 SIR JOHN SAUNDERS: So you think inadequate time has been
20 spent on training?
21 A. Yes, I do.
22 SIR JOHN SAUNDERS: How does that reflect on the night?
23 A. Um... Sorry, I just need a second to think about it.
24 SIR JOHN SAUNDERS: These are very important questions for
25 me on recommendations, so I am very happy for you to go

214

1 away and put your recommendations down on paper but
2 indicate to me as well what difference it would have
3 made on the night, in your view, if you'd had that
4 training. Would you prefer to do that?
5 A. I can probably elaborate further.
6 SIR JOHN SAUNDERS: Why don't you do it tomorrow morning
7 when you've had some time to think about it and make
8 some notes? Thank you.
9 MR DE LA POER: When you do that, rather than me asking the
10 question now, bearing in mind we're going to return to
11 the topic, can I also ask you to reflect on the evidence
12 that we have heard from at least one person about the
13 number of staff who were available and can I also ask
14 you to reflect, please, on the evidence that we've just
15 heard from Mr Casey about the way he thought about
16 incidents in terms of it being a different pod or
17 a particular pod's primary responsibility?
18 SIR JOHN SAUNDERS: Did you hear his evidence?
19 A. I only heard the first part because then I got the phone
20 call to come here. So I've missed -- I will catch up on
21 it tonight.
22 SIR JOHN SAUNDERS: That would be helpful, thank you.
23 MR DE LA POER: You'll know the part I'm speaking about, if
24 you're happy to watch the feed later.
25 MR COOPER: I wonder if I can assist again as we have got

215

1 the helpful opportunity of the witness going overnight
2 to invite through you, sir, the witness to look at the
3 entirety of Mr Casey's evidence, if not the entirety at
4 least the questions I was asking him and his answers
5 that he gave to me. That would be of great assistance.
6 SIR JOHN SAUNDERS: So give preference to Mr Cooper's part
7 over everybody else?
8 MR COOPER: I hesitated to say that because I knew that
9 would be said, but yes, actually.
10 SIR JOHN SAUNDERS: Just look at it all, please.
11 A. I will.
12 SIR JOHN SAUNDERS: Thank you very much.
13 MR DE LA POER: We'll leave that for the time being and
14 return to it perhaps at the start of your evidence
15 tomorrow. So we will, with the fact that that remains
16 incomplete, now turn to 22 May 2017.
17 We have heard evidence from David Ellis that you
18 were in a side office, off the main control room floor,
19 at the time that he began his call with GMP. Does that
20 accord with your recollection?
21 A. That's correct.
22 Q. We have also heard what doesn't appear to be
23 controversial evidence that he first attracted the
24 attention of Lisa Owen. Again, bearing in mind where
25 you came into the sequence, does that fit with your

216

1 understanding of events?
 2 A. Yes.
 3 Q. Is that because Ms Owen came and attracted your
 4 attention from that side office and brought you into the
 5 incident?
 6 A. That's correct.
 7 Q. Have you had an opportunity to review the entirety of
 8 Mr Ellis' call?
 9 A. Yes, I have.
 10 Q. That's extremely helpful. Can you give us an indication
 11 about approximately at what point in that call you first
 12 became aware of the incident? We know that the
 13 notification occurred at 22.34 when the subject matter
 14 of the call changed and we know he created the incident
 15 log at 22.38. So was it between those two times that
 16 you became aware or was it after he'd created the
 17 incident?
 18 A. I'm unsure, sorry.
 19 Q. The evidence he gave in relation to mobilisation
 20 involved Lisa Owen. Were you aware at the time that he
 21 did it of the explosion action plan being selected?
 22 A. I was aware that he had got the explosion incident type
 23 on his screen. I wasn't aware until watching the
 24 evidence of Mr Ellis that he had already been told
 25 before me. I thought I was the first person to kind of

217

1 prompt the non—mobilisation, but I wasn't aware until
 2 watching the evidence of Mr Ellis that he'd already been
 3 instructed not to mobilise.
 4 Q. It sounds from that evidence that — we'll hear what
 5 Ms Owen has to say about it, but on the basis of what
 6 Mr Ellis has told us, your instinctive reaction was
 7 exactly the same as Ms Owen's?
 8 A. Absolutely.
 9 Q. Namely don't mobilise in accordance with the explosion
 10 action plan?
 11 A. Absolutely, my decision was the same.
 12 Q. Your witness statement at paragraph 7, the first, deals
 13 with you — it begins saying:
 14 "I shouted up the rest of the control room to
 15 remember any information they received in relation to
 16 the incident and were not sure if and who to share it
 17 with to refer to me or Lisa and to remember our JESIP
 18 training and multi—agency working."
 19 A. That's right.
 20 Q. Do you recall doing that?
 21 A. Yes, I do.
 22 Q. Was that before or after the event that you recall,
 23 namely telling Mr Ellis not to mobilise?
 24 A. I'd told him not to mobilise and then I addressed the
 25 room.

218

1 SIR JOHN SAUNDERS: Okay, I don't know whether you heard any
 2 of this, but one of the problems, it seems to me, about
 3 the JESIP principles in this situation, and of course
 4 it's all about sharing information and making sure
 5 everyone does have the information —
 6 A. Yes.
 7 SIR JOHN SAUNDERS: In an incident like this, it seems quite
 8 difficult to know as an operator what information the
 9 person you're talking to has already got, particularly
 10 when they've already been on other calls. How would you
 11 expect that to work in practice? And does it work in
 12 practice?
 13 A. I was just going to say, actually, sir. Essentially,
 14 it would be very difficult to make it work in practice.
 15 SIR JOHN SAUNDERS: Because?
 16 A. Because there's so much information. It's probably
 17 impossible for everybody to hear exactly what each other
 18 is getting simultaneously because there was things
 19 happening at the same time.
 20 SIR JOHN SAUNDERS: So is this something that you were aware
 21 of before this incident, that this difficulty could
 22 arise, or did this incident show you a problem that you
 23 hadn't previously been aware of?
 24 A. No, I was certainly aware that sometimes, on certain
 25 occasions, more so in busier periods in the control

219

1 room, of a period of higher activity, that difficulty
 2 does occur. It certainly wasn't the first time that it
 3 had ever had to be managed, if you will, sir.
 4 SIR JOHN SAUNDERS: So if you've got on your log a whole lot
 5 of information, as you have here, to actually go through
 6 that with someone you're talking to may actually take
 7 quite a long time maybe?
 8 A. Yes, definitely, and —
 9 SIR JOHN SAUNDERS: Does it work when you're in a control
 10 room, taking time over a call?
 11 A. No. And the other thing that was against us, if
 12 you will, is that there was more than one incident log.
 13 SIR JOHN SAUNDERS: Yes. I gather they get duplicated on to
 14 each other.
 15 A. If it's a repeat call, so for instance Mr Casey's call
 16 was a duplicate, he would duplicate that call to, I'm
 17 assuming, incident 9074.
 18 SIR JOHN SAUNDERS: Which he did, yes. But the one relating
 19 to sending to Philips Park, that wouldn't get
 20 duplicated?
 21 A. Correct, sir, that would be cross—referenced.
 22 SIR JOHN SAUNDERS: Why? Why don't you duplicate if it's
 23 all part of the same incident?
 24 A. When you duplicate an incident you can't then see it on
 25 the CAD system, the computer—aided dispatch —

220

1 SIR JOHN SAUNDERS: Right.
 2 A. — which in essence is our mobilising system. So if you
 3 duplicate it, you would then have to go in to view your
 4 duplicate calls, whereas if you cross-reference, you can
 5 still look at the — you have easier access to the
 6 incident log.
 7 SIR JOHN SAUNDERS: Right. So you've explained to me how in
 8 practice, in a situation like this, JESIP, as defined in
 9 those terms then, just can't really work in practice
 10 because of the practical difficulties. When you make
 11 recommendations, suggest recommendations to me, you're
 12 going to tell me how that can be put right, are you?
 13 Maybe?
 14 A. I would — well...
 15 SIR JOHN SAUNDERS: You'll try.
 16 A. I have ideas.
 17 SIR JOHN SAUNDERS: Good. We'll look at it tomorrow,
 18 thank you.
 19 MR DE LA POER: I think that there will be time for us to
 20 make a good start on this, but we probably won't finish
 21 it as a topic area. We've reached the stage in the
 22 evening where we are going to talk about action plans.
 23 We should just review what you have said in writing
 24 about this.
 25 A. Yes.

221

1 Q. In your first witness statement, and again if you want
 2 me to take you to the detail of it, I very happily will,
 3 you describe that whilst Mr Ellis is on the telephone —
 4 and I'm taking this from midway down paragraph 8 —
 5 there's another call coming in from NWS to your
 6 colleague, Joanne Haslam. So if you want to just track
 7 my summary here, it's page 3, about halfway down the
 8 remnants of paragraph 8 on that page.
 9 A. Yes, I've got that.
 10 Q. You then say, and again we're just looking at what you
 11 said in writing:
 12 "Ms Haslam received information that the bomb had
 13 detonated. NWS then advised there were reports of
 14 people being shot and reports of a shooter."
 15 You conclude that paragraph by saying:
 16 "At no time during the incident was I advised that
 17 there was no active shooter on the scene."
 18 Then what you said in your first witness statement
 19 is:
 20 "At this point I and Team Leader Owen made the
 21 decision to follow the action plan for bomb, as opposed
 22 to the action plan for explosion, based on the
 23 information provided to us by the police at 22.38
 24 referred to in the previous paragraph."
 25 You have provided a subsequent witness statement,

222

1 your second witness statement, in which you say, and
 2 again I'm summarising here, that you didn't in fact
 3 attach and open the bomb action plan to this incident;
 4 is that right?
 5 A. That's right.
 6 Q. But rather, you were in effect mentally following the
 7 requirements of the bomb action plan —
 8 A. Yes.
 9 Q. — which were known to you at the time, which you could
 10 recall, because in your judgement that was the better
 11 action plan to follow than the explosion action plan?
 12 Is that a fair summary of what you have said in writing?
 13 A. It is.
 14 Q. So firstly, in your first account, you indicate that it
 15 was a joint decision by you and Team Leader Owen; do you
 16 agree?
 17 A. Yes, I do.
 18 Q. So was there a conversation between the two of you,
 19 "Let's not follow the explosion action plan, let's
 20 follow the bomb action plan, we both know what the first
 21 action is", or words to that effect?
 22 A. I have tried to think about this so many times and
 23 obviously so much time has passed now. I can't recall
 24 the exact dialogue between us, but what I can tell you
 25 is that it wasn't so much a conscious conversation about

223

1 which action plan, but rather we knew we needed the
 2 NILO. So whichever action plan that fitted into, it was
 3 more because of the information that we'd received, we
 4 needed to go to the NILO.
 5 Q. Well, let's have a look at that, and we'll probably
 6 circle around it a number of times.
 7 SIR JOHN SAUNDERS: In the exercise of your discretion, it's
 8 not open for you to say, "Well, actually, neither action
 9 plan is very good, let's talk to the NILO to get some
 10 advice before we mobilise", that's just not what you're
 11 meant to be doing?
 12 A. No.
 13 SIR JOHN SAUNDERS: So you have to find an action plan where
 14 the requirement is to speak to a NILO before you
 15 mobilise in order to get round to what you actually
 16 want?
 17 A. Yes, because there's a list of — lists and lists of
 18 action plans and each Fire and Rescue Service has their
 19 own set of action plans which all float in the system.
 20 But if you choose an incident type, then the action
 21 plan — there are action plans attached to the incident
 22 types. So you couldn't just choose an action plan
 23 without...
 24 SIR JOHN SAUNDERS: What I'm saying is, if you have a doubt
 25 about what's the right action plan or whether following

224

1 the action plan would actually cause danger to people
 2 going in, if you're going to send them in automatically,
 3 do you not have a discretion to say, "Before I decide on
 4 the action plan, before I put that down, I am going to
 5 speak to a NILO and say, 'What do we do here, which
 6 action plan do we follow'?"
 7 A. No.
 8 SIR JOHN SAUNDERS: Not an option?
 9 A. No, sir.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR DE LA POER: Let's just take it in sequence, starting
 12 with the log, and then we'll work from there.
 13 Mr Lopez, please can we have {INQ008376/3}, which is
 14 Mr Ellis' incident log, 9074 as it's sometimes referred
 15 to.
 16 We can see, as we looked at with him, that against
 17 the first entry, 22.38.48, the type code on the fourth
 18 line, which is identified is "explosion -- explosion".
 19 And he has explained to us, and I'm sure you'll be able
 20 to agree, that you can do a keyword search or you can
 21 put in a word and that will have action plans associated
 22 with it; is that right?
 23 A. That's correct.
 24 Q. What the records appear to indicate occurred is at
 25 22.38.51, the action plan for "building fire -- high

225

1 rise" was added and the action plan for explosion was
 2 added; do you see that?
 3 A. Yes, I do.
 4 Q. So it seems we've reached a stage, so far as Mr Ellis is
 5 concerned, where he has done, I'm sure you'd say, what
 6 he was supposed to, which was to type in the word
 7 "explosion", because that's what he was being told.
 8 A. Yes.
 9 Q. And he has been presented with two action plans; is that
 10 right? Is that how it will appear to an operator?
 11 A. Yes, it would.
 12 Q. So if we go over the page, {INQ008376/4}, we can see
 13 that by 22.42 there is an entry against what appears to
 14 be an action plan 3115, namely advise the ambulance,
 15 that that has been completed; do you agree?
 16 A. Sorry, could you say that again?
 17 Q. Yes, of course. At 22.40.42, the comment indicates
 18 against action plan 3115, which is the explosion action
 19 plan, and no doubt one of those, as we'll see, is to
 20 "advise the ambulance" and that has been completed.
 21 A. Sorry, I'm there now.
 22 Q. Do you see that?
 23 A. Yes, I do.
 24 Q. If we go down to 22.41.21, we can see the action plan
 25 3115, "notify or advise the police", is also marked as

226

1 completed. So it appears that the requirements of that
 2 action plan are marked as having been actioned?
 3 A. Yes.
 4 Q. And appropriately so because the information Mr Ellis is
 5 receiving permits those to be marked off.
 6 If we then go over the page {INQ008378/5}. We'll
 7 leave that for the time being, I'll come back to that.
 8 So what we've seen in those entries, which are
 9 moving towards the point of your call with Mr Berry,
 10 is that there seems to be actions against the action
 11 plan being marked off. Do you agree that's what the
 12 records seem to show?
 13 A. Yes, I agree.
 14 Q. But by the point of your call to Mr Berry, you, and
 15 we'll hear from Ms Owen, and we've already heard from
 16 Mr Ellis, and she have said, "Don't do the first
 17 requirement of the explosion action plan, namely to
 18 mobilise some standard resources, some specialist
 19 resources"?
 20 A. Yes.
 21 Q. And Mr Ellis has told us that he had reached a stage
 22 when he was instructed not to take it any further, where
 23 all that he had to do was press one further button for
 24 the mobilisation to then be automated?
 25 A. Yes, that's correct.

227

1 Q. That accords with your recollection?
 2 A. It does, yes.
 3 Q. Let's just have a look at the terms of the explosion
 4 action card and we'll need to look at the issue in terms
 5 of the action card in a moment. {INQ004404/1}.
 6 SIR JOHN SAUNDERS: While that's coming up, it really
 7 doesn't matter, but if you are notified by the police of
 8 an explosion, is it then part of the action card that
 9 you notify them of an explosion? Because that's what
 10 the log actually says has happened.
 11 A. If that was the case, then on the action plan I would
 12 expect the operator to put, "Call received from police",
 13 and a log number.
 14 SIR JOHN SAUNDERS: Yes, okay.
 15 MR DE LA POER: We can see those bullet points, the
 16 penultimate and antepenultimate in the top box, "Advise
 17 police", "Advise ambulance". Those are actions under
 18 here and of course this action card doesn't contemplate
 19 precisely where the information is coming from. So you
 20 could have been notified by a member of the public and
 21 therefore this action plan would require that the police
 22 had that passed on to them; would you agree?
 23 A. Yes.
 24 Q. As it was, you learned of it from the police and then
 25 subsequently ambulance phoned to inform you of it, in

228

1 which case implicitly they already knew and that's why
 2 those actions were able to be marked off?
 3 A. Yes.
 4 Q. This action plan, the explosion action plan, doesn't
 5 appear in this format on your system, does it?
 6 A. No, it doesn't.
 7 Q. Do the circumstances in which this action plan is
 8 relevant appear on your system when the action plan
 9 appears?
 10 A. Do you mean the triggers?
 11 Q. Yes.
 12 A. No.
 13 Q. So a person who types in the word "explosion", as was
 14 the case in Mr Ellis' case, and where the action plan
 15 comes up, other than the fact that the system has
 16 prompted that action plan, they will have no other
 17 information immediately available to them as to the
 18 circumstances as to whether they should follow that or
 19 not; is that right?
 20 A. That's absolutely correct, yes.
 21 Q. Does that strike you as being problematic?
 22 A. Yes.
 23 Q. Why?
 24 A. Because there has got to be an understanding, as my
 25 understanding was and is, that an explosion is something

229

1 caused by the triggers that are listed there. So it
 2 could be open to interpretation from the staff that are
 3 using the incident types and therefore the subsequent
 4 action plans.
 5 Q. The whole point of an action plan is to ensure that all
 6 the thinking can occur before an incident happens and
 7 people then find themselves following the relevant steps
 8 in response.
 9 A. That's correct.
 10 Q. But the system that was being operated at North West
 11 Fire Control appears to have been that you weren't being
 12 provided with the detail of the circumstances in which
 13 this action card would or wouldn't be appropriate for
 14 the control room operator?
 15 A. That's correct.
 16 Q. So was there a reliance on an expectation that they had
 17 been trained in the detail of this card and would
 18 remember it?
 19 A. I would say so, yes.
 20 SIR JOHN SAUNDERS: Just help me again: an explosion could
 21 trigger different incident type action plans?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: And the one we're looking at at the
 24 moment is explosion?
 25 A. Yes.

230

1 SIR JOHN SAUNDERS: You could have a different incident type
 2 action plan if it's caused by a gas explosion; is that
 3 right?
 4 A. Yes. Until I started to watch the inquiry, I'd not seen
 5 it laid out like this.
 6 SIR JOHN SAUNDERS: But is there a separate action plan card
 7 for a gas explosion?
 8 A. Not that I'm aware of. It could trigger -- for example
 9 let me use the chemical, because that's something that
 10 just springs to mind. That could trigger a different
 11 action plan because it could be that there would be --
 12 SIR JOHN SAUNDERS: I can understand why it could. But what
 13 would it be called, chemical explosion? What's that
 14 different action card for?
 15 A. No, I don't think there is incident types for
 16 explosions. I think explosion is just explosion, but it
 17 could mean that if it involves chemicals, we may use the
 18 hazmat --
 19 SIR JOHN SAUNDERS: -- action card as well?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So you've got two action cards going?
 22 A. You can have, I think the worst time I've ever
 23 experienced I think was 78 actions because there was
 24 about eight action plans added to a large incident that
 25 I managed once.

231

1 SIR JOHN SAUNDERS: Okay.
 2 A. You can add several action plans to an incident.
 3 SIR JOHN SAUNDERS: You can, but maybe you do different
 4 things as a result?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Probably with a chemical action plan --
 7 hazmat, did you call it?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: That may have different actions attached
 10 to it from the explosion action plan. It probably does,
 11 doesn't it?
 12 A. Yes, it does.
 13 SIR JOHN SAUNDERS: You don't send ordinary vans into
 14 a chemical explosion?
 15 A. No, sir.
 16 SIR JOHN SAUNDERS: So how do we understand bomb in that
 17 circumstance or don't we?
 18 A. Well, we don't, or I don't. I can only... Sorry,
 19 I don't want to pre-empt anything. Yes, I don't.
 20 SIR JOHN SAUNDERS: Okay.
 21 MR DE LA POER: I wonder -- I'm going to turn next to look
 22 at the bomb action plan. It may be that that's better
 23 tomorrow morning.
 24 SIR JOHN SAUNDERS: I'm sorry we sat late, but it is
 25 obviously important that we at least have some idea

232

1 where we're going. I'm sorry, I'm going to have to ask
 2 you to come back at 9.30 tomorrow.
 3 A. That's no problem, sir.
 4 SIR JOHN SAUNDERS: Thank you very much.
 5 Thank you.
 6 (4.50 pm)
 7 (The inquiry adjourned until 9.30 am
 8 on Tuesday 29 June 2021)

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19
20
21
22
23
24
25

233

I N D E X

1
2
3 MR DAVID ELLIS (continued)1
4 Questions from MR DE LA POER (continued)1
5 Questions from MR SMITH4
6
7 MS JOANNE HASLAM (sworn)43
8 Questions from MR DE LA POER43
9 Questions from MR WARNOCK78
10 Questions from MR HORWELL81
11 Questions from MR COOPER88
12 Questions from MR SMITH116
13 Further questions from MR SMITH139
14
15 MR DEAN CASEY (affirmed)144
16 Questions from MR DE LA POER144
17 Questions from MR HORWELL171
18 Questions from MR COOPER175
19 Questions from MR SMITH196
20
21 MS MICHELLE GREGSON (sworn)205
22 Questions from MR DE LA POER205
23
24
25

234

235

A

ability (2) 163:22 209:23
able (25) 4:9 11:24 31:9 35:3
46:3 65:24 75:14 80:2
108:15,25 111:9 132:19
133:24 136:6 145:4,6,20
146:2,14 153:4 169:11,14
181:15 225:19 229:2
above (4) 9:5 109:23 133:10
206:24
absence (1) 40:1
absolutely (16) 6:4 9:18
23:12 59:13 74:2,13 90:14
110:13 129:2 187:8 195:3
197:3 213:25 218:8,11
229:20
accept (8) 96:21 101:17
108:11 111:8 186:20,23
188:3,5
accepting (1) 82:3
access (4) 35:3 125:17 172:4
221:5
accessed (1) 65:2
accessible (1) 162:6
accessing (2) 57:14 64:22
accord (3) 12:12 213:15
216:20
accordance (5) 2:18 26:1
29:22 162:3 218:9
accordingly (1) 35:19
accounts (1) 228:1
account (2) 38:21 223:14
accuracy (1) 125:1
accurate (3) 4:19,19,20
accurately (1) 44:11
achieve (1) 144:21
achieved (2) 27:20 147:12
acknowledged (2) 112:3,7
acknowledging (1) 92:23
across (3) 47:4 67:11 123:7
acting (1) 27:25
action (135) 15:24
16:2,5,9,10,12,16
17:4,4,8,13,20,23
18:3,6,11,13 22:25 29:22
30:0 31:3,4 33:1,6,15,20
34:12 38:12 40:16
46:7,9,15,21,24,24
91:20,21,22 92:2,7,9,14
99:4,6,11,17,19 114:23
119:13,24 120:5 139:25
140:4,7 166:8,11
167:4,5,10,14,19 168:3,4
192:19,20 199:4,5 203:16
204:5 209:21 210:11,25
217:21 218:10 221:22
222:21,22
223:3,7,11,11,19,20,21
224:1,2,8,13,18,19,20,21,22,25
225:1,4,6,21,25
226:1,9,14,18,18,24
227:2,10,17
228:4,5,8,11,18,21
229:4,7,8,14,16
230:4,5,13,21
231:2,6,11,14,19,21,24
232:2,6,10,22
actioned (1) 227:2
actions (23) 17:6 18:10
21:23 28:11 30:21 33:22
34:5,8 44:25 45:8,13,18,19
47:5 73:12 95:23 99:13
192:13 227:10 228:17
229:2 231:23 232:9
activate (1) 152:23
active (22) 53:17 54:1
56:5,22 57:21,24 58:17,25
60:4,7,18 86:10
87:3,8,12,14 121:3
124:22,23 125:4,5 222:17
activity (2) 207:21 220:1
actual (12) 13:12,19,24 15:6
16:10 17:1 18:10 23:7
30:22 96:20 118:23,24
actually (50) 11:11 13:23

15:12 18:24 19:8,13 23:11
26:23 28:13 33:7,11,15
38:17 43:25 46:22 49:8
55:10 56:17 63:6 75:19
76:20 77:24 80:15 89:22
98:12 99:23 100:12 109:14
118:16 135:11 137:5,15
138:1 165:2 176:2 179:1
180:20 182:24 191:8
198:18 210:7 214:16 216:9
219:13 220:5,6 224:8,15
225:1 228:10
ad (10) 6:1,5,9,11 9:22,23
10:5 118:11 185:7,9
add (3) 64:12 112:13 232:2
added (3) 226:1,2 231:24
adding (1) 30:24
addition (3) 33:12 89:3
214:17
additional (7) 9:19 17:6 20:2
31:13,20 66:15 131:8
address (9) 13:8,12,14,19,20
14:22 15:6 18:6 148:20
addressed (3) 9:7 37:18
218:24
adequate (2) 175:19,22
adequately (3) 44:5 145:20
213:1
adhere (1) 34:12
adjoined (1) 233:7
adjournment (1) 127:21
adjusted (1) 42:15
adjustments (1) 143:25
admin (1) 149:1
administrative (2) 207:12,17
admit (1) 143:1
adopted (1) 128:5
advance (1) 4:17
advantage (2) 101:23 102:10
advantages (2) 101:25 102:2
advice (9) 24:22,22,23 31:23
32:11 77:11 78:1 120:5
224:10
advise (8) 20:7 119:24 159:5
226:14,20,25 228:16,17
advised (4) 23:9 158:11
222:13,16
advocates (2) 29:16 33:3
affect (1) 91:13
affected (1) 191:24
affirmed (2) 144:7 234:15
afraid (3) 5:8 8:1 80:13
after (32) 10:15 24:1 26:22
29:20 33:25 34:24 40:15
52:8 65:15 86:4 87:1
90:8,21 116:12 126:18
127:13 128:16 129:20
139:21 140:1 146:15
150:23 159:18 162:13,16
165:19 168:9 173:9 210:1
212:6 217:16 218:22
afterthought (1) 213:20
afterwards (3) 175:2 187:13
190:16
228:4,5,8,11,18,21
229:4,7,8,14,16
230:4,5,13,21
231:2,6,11,14,19,21,24
232:2,6,10,22
again (42) 5:2 7:25 16:20
19:5 25:11 30:20 36:20
42:2 51:7 52:4 68:4 69:2
70:3 91:4 94:3 101:12
108:3,20 110:6 111:4
113:19 128:16 132:3 134:4
145:15 149:20 159:6
185:20 186:20 188:3 189:5
203:16 204:8 208:22
213:12 215:25 216:24
222:1,10 223:2 226:16
230:20
against (8) 55:24 69:23
140:21 220:11 225:16
226:13,18 227:10
agencies (7) 2:6 41:12
44:8,12 97:15,25 212:17
agency (1) 213:17
ago (6) 6:18 131:3 139:8
163:14 197:15 213:23
agree (33) 29:6 50:4 57:7,24
59:19 73:2 86:19

130:13,14 136:3,8,10
153:25 155:1 156:16,24
157:14,22 158:6,16 159:13
160:5 164:18 170:9
212:24,25 213:3 223:16
225:20 226:15 227:11,13
228:22
agreed (4) 17:2 33:13,22
200:3
agreeing (1) 160:2
ahead (1) 29:21
aid (1) 10:4
aidememoire (5) 10:17 11:16
185:25 186:9,13
airwave (2) 10:4 139:12
aisha (2) 49:25 50:2
albeit (1) 208:11
alert (1) 190:22
alerted (1) 190:9
allocated (2) 158:4,7
allow (3) 38:9 115:25 182:7
allowed (2) 211:17,18
allowing (2) 192:13,13
alluded (1) 213:6
almost (3) 36:9 213:20,21
along (1) 192:18
alphabetical (1) 119:6
already (24) 14:24 16:6 21:7
42:12 45:3 57:13 82:25
112:2 129:15,21 152:1
154:11 164:8 183:20
191:19,22 197:24 199:24
217:24 218:2 219:9,10
227:15 229:1
also (24) 5:19,21 8:2,10
17:23 18:14,20 21:2 25:17
35:5 44:16 92:24 94:16
118:9 120:5 122:23
141:2,20,21 207:18
215:11,13 216:22 226:25
although (8) 2:12 20:14
31:14 45:3 50:10 51:15
158:22 159:18
always (10) 60:1,21 62:25
66:7 66:4 78:4,6 164:25
193:19 206:17
amb (1) 158:11
ambulance (38) 38:2,10 48:6
49:22 50:16 54:19 55:17
56:14 59:4 60:5 61:6 92:10
96:1 97:15 103:12,13
105:7,9,10,10,12 107:14
119:24 120:6,21,25 125:2
126:14 173:5 174:19
191:11 195:14 196:6 202:9
226:14,20 228:17,25
ambulances (1) 191:9
among (2) 9:15 50:18
amongst (3) 152:7 184:21
212:17
amount (4) 46:9 111:1 160:5
163:21
amplify (1) 161:23
analyze (1) 209:15
andor (1) 38:10
andy (10) 68:8,9,16,17,25
69:11 106:18 155:4 157:14
173:24
announcement (2) 38:21
47:25
annual (4) 89:3,7,9 90:4
annually (1) 212:15
another (18) 6:21,23 38:6
65:3 66:3 68:22 107:9
123:10,12 142:25 158:15
165:21 171:4 191:13
202:23 206:20 210:4 222:5
answer (25) 1:15 3:5 12:19
43:21 45:4 74:12 80:5,12
82:3 92:20 95:4,5 104:4
123:24 125:24 139:7
141:24 145:24 146:2,2
161:24 182:3 190:8 204:1
214:1
answered (4) 48:19 83:24
85:24 149:10

answering (1) 128:22
answers (3) 61:21 158:1
216:4
antepenultimate (1) 228:16
anybody (6) 57:9 110:20
152:11,16 164:20 166:11
anyone (13) 49:4 71:22 78:5
85:2 111:14 115:25 165:10
169:14 173:3,12 183:9,21
213:16
anything (22) 1:9 2:11 9:17
22:16 32:18,19 45:8 48:18
65:18 83:11 87:2
90:13,14,15 112:13 138:7
154:6 166:10 192:4,18
197:7 232:19
anyway (5) 6:8 20:15 21:15
29:17 200:20
anywhere (2) 32:2,9
apart (1) 127:7
apo (1) 69:8
apologise (9) 10:2 25:3 74:3
122:3 143:8 160:16 182:1
191:4,5
apparent (5) 48:24 49:2
66:10 109:19 167:21
appear (10) 78:20 138:2
173:4 204:20 205:4 216:22
225:24 226:10 229:5,8
appeared (1) 122:11
appears (10) 49:12 70:7,19
72:13 128:22 157:10
226:13 227:1 229:9 230:11
appliance (10) 112:25 113:6
117:1,2,4,17,20,21 135:9
158:25
appliances (13) 16:15 18:25
19:3 26:1,8 27:14 31:23
32:7 33:12 60:14 114:20
159:2 211:10
application (1) 10:12
applied (1) 209:12
apply (6) 136:7 210:4,24
211:14,17,18
applying (2) 210:7 213:8
apportion (1) 82:23
appreciate (6) 60:13 86:23
88:3 102:20 160:2 199:20
appreciated (1) 33:18
appreciation (1) 95:20
approach (2) 202:21 210:2
approached (1) 36:23
approaches (1) 155:12
appropriate (14) 8:18
16:8,12 17:21 18:4 38:11
113:11 124:19 176:20
192:13 193:3 196:9 211:13
230:13
appropriately (1) 227:4
approval (1) 205:15
approximately (2) 45:21
217:11
april (9) 9:21 10:14 101:8,8
118:2 119:7,8,10 196:17
area (7) 13:17 14:2 148:21
157:9 165:2 193:20 221:21
areas (7) 9:5 147:18 176:10
178:3,4,6,8
arena (19) 14:16 26:9,15,20
27:8 86:16 96:3,23
100:14,17 113:7,16,19
114:17 117:9 145:1 150:23
166:17 195:20
arent (6) 25:14 39:22 96:6
176:5 189:5 208:4
arise (3) 25:19 78:1 219:22
arises (1) 1:10
arising (1) 31:24
around (6) 116:20 148:21
153:22 214:3,6 224:6
arrange (2) 114:13 191:15
arranged (1) 190:17
arrival (1) 30:5
arrive (1) 191:18
arriving (1) 159:5
ascribed (1) 151:14

aside (1) 58:5
ask (89) 1:9,22 5:23 11:9
25:4,18 34:6 36:1,12,18
39:18 51:5 53:22 57:18
58:6 61:6,8,10,16 62:9,25
63:4,9 64:9 68:1 74:10
76:21 79:7 84:24 85:18
86:1,15 87:17,21
88:14,18,20 90:9 92:24
93:3 97:9,11 98:6 111:21
112:22 114:2 115:7,9
127:12 130:8,22,24 131:22
132:6,18 135:11 138:23,25
139:1,3,6,10 143:24 145:5
151:12,23 152:9 154:22
155:3 164:9,10 170:25
171:17 175:12,16
189:11,16,18,24 190:3,9
191:17 194:14 197:14
199:14,16 215:11,13 233:1
asked (63) 6:12 13:7 35:23
44:24 53:22 61:11 62:24
64:1 68:11,20 71:12,13
79:12 80:20 82:25 85:19
90:22 96:1 97:20 98:17
100:22,24 106:2,17 110:21
113:10 115:13 117:6 118:7
119:12,23 125:14
129:11,21 134:20 140:20
141:10,11,11,13 142:6,7
143:8,9 155:14,19 156:17
160:11 167:20,22 168:25
170:24,25 171:1,8 174:3
176:20 199:2,9,17
202:6,19 212:20
158:25
asking (27) 2:3 4:11 6:17
14:20 61:21 74:17 84:6
90:2 114:8,16,19 115:11
119:15 147:1 159:1 163:7
171:7 179:10 189:7 192:4
202:7 203:1 204:8,21
205:5 215:9 216:4
aspect (2) 125:10 191:13
aspects (4) 4:13 85:19 97:12
211:23
assessed (1) 204:7
assessment (1) 188:23
assigned (1) 168:5
assist (9) 7:1 15:11 78:19
103:3 112:14 139:3 207:17
214:6 215:25
assistance (6) 5:11 113:9
128:2 145:5 212:12 216:5
assisted (3) 42:20 45:16
160:2
assists (1) 25:4
associated (4) 15:17 16:10
17:19 225:21
assume (5) 40:25 94:18
95:4,5 132:15
assumed (2) 33:15 41:3
assuming (5) 60:21 66:7
93:16,17 220:17
assumption (2) 131:11
143:11
assure (1) 157:5
atmosphere (1) 73:14
atrocities (2) 113:16 187:10
attach (1) 223:3
attached (2) 224:21 232:9
attack (15) 8:15 9:14,18
10:21 12:3 45:16,20 85:8
108:21 139:21 140:1
144:17 145:14 175:2
188:24
attacks (2) 188:15 192:10
attempt (2) 168:10 193:10
attempting (1) 81:25
attempts (1) 190:24
attend (7) 13:24 60:15 78:24
86:20 89:10,11 104:14
attendance (6) 17:2,19,21
89:12 211:8,19
attended (2) 70:21 95:1
attending (2) 41:6 212:15
attention (13) 7:24

19:12,13,16,22 21:6 49:3
98:13 149:18 160:8 183:7
216:24 217:4
attract (1) 19:12
attracted (5) 19:13,16 21:5
216:23 217:3
attracting (1) 19:22
audible (1) 43:21
audio (18) 47:1
51:2,9,10,14,25 52:12
67:3,5 70:15,17 71:8 128:4
150:21 155:6,8 168:20,22
august (2) 144:13 145:11
authority (2) 23:20 107:7
automated (1) 227:24
automatic (2) 23:14 56:10
automatically (9) 13:15 14:5
18:7 20:6 22:15,19 34:17
197:22 225:2
autumn (1) 144:17
availability (2) 10:24 12:18
available (25) 13:18,21,23
18:17 27:11 35:2 65:2 70:6
76:6 80:24 80:25 85:19
129:13 130:5 141:5 158:25
180:11 203:10,15,16
200:24 192:19 204:13
215:13 229:17
venues (1) 125:15
avoid (1) 139:21
aware (104) 1:11,19 2:17
19:14 20:16,19 22:8
24:1,14,25 28:4,6 31:16
35:1,5,20 38:14,18 40:12
46:8,19,22 47:22 49:7,7
54:17 62:5 63:7,8,13,17,17
66:8,19,22 76:13 77:19
78:8 79:9,14 83:1,3,5,6,7
84:10,16,21 85:3,7,9,13,15
90:20 93:8 96:6,15 99:2,4
106:22 109:4 112:20
125:15,18,20 130:18,19,25
131:7,8,13,15 132:9,12,20
135:7,22 138:11 142:7
211:23 148:11 149:16
150:2,11 152:5,11
162:12,18 174:25 176:22
187:23 195:20 199:5
200:15 217:12,16,20,22,23
218:1 219:20,23,24 231:8
awareness (7) 8:19 23:16
81:14,17 125:13 172:13
173:16
away (2) 73:19 215:1
awful (1) 60:3

back (60) 1:5 5:8 9:20 13:20
26:3 28:24 36:18 37:10,16
39:13,19,21 46:25 49:21
50:3,7 53:15 59:2
61:11,15,21 69:8 82:16
90:17 92:17 95:14 115:25
116:15,17 120:20 121:21
127:13 131:14 149:25
156:16 157:3 158:24
160:20 170:5 179:21,22
181:8,10,22 182:18,19
183:5,10 185:11,16 186:14
190:17 191:2,19 197:7
198:20 211:23 212:8 227:7
233:2
backend (1) 69:14
background (4) 47:1 51:4,6
52:1
backup (1) 183:6
bad (1) 195:10
bag (1) 99:25
baldly (1) 59:15
based (9) 16:16 17:1 19:15
25:16 146:8 200:23
214:9,10 222:22
basically (1) 147:17
basing (1) 83:22
basis (4) 32:21 84:14 131:2
218:5
bataclan (1) 8:16
bear (1) 148:6
bearing (8) 1:23 44:3 49:10
124:17 142:21 152:21
215:10 216:24
became (5) 49:2 66:8 206:19
217:12,16
become (3) 28:4 47:22 48:24
before (58) 1:6 23:21
24:8,22 26:12 31:23 33:18
34:22 37:3 39:25 47:24
67:21 70:1 71:2,3,5
74:9,10 79:7 91:4 93:22
94:10,19 107:9 109:14
110:18 115:7,13 118:8
119:2 126:7 128:9,15
129:3 130:7 131:19 132:4
133:23 134:23 137:17
141:1 144:16 159:19
162:19 165:19 169:2
171:14 175:1 192:6 214:2
217:25 218:22 219:21
224:10 14 225:3,4 230:6
beforehand (1) 51:2
begin (4) 4:11 13:20
88:20,22
beginning (1) 188:18
beginnings (3) 70:2 128:20
218:13
behalf (7) 1:7 2:1 78:15 81:6
88:19 125:14 175:16
behind (8) 5:21 35:11 36:6
37:7,15 69:3 150:4 161:25
being (64) 9:1 12:2,3 20:5
25:1 27:15 28:11 35:14
36:24 38:8 45:17 48:24
52:22 63:23 74:9 76:4,6
95:3 101:22 102:9 103:1,7
104:22 108:2 113:15 115:3
117:6,12 122:21 125:1
127:9 136:6 139:22 140:20
160:18 161:24 162:14
165:8,13 166:12 176:11,19
172:20 175:25 167:10
180:19 191:16 199:5,6
200:3 208:15,16 209:9
210:24 215:16 216:13
217:21 222:14 226:7
227:7,11 229:21 230:10,11
believe (12) 11:20,21 15:22
26:10 33:10 40:7 42:3
81:19 115:12 121:7 201:7
206:20
believed (1) 121:11
bells (3) 26:17 190:1,2
below (1) 7:13
ben (1) 68:21
beneficial (2) 45:18 146:10
benefited (3) 11:6,22 182:5
bereaved (2) 88:19 175:17
berry (71) 1:17 2:14 9:9 27:25
68:8,9,10,16,17,25
69:11,16 79:11
83:2,10,19,23 106:2,9,12
107:3 108:4 128:5,19,22
129:3,9,11 130:12,16
131:7 132:13,22 133:23
134:10,19,23 135:16
140:19,24 141:2,5,12,15
142:1,2,14,24 155:4,14
156:4,16 157:14 158:6,18
159:6,19 160:6,11 164:12
166:15 167:14,22 173:24
167:3 193:7 198:5
199:11,11 227:9,14
berries (5) 106:18 132:5
134:18 141:18 165:22
best (8) 12:19 25:3 60:24
62:7 102:10 108:25 111:14
213:15
better (7) 24:7,21 27:16
170:18 177:13 223:10
232:22
between (19) 40:9 51:17
53:4 56:22 83:12 104:24

<p>107:10 118:9 123:21,22 125:16 128:18 150:5,10 159:20 202:8 217:15 223:18,24 beyond (3) 206:1,2,3 big (3) 45:1 151:15 179:15 bigger (3) 103:25 104:2,17 bit (11) 8:10 29:15 69:1 73:19 138:17 146:1,1,12 155:20 168:24 183:6 blame (2) 82:23 138:1 blast (1) 151:15 blocks (1) 6:19 blue (1) 26:12 body (1) 135:21 boiler (1) 33:6 bomb (46) 9:2 14:16 21:21 26:2,19 27:6 30:8 31:3 46:7,15,20,23,23 52:2 56:4 60:16 120:4,25 151:16,20,22 152:1,5 153:3 154:2 156:24 188:23 189:3,20,24,25 190:6,14 191:2,22,24 192:6 195:6 204:5 222:12,21 223:3,7,20 232:16,22 bombs (5) 188:11,14 190:10,16 203:18 book (3) 144:22,23 147:18 booked (1) 71:12 booklet (1) 147:13 booklets (1) 147:15 books (1) 144:19 border (1) 68:22 both (8) 27:22 50:1 73:11 74:14 148:7 149:4 205:3 223:20 bottom (16) 8:23 25:9 52:10 59:14 68:6 79:17,20 118:14 120:15 122:4 151:13 153:16 156:1 164:5 183:25 184:3 box (6) 2:19 11:10 15:17 115:21 197:21 228:16 break (12) 42:14,16,18,25 73:24,25 74:6 103:9 116:8,15 144:3 205:19 briefly (3) 111:21 130:6 151:4 brigades (6) 44:22 75:3,9 76:16 82:15 109:8 brigadier (1) 96:7 bright (1) 198:25 bring (5) 62:21 98:12 155:5 161:6 204:14 british (3) 86:8 125:4 157:20 broadcasting (1) 170:4 broadly (1) 4:19 bronze (7) 35:17 67:15 87:25 88:8 122:5,6 130:19 brought (2) 51:15 217:4 btp (7) 86:14,14,19,24 87:13 157:22 159:1 buckley (1) 156:4 building (5) 16:2 42:12 203:20,23 225:25 built (1) 208:15 bullet (1) 228:15 bulletin (11) 9:23 185:4,5,9,10,14,15 186:4,5,10 190:16 busier (1) 219:25 busy (8) 63:9 136:1,13 161:14,16 182:11 183:17 185:18 button (12) 19:4,7,14 23:15,20,22 26:24 152:13,23 198:20,24 227:23 C cad (3) 7:16 10:7 220:25 call (195) 7:5 9:1,1 12:14,14,23 13:13 14:4 21:8,24 25:6,20,23 26:12 27:2 28:1,9,10 30:4</p>	<p>38:3,9,15,20 39:8,25 40:17,18,19 41:4,8,10,17,21,23 47:2,8,9,10,13,19,23 48:5,14,19 49:3,8 50:4,25 52:9,17 54:19 55:5,12 56:3,13,20 58:11 59:17 60:9 61:5,6 62:19,20 65:19,22 66:17 67:1,7,23 69:2,7,7,14,23 70:1 71:23 77:12 79:10,11 80:8 85:24 87:17 88:22,23 91:17 104:7,25 105:1,13 115:9,13 120:6,13 124:18,20 125:2 126:14 128:7,9,15,18,22 130:7,15 131:17,19 141:7,20 142:15 146:14 147:6,7 148:12,15,25 149:7,10,10,13 150:8,10,16,18,19,22 152:12,18,20,21,22,25 153:4,8,9,15 154:23,24 155:11,24 156:2 159:7,19 164:11 165:19 168:9,10,19 169:2 173:24 174:2 180:18 181:1 184:11 190:14 192:6 193:24 194:20,21,25 195:22 196:7,7 198:4 199:10 200:2,3,20 203:7,8,8,14,17,19 204:3,6,9,22 205:6 213:22 215:20 216:19 217:8,11,14 220:10,15,15,16 222:5 227:9,14 228:12 232:7 called (12) 41:15 42:1 69:9 77:15 99:3,18 150:9 185:24 190:11 203:7 211:5 231:13 caller (12) 13:20 151:6,13,19 153:6 154:1 189:1,20 194:2 195:13,16 202:7 callers (3) 104:8,12 189:17 calling (3) 25:25 119:14 165:10 calls (42) 47:6 62:25 66:25 67:25 70:13 75:7 82:13 83:23 85:19 91:10 103:22 105:1,18 108:4 109:21 123:9 126:21 128:18 137:4 141:12 145:6,17,22 146:2,3,18,18,20,22,25 147:3 148:5 149:9,24 155:3 166:25 191:20 194:11 202:7 208:23 219:10 221:4 calm (2) 124:5,7 came (17) 19:15 24:4 75:23,24 95:10 122:15 140:1 149:1,10,18 165:15 167:1 179:4 203:10 211:5 216:25 217:3 cancelled (6) 125:25 126:5,6,9,11,12 candidly (1) 167:9 cannot (6) 68:21 112:3,7 117:2,21 139:10 cant (68) 5:7,7,9 7:18,19,25,25 9:17,18 10:1 12:5,6 18:14 33:17 38:17 43:24 49:18 52:5,13 54:7,24 56:17 63:15 80:12,14 86:10 87:1,4 89:22,24 90:7,15 91:5 93:24 94:1,12,21,22,25 95:8 96:17,20 100:2,2,11 101:7,9 104:4 105:4 114:24 117:9 118:23 121:3 123:21 125:3,3 140:4 157:2 163:13 165:5 186:14 188:2 193:16 197:6 200:18 220:24 221:9 223:23 capability (7) 38:7 68:14 70:5 79:21 129:16 140:25 156:7 capable (3) 115:2 170:3,4</p>	<p>capacity (3) 43:11 206:7 208:19 capture (4) 15:3 59:23 73:1 156:1 captured (4) 47:1 57:14 68:6 153:17 capturing (2) 44:11 45:6 car (6) 81:11 121:17 150:22 153:12 157:9 172:2 card (19) 32:6 33:20 46:24 99:4,6,12,17,19 100:2,3 228:4,5,8,18 230:13,17 231:6,14,19 carden (4) 71:25 85:11 173:23 179:4 cardens (1) 78:13 cards (5) 33:15 99:11,24 209:22 231:21 care (2) 32:23 42:20 careful (1) 108:23 carlos (2) 68:21 81:20 carried (3) 28:11 93:20,22 carry (5) 11:17 44:24 45:12 99:3 116:20 carrying (1) 89:17 cars (2) 81:18 172:5 casey (26) 66:18 143:25 144:5,7,10,11 148:6 151:19 154:24 157:5 168:1 170:16 171:13,25 172:22 174:2,17 175:5,12,16 184:5 196:15 203:1 205:11 215:15 234:15 caseys (2) 216:3 220:15 cast (2) 185:5 188:17 casualties (11) 20:4 32:19 37:24 56:5 57:20 121:3 152:3 158:3 190:5 191:21 204:19 catch (5) 51:17 52:1 57:9 63:25 215:20 categories (1) 152:7 category (2) 20:10 208:8 cater (2) 137:10,21 catered (1) 136:12 cathedral (3) 50:20 121:17 157:9 cause (1) 225:1 caused (9) 19:25 21:21 33:5 34:14 109:15 119:15 165:23 230:1 231:2 central (7) 14:2,6 18:18 26:14 27:11 112:1,16 centralised (1) 111:19 centre (4) 36:16 111:5 146:14 153:22 certain (11) 6:3 74:16 89:10,10,14 95:3 176:10 192:23 202:20 209:11 219:24 cetera (2) 90:11 133:11 chair (9) 95:16 101:12,24 103:3 108:24 111:4,17 136:10 180:2 chairman (9) 7:1 12:9 15:11 20:24 30:23 119:12 140:15 201:24 214:6 chairs (1) 190:22 challenge (4) 104:7,8,11,12 chance (2) 176:5 213:9 change (4) 111:18 140:4,6 198:21 changed (9) 76:11 96:2,4 112:15,18 137:10 138:7 198:24 217:14 changes (1) 100:16 channel (21) 1:24 2:11,12,15,17,22 3:1,8,18,20,22 35:4 71:1 72:7,24 174:19,21,22,24 175:6,10 channels (2) 35:2 70:23 characterisation (1) 50:5 characterise (1) 46:14 charge (2) 117:5 206:16 check (7) 40:24 68:16 73:23</p>	<p>134:15 135:8 147:23 176:19 checked (10) 40:21 80:22 89:6 92:15 93:13 131:14 135:6 136:17 143:6,9 checking (4) 93:11 106:1 114:12 136:7 checkbox (2) 17:5 34:3 chemical (4) 231:9,13 232:6,14 chemicals (1) 231:17 choice (3) 3:7 34:24 92:19 choices (1) 170:18 choose (2) 224:20,22 chosen (2) 6:6 18:4 chronological (1) 184:2 chronology (2) 168:7 171:4 circle (3) 99:13 181:22 224:6 circles (1) 181:21 circumstance (1) 232:17 circumstances (15) 25:19 32:8,17 33:8 46:20 58:15 62:1 105:15 136:12 161:21 203:12 204:1 229:7,18 230:12 clarification (5) 32:14,17 56:22 71:5 111:23 clarified (3) 14:17 20:3 71:3 clarify (4) 3:13 37:9 39:24 125:22 classified (8) 6:11 144:19 177:10,15,21 206:15,21,22 classify (1) 6:5 classroom (1) 146:7 classroombased (2) 163:18 176:2 clear (21) 39:12,16 58:11,12,14,15 61:21 62:11 67:14 82:22 116:2 129:17 134:24 136:19 163:5,9 165:25 166:7,14 192:10 195:10 clearance (1) 35:6 clearer (1) 207:18 clearly (5) 57:6 70:18 113:14 155:23 173:3 click (2) 19:4,7 clickthrough (1) 65:25 climb (1) 211:14 closed (5) 15:1 39:9 55:3 159:8 168:4 closer (1) 183:5 code (4) 15:9,9 126:1 225:17 codeleague (8) 49:23,24,25 53:13,16 58:3 66:19 222:6 colleagues (11) 9:15 60:6 79:11 89:7 97:7 101:13 108:9 110:7 136:6 176:4 196:3 collect (2) 14:23 113:7 colocate (1) 40:14 colocating (1) 99:12 colour (2) 198:21,25 column (1) 142:12 come (49) 1:22 15:7 28:23 29:20 41:17,21,23 44:2 46:25 48:10 51:20 62:8,16,24 63:8 76:6 81:20 85:9 95:23 97:4 111:15 114:14 115:25 116:15,17 122:16 123:7 127:12 138:15 141:12 143:17 149:21,23 152:14,16 162:15 179:3 181:5 182:14 183:12 186:7 197:9,9 198:23 208:8 211:23 215:20 227:7 233:2 comes (6) 104:7 176:6 188:10 189:13 209:6 229:15 comfortable (1) 183:18 coming (45) 1:5 20:18 23:13 24:15 34:15 39:25 40:5 41:6 45:5 55:18 66:11 68:21 73:22 75:25 82:2 86:8 97:3 102:8 105:17</p>	<p>106:5,5,8 107:12,16,17 109:21 111:5 123:5,23 126:21 148:17 149:9 180:21 202:8,10,13,18,23 202:2 208:14,23 222:5 228:6,19 command (6) 40:14,15 76:18,25 77:3 123:11 commander (6) 67:15 87:25 88:8 122:5,6 130:19 commands (3) 35:14,16,20 commanded (1) 21:24 commend (1) 102:22 comment (6) 56:3 72:23 123:23 158:2,9 226:17 comments (1) 148:7 common (1) 64:15 communicate (2) 37:22 38:4 communicating (1) 196:3 communication (9) 35:2,13 107:8,10,13 125:16 140:9 170:7 173:17 communications (6) 25:7 28:23 68:3 120:9,10 142:10 company (1) 210:19 competencies (1) 147:16 competent (16) 144:15,18,20 146:20 163:10 177:9,11,12,15,16,19,22,24 178:1,15 213:2 competently (1) 145:21 complete (4) 6:7 43:22 91:6 211:24 completed (15) 14:12 34:7 91:1,2 93:19 94:16 147:13,25 177:11,20,20 181:23 226:15,20 227:1 completely (2) 201:15 211:3 complications (1) 139:22 compose (1) 73:20 comprehensive (1) 130:10 computer (1) 54:5 computerized (1) 220:25 computerbased (3) 91:1,3 93:19 computerised (1) 10:9 computers (1) 198:16 concentration (1) 49:11 concept (1) 166:23 concern (1) 152:2 concerned (25) 22:4 37:21 51:10,12 57:4 63:5 64:22 69:11 88:12 100:18 113:15,16 120:9 124:9 125:13 138:11 169:24 178:12 184:10 185:21 191:14,16 200:3,20 226:5 concerning (3) 111:18 114:24 121:7 concerns (2) 25:24 112:25 concert (1) 213:8 concession (1) 168:2 conclude (3) 42:11 205:13 222:15 concluded (1) 154:24 concludes (2) 74:8 171:14 conclusion (2) 7:11 73:7 concrete (1) 105:3 conduct (1) 5:15 confidence (3) 146:5 153:4 214:3 confident (4) 49:12,15 213:6,8 confine (1) 214:9 confirm (16) 1:15 69:9 86:10 87:1,4 111:25 112:19 121:4 125:3,4 129:11,24 168:9,14 193:2 213:14 confirmed (12) 13:19 36:25 53:21,24 58:7,22,23,24 59:3 60:5 125:10 158:20 202:9,10 204:10 confirming (2) 70:8 87:2 conflicting (15) 103:1,6,9,11,12,17</p>	<p>104:3,19,22,24 105:22 106:4,10 107:20,23 confronted (2) 10:20 33:8 confused (3) 30:24 155:20 165:4 confusing (10) 54:20 103:1,7,10 105:22 106:20,21 107:21,23,24 connect (1) 153:9 connected (1) 127:3 connection (1) 88:11 conscientious (2) 93:4 176:11 conscious (2) 115:11 223:25 consequences (1) 13:13 consider (12) 10:18 30:11 31:22 32:22 115:13 124:3 142:23 151:4 163:19 170:11 207:10 209:24 considered (6) 5:6 16:8 30:6 31:1 111:13 177:19 considering (1) 131:16 consist (1) 94:24 constantly (1) 122:21 contact (34) 2:6 3:1,6,11 6:23,25 7:3,4 21:15 31:14,21 33:11 36:2 37:13 39:14 40:11 77:17 78:7 83:10,13 84:17 85:6 97:17 109:5,15 113:11 165:22 166:1 169:1 174:4,7,19 199:21 201:1 contacted (15) 3:12 21:4 26:22 28:2 36:5 41:18 60:12,19 67:18 71:11 75:1 110:10 111:24 113:5 201:1 contacting (11) 1:13,18 3:2 7:7 24:11 66:21 83:2,20 165:10 166:4 167:23 contain (1) 139:11 contained (4) 112:5,8 147:15 197:11 contemplate (1) 228:18 contemplated (2) 33:21,22 content (5) 67:23 69:2 124:17 130:10 155:11 contents (1) 130:6 context (9) 33:1 36:19 47:19 112:10 117:6 120:15 128:8 140:19 168:24 continue (4) 43:14 51:19 65:16 84:11 continued (5) 1:3,4 65:14 234:3,4 continues (1) 71:2 control (155) 1:7 2:7,8 7:3,8 9:14 10:15,19 12:15,20,24,25 14:10,17,21 19:19 20:14 22:11,24 25:16,22 28:11 30:2,4,16,25 31:6,20 32:23 33:8 35:3,11,18 36:1,1,5,17 39:20 40:11 41:8,11 42:22 43:12,16,19,20 45:5,22 47:20 48:1,2 49:17 50:7,19 68:3,7 70:4 71:11,14,22 73:14 74:14 75:2,10 76:24 77:7,25 78:12 83:11,20 84:1,2,7,9 85:6,15 90:9 94:1,7 95:10 111:5,9 116:25 120:11 124:2,4 125:17 128:21 136:1,4 139:20 140:1,3,8,22 144:12,13,16,20 146:4,11,13 148:4,10,10,15 152:3 164:20 165:8 167:10 170:15 173:17,18,19,21 174:9,20 176:14 182:11 185:11,18 192:11 194:3 196:4 199:14,15 201:6 202:9,10 204:10 206:7,18,23,24 207:16,23 209:8,25 210:18,21</p>	<p>211:5,22,25,25 212:3 213:19,22 216:18 218:14 219:25 220:9 230:11,14 controller (1) 53:5 controllers (1) 39:13 controversial (2) 46:14 216:23 conventional (1) 170:2 conversation (15) 56:21 58:19 67:12 71:21 113:12 141:25 143:7 149:4 150:5 156:18 194:4,5 195:6 223:18,25 convey (2) 158:6 159:2 conveying (1) 166:4 cooper (41) 71:2 88:16,17,18 92:17 98:19 100:13 101:2 104:22 108:20 110:6 112:12 114:11,25 115:5,6 117:7 118:7 119:19 123:24 175:14,15,16 178:19 179:6 181:19,22 183:1,21 186:3,7 187:8,14 190:8 192:4 193:5 196:12 215:25 216:8 234:11,18 coopers (1) 216:6 coordinate (1) 208:24 coordination (1) 106:25 cope (1) 111:9 coped (1) 111:10 coping (1) 180:22 core (3) 116:17 127:8 171:14 correct (63) 1:19 3:9 5:3 8:5 13:14 14:10 15:25 17:25 18:18,19,21,22 21:10,16 23:4 26:7 35:8 37:11,12 38:22 39:15 43:17 45:23 46:17 47:21 48:21 50:9 53:7,10 54:2 56:6 57:5,12 69:18 81:12 85:25 95:19 105:5 112:6 113:3 117:17 120:2,23 129:5 130:4 131:10 141:19 196:20 200:21 204:11 206:10 207:1,3,4 212:2 216:21 217:6 220:21 225:23 227:25 229:20 230:9,15 correctly (3) 38:12 106:19 147:4 correspondence (1) 51:22 corresponds (1) 153:15 couldnt (18) 83:14 84:1 110:8 125:10 132:18 134:7 138:7 147:7 165:17,21 175:8 177:25 179:21 183:13,16 187:6 206:16 224:22 count (1) 42:18</p>
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<p>72:13,16,17,18 77:20 125:25 150:15 152:10 155:25 217:14,16 creating (2) 62:20 66:18 crew (14) 113:23 116:25 117:3,8,11,17,19,20,21 156:5 206:9,11,14 208:19 crews (9) 22:1 25:25 26:11,17 30:6 31:2,7,23 75:8 critical (4) 63:23 77:5 108:9 135:16 criticised (1) 165:23 criticism (3) 97:5 179:12 186:20 cro (1) 177:22 crop (1) 153:18 cropped (2) 22:8 50:1 cross (1) 173:8 crossed (1) 107:19 crossing (1) 134:20 crossreference (2) 72:15 221:4 crossreferenced (4) 65:20,23 126:3 220:21 csr (4) 71:13 72:11 169:15 170:20 current (2) 5:8 213:24 customary (1) 7:2 cut (3) 67:11 121:20,24</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>d (1) 234:1 daily (1) 32:21 danger (1) 225:1 data (1) 126:8 date (5) 45:19,19 118:3 131:25 139:16 dated (3) 6:14 8:7,13 dates (4) 4:24 94:2 96:18,20 daughter (1) 113:8 david (16) 1:3 49:6,7 50:13 55:14 62:12,14 105:15 148:11,13,14 149:18 166:19 197:20 216:17 234:3 davids (4) 55:4,4 56:15 105:1 day (8) 11:22 63:20 77:14 85:5 89:10,23 111:13 174:21 days (1) 76:23 daytoday (1) 161:13 de (75) 1:4,6 3:24 6:17 8:15 13:3 42:10,17 43:2,5,6 47:19 52:3,7,19 55:21 56:21,25 59:13 61:5 64:6 70:20 71:10 74:4,8 78:11,15 81:6 82:25 88:16 115:7,19 116:2,5,16 127:8,25 135:24 138:22 140:20 141:24 143:24 144:5,8,9 146:6 154:12,15,22 156:15 161:23 162:25 167:24 171:13,17,21 196:13 199:3 205:10,13,21,23,24 211:21 215:9,23 216:13 221:19 225:11 228:15 232:21 234:4,8,16,22 deal (16) 1:10 33:19 48:23 68:1 70:12 75:12 91:12 96:5 104:17 113:9 115:24 145:7,21 175:19 194:18 201:4 dealing (16) 20:16 28:7 31:16 59:25 75:3 82:14 105:5 109:7 119:11 137:8 141:24 180:2 193:20 203:10 209:13 214:3 deals (1) 218:12 dealt (6) 12:11 107:20 148:5 184:22 185:8 209:2 dean (10) 67:2 87:22 106:17 120:14 128:9 129:1,10 144:7,10 234:15 deansgate (1) 159:8</p>	<p>decades (1) 907:22 december (1) 23:21 decide (6) 19:11,25 30:9 34:14 176:22 225:3 decided (3) 21:8 22:15 24:21 deciding (1) 22:17 decision (10) 15:18 20:11 21:15 32:8 34:21 125:6 165:11 218:11 222:21 223:15 decisionmaking (1) 38:1 decisions (5) 31:6 35:15,19,21 196:10 dedicated (1) 3:3 deem (1) 211:12 deemed (5) 20:4 34:18 38:11 144:15,18 deeply (1) 76:1 defaulted (1) 31:10 defaulting (1) 31:11 defined (1) 221:8 definite (1) 9:19 definitely (13) 61:1 76:3 77:2 80:24 98:1 100:19,20,22,24 101:23 117:23 137:12 220:8 degradation (1) 9:9 degree (2) 35:5 129:6 degrees (1) 47:6 delay (1) 127:23 deliberately (1) 186:21 delivered (1) 8:10 demonstrating (1) 33:17 depart (1) 209:23 depend (3) 91:20 204:1 209:13 depended (2) 202:13 209:25 depends (2) 18:10 41:6 depth (5) 178:22 179:12,16 181:12 183:11 describe (5) 72:11 130:10 131:10 147:9 222:3 described (8) 2:3,5 10:16 45:15 49:11 64:11 152:23 161:24 describing (2) 149:3 151:7 description (1) 151:17 descriptions (1) 153:8 designated (1) 147:23 designed (1) 18:3 desk (10) 11:16 36:16 77:15 99:22 100:4,5,7,25 152:15 204:17 despite (2) 124:2 145:3 detail (18) 4:22 17:7 36:12 38:22 47:4,12 57:18 70:13 115:1 188:16 189:17 195:8,9 196:22 197:18 222:2 230:12,17 details (9) 14:23 36:24 39:25 47:7 113:11 151:5 152:2 169:1 191:10 determine (3) 81:25 104:13 124:25 detonated (1) 222:13 developed (3) 50:11 210:18,22 developing (1) 96:23 device (4) 31:25 46:16 121:5 170:3 devices (1) 190:10 devised (2) 139:19 140:8 dial (1) 7:5 dialogue (2) 169:17 223:24 didn't (83) 33:19 34:13 61:6,8,16,24 62:8,16 63:2 64:4 67:7 72:2 85:9,14 87:10,13 90:12 97:11,11 98:6,15 100:1 107:4,7 114:7,18 121:21,22,24 125:9 130:18,20 131:9 134:17,19 135:2,7,21,22 137:23 138:2 141:9,10 142:3,6,25 143:1,13 148:3 151:22 152:9 154:4,6 156:22 157:1,14,22 158:18</p>	<p>159:2,6 162:16 163:1 166:9,22 168:18 169:6 172:4 175:7 178:15 179:21 183:21 189:20,24 190:1 191:4 193:24 196:11 198:11 201:5 203:14 210:10 213:7 223:2 differ (1) 33:24 difference (7) 59:9 75:13 80:7,12 104:16 110:16 215:2 differences (1) 74:16 different (40) 35:14 44:2 63:11 67:12 77:13 86:11 91:7 102:5,7 103:13,22,23 104:6 105:19 106:9 124:13,13 147:17,18,19 148:2 153:20 155:12 158:1 161:1 167:1 177:6,6 184:17 186:11 188:23 210:2,7 215:16 230:21 231:1,10,14 232:3,9 differently (1) 59:18 difficult (12) 1:23 82:18 102:25 103:6 108:10 112:23 115:20 124:15 137:18 210:6 219:8,14 difficulties (8) 1:13,17 3:14 83:4 102:19 137:20,21 221:10 difficulty (13) 3:2 35:24 66:21 83:2,19 84:8 140:12 164:21 166:3 167:25 182:5 219:21 220:1 direct (7) 83:20 84:20,21 163:7 206:24 207:19 210:17 directions (1) 41:25 directly (7) 7:5 37:15 70:23 101:13 117:11 172:18 174:9 dirty (14) 151:16,20,22 152:5 153:3 154:2 156:24 189:3,19,24,25 190:6 191:24 195:6 disable (1) 113:20 disadvantages (1) 74:19 disagree (1) 119:9 discharge (1) 44:5 discretion (13) 71:14 209:2,6,11 210:3,9,10,22,24 211:17,19 224:7 225:3 discuss (2) 136:6 208:2 discussion (9) 3:21 11:18 21:7,12,13 53:4 71:18,22 130:1 discussions (3) 139:20 140:19 210:17 disparate (1) 111:22 dispatch (2) 10:9 220:25 dispatching (1) 18:24 disseminated (1) 208:16 distinction (1) 202:8 distorted (3) 16:13 35:15 39:24 distressing (2) 143:17 151:5 document (26) 1:22,25 4:23 6:15 7:10,21 8:23 29:1 32:3,12 71:4,6,8 85:23 115:21,22 118:2 120:11 127:9 128:2 139:10,14,19 185:23 186:15,16 documents (2) 118:9 186:17 does (32) 3:17 21:4 23:18,21 25:21 33:4 38:12,24 40:20 92:9 114:1 118:10,22 119:25 120:2 130:23 133:6 139:11 198:21 213:23 214:22 216:19,25 219:5,11 220:9,9 228:2 229:5,21 232:10,12 doesnt (21) 8:17 29:19 48:10 59:9 64:24 79:5 100:9 130:22,24 135:12,15 137:20 139:7 200:2 197:22</p>	<p>216:22 228:7,18 229:4,6 232:11 doing (33) 28:14 43:24 44:23 62:15,16 68:18 71:15,16 73:22 75:16 77:12 82:12 95:22 110:1,3 117:13,14 123:9 146:8,11 147:4 148:14 149:17 167:6 175:9 176:1,3 177:4,23 183:18 201:14 218:20 224:11 done (45) 19:1 26:5 27:18 29:24 36:4 42:3,6 60:10,17 61:12,13,16,18 63:3 66:4 72:2 75:14 76:2 77:6,19,22 83:11 84:18,22 90:21 91:8 93:9 98:6 105:24 110:11,14,14 129:2 134:1 138:3,4 163:12 174:5 179:22 182:18 198:15 199:9,18 212:7 226:5 dont (95) 3:23 6:8 34:4,7 35:6 38:16 46:13 48:5,11 53:24 61:21 75:18,20 76:13 77:23 79:9,13 80:7,12 81:2 90:1 93:3,8,9,11,15 94:3,5,7 99:8 103:21 107:5 108:20 109:23 110:1,15,20,23 115:12 116:5,23 129:3 130:12 132:15,21 133:1 136:7 139:24 143:22 147:7 148:14 149:15 155:18 160:16,18 162:10,17 163:19,25 166:21 168:17 170:18 171:19 173:2 176:17 182:1,21,22 183:9,18 186:21 187:12 191:5 192:20 195:3 197:1 198:22,24 201:3 202:2 203:15 211:15 214:9 215:6 218:9 219:1 220:22 227:6 231:15 232:13,17,18,18,19,19 door (1) 37:8 double (1) 181:22 doubt (13) 12:12 32:4 74:17 83:18 96:25 116:17 154:23 187:19 198:15 201:10 224:24 226:19 doubling (1) 183:9 down (43) 15:1,8 27:7 35:19 39:9 51:18 52:2 54:3 60:14 68:15,18 73:4 86:13 89:1 97:6 103:9 113:25 118:9 119:6 126:4 138:13 151:18 153:16 154:9 155:9 157:19 164:9 183:21 185:4,5,20 186:3 188:17,17 194:2,24 196:5 209:20 215:1 222:4,7 225:4 226:24 draw (2) 46:3 49:3 drawn (1) 160:8 drift (1) 109:14 drifted (1) 109:11 drifting (1) 109:19 drill (1) 97:6 driving (2) 82:5 172:8 drop (1) 11:16 dropout (1) 33:2 dropped (1) 26:17 due (8) 24:13 31:13 90:1 92:6 113:5,6 140:5 198:10 duplicate (10) 55:3 126:8,22 137:3 220:16,16,22,24 221:3,4 uplicated (12) 56:15,16 65:22 126:10,13,15,20,20,24 154:19 220:13,20 during (10) 35:9,12,23 44:9 77:14 81:14 101:8 184:25 192:5 222:16 duty (69) 1:13 21:4,9,15,25 25:6,20 23:23 27:10,13 29:21 31:15,16,21 32:23 35:1,24 36:3,15,22 37:5 38:25</p>	<p>47:20 60:19,21,22 66:21 67:18 69:5 70:4 71:13 75:1 77:6,12,18 84:19 105:23,23,25 109:5 111:6,7 117:12,12 120:13 121:10 124:18 128:25 129:9 131:6 148:9 164:14 165:22 174:1 192:12 193:8,10 199:13,16,21,22 201:3,12,13,24 207:8,11,14,20 dynamic (1) 40:5</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>e (1) 234:1 earlier (4) 51:16 72:16 116:10 130:9 earliest (1) 20:19 early (4) 81:15 109:1 116:8 194:20 ease (1) 25:7 easy (1) 221:5 easey (3) 161:2,12,13 eavesdropping (1) 194:9 ecm (3) 203:8 204:22 205:5 education (1) 102:12 effect (4) 124:25 132:14 223:6,21 effective (2) 7:7 139:16 effectively (7) 145:21 146:25 149:4 166:25 185:10 195:19 207:15 efficiently (1) 101:19 effort (2) 49:3 102:1 eight (1) 231:24 either (12) 4:19 18:3 43:19 64:8 83:10 117:19 132:8 149:1 172:20 173:5 174:4 182:7 elaborate (1) 215:5 elapsd (1) 21:25 elarning (8) 44:1 63:25 91:2 92:18,24 93:20 95:1 101:7 elizabeth (1) 43:7 ellis (46) 1:3,9,11 2:10 3:24 4:11 25:12 29:6,9 30:20 39:18 42:11 47:22 49:6,9,12 52:8 55:22 57:13 65:13 66:9 148:11 149:14,17 150:15 153:9 154:12 155:25 162:3 168:25 171:5 197:20 216:17 217:8,24 218:2,6,23 222:3 225:14 226:4 227:4,16,21 229:14 234:3 else (20) 2:9 18:13 28:14 30:12 49:4 106:12 110:20 112:13 114:14 130:20 132:8,22 134:8 135:6 146:18 161:5 169:14 183:11 184:22 216:7 email (4) 8:7 9:10,12,20 emergency (19) 6:21,23 9:1 10:20 40:9 43:19 59:3 81:15 85:6 104:23,24 105:6,8 158:13 172:19 185:19 196:4 202:23 203:7 emphasise (1) 113:19 en (3) 81:23 82:7 158:11 enables (1) 2:6 end (13) 36:9 71:21 87:23 92:21 98:24 122:6 123:11 126:5,7 146:24 147:10 190:24 201:25 ended (3) 61:5 159:20 185:18 ending (3) 62:19 66:17 158:10 endorsing (1) 107:9 engaged (2) 48:14 148:18 engine (6) 112:17 113:20,24 114:7,15 117:10 engines (1) 60:14 enhanced (1) 11:21</p>	<p>ennis (3) 79:12 140:23 141:21 enormity (1) 196:1 enough (5) 12:6 87:7 98:23 175:19 177:12 ensure (5) 17:5 18:9 49:10 147:4 230:5 ensured (3) 24:3 55:10 136:13 enter (2) 87:13 130:1 entered (4) 13:9 56:8,9 87:16 entering (1) 7:15 entertainment (1) 119:18 entire (1) 20:14 entirely (5) 115:10 116:3 201:11 208:9 209:20 entirety (3) 216:3,3 217:7 entitled (3) 5:2 7:12 10:12 entrapment (1) 203:18 entrapments (1) 9:2 entries (4) 65:15 141:8 162:9 227:8 entry (24) 55:24 67:21 68:5 70:7 72:21 79:17,20 126:1,5,7 140:23 152:10 153:14,23 155:22 156:2 159:11,15,18,22 164:6,10 225:17 226:13 envisaging (1) 45:3 ep01 (1) 15:10 equally (1) 133:3 equip (1) 5:18 equipped (2) 31:5 201:4 equivalent (1) 206:11 error (2) 142:23 143:1 escalate (3) 19:25 20:5 24:18 escalated (1) 22:23 escalating (1) 24:12 escalation (4) 10:14 20:23 22:4 37:24 especially (1) 81:14 essence (1) 221:2 essentially (1) 219:13 establish (1) 58:21 estimate (1) 4:5 et (2) 90:11 133:11 even (6) 41:21 48:11 137:5 139:6 197:25 198:18 evening (10) 1:12 66:20,23 109:2,10 148:13 165:16 174:25 183:17 221:22 event (6) 44:9 115:18 167:11 175:20 212:6 218:22 events (8) 5:20 8:14,16,18 9:16,18 110:12 217:1 eventually (1) 84:2 ever (10) 124:18 162:22 173:3,4,8,12 192:6 207:24 220:3 231:22 every (9) 33:16 76:5 91:6 136:13 138:17 147:6,7 203:14 213:21 everybody (8) 11:13 47:7 75:21 132:15 138:16 139:14 216:7 219:17 everyone (11) 6:2,4 33:15 35:20 37:19 102:20 111:12 135:25 163:20 177:8 219:5 everything (16) 11:10,13 67:19 88:6 106:19 121:11 131:6 133:18 134:15,24 135:17 137:1,25 171:19 184:22 188:3 evidence (39) 11:2 12:11 32:3,5 36:14 42:11,20 47:25 80:11 83:18,22 84:13 96:7 101:12 102:23 105:8 110:24 115:15 143:18,19 167:8 169:25 182:2 187:19 190:23 197:15 205:14 213:5 215:11,14,18 216:3,14,17,23 217:9,24 218:2,4 evidenced (1) 118:8</p>	<p>evolving (1) 135:25 exact (2) 140:5 223:24 exactly (8) 51:21 65:21 107:2 108:1 115:3 117:24 218:7 219:17 examine (1) 96:13 example (16) 31:24 99:25 101:14 107:10 162:4 166:7 167:13 203:15,20 210:4 211:1,2,3,6 213:10 231:8 examples (1) 5:20 excess (1) 207:22 excuse (8) 63:22 82:11,17,19 110:18 137:18 160:15 161:19 excuses (2) 82:21 161:22 exercise (18) 12:12 44:19,23 45:1,2,4,14,17 92:19 97:8 101:14 102:9 122:14 163:16 175:25 213:15,18 exercises (9) 11:23 12:19 44:22 101:18,22 102:5,8 213:20 214:16 exist (1) 94:5 existence (5) 2:15 66:9,11 95:10 175:6 existing (1) 59:16 exists (1) 94:14 expand (2) 146:6 206:13 expect (8) 35:10,14,18 42:17 54:15 104:5 219:11 228:12 expectation (3) 72:4 170:22 230:16 expectations (1) 136:5 expected (7) 48:10,16 97:17 190:14,25 207:15 212:22 expecting (1) 190:23 expeditions (1) 4:9 experience (32) 3:14 25:16,17 30:16,21 31:5,19 40:7 45:21,24,25 46:3 73:11 81:1,13 123:18 131:16 143:17 146:5 148:7 163:21 167:8 189:14 200:4,4 207:22,24 208:10,14,18 210:21 212:14 experienced (8) 1:17 74:14 17:24 182:8 189:10 203:21 210:23 213:23 expertise (4) 30:9,11 31:5,8 expert (6) 22:14 110:9 165:15 190:18 197:17 198:10 explained (4) 49:20 205:3 221:7 225:19 </p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

166:2,5 217:10
eye (2) 185:5 188:17

F

face (1) 30:6
faced (1) 167:11
facility (2) 149:3 182:10
facing (1) 31:2
failed (1) 162:8
fair (10) 12:6 50:5 104:19
106:24 110:14,22 151:6
176:4 200:23 223:12
fairly (1) 162:11
fairness (1) 179:1
fallback (1) 3:3
falls (1) 11:10
familiar (4) 9:1 16:6 25:12
85:23
familiarise (1) 115:23
families (3) 88:19 110:22
175:17
family (2) 113:2,15
far (37) 5:7 9:24 22:4 32:3
37:21 51:10,11 57:3 63:5
64:22 77:18 84:8,20
85:2,3,13,15 90:20 93:8
100:17 109:4 120:9 125:13
149:13 153:21 169:24
176:22 178:12 184:9
185:21,24 186:14
200:3,14,20 203:1 226:4
fatality (2) 31:2,24
fault (4) 115:9 116:2 132:3
201:11
fdo (27) 1:18 26:4 27:15
35:25 36:2 66:19
83:3,10,14,21 84:5,17
85:17 107:3 109:16 132:24
165:11 166:1,4 167:15,23
174:4,5,7,8,10 201:12
fdos (4) 83:23 84:4,14 85:1
fds (1) 174:13
fear (1) 115:17
february (3) 4:25 139:17
140:2
feed (2) 35:18 215:24
feel (12) 93:3 107:12,15
124:7 163:4 178:19
179:16,16 180:5 201:4
212:11 213:7
feeling (1) 179:11
felt (12) 55:19 58:11
61:19,19,20 105:2 107:17
108:17 163:10 179:14
183:18 213:6
few (8) 31:20 128:8 141:6
148:15 149:24 169:2 184:7
205:16
fewer (1) 4:6
file (3) 43:19 204:15,16
filled (1) 126:14
filtered (2) 35:16,19
final (5) 62:7 73:5 159:18
164:10 168:19
finally (4) 39:8 125:21
194:19 202:6
find (23) 7:7 15:8 32:2 33:19
55:16 57:11 62:17 64:2
68:21 75:1 80:15 83:14
104:8 107:3 108:1 115:3
141:2 143:7 150:2 186:2
212:12 224:13 230:7
finding (2) 77:9 173:13
fine (2) 47:18 74:13
finish (2) 116:12 221:20
finished (2) 127:14 148:3
fire (100) 1:7 10:19 12:20
13:16,22,25 14:6 16:2 18:5
28:3 29:13 30:6 31:2
32:22,23 33:23 35:12
40:13,25 42:2 43:8,16
50:7,19 55:9 60:14 68:3,14
71:11 75:2 78:12,19,23
88:9 90:9 91:10,18 94:1,7
95:10 105:11 106:8 109:10
111:24 112:1,2,17

113:6,20,24 114:6,15,18
116:24 117:9 120:11
124:4,20 125:16,17 139:20
140:1,7,8 144:12,12
146:13 148:4,10 164:20
165:8,9 173:7,19,21
174:19 176:14 195:17
196:5,6 199:14 204:10
206:4,14,18,23 209:7,25
210:1,1,17 211:5,22,24,25
212:3 214:12 224:18
225:25 230:11
firearms (2) 9:3 145:14
firefighter (5) 77:25
113:1,15,18 211:13
firefighters (2) 34:16 211:14
first (54) 1:11 2:11 3:7 5:22
12:25 13:9 15:5,8 18:12
23:24 48:18 51:8 55:5
67:18 78:18 85:20 86:20
90:7,8 97:13 108:11
119:12 120:25 131:5
132:10 134:16 147:10,10
151:13 154:23 155:13
156:22 157:7,12 171:17
180:18,25 195:19,22
198:14 207:19 212:10
215:19 216:23 217:11,25
218:12 220:2 222:1,18
223:14,20 225:17 227:16
firstly (4) 103:11 180:6
188:16 223:14
fit (3) 33:4 75:16 216:25
fits (4) 33:7 34:4 129:2 168:7
fitted (1) 224:2
five (4) 113:24,25 158:11
162:21
fiveminute (1) 42:16
flagged (1) 7:23
flat (1) 211:12
flatler (7) 47:11 70:15
71:11 72:6,23 73:2 85:10
flick (1) 123:19
flicking (2) 122:16 123:3
float (1) 224:19
floor (1) 216:18
focus (5) 20:25 37:17 47:6
57:2 90:6
focuses (1) 212:16
follow (17) 3:17 21:5 30:22
37:19 41:24 73:12 91:21
210:11,13,14,24 222:21
223:11,19,20 225:6 229:18
followed (11) 15:5 26:21
29:25 73:12 92:7 165:8
166:12 167:11,19 199:5,6
following (15) 8:20 30:8 45:8
71:23 110:6 122:9 126:17
128:4 139:20 142:22
165:12 167:6 223:6 224:25
230:7
follows (3) 29:19 36:14 38:24
followup (1) 69:7
force (14) 1:13 60:22 66:21
140:2 164:14 165:22 174:1
193:8,10 199:12,16,22
201:3,12
forefront (2) 100:19,23
forgetting (1) 83:18
forgive (2) 187:14 202:25
forgiven (1) 116:4
forgot (5) 97:1,2,10 175:7,11
forgotten (2) 110:10 175:5
form (6) 31:3 102:11 153:17
164:7 170:4,7
format (2) 153:20 229:5
formed (1) 61:25
forms (1) 74:14
formulated (1) 5:6
forth (1) 108:5
forward (2) 90:10,23
found (3) 71:12 166:20 173:9
four (12) 28:5 33:24 47:6
66:25 75:3 76:16 106:2
113:24,25 114:1 147:19
210:1

fourth (3) 15:8 70:12 225:17
france (1) 8:15
free (1) 212:11
french (1) 186:10
fresh (2) 15:2 66:11
front (10) 36:16 51:4 99:21
160:16,20 161:25 162:5,7
166:10 197:17
frss (2) 33:24 147:19
full (5) 11:19 43:6 144:9
205:24 211:19
fulltime (1) 95:14
fully (5) 31:16 101:18
144:20,25 145:3
function (2) 17:4 170:16
functionality (1) 38:16
further (21) 9:21 26:3 31:4
32:11 34:8,8,19,22 42:10
78:7 92:25 96:13 107:2
138:22 139:2 194:2 196:12
215:5 227:22,23 234:13
future (6) 9:16 97:7 114:20
138:12,12 180:3

G
g16 (6) 14:2 22:1 26:8
27:12,14,22
gain (1) 173:15
gas (4) 33:5 203:21 231:2,7
gaskell (1) 213:5
gather (2) 81:21 220:13
gathering (1) 182:13
gave (12) 36:13 40:21 51:8
133:12 136:14 149:25
163:11 197:15 202:20
214:1 216:5 217:19
gazetteer (1) 7:11
gemma (2) 8:8,8
general (6) 46:20 120:5
136:24 179:11 204:5 209:2
generally (8) 3:21 9:15 40:23
75:8 134:12 152:6 179:15
209:5
generate (1) 14:5
generated (1) 13:15
generic (1) 34:5
geneous (1) 168:1
gentleman (1) 104:4
gesture (1) 49:19
get (84) 23:14 24:22 26:3,14
32:10 34:22 36:2 49:18
52:10 55:7 59:13 61:2
62:13,17 63:9 64:2
68:15,18 77:11 83:14
84:1,2,7 91:11,22 92:10,21
97:17,22 102:3 103:16,22
104:3,6,8,12 107:1,25
110:23 111:22 112:10
114:14,24,25 115:22 135:8
143:8 146:4 149:24,25
152:2 154:17 161:2 163:19
166:21 168:11,18 169:1
173:25 174:8 175:8,18
177:10 180:18,20 182:2,18
185:11 186:24 189:17,23
190:14 193:7,10,16
199:12,16 204:15,16
207:23 220:13,19 224:9,15
gets (3) 165:3 171:5 177:2
getting (39) 32:5 35:25
39:13 50:17 52:22 53:3,19
54:18 55:14,14 60:24
61:21,22 62:12 75:7
84:9,10 85:13,14,16 97:13
104:18 105:3,15,17,18
113:1 114:4,9 121:1
124:11,24 143:21,23
164:13 167:4 192:2 195:22
219:18
gilmour (1) 78:12
give (25) 15:19 41:19 51:1
64:7 71:15 74:12 78:2
92:18 98:15 102:2 122:19
130:11 133:7 134:23
143:17,19 157:12

160:6,12,13 173:20 201:16
211:2 216:6 217:10
given (47) 23:20 27:6 38:21
42:19 43:21 45:4 48:24
50:16 67:11,20
98:9,14,22,22 99:24
102:22 104:22 110:24
127:10 149:21 151:22,25
155:6 160:3,11,19 167:8,9
170:10,15,17 176:5,7,9
178:20 184:24 186:23
187:9,16 188:17 190:14
191:1 200:4 203:25 204:22
205:1 214:16
giving (15) 11:2 50:10,11
88:12 101:25 103:3,23
105:9 106:10 122:22
131:21 142:23 189:20
195:9 211:1
gm (4) 69:25 70:4,4 72:23
gmca (3) 78:16 138:23
171:17
gmfrs (15) 2:7 3:24 40:22
41:15,18 43:14 44:16,21
74:15,20 75:10 76:18
77:7,11 136:15
gmp (35) 1:13 2:8 3:1,6,11
7:8 13:7,8 14:17,25 19:19
28:10 35:25 36:5,25 39:12
40:11,14,21 41:20,25 42:2
81:6 83:10 84:9,10 85:5,7
174:4,20,20 199:15
202:9,20 216:19
gmpts (1) 2:7
goes (6) 59:10 117:20 119:6
142:12 184:2 194:4
going (141) 1:9,22
5:11,13,23 9:11 17:7 19:18
20:22 21:18,19 27:24
28:24 33:3 37:16 39:12
41:13 42:13,15,21,
47:3,5,11 48:22 50:25
51:1,2,3,5,11,12 55:22
58:15 62:2,12,18,18,20,21
63:20 64:3,19 65:9,11
67:24 68:1 69:8,19,20
70:12,22,24 72:9,10 75:6,8
76:7,21 77:1,9 81:1 82:19
87:19 89:1 92:17,22 97:4
107:2 108:1 109:22 110:19
111:3,19 112:20 113:6,19
115:17 116:16 117:9,10
118:6 123:7 125:7
127:1,2,3,8 128:3 132:2
135:2 136:1 137:4 142:8
145:18 149:24
150:2,19,20,21 151:5
152:9 153:14 155:4,11
156:6,7 157:5,12,25
160:17 161:9 164:10
165:15,18 172:20,23
173:5,15,20 181:8 182:14
191:15,20 194:5 199:25
200:17 206:1,2 212:10
215:10 216:1 219:13
221:12,22 225:2,2,4
231:21 232:21 233:1,1
gold (1) 35:17
gone (24) 67:17 75:25 83:6
111:20 122:1 131:23 135:6
136:16,16,20 137:11
138:10,11 141:22 152:1
160:21 166:16 176:16
185:14 191:22 196:1
199:11 201:21 204:18
good (20) 1:6 8:12 71:9
73:11 79:4,5 87:7 111:16
145:24 179:23,25 180:5,7
183:4 203:12,14 213:3
221:17,20 224:9
graphic (1) 195:9
grateful (4) 42:19 78:11
110:25 143:16
gratuitous (2) 157:7 160:4
grave (1) 152:6
greaney (1) 128:4

great (6) 42:20 101:22
106:14 119:16 137:2 216:5
greater (20) 2:1 7:3 11:8
21:20 40:1,13 43:8 78:24
95:11 101:25 125:14
164:22,23 165:9 166:21
167:20 171:22 193:13,15
199:7
gregson (28) 21:3 25:24 28:2
29:12 36:15,23 37:6,14
38:13 48:1 62:19 64:7
65:15 66:10,18 69:22
150:3,10 152:17 157:17
180:20 194:6 196:8 202:3
205:21 22:25 234:21
groups (1) 52:9
ground (2) 27:24 28:3
group (48) 1:21 2:4 3:4
6:21,22 12:10 47:9,10,11
66:6 67:2,18 69:5 70:14
71:1,16,19 80:1,1
85:4,5,7,9 105:24,25
117:12,13 120:13 121:10
124:18 128:9,18,25 130:2
131:6 139:20 168:10,25
169:7,11,15,22
170:10,17,17,19 174:16
195:22
groups (2) 6:16 10:5
growing (1) 148:21
gs098 (2) 140:24 141:2
guidance (3) 22:11 34:19,22
guide (1) 24:4
gunshot (4) 103:14,15
158:20 159:17

H
hadnt (16) 27:1 59:5 60:11
81:20 83:6 84:12 112:18
131:24 132:20 135:5,7
143:5 162:23 178:17
180:13,23 181:12 182:7
183:12 197:2,5 199:14
230:20
helped (12) 11:7,12 76:21,23
78:2,6 163:17 167:16
189:6 190:20 201:8 202:3
helpful (13) 10:1 12:15,16
18:21
handicap (1) 75:19
handle (4) 12:25 146:25
179:15 201:5
hands (3) 30:11 35:11 200:1
happen (3) 12:4 23:21 76:8
happened (13) 33:20 55:10
76:10 82:21 97:6 101:21
115:4 129:25 164:24
191:10 193:6 195:4 201:3
208:2 215:20 220:5 222:7
happening (11) 5:25 27:17
64:23 67:22 82:24 97:10
109:22 150:13 172:16
175:20 219:19
happens (5) 102:6,6 198:15
208:9 230:6
happy (1) 222:2
happy (7) 74:23 93:2 116:20
210:3 211:7 214:25 215:24
hard (10) 75:9,22 82:10
102:4 105:16 109:8,8
111:1 123:1 136:9
harder (1) 137:2
harsh (1) 177:12
haslam (18) 42:12 43:2,4,7
57:1 70:22 74:9 79:9 88:18
115:9 119:7 127:10 128:1
138:23 189:9 222:6,12
234:7
hasnt (1) 120:6
havent (11) 18:1 56:15,16
58:9 93:9 94:13 98:14
104:25 105:1 165:6 184:5
having (33) 12:2 15:4 22:23
34:1 35:24 50:5 66:20
75:11 77:24 79:10 80:23
82:2,19 98:13 108:14
123:21 131:10 142:21
145:19 151:7 152:22

154:24 164:21 166:3
167:24 168:12 170:10,17
188:4 208:23 210:23 213:1
227:2
hazmat (3) 204:7 231:18
232:7
head (3) 12:20 92:12 139:19
header (2) 66:14 112:18
heading (1) 7:11
headquarters (1) 78:24
headset (4) 99:25 149:5,19
153:1
hear (18) 24:7 49:10,22
50:15 51:6,19 54:14 67:24
96:9 135:21 148:15,22
149:3 169:4 215:18 218:4
219:17 227:15
heard (32) 12:1,12 14:6 32:6
46:23 48:11 49:9,13,15
86:10 87:6 103:15,16
104:25 105:1,14 107:8
110:22 148:24 155:23
168:8 174:22,23 189:9
190:23 152:12,15,19
216:17,22 219:1 227:15
hearing (4) 48:4,5 51:23
124:13
hed (10) 58:16 87:6
141:11,12 143:3 151:25
155:19 173:25 217:16
218:2
heels (1) 128:15
height (3) 211:5,9,11
hello (1) 194:3
help (37) 15:18 18:23 51:2
55:21 62:7 79:1,16 80:14
83:17 91:9 93:22 97:7
101:19,24 111:6 115:1
118:22 120:2 147:1
152:13,23 157:6 167:20,22
172:23 176:1 178:23 179:8
180:13,23 181:12 182:7
183:12 197:2,5 199:14
230:20
helped (12) 11:7,12 76:21,23
78:2,6 163:17 167:16
189:6 190:20 201:8 202:3
helpful (13) 10:1 12:15,16
18:21
99:18 117:15 209:14,19
211:20 212:21 213:11
215:22 216:1 217:10
helping (1) 191:21
helps (2) 85:21 164:8
here (22) 12:4 33:14
57:14,16,19 94:13 119:6
178:22 180:3,23 185:3
191:10 193:6 195:4 201:3
208:2 215:20 220:5 222:7
223:2 225:5 228:18
herself (1) 41:21
hes (8) 30:14 68:20 80:20
129:19 156:4 197:21,23,23
hesitated (1) 216:8
hi (1) 128:21
high (2) 16:3 225:25
higher (1) 220:1
highlight (1) 8:23
highlighted (1) 98:23
highlighting (1) 162:11
highly (1) 211:21
hilarity (1) 119:15
himself (2) 71:12 155:15
hoc (10) 6:1,5,9,11 9:22,23
10:5 118:11 185:7,9
hodgets (1) 96:7
hold (15) 7:14 32:10 35:25
53:22 91:22 92:10 106:18
164:13 174:1,8 175:8
193:7,10,16 199:12
hollins (1) 113:6
honest (1) 62:5
honestly (8) 5:7,9 7:19 157:2
162:10 190:19 197:6,13
hope (8) 4:6 50:4 67:1 82:22
133:16 165:23 169:5 192:4
horwell (19) 81:6,7,8 82:22

83:22 84:2,5,11,14 88:14
125:13 171:23,24,25
172:25 173:3 175:12
234:10,17
hour (3) 4:27,13 89:23
hours (3) 85:5 89:23 174:21
house (1) 33:5
however (4) 9:5 34:5 38:5,15
hurry (1) 184:8

I
id (32) 14:24 19:13 25:6
29:25 41:21 44:21 50:16
67:18 82:8 84:21 90:16
120:17 121:11,22,24
132:10 133:15 134:16
135:4 150:18 174:22,24,25
175:17 177:20,25 178:3,6
202:23 208:1 218:24 231:4
idea (9) 64:10 92:18 122:19
62:4 65:14 85:20 94:14
186:4 232:25
ideas (1) 221:16
identical (1) 187:19
identification (2) 13:14,16
identified (4) 69:12 136:10
162:23 225:18
identify (4) 30:3 52:5 162:8
163:23
identifying (2) 9:16 16:15
ie (2) 32:10 74:14
ill (15) 12:8 25:3 26:3 32:4
62:4 65:14 85:20 94:14
111:12 139:6 173:3
175:11,18 183:1 227:7
im (165) 1:22 2:3,10,1

58:9,20 59:22 62:3 96:22
 98:8 102:13 110:11 127:17
 133:3 161:10 166:2,5
 167:9,17 182:2 189:22
 190:3 199:4 214:24 232:25

impossible (1) 219:17

impress (1) 149:20

improve (1) 140:9

improved (1) 214:11

improvements (2) 100:13,16

inability (3) 109:15 165:22
 166:1

inadequate (2) 175:24
 214:19

inaudible (4) 16:13 35:15
 39:2,24

incidences (1) 45:25

incident (201) 6:22,24 10:15
 13:2,10 14:15,22,23
 15:1,2,7,13,15 16:11,12
 17:1,3,9,10,16,18,18
 18:6,10,25 19:8,15
 20:6,7,10,12,16,17 21:24
 22:16 23:7,8,9,13,19
 24:2,7,13,15,23 26:1
 28:13,15,20,24 29:7,10,23
 30:5 32:20 33:23 34:5,17
 35:9 37:24 48:25
 54:6,7,16,25 55:2,3,12
 56:13,16 57:3,10 60:2
 62:1,13,21 63:14
 64:6,10,13,16,16
 65:3,3,7,8,13,16,18
 66:14,23 69:21 72:18
 78:20,25 79:19 82:6,8 83:7
 84:22 87:10,13 91:12
 92:3,4,6 103:21
 104:1,2,9,14,17 112:18
 119:2 121:9 122:20,21
 123:1,10,10,12,12,14
 124:4 125:22,24
 126:3,5,8,8,11,17 135:1
 139:25 140:5,12,18 145:1
 153:11,13 154:10,17,19,25
 156:6,20 157:20,23
 161:13,14,14,16 162:16
 163:8 165:3,18 166:21
 167:19 172:4 183:4
 192:11,19,25 197:16,20,24
 199:8 207:25 209:13 210:5
 211:4,4,7 213:21 214:11
 217:5,12,14,17,22 218:16
 219:7,21,22
 220:12,17,23,24 221:6
 222:16 223:3 224:20,21
 225:14 230:3,6,21
 231:1,15,24 232:2

incidents (29) 8:3 9:3,3
 14:24 15:17 22:9,15,18
 23:5,25 24:24 45:11
 64:17,18 65:11 75:6 76:9
 82:14 89:17 90:24
 123:21,22 136:24 164:24
 208:1,4,11,18 215:16

include (9) 78:23 89:17
 90:11,11,12 92:10 100:9
 169:15 214:12

included (3) 101:13,17 125:7

includes (1) 212:15

including (5) 2:7 9:2 11:24
 45:6 68:24

incomplete (2) 200:6 216:16

incorrect (3) 112:5,9 126:12

independently (1) 144:15

indicate (7) 4:3 68:7 115:8
 129:14 215:2 223:14
 225:24

indicated (1) 42:1

indicates (2) 129:15 226:17

indicating (2) 158:14 189:5

indication (4) 133:20 153:25
 180:18 217:10

indicator (1) 157:19

individual (2) 93:4,6

individuals (6) 103:2,8,10
 106:9 108:3 138:5

inelegantly (1) 111:12

inevitable (1) 135:25

inexperience (2) 198:10
 200:23

inexperienced (1) 178:21

inf (1) 70:4

inform (18) 18:8 81:19,22
 82:6,9 92:1,4,5 110:19
 134:7,8 136:22,24 138:16
 170:12 193:2 204:6 228:25

information (250) 3:13,13
 13:1 14:16,19,21 15:3,5
 19:16,24 20:2,18 21:21
 23:10 24:15 25:19 30:4
 31:13 32:18 33:1,25
 34:1,15,18 37:8,21,23,25
 102:1,3 103:9 111:5,20
 112:16 120:15 124:10
 130:1 140:2 152:21 153:18
 160:21 167:18 168:7
 182:19 200:1 202:9,10
 210:2 213:11 216:25 217:4
 224:2 232:13

introduce (1) 67:23

introduced (4) 96:8 166:24
 194:1 211:22

invented (1) 96:8

investigating (1) 46:13

invite (4) 1:6 115:7 171:17
 216:2

invited (1) 213:17

involve (2) 5:4 25:21
 225:13

involved (27) 8:2 11:23
 44:19,19,21,25 45:4,14,17
 46:1 83:8 101:22 102:9
 145:17 154:25 155:4
 163:14 165:3,9 166:21
 167:4 175:25 180:12,19
 183:3 210:16 217:20

involvement (8) 101:14
 122:25 144:11 146:4
 188:22 207:24 208:1
 211:24

involves (2) 68:4 231:17

involving (9) 9:3 16:2
 47:8,14 67:2 70:14 141:20
 198:5 199:10

isnt (11) 22:7 29:9 39:6 57:3
 96:22 109:9 114:24 160:22
 184:22 191:13 200:21
issues (2) 90:5 119:11

items (3) 8:21 120:22 160:8

its (144) 2:3,18 4:22 5:7
 7:10,12 8:13 9:24 16:22
 17:18,18 18:11
 20:9,10,10,12 22:7 23:18
 24:18,20,21 29:5,7,16
 32:6,12 33:22 34:7 39:23
 41:16 43:7 51:9 52:7,14
 56:10 57:6 58:1,15 59:10
 61:12,17,23 68:4 71:6,17
 73:21 76:15 79:3 80:17
 82:11,17,20,22 83:7 85:11
 86:2,12 87:18 88:8,9 95:4
 96:21 97:2,6 99:12,17
 100:10,22,24,25 102:10,14
 104:16,22 109:24 112:22
 114:9,16,18 115:2,20
 122:9,20 123:1,3,4
 127:10,17 128:8,19 129:13
 130:22 132:10,21 133:3
 136:9 137:5,17 139:16
 140:7 146:8,9 147:17,17
 151:3,16 152:5,20 153:20
 154:5,12 158:22 161:19
 162:16 163:14,19 164:3,9
 166:18 167:9,21 168:17
 170:7 175:7 176:1 181:7
 182:1 184:11 185:24
 190:13,13 192:24 195:6
 198:18 210:13 212:21
 219:4,16 220:15,22 222:7
 224:7 225:14 231:2

itself (6) 14:15,22 38:9 69:3
 106:9 190:23

ive (43) 6:12 9:24 16:11 26:4
 27:15 28:23 38:19 49:21
 54:13 56:13 58:17 61:23
 86:10 87:7 94:4,22

interim (1) 14:19

interpretation (1) 230:2

interpreted (1) 193:17

interpreting (1) 72:14

interrogate (1) 189:11

interrupted (1) 149:13

intervention (2) 52:8 171:6

into (51) 4:22 7:16 11:10
 12:14,23 15:12,16 17:7
 18:12 30:4 35:18 45:5
 50:11 54:5 62:8,16 63:8
 72:4 75:16 76:1,24 85:10
 87:13 95:10,23 97:6
 102:1,3 103:9 111:5,20
 112:16 120:15 124:10
 130:1 140:2 152:21 153:18
 160:21 167:18 168:7
 182:19 200:1 202:9,10
 210:2 213:11 216:25 217:4
 224:2 232:13

introduce (1) 67:23

introduced (4) 96:8 166:24
 194:1 211:22

invented (1) 96:8

investigating (1) 46:13

invite (4) 1:6 115:7 171:17
 216:2

invited (1) 213:17

involve (2) 5:4 25:21
 225:13

involved (27) 8:2 11:23
 44:19,19,21,25 45:4,14,17
 46:1 83:8 101:22 102:9
 145:17 154:25 155:4
 163:14 165:3,9 166:21
 167:4 175:25 180:12,19
 183:3 210:16 217:20

involvement (8) 101:14
 122:25 144:11 146:4
 188:22 207:24 208:1
 211:24

involves (2) 68:4 231:17

involving (9) 9:3 16:2
 47:8,14 67:2 70:14 141:20
 198:5 199:10

isnt (11) 22:7 29:9 39:6 57:3
 96:22 109:9 114:24 160:22
 184:22 191:13 200:21
issues (2) 90:5 119:11

items (3) 8:21 120:22 160:8

its (144) 2:3,18 4:22 5:7
 7:10,12 8:13 9:24 16:22
 17:18,18 18:11
 20:9,10,10,12 22:7 23:18
 24:18,20,21 29:5,7,16
 32:6,12 33:22 34:7 39:23
 41:16 43:7 51:9 52:7,14
 56:10 57:6 58:1,15 59:10
 61:12,17,23 68:4 71:6,17
 73:21 76:15 79:3 80:17
 82:11,17,20,22 83:7 85:11
 86:2,12 87:18 88:8,9 95:4
 96:21 97:2,6 99:12,17
 100:10,22,24,25 102:10,14
 104:16,22 109:24 112:22
 114:9,16,18 115:2,20
 122:9,20 123:1,3,4
 127:10,17 128:8,19 129:13
 130:22 132:10,21 133:3
 136:9 137:5,17 139:16
 140:7 146:8,9 147:17,17
 151:3,16 152:5,20 153:20
 154:5,12 158:22 161:19
 162:16 163:14,19 164:3,9
 166:18 167:9,21 168:17
 170:7 175:7 176:1 181:7
 182:1 184:11 185:24
 190:13,13 192:24 195:6
 198:18 210:13 212:21
 219:4,16 220:15,22 222:7
 224:7 225:14 231:2

itself (6) 14:15,22 38:9 69:3
 106:9 190:23

ive (43) 6:12 9:24 16:11 26:4
 27:15 28:23 38:19 49:21
 54:13 56:13 58:17 61:23
 86:10 87:7 94:4,22

96:10,17 103:15 119:21
 128:25 135:19 140:1
 142:4,5 155:5 160:15,19
 178:3 184:7 186:3 194:24
 198:6 199:12 201:2 12:24
 202:25 204:18 212:19
 215:20 222:9 231:22

J

james (1) 144:10

janine (9) 71:24,25 72:2,4
 78:13 85:11 110:1 173:23
 179:4

january (9) 10:6,11 43:23
 94:17,20 118:10,14,19,21
 37:20 43:22,24 48:3

jesip (61) 4:12 5:2,5,19,21
 9:23 10:12,16 11:4,24
 92:20 43:22,24 48:3
 90:6,13,16,19
 91:1,3,9,13,16 93:19 94:25
 99:12 100:6 118:3,12,21
 119:2,8 145:8
 184:11,11,15,24
 185:2,4,5,8,23,25
 186:4,5,8,10,13,19,24
 187:2,11,16 188:7 197:10
 212:16 213:4,17 218:17
 219:3 221:8

joanne (6) 43:4,7 119:7
 199:9 222:6 234:7

job (26) 3:6 63:19 76:8 77:20
 91:10,14 95:2,3,6,9,11,12
 108:15,17 109:1 110:8,13
 111:2,3 124:8,11 172:23
 177:5 180:17 188:6 201:14

jobs (1) 123:20

john (343) 1:5 4:8 5:25 6:10
 10:25 11:2 12:1,6,17
 15:21,23 16:19,22,25
 17:13,16,22 19:5,9 20:9,20
 21:11,14,17 22:14,19,22
 23:11,18 24:6,10,17,21
 25:1,5 26:23
 28:13,16,19,21,25
 29:8,14,17 30:13,18
 32:2,16 33:14 34:2,10,21
 37:3 38:24 40:20,25
 41:3,14,24 42:6,9,16,19
 47:16 51:21 52:5,14,16,18
 54:9,15 55:6,9,20
 56:7,10,20,24 59:9
 60:11,21,24 61:4 62:23
 63:5,11,14,16,23 64:5
 70:18 71:6 72:6 73:19,24
 74:2,10 75:5,11,18,23
 76:4,11,14,17,20 77:5,9,23
 78:5,10,14 79:4 80:15,18
 82:10 83:17,25 84:4,6,11
 85:10 88:15 91:9,17,22,25
 92:9,15 97:12,21,25
 98:2,5,7,11,18 99:20,23
 100:1,4,9,23
 103:14,19,21,25
 104:3,5,11,16,21 108:14
 109:9,13,18,24 110:5
 112:10 113:23,25 114:5,25
 115:6,17,20
 116:4,9,12,14,19
 118:16,19
 119:1,4,14,18,21
 121:13,17,20,23 122:1,3,8
 123:14,16 124:7,9,15
 127:6,12,17 132:21,24
 133:3,6,12,16,19,22
 134:2,4,11,17,21
 135:10,14,23
 137:5,8,10,14,19,23
 138:1,9,19,25
 139:5,9,13,18 140:16
 142:18 143:16,22 145:24
 146:1 154:10,13,16,21
 179:20 182:14 160:22,25
 161:2,8,12,15,17,20
 162:11,19,21,23 167:21
 198:17,17,21 199:4 201:4
 209:21 210:18 211:6,13

181:2,5,10,15,18,20
 182:23 183:9,15 186:2,4
 187:2,4,12 189:16,24
 190:2 191:5,13,23
 192:3 214 193:2 198:14,23
 199:1 201:10,14,19,21,23
 203:2,5 205:9,12 209:19
 210:6,13 211:1,16,20
 214:14,19,22,24
 215:6,18,22 216:6,10,12
 219:1,7,15,20
 220:4,9,13,18,22
 221:1,7,15,17 224:7,13,24
 225:8,10 228:6,14
 230:20,23
 231:1,6,12,19,21
 232:1,3,6,9,13,16,20,24
 233:4

join (7) 43:8,11 107:23
 144:12 146:14 206:4,7

joined (2) 43:2 144:5

joint (3) 35:15 213:17 223:15

judgement (1) 223:10

July (6) 5:15 6:14 8:2 10:17
 185:24 186:9

jump (1) 161:4

June (2) 1:1 233:8

junior (2) 78:12 206:15

K

keep (2) 45:18 187:8

kept (4) 49:21 73:22 131:25
 135:16

key (5) 37:22,25 136:14
 163:2 166:2

keyword (3) 15:18 161:7
 225:20

keywords (4) 15:14,16,16
 161:5

killed (1) 30:7

kind (4) 148:23 177:18
 209:25 217:25

kitson (2) 8:8,8

knew (24) 37:4 41:15 48:18
 55:4 62:12 84:19 117:15
 129:9 131:7,11 132:11
 134:8 138:18,21 153:13
 154:17 155:17 163:8
 171:25 224:21 199:25
 216:8 274:1 229:1

knock (1) 37:8

know (163) 1:16 2:12,15
 5:8,25 6:8 12:24 13:6
 17:23 21:3,11,12,14 22:24
 25:2 27:24 37:5 47:7
 48:6,7,16 50:1 51:7 52:3
 53:24 54:22 55:6 57:11
 58:10 59:24 60:8,16 61:22
 66:13 69:10 72:21 74:18
 75:24,25 76:7,8 77:16
 79:9,13 80:6,7,12 81:2
 82:15,21 86:16 87:5,10
 92:2,5,6 93:8,9,11,14,15
 95:4 96:4 99:8 102:5 105:4
 106:16,17,22 109:13,23
 110:1,4,16,20 116:5,23
 117:23 123:18 127:9
 128:5,25 129:10 130:18,20
 131:9 132:9,11,13,21
 133:1
 135:2,11,12,17,17,22
 137:1,1,17 138:4,10,13
 139:7,24 140:4,5 141:9,15
 142:6 143:13,16 148:14
 149:10 150:8 151:20,22
 154:4 155:18 159:7,22
 160:16,18,22 162:17
 165:21 166:17 167:10
 168:24 172:9,24
 174:10,13,16 176:17 178:8
 179:20 182:14 160:22,25
 182:21 190:5,8 191:7,23
 195:25 196:11
 198:17,17,21 199:4 201:4
 209:21 210:18 211:6,13

213:5 215:23 217:12,14
 219:1,8 223:20

knowing (3) 182:5,11 201:6

knowledge (5) 2:10 9:6
 95:20 213:1,7

known (9) 35:17 58:23
 131:24 135:5 167:13
 180:6,7 182:10 223:9

knows (3) 115:1 135:21
 140:15

L

la (74) 1:4,6 3:24 6:17 13:3
 42:10,17 43:2,5,6 47:19
 52:3,7,19 55:21 56:21,25
 59:13 61:5 64:6 70:20
 71:10 74:4,8 78:11,15 81:6
 82:25 88:16 115:7,19
 116:2,5,16 127:8,25
 135:24 138:22 140:20
 161:23 162:25 167:24
 171:13,17,21 196:13 199:3
 205:10,13,21,23,24 211:21
 215:9,23 216:13 221:19
 225:11 228:15 232:21
 234:4,8,16,22

lack (6) 106:25 107:8,10,13
 172:12 200:4

ladder (1) 211:14

lady (1) 8:9

laid (1) 231:5

lancashire (7) 200:21
 206:4,14 211:6,7,7,17

landing (1) 158:12

large (6) 7:13,14 33:25 46:9
 208:11 231:24

largely (1) 69:2

last (8) 66:25 89:21 94:18
 119:1 127:14 152:25 184:1
 198:15

lasted (1) 89:22

late (1) 232:24

later (9) 59:10 60:12 64:8
 66:22 67:24 115:24 141:6
 169:4 215:24

latest (2) 132:16 136:14

latter (1) 70:24

latterly (1) 43:20

laying (1) 28:3

leader (65) 9:11 11:18
 19:12,22 20:1,5,7,13 21:3
 23:4 24:25 25:14,18 27:12
 28:2 30:3,14,17,21,24
 31:10,12,15,16,19
 32:11,15,22 34:24
 36:1

232:25
 leave (13) 27:14 52:20 68:24
 79.8 81.4 113:13 116.6
 156:15 185:19 212:3.5
 216:13 227.7
 leaving (2) 10:25 114.9
 led (1) 171.6
 left (6) 72:7 93:5 101:5.6
 194:15 212:8
 leg (1) 158:20
 less (1) 26:18
 lesson (1) 137:15
 lessons (1) 140:11
 let (12) 51:7 69:10 89:5 96:5
 127:8 128:25 141:15 157:5
 183:21 192:8 198:21 231.9
 lets (22) 17:13 30:25 45:2
 73:24 103:9 128:8 146:12
 148:5 180:15 183:25 184:2
 185:2 188:17 194:1 206:3
 207:10 223:19,19 224:5,9
 225:11 228:3
 letting (2) 92:5 106:16
 level (4) 147:11 148:6
 190:12 213:2
 levy (5) 68:21 69:25 80:1
 81:24 110:15
 levys (1) 12:10
 liaise (3) 60:19 62:14 208:25
 licence (1) 29:16
 lies (2) 30:11 161:25
 life (3) 146:8,9 163:19
 liferisk (1) 22:18
 light (5) 8:18 80:3 124:19
 140:11 162:15
 lights (1) 26:13
 like (88) 4:11,14,23 6:18
 16:7 25:6 30:1 32:18 34.4
 36:9,12 37:16 39:9 45:17
 56:14 61:10,19,20
 64:4,17,18 65:4 71:4 72:17
 73:22 74:18 76:9 77:14
 89:14,16,18
 90:9,13,21,22,23 92:7 95:2
 96:13 97:15 98:25 102:4
 105:2 108:17 109:7
 120:9,17 122:20,20,25
 125:21 128:2 135:1,15
 137:11,17 138:4 139:3
 143:19 151:15 154:22
 159:17 160:23
 163:6,12,15,20 166:20
 175:25 177:10,14 179:7
 180:19,25 181:7 183:4
 185:14,14 189:18 191:20
 192:1 198:16 199:7 200:5
 209:22 219:7 221:8 231:5
 liked (4) 182:9 186:25
 187:6,20
 likely (5) 35:10 86:19 104:18
 116:9 202:21
 likewise (1) 204:5
 line (24) 3:3 13:10 14:1
 15:8,20 23:10 36:25
 39:12,16 40:2 53:23 84:5
 89:2 149:1.1 188:18
 194:13 201:3,12,25 204:18
 206:24 209:20 225:18
 lines (5) 103:4 126:7 185:19
 188:18 192:18
 linked (1) 17:3
 lisa (16) 19:12 20:1 21:7,14
 24:4 36:22 37:5 52:8
 149:16,18,18 150:2 202:3
 216:24 217:20 218:17
 list (2) 142:12 224:17
 listed (5) 7:13 8:21 9:5
 115:15 230:1
 listen (15) 38:8 46:25 48:22
 62:14,15 105:14 123:8
 146:21 148:23 149:19,23
 152:14,18,21 182:23
 listened (6) 51:5 142:4 147:8
 148:23 149:22 152:25
 listening (14) 19:19 38:15
 123:8 146:21 147:3,3,5

148:25 149:4,14 153:1,5
 166:19 194:6
 lists (2) 224:17,17
 little (12) 36:12 47:12 51:16
 59:9 96:13 99:12 101:17
 103:4 122:19 146:12
 168:24 197:18
 live (8) 12:18 65:16 160:18
 163:16 175:25 176:3
 178:17 214:14
 living (1) 148:21
 locally (1) 148:21
 located (1) 158:5
 location (3) 13:17 14:9 67:8
 locations (3) 7:16,20,22
 log (155) 13:2,10,15 14:9,15
 16:14 18:16 28:4,14,17,24
 29:7,12 39:6 44:13,24
 45:7,11,12 50:13,14
 54:6,8,16,24 55:4,13,22
 56:8,9,11 57:2,3 58:18
 59:1,7,10,17 62:21
 64:13,16 65:3,13,16,19,24
 66:2,3,18 67:16,19
 69:19,21,24 72:9,10,11,16
 78:21 79:3 87:11,13,15
 88:6 102:12,18
 122:11,15,16,21 123:2,3
 125:22,24 127:2,2,4
 128:13 130:11,13,17
 131:12,24
 133:6,7,9,10,13,19,22
 134:9,12,14,23
 135:2,4,6,8,20 137:4
 140:18,23 141:7,9,17,22
 142:1,2,3,6,8,13 143:2
 150:15,18 152:10 153:14
 154:10,19 155:22,25
 156:15 157:3,10,20,22
 158:24 159:13,23
 160:17,19,21 161:9 162:8
 164:6,10,17 165:6 168:2,5
 172:4 197:17,20,23 202:17
 204:24 205:2 217:15
 220:4,12 221:6 225:12,14
 228:10,13
 logged (1) 165:6
 logs (8) 57:2 64:10 66:9 76:1
 82:14 123:14 136:24 137:3
 long (13) 66:23 89:21,22
 109:13 116:9,10,11 136:25
 162:16,19 163:14 187:12
 220:7
 longer (2) 4:4 211:25
 look (76) 13:21 25:6 33:24
 35:24 36:21 47:12 55:1
 56:12 57:15 64:23 69:19
 70:13 72:9 79:5 86:3 90:17
 92:12,14 93:24 97:8
 115:12,20,22 120:17
 122:17 123:2,16,20,22
 126:24 127:15 133:15
 134:22 135:15 137:2
 140:21 142:1,3,10 145:18
 148:5 150:18,19,21,24
 152:9 153:14 155:22
 159:17 161:17 178:22
 179:15 180:8,15,22 181:11
 183:11,23 184:4 195:13
 197:19 199:12 202:17,18
 203:15 204:16 209:14,15
 216:2,10 221:5,17 224:5
 228:3,4 232:21
 looked (19) 49:20 51:21
 56:25 66:2,2 76:1 133:22
 134:9 135:4 143:2 150:15
 160:19 162:6 164:8 167:18
 168:2 174:6 196:24 225:16
 looking (39) 4:16,20 13:4,11
 20:25 21:1 31:18 59:2
 61:11,15 67:16 18:16 82:16
 121:4,13 131:14 134:4
 141:9 151:15 153:21
 160:20 165:21 167:21
 179:21,22 181:7,10 183:10
 184:5,9 186:17 191:19

192:19 194:2 195:14
 197:20 210:1 222:10
 230:23
 looks (3) 72:17 79:4 137:11
 lopez (27) 1:25 5:23 6:13 8:6
 13:5 22:5 25:10 36:18 51:8
 52:10 67:3 68:5 70:11 73:4
 79:2.8 120:16 150:20
 153:18 155:5,9 168:20,23
 183:24 186:7 194:23
 225:13
 loss (1) 112:25
 lot (27) 11:15,23 15:3 42:21
 55:18 63:22 70:18 73:16
 75:3 82:11,11,12,13 98:25
 105:16 107:12 108:18,18
 146:4,11 148:24 163:17
 186:25 187:6 191:9 211:9
 220:4
 lots (4) 103:22,22 104:6
 111:3
 loud (4) 37:18 49:22 54:11
 105:13
 louder (1) 52:15
 louise (1) 205:25
 lunch (7) 115:18 116:7,7,15
 127:10,13,21
 lunchtime (1) 115:23
 lying (1) 36:6

M

main (9) 33:5 57:3 90:21
 91:15 126:15,22 152:2
 160:19 216:18
 maintain (2) 20:8 207:20
 maintained (1) 212:14
 maintenance (1) 10:7
 major (6) 45:1 62:1 139:24
 207:25 208:1,4
 majority (2) 92:7 169:3
 makes (4) 8:13 59:9 125:8
 129:17
 making (19) 27:4 54:9,9,11
 67:19 75:21 82:21 88:5
 106:13,15,18 108:6 112:21
 155:23,24 158:4,7 161:22
 219:4
 man (2) 98:8 176:11
 manage (7) 102:25 117:24
 121:9 122:20,22 167:2
 207:16
 managed (3) 124:4 220:3
 231:25
 management (5) 9:1 123:24
 202:7 203:7 206:24
 manager (64) 1:17 12:10
 21:4,8 27:25 47:9,10,11
 66:6 67:2,18 69:5 70:14
 71:16 80:1,1 105:24,25
 116:25
 117:3,8,12,13,15,19
 120:14 121:10 124:18
 128:5,9,19,19 129:1
 130:2,12,16 131:6 140:24
 141:18 142:14,24 155:4,14
 160:6,11 164:12 168:10,25
 170:10,17,17 176:18 198:5
 199:11 206:9,11,14,17,22
 207:14,17 208:19 210:20
 212:8
 managers (2) 9:9 210:3
 managing (1) 122:24
 manchester (40) 2:1 7:3
 14:2,6 18:18 21:20 26:14
 27:11 40:1,13 43:8 50:1,3
 74:25 75:10 76:23 78:24
 80:21 86:17 95:11 96:3,23
 100:14,17 112:1,16 125:14
 125:21 161:31 166:21
 164:22,23 165:9 166:21
 167:20 171:22 190:23
 193:13,15 199:7 210:8,10
 211:18
 mandatory (7) 6:2,4,7 10:7
 24:18 200:12,16
 manner (1) 124:5

many (7) 101:8,9 113:23
 165:2 167:3 183:3 223:22
 marauding (1) 145:13
 march (3) 5:2 10:13 212:4
 mark (1) 147:23
 marked (5) 226:25
 227:2,5,11 229:2
 massive (1) 176:1
 material (2) 94:5 139:12
 matter (14) 12:8 26:13 57:18
 73:5 79:1 97:16,16 110:12
 125:22 127:7 149:21
 197:14 217:13 228:7
 matters (5) 12:9 46:6 78:18
 110:9 188:9
 maybe (10) 55:21 138:11
 167:18 183:5 190:16 191:6
 192:21 220:7 221:13 232:3
 meakin (5) 68:21 69:25 80:1
 81:20 110:15
 mean (19) 23:18 40:20 80:7
 84:23 91:17 103:5 114:1
 138:15 141:16,17 154:6
 169:11 173:6 174:23
 182:24 192:16 204:25
 229:10 231:17
 meaning (2) 169:20 189:1
 means (5) 57:9 83:16 108:14
 138:9 161:17
 meant (9) 6:1 37:22 84:25
 106:20 108:8 151:24
 189:25 201:13 224:11
 media (1) 104:23
 meetings (1) 139:21
 member (14) 77:10
 117:11,21 146:20 150:9,16
 151:23 152:12 195:1,4,25
 202:11,24 228:20
 members (5) 104:22 105:18
 177:9 191:7 203:22
 memory (3) 128:6 151:1
 157:6
 mentally (1) 223:6
 mention (4) 73:6 156:22
 160:12 163:2
 165:11 192:14,16 193:3
 209:6 217:19 227:24
 mentioned (10) 11:21 12:10
 58:16 60:18 72:7 85:11
 96:17 106:5 115:14 159:7
 mentor (3) 201:16,17,21
 menu (1) 33:2
 message (22) 36:2 63:1,8
 70:20 97:14,18,22 98:16
 103:11 106:21 122:7
 132:7,17,17,18,19 134:6
 136:22,23,23 197:21
 199:16
 messages (13) 62:3 63:12
 103:1,7,10,10,12 105:22
 107:20,22 165:1 170:3
 197:10
 messy (1) 165:3
 met (1) 162:18
 methane (46) 61:7,12,16
 62:3,5 63:1,7,11,17 64:1
 90:13,16,19 94:25
 95:15,16,21 96:8,14,15
 97:10,11,12,14,18,22
 98:16,19,21 99:4,6
 100:9,17,19 101:3
 110:9,20 118:12,21 119:2
 187:17,24 188:7 197:10,10
 methanesejip (2) 94:16,19
 metres (1) 26:9
 michelle (28) 21:3 25:24
 28:2 29:12 36:13,25
 37:6,14 38:13 48:1 52:9
 62:19 64:7 65:15 69:22
 150:1,3,10 152:17 157:17
 180:20 194:3,6 196:8
 202:3 205:22,25 234:21
 middle (3) 6:18 89:2 163:8
 midnight (1) 40:15
 midway (1) 222:4
 might (28) 11:17,18 12:4
 13:21,22 18:8 40:16 41:22
 59:4,17 62:1 66:22 86:19

88:9 111:13 114:20 136:5
 149:20 153:10 156:23
 190:16 193:14 197:2,5
 198:10 201:15 202:12
 203:22
 mind (30) 1:23 44:3 49:11
 58:10 62:8,16 63:9 69:3
 85:10 95:24 98:20 124:17
 129:6 142:21 148:6 152:22
 153:9 154:24 163:6,9
 166:14 173:1,8 191:25
 209:4 210:16,20 215:10
 216:24 231:10
 mine (7) 33:25 47:24 99:24
 103:12 105:2 115:10 116:3
 minimal (2) 185:21 188:7
 minimum (3) 76:15
 117:16,19
 minor (2) 119:11,14
 minute (4) 59:10 60:12 70:1
 149:9
 minutes (20) 4:4 21:25
 26:12,13,18,25 27:5 31:20
 42:17 116:8 130:9 141:6
 143:24 150:23 152:20
 169:2 185:16,16 190:17
 191:1
 miss (6) 64:25 95:2,5,7
 163:25 164:3
 missed (8) 12:13 63:21
 155:19 178:3,6,8 200:2
 215:20
 missing (1) 136:11
 misunderstood (2) 84:12
 198:6
 mixed (1) 55:18
 mm (6) 57:22 101:16 109:12
 120:1 124:1 142:16
 mmh (5) 3:24 29:18 37:3
 114:22
 mobile (1) 13:23
 mobilisation (18) 11:8,25
 18:1 22:2 24:24 28:5 29:11
 37:7 34:9 44:20 111:25
 165:11 192:14,16 193:3
 209:6 217:19 227:24
 mobilise (33) 17:24 18:12
 19:4,7,8
 23:3,9,16,20,22,24
 24:2,22,25 25:25 26:24
 27:13 29:13,22 33:12
 34:14,17,23 106:1,2
 192:20 218:9,23,24
 224:10,15 227:18
 mobilised (19) 17:6 24:8
 26:24 69:25 70:6,9
 78:19,22,23 79:13 80:2,4,9
 112:17 129:8 135:9
 141:3,18 166:15
 mobilising (9) 18:24 26:2
 30:10 110:16 165:10
 166:18 172:9 207:19 221:2
 mode (1) 124:10
 modules (1) 177:21
 moment (21) 20:22,25 29:2
 51:20 73:17 79:8 97:4,9
 118:6 129:2 139:8 155:10
 156:15 174:3 176:9 182:23
 194:15 204:6 207:10 228:5
 230:24
 moments (4) 76:6 128:8
 131:3 205:16
 monday (1) 1:1
 monitor (3) 72:23 169:7,21
 monitored (3) 2:8 85:5
 174:20
 monitoring (2) 72:24 169:10
 month (1) 91:6
 months (4) 144:16
 162:20,21,24
 more (98) 11:6,12,23 33:12
 35:6 36:12 40:5,10 43:20
 44:7 45:10 52:9 57:15
 59:18 61:1 63:3,13,17,17
 64:15 69:1 72:20,20
 75:1,20,24

N

76:1,2,2,4,5,7,12,13 87:17
 101:2,3,18,19 102:3,13,13
 103:4 104:3,13,18,18
 109:18,20,21 111:18
 132:25 146:4,5,10,11,12
 148:2,20,25 156:8 158:4
 159:5 160:21 161:17
 163:17 173:7 177:9,10
 179:10 182:8 183:8,19
 186:25 187:7,20,21
 189:6,10,22 190:3
 191:4,6,21 192:1 197:18
 198:3,23 200:25 202:24
 204:8 205:10 206:22
 214:12,17 219:25 220:12
 224:3
 morning (7) 1:6 8:12 42:18
 116:11 189:9 215:6 232:23
 moss (1) 111:24
 most (4) 98:8 189:18
 209:14,19
 motorway (2) 89:17 90:24
 move (7) 16:22 52:11 67:25
 120:14 122:4 148:3 164:5
 moved (2) 147:14 162:7
 moving (3) 10:23 51:17
 227:9
 ms (24) 42:12 43:2,4 57:1
 66:10,18 70:22 74:9 78:12
 79:9 88:18 115:9 127:10
 128:1 138:23 205:21,22
 217:3 218:5,7 222:12
 227:15 234:7,21
 mtafa (16) 5:15,20 6:11 9:21
 32:19 43:22,24 68:11
 129:16 155:14,17 156:7
 166:8 212:17 213:3,17
 mts (3) 70:5 79:21 140:25
 much (55) 3:24 29:18 37:3
 39:4 50:12 52:19 54:18
 62:4,6 70:11 73:4 78:14
 80:19 81:5 88:15 92:21
 95:17 97:3 102:7 103:25
 106:11 107:16 108:15
 110:8 119:22
 127:5,13,19,25 135:1,2
 138:24 152:21 154:9 162:3
 164:4 166:22 168:23 170:1
 171:13 172:15 180:8 182:6
 184:24 186:23 202:2 205:9
 210:11,11,29 216:12
 219:16 223:23,25 233:4
 multiagency (11) 1:21 2:4
 62:2 70:25,25 71:18 72:24
 85:4 140:9 174:16 218:18
 multiple (10) 32:19 83:23
 92:19 103:2,8,10 108:2
 208:15,23,24
 murderous (1) 190:24
 must (11) 19:1 32:15 47:16
 79:5 142:7 173:7 175:11
 209:21 210:6,14,24
 muster (1) 129:18
 mutual (1) 10:4
 myerscough (1) 84:3
 myself (8) 3:19,19 31:15
 38:4,19 164:1 173:11
 180:1

169:1,6,11 170:12 171:25
173:15
nobody (1) 147:3
none (1) 83:24
nonmobilisation (1) 218:1
nor (1) 213:15
normal (9) 55:12,12 56:13
82:6 92:4 110:11 161:18
179:2,10
normally (6) 7:4 81:22 82:6
85:12 98:15 104:17
north (46) 1:7 10:19 12:20
42:21 43:15 50:7,19 68:3
71:11 75:2 78:12 90:8
94:1,7 95:10 116:24
120:11 124:4 125:17
139:19,25 140:8 144:11,12
146:13 148:3,10 164:20
165:8 173:19,21 176:14
199:14 202:9 204:10
206:18,23 209:7,25 210:17
211:4,22,24,25 212:3
230:10
note (2) 52:7 54:16
notes (5) 54:4,10,11 184:7
215:8
nothing (8) 29:6,15
86:9,15,24 87:14 191:25
203:18
notice (2) 76:6 208:7
noticed (1) 148:18
notification (2) 6:20 217:13
notified (2) 228:7,20
notify (4) 6:24 20:13 226:25
228:9
november (6) 8:7,13 9:22
10:3 185:3,7
nuanced (1) 59:18
number (40) 7:13,14 8:21
17:8,9,10,14,24 20:4 45:25
46:6 69:17,24 75:4 78:13
83:23 84:4,14,21,23 85:1
91:25 92:1 117:16,19
120:22 145:17 152:7
154:14 155:12 156:12
158:24 159:23 174:7,10,13
212:20 215:13 224:6
228:13
numbers (5) 1:24 78:7
84:20,20 158:3
nutshell (1) 212:19
nwas (27) 2:7 40:15 47:8,14
48:19 50:6,7,18 53:5 56:3
58:6,21 62:9 85:24
86:4,6,13 91:19,23 96:9
98:12 106:6 108:4 152:4
194:3 222:5,13
nwfc (13) 2:7 74:15,19
82:1,4 84:7 85:2,24 109:19
133:24 135:17 162:13
213:16

O

obligation (1) 98:12
obligatory (1) 90:18
observing (1) 146:19
obtain (3) 3:12 81:17 172:15
obtained (2) 27:16 50:5
obvious (3) 30:7 174:2
199:13
obviously (40) 7:18 21:11
39:22 49:20 58:17 60:3
61:15 64:23 75:2,21 77:3
82:16 83:6 94:14 95:25
105:16 106:11 111:14
112:15 114:16 115:2
123:8,19 124:8 135:6
136:24 142:3 143:5 154:16
160:9 162:11 172:4 176:20
178:3,17 180:17 184:7
191:10 223:23 232:25
occasions (1) 219:25
occupiers (1) 203:22
occur (5) 2:21 151:23 208:7
220:2 230:6

occurred (8) 5:21 8:14 12:24
14:7 179:9 198:7 217:13
225:24
occurring (1) 69:23
occurs (2) 128:15 153:3
oclock (3) 116:20 127:19
130:8
offer (2) 112:4,7
offered (7) 88:21 177:4,6,8
187:5,10,16
offering (1) 15:24
offers (1) 16:7
office (6) 37:7,10,14 190:17
216:18 217:4
officer (21) 1:13 18:9 60:22
66:21 78:19,23 91:18
106:23 113:7 117:5,24
124:21 158:12 159:5
164:14 165:23 174:1
193:8,11 199:13,16,22
201:3,12 204:7
officers (10) 34:6,6 39:3,3
82:7 86:20 98:3 125:16
158:4,7
offset (1) 4:6
often (4) 91:3,5 103:23
176:25
oh (3) 116:13 129:21 142:5
okay (34) 12:1 17:22 26:23
28:21,25 29:14 52:16
63:16 76:14 80:18 82:21
83:25 97:21 98:2 109:24
53:11 68:22 72:2,19 80:21
89:14 95:12 107:19
115:17,23 116:7 122:8
127:10 134:20 142:12,18
144:24 149:19,22,23
152:14,16,24 156:7 157:8
158:9 159:10 162:15
165:15 167:4 179:3 181:13
193:12,23 199:8 216:7
220:10 226:12 227:6
overall (4) 101:20 102:1
106:24 207:20
overhear (1) 150:5
overheard (6) 53:12 54:21,21
58:3 61:23 87:7
overlapped (1) 141:12
overlooked (1) 213:19
overnight (1) 216:1
oversee (1) 208:23
overspeaking (14) 17:17
20:13 87:6 106:23 154:20
178:13,16 179:2 181:9,20
191:23 194:12 195:1
202:17
overview (1) 20:8
overviewing (1) 20:14
overwhelmed (5)
108:12,13,20,23 110:7
overwhelming (2) 110:13
183:2
owen (17) 19:12 20:1
21:7,14 36:22 37:5 52:8
149:16 150:2 202:3 216:24
217:3,20 218:5 222:20
223:15 227:15
owens (1) 218:7
own (9) 81:10 91:2 92:3
146:25 166:14 172:1
189:22 200:1 224:19

opportunity (20) 4:16 12:13
20:19 127:15 128:6 136:13
150:25 178:19,20
179:14,17 180:10 181:11
184:4 186:22,23 187:5,21
216:1 217:7
opposed (3) 74:19 83:20
222:21
ops (2) 139:20 176:18
option (6) 147:1 169:10,24
170:1 200:24 225:8
order (10) 14:22 29:12 41:10
119:6 139:21 143:19
145:20 146:14 184:2
224:15
ordinarily (1) 207:2
ordinary (2) 32:14 232:13
organisation (2) 10:19
201:16
originally (2) 86:7 195:13
originated (1) 120:6
others (5) 6:7 49:10 57:1
106:10 167:6
otherwise (2) 48:23 75:14
ought (2) 109:18 134:2
ourselves (4) 150:25 190:13
192:14 194:1
outside (4) 11:9 157:9
158:20 205:16
over (51) 21:25 24:4 25:10
27:24 30:20 31:19 39:17
40:8 41:12,18 42:13 49:20
53:11 68:22 72:2,19 80:21
89:14 95:12 107:19
115:17,23 116:7 122:8
127:10 134:20 142:12,18
144:24 149:19,22,23
152:14,16,24 156:7 157:8
158:9 159:10 162:15
165:15 167:4 179:3 181:13
193:12,23 199:8 216:7
220:10 226:12 227:6
overall (4) 101:20 102:1
106:24 207:20
overhear (1) 150:5
overheard (6) 53:12 54:21,21
58:3 61:23 87:7
overlapped (1) 141:12
overlooked (1) 213:19
overnight (1) 216:1
oversee (1) 208:23
overspeaking (14) 17:17
20:13 87:6 106:23 154:20
178:13,16 179:2 181:9,20
191:23 194:12 195:1
202:17
overview (1) 20:8
overviewing (1) 20:14
overwhelmed (5)
108:12,13,20,23 110:7
overwhelming (2) 110:13
183:2
owen (17) 19:12 20:1
21:7,14 36:22 37:5 52:8
149:16 150:2 202:3 216:24
217:3,20 218:5 222:20
223:15 227:15
owens (1) 218:7
own (9) 81:10 91:2 92:3
146:25 166:14 172:1
189:22 200:1 224:19

P

p1 (2) 26:8 27:12
p2 (1) 26:8
packages (1) 9:4
paged (4) 80:9,10,10,11
pager (4) 81:20 169:24
170:1,2
pagets (2) 169:8 170:13
pages (1) 184:9
paging (1) 80:16
panic (2) 62:11 64:4
panicking (3) 58:13 62:9
64:3
panicky (1) 61:20

paper (1) 215:1
paragraph (21) 36:10,13,21
37:2,4,16 88:22,24 93:18
102:21 112:24 188:11,16
189:6 192:8 193:9 218:12
222:4,8,15,24
paragraphs (2) 111:23
188:13
parallel (1) 64:12
paramedic (4) 67:15 87:25
88:8 122:6
pardon (1) 178:5
paris (5) 8:14 9:14,18 12:1,4
park (31) 28:2,5,18 29:13
62:20 64:6 65:12 66:15
69:21 79:3,13,22
81:9,11,18 82:5 112:1,15
121:17 127:3 129:8,18
140:25 150:22 153:12
156:8 157:9 165:25
172:1,9 220:19
parked (1) 6:22
parking (1) 50:21
park (41) 2:24 7:17,18,21 8:1
11:20 20:20 39:2 43:25
46:25 48:22 51:1,18 56:21
61:9,25 62:24 86:1 87:20
97:21 107:19 108:11
109:1,15 149:7 151:12
152:25 161:23 163:17
165:17 166:25 170:16,22
175:3 187:18 213:14
215:19,23 216:6 220:23
228:8
participant (1) 116:17
participants (2) 127:9 171:15
participate (1) 213:17
participated (1) 169:2
particular (22) 3:4 7:23 8:1
9:17 15:14,15 17:3 20:16
24:6,14 33:23 74:21 75:13
83:2,9 96:21 140:9 169:21
174:5 208:3 212:22 215:17
particularly (7) 109:1 183:10
188:6 192:4 196:6 198:12
219:9
parties (1) 20:24
partner (4) 44:8,12 95:13
158:13
parts (3) 14:20 68:6 164:7
pass (29) 37:8 38:6,9 39:4
50:6 55:7,16 67:7 82:1
97:18,24 98:9 105:21
120:20 132:8,17,18,19
133:3 136:23 142:25 152:3
158:18 163:23 165:1
189:23 191:11 193:19
198:12
passage (2) 209:5 212:10
passed (23) 26:5 36:24 40:10
48:3 53:2 54:19 60:7,10
80:21 92:22 109:3 123:23
134:13 137:13 138:7
142:14 143:13 165:5
191:25 193:12,23 223:23
228:22
passes (1) 143:4
passing (10) 44:15 45:7
86:13 106:16 108:6 120:18
160:15 161:19 173:13
178:14
past (2) 9:25 201:21
patients (1) 158:4
pattern (1) 128:4
pause (4) 52:25 73:18
118:13 186:1
pay (1) 7:23
pcso (1) 158:5
pda (1) 33:13
pdr (2) 91:2,5
pedant (1) 25:2
pedantic (1) 24:17
penultimate (1) 228:16
people (49) 7:15 38:20 45:8
52:22 75:23,25 82:12
90:23 91:12 93:9,12

101:20 103:22 111:1,5
115:10 122:23 123:2 132:5
133:4,7 135:16 136:15
138:12,25 143:19 145:5
151:7,16,25 152:19 164:8
165:2,25 167:4 176:21
177:4,6,10 183:3 189:21
191:10 195:19,23 198:16
201:14 222:14 225:1 230:7
perceived (1) 34:16
percentage (1) 92:22
perfectly (4) 121:21 140:13
190:11 194:8
perform (2) 212:22 213:2
performed (2) 73:9,10
perhaps (35) 8:22 11:12
29:16 40:20 51:22
59:2,2,5,16 60:3 61:11,15
71:4 78:7 95:5 98:19,20
101:6,19 107:10 110:7
120:4 121:20 132:25 134:9
161:23 168:17 171:4 189:7
195:19 208:11 210:4
213:8,11 216:14
period (3) 144:24 206:3
220:1
periods (1) 219:25
permits (1) 227:5
person (21) 12:19 38:25
45:20 58:1 64:22 75:24
98:12 114:6,24 191:8
198:14 207:15
211:5,9,11,11,15 215:12
217:25 219:9 229:13
personal (3) 3:2 87:9 124:3
personally (4) 81:2 89:7
178:6,8
personnel (3) 6:23 32:24
44:16
persons (2) 23:25 203:13
perspective (3) 64:9 73:7
171:20
pete (1) 156:4
phase (16) 10:7 144:19,22,23
147:10,10,13,14,25 148:4
166:8 177:11
200:9,10,14,16
phases (2) 147:9 191:6
philips (27) 28:2,5,18 29:13
62:20 64:6 65:12 66:15
69:21 79:3,13,22
81:9,11,18 82:5 112:1,15
127:3 129:8,18 140:25
156:8 165:25 172:1,9
220:19
phone (16) 27:2 37:25 38:3
69:8 70:3 75:7 77:12
84:4 115:8 133:23 140:24
156:4 175:9 213:22 215:19
phoned (1) 228:25
phoning (1) 77:5
photograph (1) 37:10
phrase (5) 6:6 59:14 177:21
189:2,3
physical (3) 13:24 43:25
89:12
physically (1) 16:7
pick (7) 25:9 36:19 39:22
130:2 148:22 156:6 161:9
picked (2) 162:13,17
picking (2) 174:1 199:13
picture (2) 59:18 208:15
piece (4) 67:6 157:13,17
17:14
pieces (1) 163:2
pling (1) 107:5
place (13) 5:22 35:11 41:11
57:7,10 70:21 72:5 91:11
95:10 100:14 137:16
168:20 203:16
placed (1) 124:3
plainly (1) 207:22
plan (97) 16:2,5,9,16
17:4,4,8,13,16,23
18:7,11,13 29:23 33:6
34:12 46:7,15,16,21,24

50:2 91:20,21,22 92:8,9,14
100:6 119:13,24 120:5
139:25 140:7 165:7
166:8,11 167:5,5,10,15,19
168:3,4 192:19,20 199:4,5
203:16 204:5 205:14
210:15,25 217:21 218:10
222:21,22
223:3,7,11,11,19,20
224:1,2,9,13,21,22,25
225:1,4,6,25
226:1,14,18,19,24
227:2,11,17 228:11,21
229:4,4,7,8,14,16 230:5
231:2,6,11 232:6,10,22
planned (1) 208:4
plans (21) 15:25 16:10,12
17:20 18:3 33:1 45:8 46:9
92:2 140:4 210:11 221:22
224:18,19,21 225:21 226:9
230:4,21 231:24 232:2
plato (1) 213:18
play (5) 50:25 51:1 52:4
128:3 150:20
played (9) 51:14,25 52:12
67:5 70:17 155:8 166:25
168:22 213:14
please (77) 5:1,24 6:19 7:1
8:6,25 13:1,4 15:11 18:23
22:6 25:8 36:1,13,19,20,21
37:17 39:8,10 43:3,6 47:13
51:7 55:23 72:19 73:9,17
79:3 81:6 86:1,13 87:20
88:24 93:18 97:7 107:5
110:23 111:23 112:24
118:1,10 120:16,17 125:21
128:3 144:6,9,12 150:24
153:16 155:5 157:3 171:23
174:3 175:14 182:1
183:23,24,25 184:12
188:11 193:6 194:19,23
196:13,16,16 197:18 198:5
205:21,24 206:13 212:11
215:14 216:10 225:13
plethora (1) 96:4
plural (1) 58:5
plus (1) 20:3
pm (8) 127:20,22,24 144:2,4
205:18,20 233:6
pocket (4) 99:4,6,17,19
pod (14) 50:1,3 80:22 149:19
164:22 165:1 166:24
167:20 193:13,15,20 199:8
200:21 215:16
pods (3) 167:1 204:15
215:17
poer (74) 1:4,6 3:24 6:17
13:3 42:10,17 43:2,5,6
47:19 52:3,7,19 55:21
56:21,25 59:13 61:5 64:6
70:20 71:10 74:4,8
78:11,15 81:6 82:25 88:16
115:7,19 116:2,5,16
127:8,25 135:24 138:22
140:20 141:24 143:24
144:5,8,9 146:6
154:12,15,22 156:15
161:23 162:25 167:24
171:13,17,21 196:13 199:3
205:10,13,21,23,24 211:21
215:9,23 216:13 221:19
225:11 228:15 232:21
234:4,8,16,22
points (2) 89:15 228:15
pol (4) 158:3,11,20 159:5
police (58) 2:1 7:3 18:9
21:20 38:2,10 40:2 49:8
50:17 53:21 24 55:17
58:6,22,23,24 59:3,5,11
60:4,8,11,20 61:2 72:23
78:24 83:13 85:13,14
86:9,20 91:18 92:1,5 99:3
105:17 107:14 119:24
120:6,7 121:2,4 125:5,15
157:20 158:24 159:16
171:22 173:5 174:9 196:6

222:23 226:25
228:7,12,17,21,24
portal (1) 18:15
pose (1) 152:6
position (11) 22:23 30:25
36:24 49:18 66:6 114:10
124:25 131:20 132:5
173:11 198:12
positioned (1) 148:13
positions (2) 37:23 207:11
positive (1) 97:8
possibilities (3) 25:18 169:6
170:11
possibility (6) 27:10 30:5
31:4 33:16 77:23 198:6
possible (8) 20:19 32:19 39:5
71:8 172:16 180:21,23
196:5
possibly (3) 3:12 190:11
210:12
postcode (1) 13:8
posters (1) 101:1
postmobilisation (3) 18:4,11
39:4
potential (6) 7:14 9:16 25:21
154:5 162:14 192:10
potentially (2) 40:11 48:25
powerpoint (6) 5:4,12 6:13
196:24 197:2,11
practical (2) 55:11 221:10
practically (2) 213:8 214:3
practice (16) 7:15 38:5
56:13 64:15 75:11 91:13
163:12,15 178:17
214:15,16 219:11,12,14
221:8,9
practised (1) 11:7
pre (2) 18:3 39:3
prealert (5) 14:5,13 22:1
26:11,12
precise (1) 67:8
precision (3) 26:6 29:24
228:19
predetermined (3)
17:2,19,21
preempt (1) 232:19
prefacing (1) 188:3
prefer (3) 74:12 127:13
215:4
preference (1) 216:6
preferred (1) 7:2
premises (2) 7:13,14
premobilisation (1) 18:5
preparation (1) 22:1
prepared (7) 2:1 4:17 29:1
68:3 120:11 139:25 209:20
presence (3) 38:13 114:3
163:6
present (3) 15:17 18:7 19:3
presentation (5) 5:4 6:13
196:25 197:11 213:5
presentations (1) 212:18
presented (3) 17:20 169:5
226:9
press (5) 23:15,20 58:2,21
227:23
pressed (3) 26:24 34:23
152:13
pressing (4) 19:13 23:22
53:8 54:23
pressure (6) 75:21 96:25
97:9 99:1 124:3 183:19
pressures (1) 124:2
presumably (4) 80:15 121:18
123:17 167:15
presume (3) 176:8 189:13
199:24
presumed (3) 143:3
199:23,24
pretty (2) 185:21 188:7
prevalent (1) 98:22
prevents (1) 33:25
previous (2) 15

primary (2) 6:24 215:17
principles (7) 4:13 5:5,19
11:5 37:20 210:7 219:3
printed (1) 127:10
prior (5) 19:13 21:5 24:23
186:19,24
priority (13) 20:6,12
22:8,14,16,18,20
23:5,13,18,25 24:24
192:24
private (1) 210:19
privy (1) 21:13
pro (2) 91:2,5
proactive (3) 102:14
109:20,22
proactively (2) 131:21 132:4
probably (9) 6:2 26:18 206:2
215:5 219:16 221:20 224:5
232:6,10
problem (9) 41:14 71:6
92:16 106:24 132:21
162:14,24 219:22 233:3
problematic (1) 229:21
problems (5) 33:14 109:9
138:14 139:22 219:2
procedure (20) 10:14 20:23
22:4 63:18 77:16 93:9
99:13 107:4 133:17
134:6,21,22 135:14
136:11,21 137:15,21 138:8
179:10 211:14
proceeds (5) 74:24 134:4
138:2,13 142:22
proceed (3) 40:24 116:6
129:21
proceeding (3) 112:16 113:7
211:10
proceedings (1) 127:23
process (6) 23:1 93:11 95:9
121:14 184:8 194:20
produced (1) 2:2
professional (2) 124:5 212:14
programme (1) 145:10
programmed (1) 89:10
progress (2) 146:13 210:20
promoted (2) 206:9 212:6
promotion (1) 212:7
prompt (6) 116:23 203:17,19
204:7,9 218:1
prompted (1) 229:16
prompts (8) 9:2 11:9 65:1
203:8 204:3,22 205:6
proper (1) 127:15
properly (6) 93:7 108:16,17
180:17 194:8 199:3
proposal (2) 18:16 115:15
propose (1) 42:13
proposed (4) 17:1 19:14
21:2,23
proposing (1) 67:25
provide (5) 130:12,16 132:5
138:3 186:22
provided (20) 5:20 9:4,8
14:18 21:20 30:4 33:2
113:10 119:18 121:8
128:12 130:9 131:3 141:21
186:18 188:5 203:6
222:23,25 230:12
providing (3) 39:23 59:16
176:15
provision (1) 113:20
provisions (1) 187:23
public (15) 104:23 105:18
150:9,17 151:23 152:12
191:7 195:1,4 196:1
202:11,24 203:11,22
228:20
pulling (1) 10:18
pumps (18) 17:8,9,11,14,24
18:17,20 27:11,22 28:5
29:13 44:23 65:9,11 77:20
106:3 173:9 192:23
purely (1) 105:5
purpose (5) 5:14 24:11 41:10
69:3 113:13
purposes (2) 4:25 13:1

putting (13) 50:13,14
54:5,7,25 58:5 59:6 60:13
80:25 123:2,6 161:5
183:19
Q
q (613) 1:15,20
2:15,18,21,24
3:5,10,14,17,21 4:19,22
5:4,11,18,23 7:7,10,20
8:2,6,11 9:13,21
10:2,11,23 12:23 13:13
14:1,4,9,12,15 15:7
16:2,5,14 17:7,10
18:1,14,20,23 19:18,22,24
22:4,11 23:3,6,8 25:14,16
26:8,11,17 27:10,20,22,24
28:7,10 30:1,23 31:11,18
32:22 33:1 35:9,23
36:6,9 37:13,16 38:21 39:8
40:1,4,7,12,18
43:8,11,14,18,22
44:2,7,11,15,19
45:2,14,20,24
46:3,6,10,13,18,20,25
47:22,25 48:10,14,18,22
49:2,9,15,24
50:4,10,18,23,25
53:4,8,11,15 54:3 56:2
57:6,9,13,18,23
58:1,5,9,19 59:21
61:9,14,17,25 62:7,19
64:15,18,20,22
65:6,13,21,24 66:6,17,25
67:11,14,21
69:7,11,14,16,19 70:11
71:18,21,25
72:4,9,13,19,23 73:4,14,17
78:23 79:1,16,25 80:11,14
81:13,17,25 83:9,16
84:17,23,25 85:4,18
86:1,19,23 87:5,10,13,17
88:3,7 89:12,19,21,23,25
90:2,5,12,18,25
93:1,4,11,14,16,18
94:3,10,14,24 95:4,9,15,20
96:3,5,13,16,19,21,25 97:4
99:2,6,9,11,15,17
100:16,21 101:6,11,17,24
102:11,17,19 105:5,8,20
106:4,8,24 107:5,8,19
108:2,8,23 110:22
111:4,8,12,17 112:7,22
113:4,18,22 114:16,23
117:6,16,19 118:1,6,22,25
119:11 120:2,4,9,25
122:14,19 123:23 124:2,25
125:9,13,19,21
126:7,11,17 127:1
128:12,15,18,25 129:6,12
130:5,15,22 131:2,10,16
132:2,14 136:3,5,10,19
140:7,11,15 141:17,20,24
142:10,17 143:11
144:11,15,21,23,25
145:3,7,11,13,17
146:12,17,24
147:3,6,9,15,20,25
148:2,5,17
149:3,7,10,13,16,20
150:2,5,8,13,15,19
151:3,10,12,22
152:5,9,16,18,20
153:3,8,14,25 154:4,9
155:3,17,22 156:22
157:1,3,12,16,22,25
158:9,18
159:4,10,13,15,22
160:1,8,11 162:3
163:4,16,21
164:2,4,17,20,23
165:7,16,19,21
166:7,11,14,23 167:8,13
168:7,14,17
169:10,14,17,20,24
170:7,9,15,22 171:4,9,11

172:4,7,9,12,15,19,22
173:12,15,18,20,24
174:10,13,16,19,23
175:1,5,10,22,24
176:4,14,20,25
177:2,4,12,16,18,23
178:2,5,8,10,25
179:9,20,25 180:2,5,10
182:1,14,20,22 183:23
184:7,19,21,24
185:2,7,16,21,23
186:13,15,17 187:16,19,23
188:1,3,9,21 189:5,9,13
190:20,22 192:8,22
193:17,22,24
194:1,8,11,14,18,23
195:3,6,8,13,16,19,22,25
196:3,9,22,24 197:2,9,14
198:4,10 199:10,20
200:3,9,12,14,18,20,23
202:2,6,16,20,25
203:10,15,25 204:5,13,20
205:1 206:1,7,9,11,13,24
207:2,5,8,10,14,22
208:3,7,14,18,22
209:2,9,14,18 212:3,5,10
213:1,11 214:1,5,9 216:22
217:3,7,10,19
218:4,9,12,20,22 222:1,10
223:6,9,14,18 224:5
225:24
226:4,9,12,17,22,24
227:4,14,21 228:1,3,24
229:4,7,11,13,21,23
230:5,10,16
qc (5) 78:15 88:16 128:4
175:14 196:13
qualification (1) 147:11
qualified (3) 144:25 145:3
146:14
quarter (1) 51:18
queries (1) 207:19
question (46) 34:11 39:18
62:7 74:10,11 82:10 92:17
108:8 110:21 112:22
113:14 114:16 119:23
125:24 132:2 140:17 141:4
155:13 156:17 157:12
163:7 164:11 170:24
171:1,2,9,14 173:11
179:11 182:4,15,24 183:12
189:20 190:3,6,8 191:3,4
193:6 202:12,14 203:4
209:2 212:20 215:10
questioned (2) 189:1 202:15
questioning (2) 74:8 84:11
questions (76) 1:4,7,8 3:25
4:2,6 11:9 12:19 13:7 25:4
36:10 42:10 43:5 47:4
61:20 67:1 78:17 81:7
88:17,18,21 92:21 110:6
111:17 115:5,8 116:6,22
138:22 139:1,2,3 144:8
147:17 160:1 169:3
171:15,18,19,24 175:15,16
176:20 182:4
189:7,11,17,18 190:4,10
191:17 194:14 196:12,14
202:6,7,18 204:21
205:5,10,23 214:24 216:4
234:4,5,8,9,10,11,12,13,16,17
quicker (4) 13:24 27:1,3 61:3
quickly (4) 24:16 48:23
135:25 196:5
quiet (1) 76:9
quietened (1) 185:20
quite (19) 6:8 8:10 15:2
23:11 24:15 30:23 61:24
62:11 74:22 103:17 113:14
161:14,15 184:1 198:25
199:3 201:24 219:7 220:7
R
radio (2) 35:4 37:25
railway (1) 86:17

raise (8) 32:15 39:20 73:5
116:16 129:3 179:2,7
180:20
raised (3) 49:6 77:24 162:22
raising (3) 49:9 139:8 179:9
ran (1) 120:22
rang (10) 80:8 81:19,20,24
82:15,16 133:23 134:19
141:14,15
range (1) 90:5
rank (8) 77:8,14,25 206:9,15
207:6 210:8 212:5
rapidly (1) 161:2
rathier (14) 12:21 19:1 51:17
57:15 71:8 98:13 109:20
111:12 132:6 177:12 190:5
215:9 223:6 224:1
reached (5) 18:1 200:14
221:21 226:4 227:21
react (1) 59:17
reacting (1) 109:21
reaction (2) 208:10 218:6
read (12) 8:22 25:11 50:14
55:13 93:18 123:3 141:7
151:5 186:16 204:6 212:10
214:2
readily (3) 162:6 204:13,13
reading (7) 59:17 90:25
141:10 160:16 168:12
185:10 204:23
reads (3) 8:11 36:14 39:11
ready (1) 144:1
real (5) 67:22 146:8,9 163:19
203:10
realise (5) 88:18 121:22,24
141:10 153:10
realised (2) 66:23 112:17
realistically (1) 180:16
really (28) 9:25 12:3 32:20
42:19 63:23 73:10 98:7
103:19 114:18 116:11
122:3 135:4 137:19 149:23
180:22 183:12,13 185:18
188:5 189:6 190:5
201:3,10 202:2 203:12,14
221:9 228:6
reason (12) 5:21 20:3 40:4
74:2 98:19 114:5,16,19
119:9 126:19 142:25 154:7
reasonable (2) 32:8 33:16
reasons (5) 31:11 33:10
34:13 174:2 199:14
reassurance (1) 157:16
reassured (1) 59:11
recall (61) 3:21
7:17,18,19,25 10:1
12:2,5,6 43:24,25 45:10
46:8,12 48:3,5 52:13 53:8
54:7,24 56:17 77:8,17,21
89:22,24 90:7,15 91:5
93:24 94:13,21,22,22,25
95:8 96:18,20 100:2,2,11
101:7,9 111:7 116:24
117:9 118:23 139:24 140:5
149:15 157:2 162:10 165:5
186:14 188:2 198:22,24
218:20,22 223:10,23
recalled (1) 111:8
recap (1) 9:8
receive (2) 3:10 65:15
received (29) 5:10 6:20 9:19
11:4 12:24 19:24 36:3
37:24 38:4 46:7 47:22,25
56:3 94:19 108:7 145:8,13
150:20 151:7 153:10
162:25 169:25 188:22,24
192:9 218:15 222:12 224:3
228:12
receiving (20) 15:2 19:16
20:2,4 31:14 32:18
34:15 19:40 6:49 3:82 13
96:14 16 148:11 170:3
185:10 190:24 204:23
205:1 227:5
recently (1) 56:17
recognise (2) 153:22 156:10

recognised (1) 36:6
recognition (1) 213:21
recollection (8) 9:10 117:1
148:17 168:13 197:4,12
216:20 228:1
recommendation (1) 214:5
recommendations (5)
214:8,25 215:1 221:11,11
record (8) 13:11 23:10 45:12
56:10 119:1 133:6,6,13
197:1 198:20 200:18
202:16 203:6,8 218:15,17
230:18
remembered (1) 48:2
remembering (1) 140:13
remind (6) 20:23 89:1 142:19
150:24 190:12 194:1
reminded (1) 94:14
reminding (1) 37:19
remiss (1) 94:3
remit (1) 170:22
remnants (1) 222:8
remotely (1) 38:17
remotivous (9) 18:9 37:23
50:20 67:8 121:14
129:18,22 162:5 166:17
170:10 121:6,19
repeat (9) 15:4 39:21 50:15
53:18,22 155:14,19 164:2
220:15
repeated (3) 39:19 49:21
54:13
repeating (3) 49:21 54:11
105:13
replaced (1) 117:22
report (2) 57:23 68:9
reported (6) 18:25 23:19,25
158:5 192:11 203:13
reports (11) 52:22 54:12,14
56:3,4 57:20 58:1 86:5
121:2 222:13,14
representative (1) 40:13
request (9) 14:17 36:3,5,7
40:1 70:4 161:8 171:2,5
requested (2) 70:5 196:8
require (4) 32:17 34:8
134:22 228:21
required (16) 3:20 18:11,13
22:25 31:21 34:11 35:16
89:3 109:20 121:9 158:1
188:25 190:4 191:8 204:7
208:10
requirement (5) 17:24 20:9
24:19 224:14 227:17
requirements (3) 16:16
223:7 227:1
requires (7) 17:8,9,10,14,17
119:24 120:5
requiring (1) 33:6
rescue (22) 18:5 33:23 35:12
40:14 43:8 124:20 125:16
140:7 165:9 191:15
206:4,14 210:1,2
211:5,8,10,11,15,15
214:13 224:18
research (3) 147:18,18,20
resilience (8) 5:15 6:11,13
9:21 20:15 196:19 212:17
213:4
resource (3) 18:16 19:14
21:2
resources (13) 13:18,21,22
16:15,18 17:1 18:12 19:4
21:22 23:15 211:9
227:18,19
respect (6) 27:4 28:17 30:23
40:17,18 119:16
responsive (1) 81:18
respond (2) 8:3 10:20
responders (2) 40:9 152:6
response (10) 9:13 12:13,23
21:23 23:1 25:22 62:2
78:19 165:24 230:8
responsibilities (6) 44:3,5
192:15,17 212:23 213:2
responsibility (8) 82:1,4

remain (1) 40:2
remaining (1) 28:10
remains (1) 216:15
remember (37) 5:7 7:21
9:13 23 34:1 37:20 72:6
77:17 84:9 88:1 93:23 94:2
95:18 100:6,7 118:22,23
120:2 140:3 142:5 159:8
163:13 164:14 166:10
168:17 184:24 196:22,24
197:1 198:20 200:18
202:16 203:6,8 218:15,17
230:18
remembered (1) 48:2
remembering (1) 140:13
remind (6) 20:23 89:1 142:19
150:24 190:12 194:1
reminded (1) 94:14
reminding (1) 37:19
remiss (1) 94:3
remit (1) 170:22
remnants (1) 222:8
remotely (1) 38:17
remotivous (9) 18:9 37:23
50:20 67:8 121:14
129:18,22 162:5 166:17
170:10 121:6,19
repeat (9) 15:4 39:21 50:15
53:18,22 155:14,19 164:2
220:15
repeated (3) 39:19 49:21
54:13
repeating (3) 49:21 54:11
105:13
replaced (1) 117:22
report (2) 57:23 68:9
reported (6) 18:25 23:19,25
158:5 192:11 203:13
reports (11) 52:22 54:12,14
56:3,4 57:20 58:1 86:5
121:2 222:13,14
representative (1) 40:13
request (9) 14:17 36:3,5,7
40:1 70:4 161:8 171:2,5
requested (2) 70:5 196:8
require (4) 32:17 34:8
134:22 228:21
required (16) 3:20 18:11,13
22:25 31:21 34:11 35:16
89:3 109:20 121:9 158:1
188:25 190:4 191:8 204:7
208:10
requirement (5) 17:24 20:9
24:19 224:14 227:17
requirements (3) 16:16
223:7 227:1
requires (7) 17:8,9,10,14,17
119:24 120:5
requiring (1) 33:6
rescue (22) 18:5 33:23 35:12
40:14 43:8 124:20 125:16
140:7 165:9 191:15
206:4,14 210:1,2
211:5,8,10,11,15,15
214:13 224:18
research (3) 147:18,18,20
resilience (8) 5:15 6:11,13
9:21 20:15 196:19 212:17
213:4
resource (3) 18:16 19:14
21:2
resources (13) 13:18,21,22
16:15,18 17:1 18:12 19:4
21:22 23:15 211:9
227:18,19
respect (6) 27:4 28:17 30:23
40:17,18 119:16
responsive (1) 81:18
respond (2) 8:3 10:20
responders (2) 40:9 152:6
response (10) 9:13 12:13,23
21:23 23:1 25:22 62:2
78:19 165:24 230:8
responsibilities (6) 44:3,5
192:15,17 212:23 213:2
responsibility (8) 82:1,4

109:25 130:15 167:2
193:18 206:23 215:17
responsible (2) 176:14,17
rest (3) 142:18 183:20
218:14
restrict (1) 71:7
result (8) 14:4 21:18,19 40:8
60:13 63:14 113:18 232:4
return (2) 215:10 216:14
review (5) 130:6,10 159:13
217:7 221:23
righthand (2) 142:11,11
ring (9) 84:24 91:18 158:24
170:25 190:1,2 191:7
200:1 201:11
ringing (4) 75:8 82:12
110:17 112:19
rings (1) 97:22
rise (4) 16:3 71:3 143:24
226:1
risk (9) 30:1,7 31:2,24 32:10
34:16 59:15 64:24 203:21
risks (2) 31:13 37:25
role (12) 2:24 43:18 71:13
78:8 117:12 170:15,23
206:19,19 209:10 211:22
212:8
roof (1) 211:12
room (11) 2:7,8 7:3,8 9:14
10:15 12:15,24,25
14:10,17,21 19:20 20:14
22:11,24 25:17,22 28:12
30:2,5,16,25 31:6,20 32:23
33:8 35:3,11,18
36:1,1,5,17 37:10,18 39:20
40:11 43:12,20 45:5,22
47:20 48:1,2,7 49:4,10,17
71:20 72:22 73:14 76:19,25
77:3,7,25 83:11,20
84:1,3,7,9 85:7,15 106:17
111:9 122:24 123:11 124:2
136:1,14 140:3,22
144:16,20 146:4,11
148:10,16 167:10 170:15
174:4,20 182:11 183:8,19
185:11,16,18 192:11 196:4
199:15 201:6 202:9,10
206:7,25 207:16,18,21,23
210:21 213:19,22 216:18
218:14,25 220:1,10 230:14
rooms (1) 74:14
rope (2) 211:9,15
roughly (2) 14:13 162:20
round (5) 49:18 73:22 179:4
190:25 224:15
route (4) 7:2 81:23 82:7
158:11
row (2) 2:3 191:2
rows (1) 153:22
run (7) 4:23 113:6 114:15
117:21 126:4 163:12
206:19
run (7) 84:19 107:14
110:17,18 171:1 174:9
197:19
running (2) 64:10 133:19
rush (1) 163:20
rvp (6) 39:1,6 79:21 140:25
156:8 157:9
S

sat (3) 150:4 206:24 232:24
saunders (341) 1-5 4:8 5:25
6:10 10:25 11:2 12:1,6,17
15:21,23 16:19,22,25
17-13,16,22 19:5,9 20:9,20
21:11,14,17 22:14,19,22
23:11,18 24:6,10,17,21
25:1,5 26:23
28:13,16,19,21,25
29:8,14,17 30:13,18
32:2,16 33:14 34:2,10,21
37:3 38:24 40:20,25
41:3,14,24 42:6,9,16,19
47:16 51:21 52:5,14,16,18
54:4,9,15 55:6,9,20
56:7,10,20,24 59:9
60:11,21,24 61:4 62:23
63:5,11,14,16,23 64:5
70:18 71:6 73:19,24
74:2,10 75:5,11,18,23
76:4,11,14,17,20 77:5,9,23
78:5,10,14 79:4 80:15,18
82:20 83:17,25 84:4,6,11
88:15 91:9,17,22,25
92:9,15 97:12,21,25
98:2,5,7,11,18 99:20,23
100:1,4,9,23
103:14,19,21,25
104:3,5,11,16,21 108:14
109:9,13,18,24 110:5
112:10 113:23,25 114:5,25
115:6,17,20
116:4,9,12,14,19
118:16,19
119:1,4,14,18,21
121:13,17,20,23 122:1,3,8
123:14,16 124:7,9,15
127:6,12,17 132:21,24
133:3,6,12,16,19,22
134:2,4,11,17,21
135:10,14,23
137:5,8,10,14,19,23
138:1,9,19,25
139:5,9,13,18 140:16
142:18 143:16,22 145:24
146:1 154:10,13,16,21
156:12,14 160:22,25
161:2,8,12,15,17,20
162:11,19,21,23 167:21
171:16 172:25 175:14
178:11,14 179:1 180:15
181:2,5,10,15,18,20
182:23 183:9,15 186:2,4
187:2,4,12 189:16,24
190:2 191:5,13,23
192:3,24 193:2 198:14,23
199:1 201:10,14,19,21,23
203:2,5 205:9,12 209:19
210:6,13 211:1,16,20
214:14,19,22,24
215:6,18,22 216:6,10,12
219:17,15,20
220:4,9,13,18,22
221:1,7,15,17 224:7,13,24
225:8,10 228:6,14
230:20,23
231:1,6,12,19,21
232:1,3,6,9,13,16,20,24
233:4
save (2) 18:6 107:21
saved (4) 16:12 111:13
197:24,25
saw (6) 58:1 67:7 81:21
130:2 153:8 170:9
saying (33) 11:11 48:4 50:15
54:22 55:17 60:2 77:1
83:25 86:14 95:7,18
106:21 109:22 124:12
129:19 137:5 148:24
155:21 164:14 167:16
181:24 182:3 186:21
187:5,8 189:10 191:8
198:2,4 214:16 218:13
222:15 224:24
scale (1) 208:11
scenario (2) 11:20 26:20

scenariobased (1) 5:20
scenarios (4) 11:10 147:17
163:15 209:12
scene (21) 31:8 32:7 67:15
86:21 87:25 88:9,10 114:7
158:12,14,15 159:5
166:15,18 172:10,17,20
173:6,10 222:17
scenes (1) 35:11
schedule (3) 4:14,17,18
screen (32) 8:6 14:20,24
18:7 21:7 24:4 33:3
38:8,14,17 39:23 79:8
88:24 118:18 139:11
160:19,25 161:3,25
162:5,7 196:17 197:16,17
198:1,1,3,8,19,21 204:14
217:23
screens (2) 16:23 57:15
scroll (2) 161:4 185:4
search (4) 13:11 14:12 80:23
225:20
searched (1) 14:9
seat (1) 182:7
second (18) 1:21 2:2 27:10
63:3 65:16 66:25 79:1
97:21 107:19 153:18 155:3
182:15 197:14 200:9 209:3
213:12 214:23 223:1
secondary (2) 31:25 121:4
seconds (4) 67:21 149:1,8
153:2
section (3) 15:8 56:25 86:3
sections (2) 111:22 199:9
security (1) 35:5
see (95) 2:19 6:15 7:20 8:7
12:9 14:1 16:14 18:13,14
20:24 37:13 38:15,16 49:5
50:13 51:1,16
52:4,10,21,24 53:1,11
55:24 56:2 64:23
65:2,24,25 66:1,3 67:14
68:5 69:14,22 70:3
72:11,13 79:16,23,25
87:15 88:6,25 96:19
118:20 119:25 121:12
122:14 126:1,4,7,23
128:20 133:24 135:4
140:21 142:1,18 152:11
156:2 157:7,9,19
159:11,11,15,22,24 164:6
167:19 174:6 178:10
179:4,21 184:10 185:4,24
186:18 188:16,18
192:20,22 196:19 197:2
202:8 212:21 220:24
225:16 226:2,12,19,22,24
228:15
seeing (3) 9:10 160:22
198:24
seek (3) 31:22 32:11,14
seeking (5) 82:22 111:25
113:9 138:1,2
seem (1) 227:12
seems (8) 82:2 136:11
186:19 213:19 219:2,7
226:4 227:10
seen (16) 4:18 14:21 37:9
45:25 56:15,16 58:9,19
94:4 121:22 142:21
168:3,14,16 227:8 231:4
segue (1) 213:11
select (2) 15:12 16:8
selected (7) 16:11,13
18:17,20 29:23 168:4
217:21
selecting (1) 21:24
selection (1) 15:16
selfassessment (1) 94:11
selfcontained (1) 193:6
selfguided (1) 147:20
send (9) 31:7 32:6 77:1
106:2 191:15 192:23
211:19 225:2 232:13
sending (3) 31:23 80:22
220:19

sense (7) 7:4 101:25 125:8
157:6 163:19 192:10
208:23
sensitive (4) 70:19 139:11
156:5 192:5
sent (6) 12:2 68:12 70:20
165:25 168:12 191:16
separate (5) 17:4 29:7,10
185:12 231:6
september (4)
184:12,13,15,25
sequence (8) 25:7 28:23
39:10 68:2 120:10 142:10
216:25 225:11
series (2) 147:16 203:7
serious (6) 30:7 48:25
103:21 151:7 154:25 183:4
seriousness (1) 205:2
served (1) 34:3
service (27) 6:21,24 18:5
32:23 35:12 40:14 43:8
55:9 61:6 88:10 91:10
92:11 97:15 106:8 109:10
124:21 125:16 140:7 165:9
173:5 195:17 202:10,23
206:4,14 210:2 224:18
services (18) 10:21 33:23
38:3,10 59:4 85:6 101:20
104:23,24 105:6,9 107:11
158:13 172:20 191:15
196:4 210:1 214:13
set (5) 106:19 128:8 138:13
210:18 224:19
setting (3) 5:5 40:23 41:7
settle (1) 182:1
seven (1) 76:15
several (2) 158:3 232:2
severe (2) 190:12,22
severity (4) 20:17 24:3,13
34:18
shadow (1) 146:9
shadowing (3) 146:16,17,24
shall (4) 73:24 77:2 114:25
116:14
share (11) 37:22 50:12 63:19
91:15 95:2,3,6,9,11,12
218:16
shared (1) 38:2
sharing (6) 37:21 40:8 44:8
62:3 212:16 219:4
sheet (10) 18:15 28:22,25
94:12 112:3,4,8 118:6
119:6,8
sheets (4) 93:25 94:4,7,8
shift (3) 118:8 206:16,19
shock (1) 73:21
shooter (27) 53:17 54:1
56:5,22 57:21,24 58:17,25
60:4,7,18 86:5,8,10,15,25
87:3,8,12,14 121:3
124:22,23 125:4,5
222:14,17
short (15) 1:8 6:17 11:18
42:14,25 52:8 74:6 78:18
85:18 130:7 144:3 192:5
197:15 205:19 212:10
shortage (1) 75:18
shorter (1) 66:25
shortly (2) 116:12 168:9
shot (2) 52:23 222:14
shots (2) 54:13,14
should (48) 2:25 7:23 20:13
30:10 32:9 40:21 56:18
58:25 59:2 60:3
61:10,11,15 64:1 71:15
82:16,19 92:10 98:6 101:9
104:9 105:24 110:20
129:24 131:14,14
133:9,9,19 134:9
136:16,16,19 137:24 138:3
143:1,6,9,9,22 153:17
160:21 169:8 170:12 198:2
201:11 221:23 229:18
shouldnt (2) 138:20 143:2
shout (1) 135:19
shouted (1) 218:14

show (6) 20:22 118:6,11
197:4 219:22 227:12
showed (1) 50:2
showing (1) 7:20
shown (1) 197:25
shows (1) 14:9
shrapnel (3) 121:7 151:10
159:17
shut (1) 183:1
sic (1) 156:9
side (5) 111:24 114:18
142:11 216:18 217:4
sides (1) 149:4
sign (1) 91:8
signed (1) 94:8
significance (3) 154:5,5
199:20
significant (9) 4:24 45:25
47:23 67:6 115:3 145:17
148:11,19 149:21
significantly (1) 101:3
signingoff (2) 93:25 94:8
signature (3) 118:6 119:5,7
silver (9) 35:17 39:13,17
40:8,14,15 41:8,11,17
similar (1) 66:8
simple (1) 22:7
simulated (1) 213:10
simulating (1) 45:5
simultaneously (1) 219:18
since (10) 76:11 94:23
95:10,13 96:11
100:14,15,16 101:3 187:10
single (4) 57:7,10 136:13
213:21
singular (1) 58:5
sir (412) 1:5,6 3:23 4:3,8,10
5:17,25 6:10 10:22,25
11:1,2 12:1,5,6,17,22
14:3,14,24 15:21,23
16:4,10,19,22,25
17:13,16,18,22 19:5,9
20:9,20 21:11,14,16,17
22:3,10,13,14,18,19,22
23:2,11,18
24:6,10,17,20,21 25:1,5,15
26:16,22,23 27:4,9,23
28:13,16,17,19,21,25
29:4,8,14,17 30:13,18
32:1,2,16,25 33:14
34:2,10,21,25 35:4,8 37:3
38:23,24 40:3,20,25
41:3,7,14,24
42:5,6,9,10,16,19 43:2
47:16 51:21 52:5,14,16,18
54:4,9,15 55:6,9,20
56:7,10,20,24 59:9
60:11,21,24 61:4 62:23
63:5,11,14,16,23 64:5
70:18 71:6 73:19,24
74:2,4,8,10 75:5,11,18,23
76:4,11,14,17,20 77:5,9,23
78:5,10,14 79:4 80:15,18
82:20 83:16,17,22,25
84:4,6,11 88:14,15
91:9,17,22,25 92:9,15
97:12,21,25 98:2,5,7,11,18
99:20,23 100:1,4,9,23
103:14,19,21,25
104:3,5,11,16,21 108:14
109:9,13,18,24 110:5
112:10 113:23,25 114:5,25
115:5,6,17,20
116:4,5,9,12,14,19
118:16,19
119:1,3,4,14,16,18,21
121:13,17,20,23
122:1,3,8,9 123:14,16
124:7,9,15 127:6,12,17
132:1,2,4
133:3,6,12,16,19,22
134:2,4,11,17,21
135:10,13,14,23
137:5,8,10,14,19,23
138:1,9,19,22,25
139:3,5,7,9,13,18 140:16

142:18 143:15,16,22,24
144:5 145:24 146:1
154:10,13,16,21 156:12,14
160:22,25
162:1,8,12,15,17,20
162:11,19,21,23 167:21
171:15,16 172:25 175:14
178:11,14 179:1 180:15
181:2,5,10,15,18,20
182:23 183:9,15 186:2,4
187:2,4,12 189:16,24
190:2 191:5,13,23
192:3,24 193:2 198:14,23
199:1 201:10,14,19,21,23
203:2,5 205:8,9,10,12
207:9 209:19 210:6,13
211:1,16,20 212:2 213:25
214:14,19,22,24
215:6,18,22 216:2,6,10,12
219:1,7,13,15,20
220:3,4,9,13,18,21,22
221:1,7,15,17 224:7,13,24
225:8,9,10 228:6,14
230:20,23
231:1,6,12,19,21
232:1,3,6,9,13,15,16,20,24
233:3,4
sit (3) 146:17 182:8 186:7
sitting (1) 7:23
sites (2) 37:15 166:24
situation (21) 61:10 96:5
101:21 102:25 103:6
116:24 122:24 123:25
135:24 136:8 163:6 203:25
204:2,8,20 205:3,5 209:16
210:10 219:3 221:8
situational (5) 81:14,17
125:13 172:12 173:16
situations (2) 96:22 178:18
size (3) 33:4 34:4 167:11
skill (1) 189:13
skills (3) 9:6 10:7 212:15
slightly (6) 4:4 114:18
153:20 161:1 181:20,23
slowly (1) 202:25
sm (2) 113:5 156:4
small (5) 11:20 44:22 46:25
48:22 119:17
smaller (1) 45:11
smith (83) 1:8,10
4:1,2,3,9,10 6:11 11:1
12:8,18 15:24 16:21,24
17:15,23 19:10 20:22
21:18 22:23 24:11 25:3,6
27:4 28:17,20,23
29:4,9,12,16,19 30:15,19
32:17 34:11 35:1 37:9 39:6
41:10 42:1,5,8 115:7
116:9,10,13,17,22,23
118:20 119:3,5,16,20,23
122:4,9 123:21 124:17
127:5 139:2,3,6,10,14,19
140:17 142:21 143:15
196:13,14,15 199:2
201:13,24 203:6 205:8,9
234:5,12,13,19
smiths (1) 116:6
solely (1) 206:16
somebody (22) 2:9 28:14
54:21 59:17 66:6 103:15
106:12,20 114:2,4,8,14
122:10 131:12,20 132:8,18
134:6,8 135:20 136:23
156:23
somebodys (1) 38:15
someone (19) 30:12 39:24
40:22 43:11 77:10,10
97:22 115:1 137:15 146:18
158:15 161:5 180:23
181:11,12 182:8 183:11
204:18 220:6
someones (1) 38:16
something (51) 10:12 12:2
16:7 18:8 19:1 32:12,13
33:18 39:21 48:6 58:25
61:9,12,17 64:12 78:20

83:8 85:12 86:8 95:25
100:19,22,24 106:21 115:2
117:10 119:21 125:19,20
134:2 148:18,22,23
162:13,14 163:15 164:17
165:24 178:16 179:9
180:19 184:17 186:10
195:10 199:17 208:9,22
213:18 219:20 229:25
231:9
sometimes (15) 39:20 44:21
63:20,21 92:2 103:1,7
107:21 111:2,3 119:20
201:15 208:4 219:24
225:14
somewhere (3) 64:19 179:13
186:3
soon (5) 16:11 18:6 19:15
94:10 162:13
sort (25) 12:3 45:2 59:23
60:1 62:25 64:11 90:19
92:19,19 95:23 100:7
102:9,9 107:24 124:10
136:7 141:12 185:17
189:7,13 203:25 204:2,21
209:13 214:15
sorted (1) 60:15
sorts (2) 54:9 177:6
sought (1) 165:13
sounded (1) 151:15
sounds (2) 137:17 218:4
source (1) 53:9
sources (1) 208:15
speak (20) 3:19 34:6,23
35:25 39:2,3 49:18 114:12
117:11,24 128:16 131:20
132:15 169:12,14 170:19
199:15 205:17 224:14
225:5
speaking (22) 14:25 44:16
51:3 61:2,19 66:19 69:4
71:7 12:95 16 105:7
106:12,12 107:15 110:3
134:23 141:13 142:8
167:15 195:25 209:5
215:23
speaks (1) 69:2
specialist (2) 31:22 227:18
specific (11) 11:16
17:8,9,10,24 45:2 46:6
171:9 192:14,16 209:9
specifically (3) 44:7 73:6
186:18
specifics (1) 209:15
specified (1) 129:15
speed (3) 7:5 162:8 163:23
spent (1) 214:20
spoke (16) 67:22 84:3 85:10
104:4 105:12 106:14
125:10 141:12 157:17
159:18,19 165:14 166:14
167:14 185:15 199:24
spoken (15) 26:4 27:15
29:21 38:25 68:8,17 128:9
132:10,22,24 134:16
166:19 174:8 192:21
193:15
spontaneous (3) 81:15
207:25 208:3
spot (1) 78:2
springs (1) 231:10
stade (1) 8:15
staff (17) 8:19,25
75:4,12,18,20
76:2,4,5,7,12 146:21 177:9
183:20 214:12 215:13
230:2
staffing (3) 10:23 12:18
76:11
stage (20) 1:12 2:1 3:10
18:1 35:23 42:14 66:20
69:4 115:24 154:18 165:16
180:6,6 181:5 200:6,9
201:21 221:21 226:4
227:21
stages (1) 81:15

stall (1) 165:24
stand (3) 64:19 169:8 170:12
standard (7) 30:6 31:1,23
38:5 147:11 213:3 227:18
standby (5) 65:9,18 66:15
77:20 166:8
standing (1) 117:1
start (15) 11:2 47:13
51:11,12,23 58:2 67:8
144:11 156:1 179:13 184:2
205:15 206:3 216:14
221:20
started (9) 47:24 50:6,10
119:21 124:12 150:8,10
160:1 231:4
starting (3) 51:16 186:21
225:11
starts (1) 213:22
stated (1) 112:2
statement (23) 12:10 22:5
36:10 47:5 73:6 88:23
90:25 102:21 107:20
111:22 115:14 118:17
159:16 188:11 209:3
212:11 213:12,23 218:12
222:1,18,25 223:1
stating (1) 59:15
station (38) 1:17 13:16,22,25
14:2,6 21:4,8 27:25 28:3
29:13 65:10 77:21 86:17
111:24 112:1,2,15 113:6
117:14 123:13 128:5,19
130:12,16 140:24 141:18
142:14,24 155:4,14
158:5,21 160:6,11 164:12
198:5 199:11
stationed (1) 26:8
stay (6) 23:9 36:25 41:22
162:16,19 180:13
stayed (3) 40:19 41:15 95:12
staying (2) 40:17,18
step (3) 167:14 182:7,18
stepped (1) 183:5
steps (2) 165:12 230:7
stickers (1) 100:25
still (24) 4:5 11:13 17:20
26:11 38:20 41:18 65:10
68:12 74:25 76:15,15
77:6,11 99:3 109:7 123:5
126:23,24 147:9 165:25
166:18 197:12 203:4 221:5
stood (2) 36:15 49:5
stop (2) 17:13 119:22
stopped (1) 211:1
stories (1) 124:13
straight (3) 72:1 175:18
197:23
straightaway (9) 19:17 60:19
82:17 83:5 107:15 123:4
153:13 163:20 199:19
strategic (1) 38:1
strict (1) 209:24
strictly (2) 34:12 114:17
strike (2) 193:9 229:21
stuck (4) 99:22 100:7,8
111:13
stuff (1) 70:19
subject (6) 6:17 95:15
186:19 205:14 207:2
217:13
submit (1) 21:19
subsequent (3) 8:16 222:25
230:3
subsequently (4) 130:3
141:6 158:23 228:25
substantial (4) 48:18 135:24
160:5 206:3
substantive (1) 88:23
subtlety (1) 59:23
subtype (1) 15:9
succeeded (1) 164:13
suchandsuch (1) 135:21
suddenly (1) 122:11
sufficient (1) 21:12
sufficiently (2) 98:23 163:5
suggest (5) 26:18 88:7 89:16

151:16 221:11
suggested (2) 32:10 107:8
suggesting (2) 97:5 194:8
suggestion (1) 108:24
suitable (1) 33:19
summarise (1) 151:6
summarised (1) 211:21
summarising (2) 32:4 223:2
summary (5) 48:23 68:2
164:7 222:7 223:12
supervision (2) 145:4 207:3
supervisor (3) 39:16 41:22
208:19
supplementary (2) 1:8 3:25
supplied (4) 13:8 25:20
97:14 204:10
support (5) 8:9 76:19,25
7:7 123:11
supportive (2) 131:18 201:8
suppose (1) 165:21
supposed (5) 73:12,13
108:18 109:5 226:6
sure (63) 4:8,22 6:5 20:18
23:12 24:14 45:3 50:16
59:8 63:15 65:14 66:1
67:19 70:21,21 75:21 80:8
84:12 85:23 88:5 89:15
92:4,13 93:15 94:4 95:24
96:4,16 100:10 103:18
105:13 106:13,15,19 108:6
110:2,12 112:20,21
117:8,23 122:17 127:13
133:17 134:8 135:15,20
137:12 138:6,16 155:21
172:25 181:23 184:1
186:12 194:22 203:15
209:4,20 218:16 219:4
225:19 226:5
surely (1) 173:7
surprise (1) 48:11
suspect (1) 9:3
switch (1) 123:21
sworn (7) 43:3,4 144:6
205:21,22 234:7,21
system (25) 10:9 13:15,20
14:4 15:12,24 16:14 19:2,3
21:23 91:5 126:25 137:10
146:9 174:6,11,14 206:21
220:25 221:2 224:19
229:5,8,15 230:10
systems (1) 176:3

T

31:10,11,15,16,18
32:11,15,22 34:24
36:15,16,22,23 37:6,7
38:5,7,18 39:21,24 48:8,15
49:5 54:12-17 55:15 62:15
73:8,11 77:2 80:22 83:12
101:20 102:22,24 105:14
106:16 109:24 122:24
123:25 147:5,22,23
149:16,21 150:1 152:14
165:14 170:24 171:3,6
173:22 174:8 176:16
178:21 179:3 181:17
183:7,19,19 185:12,12,13
192:12 201:2,7
206:11,18,20,25
207:3,11,12,14,20 208:20
209:5,9,22 211:23 212:5,8
222:20 223:15
teams (1) 46:11
technically (2) 147:24 152:1
technique (1) 49:9
techniques (1) 39:19
telephone (12) 6:25 7:6 85:1
122:22 124:17 141:20,25
145:21 150:22 174:10,13
222:3
telephony (1) 9:8
telling (11) 41:7,25 49:22
86:4 105:18,25 114:8
121:14 131:5,18 218:23
temporary (1) 212:7
tend (3) 22:18 148:15,22
term (5) 6:9 34:4 43:19
151:10,24
terminal (2) 64:22 66:7
terminated (1) 28:1
terminology (3) 126:13
190:18 191:2
terms (25) 2:25 9:15 10:23
12:18 16:15 31:5 34:12
35:13 40:8 46:6 55:11
56:21 59:21 67:1,14
114:17 177:4 190:18
202:11 210:8 214:2 215:16
221:9 228:3,4
terrific (1) 132:2
terrorist (9) 8:3 30:8 31:3
145:13 188:10,14,15,24
192:10
tessa (1) 110:2
test (3) 11:24 12:13 189:11
text (3) 2:9,19 170:3
thank (96) 1:5,20 3:24 4:9
6:10 12:7,17 15:23 21:17
22:22 24:10 25:1,5,25
28:19,21 29:17 32:16
34:10 42:5,9,22,23 47:18
52:18,19 55:20 56:20,24
61:4 64:5 70:11 71:10 73:4
74:4 78:10,14 80:14,18
81:4,8 88:14,15 98:18
101:11 104:21 108:2 110:5
115:5,6 119:4,22
127:5,6,16,19,25,25
135:23 138:23 139:5,9,18
140:16 142:20 143:15
151:18 154:9,21 155:9
156:14 162:24 164:4
168:23 171:13,21 175:13
178:18 186:7 193:5 196:12
197:14 199:1 201:23 203:5
205:8,9,12 211:20
215:8,22 216:12 221:18
225:10 233:4,5
thats (180) 1:19 2:9 3:9
5:3,25 6:14 8:5 10:9 11:12
13:11 15:24 17:25
18:19,22,25 20:20
21:10,16 23:11 26:7
29:9,10 32:12 34:24 35:8
37:12 39:2,6,10 43:17
45:23 46:17 47:21 48:21
50:9 53:7,10,19
54:2,13,22,22 55:19
56:1,6,7,9,18 57:5,12,14

58:18 61:24 63:22,25
64:14 65:21 69:18 70:1,14
71:3,25 72:7 73:1 74:13
75:3 76:8,20 77:9,21,20
80:25 81:1,12 84:21,25
85:25 87:8,15 88:14 92:15
94:21 95:19 100:15,19
104:6 105:13 106:19
107:17 111:2,3,10,19
112:6 113:3 114:24
115:2,19,22 118:16 119:7
121:17,18 125:2,6,19,20
126:12,12,21 128:11
129:5,25 130:4 137:2
138:18 141:19 145:24
151:14 154:22 156:12
162:14 167:18,25 169:20
171:4,11,11 172:7,25
175:12 176:21 177:14
178:6 179:12 182:2
184:16,18,19 185:7,21
186:17 193:20 194:11
197:4 198:2,7 202:25
203:1,25 204:2 206:10
207:1,4,7,13 209:1,18
211:20 212:2,19 213:11
216:21 217:6,10 218:19
223:5 224:10 225:23 226:7
227:11,25 228:6,9
229:1,20 230:9,15 231:9
232:22 233:3
themselves (3) 15:4 57:10
230:7
theory (1) 214:15
thereabouts (1) 19:11
therefore (14) 18:14 19:10
21:1 29:19 32:6 86:19
104:17 113:10 138:10
141:4 187:19 198:4 228:21
230:3
thers (38) 7:11 8:21 32:10
41:16 46:9 51:2,3 53:16
63:1 64:24 68:9 74:2 79:17
80:23,24 86:7,8 87:20,25
93:11 100:6,25 105:16
111:3 112:22 113:24 121:3
125:4,5 141:17,20 142:12
161:17 178:3 188:13
219:16 222:5 224:17
theyd (4) 26:11 54:21 80:9
199:24
theyre (9) 41:7,7 100:4
172:8,23 174:1 176:7
199:13 210:7
theyve (6) 6:6,8 68:14 80:5
167:5 219:10
thing (21) 2:11 23:12,14
56:8 63:18 76:18,20 91:15
98:8 102:10,13,14 107:24
127:14 156:22 179:15
180:8 185:17 197:4 201:17
220:11
thinking (3) 2:25 213:24
230:6
third (8) 14:1 67:25 72:9
89:2 168:19 199:2
200:10,14
thoroughly (1) 177:13
though (2) 48:11 198:18
thought (40) 4:4 11:11 24:6
46:23 51:23 58:5,20 59:4
84:25 93:2 121:23,24
130:24 131:7,12,13,15
136:18 138:20 143:4,12,12
152:2 156:23 166:16,18
173:8 175:9 180:1
181:3,16,24 182:3,8,14,16
183:16 200:25 215:15
217:25
thoughts (1) 189:22
threat (2) 9:2 152:6
threatening (1) 190:10
three (26) 6:19 68:11,20,24
69:12 79:12,21
80:23,23,24 81:9 103:4,9
114:1 130:1,5 140:25

141:13 142:6 144:19
145:19 147:9 155:3 171:25
177:21 193:14
through (101) 4:23 13:3
20:18 33:24 35:16,20 40:5
43:14 46:11 48:7 51:20
55:18 60:22 64:1 66:2,3
67:16 74:17 75:25 80:24
81:21 82:2,13
84:1,2,7,9,10 85:13,14
89:18 18 91:1 92:20,23
102:3 103:2,7 105:17
107:16,17 108:2 120:22
121:2 122:16
123:2,5,18,19 131:23
134:14,22 135:4,6,8
136:16,17,20,25 137:3
138:5 142:8 143:2
146:13,22 149:2,19 153:3
155:11 157:5,25
161:4,9,10,17 162:8
168:2,11,12,18 173:17
174:19 175:9 176:8 180:18
185:15 191:25
194:3,5,11,15 195:3,8,16
198:11 200:25
202:13,17,18 216:2 220:5
throughout (1) 42:3
throw (1) 80:2
thursday (3) 4:3 11:22 13:3
tickbox (1) 92:19
ticked (1) 119:7
time (165) 6:18 7:15
9:10,11,14 14:12 16:19
19:18 21:2 25:16,20 26:23
27:15 28:7
30:2,13,15,19,19,22
31:1,9,14,17 34:7 35:22
39:23 40:12 42:2 45:20
47:17 52:7,10 54:5,8
56:8,10,20 60:13,15
61:13,17 62:12,19 64:11
66:17,18,24 67:18,22
69:23 74:9,22 77:13 79:10
80:6,7,12,15,18 83:7 86:23
88:3,5,11,12 89:11 90:2
95:2,24 96:1,5 97:1,20
98:4,20,21 100:10,11
105:7 107:21 109:13
110:16 120:19 121:2,7
122:15 123:16 124:11
126:1 130:18 131:1,5
132:10 134:16 136:11
140:22 142:1,9,15,22
145:1 146:22 148:4,14
150:8,13,16 151:14 153:1
154:1,4 155:20,24 162:15
165:7,17 167:13 170:16
177:8 180:25 181:2,16
184:24 189:19,23
190:15,15,25 191:19 192:5
196:20,25 197:15 198:16
199:10 200:15,25
201:19,20 203:17 204:17
205:7 207:8,23 212:13
213:23 214:12,17,19 215:7
216:13,19 217:20 219:19
220:2,7,10 221:19 222:16
223:9,23 227:7 231:22
timed (1) 56:7
times (9) 21:18 90:22
101:8,9 195:9 210:23
217:15 223:22 224:6
tis (1) 22:8
tobove (1) 86:17
today (6) 64:8 95:16 101:12
111:4 206:1 208:2
together (7) 10:18 95:13
106:14 107:24 145:18
154:17 176:21
told (58) 23:22 39:1,16
41:8,22 44:12 52:21
53:12,16,19 57:13,23
59:23 68:17 73:2 83:9
87:23 95:15 101:12 108:4
111:4 121:11,23 125:1,5

131:19,23,25 132:9
133:1,8,14,20,24 154:1
157:16 162:4
164:12,21,22,23 165:6
166:3,11 172:12,15 173:25
174:24 193:16,19 209:23
210:24 214:14 217:24
218:6,24 226:7 227:21
tomorrow (6) 64:8 215:6
216:15 221:17 232:23
232:2
tonight (1) 215:21
too (15) 6:5 9:24 54:18 63:9
102:7,12 155:21 165:2
166:22 167:3 179:15 180:8
182:6 194:22 202:2
took (22) 12:11 13:3 38:13
43:25 56:13 67:12 75:21
80:3 92:3 131:13 132:17
134:6 148:14 150:16 153:8
165:1 168:19 181:17
193:24 194:25 199:25
210:2
tool (1) 96:22
topic (5) 1:21,23 62:7
215:11 221:21
topping (4) 113:5,9 114:12
117:15
totally (1) 113:20
touch (3) 83:15 85:17 102:21
touched (3) 102:19 108:3
111:17
towards (7) 8:23 67:7 69:14
87:23 118:14 122:6 227:9
track (1) 222:6
tragedy (2) 96:3 177:19
27:15 28:7
tragic (1) 8:18
train (2) 123:13 214:12
trained (25) 9:24 10:19
15:15 44:5,7,11,15 46:6
123:8 132:4 136:20,21
145:20 164:25 176:23,25
177:13 180:17 189:11
191:3,17 201:15 213:1,3
230:17
training (202) 4:12,13,14,24
5:1,2,8,9,16
6:1,2,3,6,8,11,12,14
7:17,19,22 8:1,2,3,10
9:4,19,22 10:4,8,16,25
11:3,4,7,12,15,17,24 20:20
33:18 43:22 44:2 46:7,11
48:3 59:21 61:9,25 62:24
63:2,6,7,11,20,21,22 81:13
88:21 89:4,8,9,13,15,16
90:4,7,10,12,16,19,20,23
91:1,4 92:24 93:2,6,25
94:9,12,16,19,24,25
95:1,8,8,15
96:10,14,16,17,18 97:16
98:21 101:2,2,3
102:10,12,14
118:1,3,4,11,23,24 119:1,8
123:19 131:16 132:14,16
144:18 145:7,8,9,13,16
146:3,7,11 147:11 148:7
162:25 163:4,11,12,18
166:9 174:24 175:1,2,4,18
176:6,10,21
177:2,4,5,7,9,10,20,25
183:23
184:9,11,15,16,17,19,21,25
185:7,9,19
186:14,17,22,24
187:1,11,16,17
188:5,10,14,15,22,25
189:6,16 190:9 192:9
196:15,19,22 197:1,9
200:5,6,10,12,16 206:20
212:15,16,17,18,19,21
213:4,6,7,15 214:6,17,20
215:4 218:18
traininglearning (1) 93:20
trainings (1) 89:19
transcript (19) 13:6
51:4,9,12,16 67:4 70:16

85:20,21 87:19 113:11
115:15 141:10 142:4
150:21,24 155:5 167:21
168:21
transferred (3) 43:15 95:12
206:18
transport (4) 86:9 125:4
157:20 158:24
trapped (1) 203:22
travelling (2) 81:10 172:1
tried (6) 83:13 111:14 167:6
201:5 210:23 223:22
trigger (3) 230:21 231:8,10
triggers (2) 229:10 230:1
trouble (4) 85:12,14,16
115:10
tru (11) 18:20 27:14,22
68:12 106:1,2,17 129:4,7
134:19 143:8
true (1) 11:12
try (17) 50:14 83:13 104:12
105:14 114:25 116:23
119:20 132:2 134:4 139:21
140:8 180:15 181:22 200:1
210:11,13 221:15
trying (35) 9:25 50:12,15
55:16,16 59:13
62:13,14,14,15 63:9 64:2
66:6 82:23 97:2,6 102:25
103:16 105:21 107:1,25,25
108:10 119:16 120:20
122:17 123:1,3 143:7
145:7 173:25 177:18
182:21 186:2 199:12
tuesday (1) 233:8
turn (17) 3:25 12:23 30:1
67:12 70:12 78:15 114:18
120:4 138:23 171:14,14,22
209:3 212:11 213:12,12
216:16 232:21
turnout (3) 112:2,4,8
twohairs (1) 157:18
twoway (1) 169:17
type (46) 14:23
15:5,7,9,13,15,16,19
16:11,12 17:2,3,9,10,18,18
18:6,10 19:15 20:7,12,16
21:24 29:23 33:24 34:5,17
45:9,10,15 82:8 92:6
104:9,14 123:7,9 161:5
203:19 211:4,7 217:22
224:20 225:17 226:6
230:21 231:1
typed (1) 15:22
types (7) 32:20 188:23
213:20 224:22 229:13
230:3 231:15
typing (6) 14:19 15:12 19:19
197:20,21,23

U

um (8) 46:19 63:2 78:4
134:3 137:12 141:9 183:17
214:23
unable (4) 38:3 80:5 168:11
193:7
uncertainty (2) 59:16 129:7
undergo (3) 6:3,4,7
undergoing (1) 93:6
undergone (1) 94:11
understand (43) 3:5 19:10
25:24 29:17 32:3 41:24
58:13,14,16 61:24 66:7
82:23 90:2,25 98:7,8
105:4,20 106:4 107:5
108:22 114:11 135:10
137:19,19 138:19 143:18
146:12 161:20,21,21
165:7,12 167:16 169:10
172:19 173:2 179:6,9
193:5 203:3 231:12 232:16
understandable (1) 140:13
understandably (4)
113:1,14,18 121:21
understanding (16) 2:18
4:12 11:8 27:16 42:21
46:18 81:11 155:18 163:11
166:7 170:1 173:22 203:20
217:1 229:24,25
understands (2) 47:8 70:22
understood (9) 2:25 3:6 11:4
58:18 60:9 64:20 85:2
109:7 210:10
undertake (2) 5:1 192:14
undertook (1) 196:19
underwent (4) 10:4,16
118:3,11
unexpected (2) 190:13 208:9
unexploded (1) 46:16
unfolded (1) 209:16
unfolding (6) 35:10 44:9
48:19 73:15 163:8 177:19
unfortunately (3) 95:3
138:20 191:22
units (1) 166:15
unless (3) 23:3 42:10 126:19
unrelated (1) 211:3
unsuccessful (1) 3:7
unsure (5) 15:14 150:18
153:7 154:8 217:18
unsurprising (1) 168:17
until (20) 23:20 27:15 40:15
60:15 80:3 85:10 101:6
116:20 117:21 121:22
156:8 165:14 166:22
177:10 185:20 192:21
217:23 218:1 231:4 233:7
unusual (1) 103:19
unwise (1) 119:21
update (10) 39:23 82:4
130:16,23 131:21 132:5
134:24 136:14 137:6
160:12
updated (2) 79:19 122:21
updates (1) 37:23
updating (1) 38:20
uploaded (2) 38:8 160:18
upon (10) 46:3 47:6 57:2
58:19 90:6 102:19,21
111:17 149:20 214:9
upset (4) 73:16 110:23
143:21,23
upshot (1) 170:9
upwards (1) 23:19
used (14) 3:3,7 6:8 17:5
38:19 46:21 59:14 62:4,6
95:17 142:22 151:10 152:5
188:24
useful (3) 78:5 102:15,17
user (2) 65:2,24
userfriendly (1) 57:15
using (9) 1:24 25:17 30:21
108:23 110:17 165:24
204:9 205:5 230:3
usual (1) 136:5
utilise (1) 7:15

V

voices (1) 52:1
 volunteer (1) 138:25

W

wait (1) 27:22
 waiting (3) 62:23 109:6
 132:6
 walked (2) 152:24 179:4
 wants (2) 115:25 129:15
 warning (1) 12:3
 warnock (11) 78:15,17,18
 79:5 80:17 81:2,4 138:24
 171:19,21 234:9
 warrington (1) 77:3
 wasnt (67) 1:19 3:19 9:11
 11:19 21:13 24:18 28:16
 38:14 46:22
 58:11,12,12,14 60:8 61:21
 62:4,6,11 63:21 75:15,16
 77:3,8,14,15,15 82:7
 83:5 87:2,2,7,8,9 90:18
 95:25 98:22,22,23
 100:10,11 103:17 105:2,3
 106:11,20 114:6 125:18
 131:8 132:19 133:2
 135:27 140:7 142:7
 143:13 173:10 175:19,22
 187:5 195:16 204:20 205:4
 217:23 218:1 220:2 223:25
 watch (5) 38:7 206:17,21
 215:24 231:4
 watching (6) 38:14,17 39:22
 164:9 217:23 218:2
 way (61) 5:5 7:7,22 11:19
 25:4 37:13 41:19 44:3
 45:16 46:15 49:17 51:18
 63:18 65:4 66:4,5,8 68:2
 72:11 74:16,19 81:9,18,22
 91:13 108:8 123:6 129:16
 137:8,20 138:5 142:4,5
 148:24 157:18 158:4,7,14
 160:4 163:3,22 165:21
 167:1 172:1 175:8,24
 178:7 179:2 180:12 185:9
 190:9 198:17 201:6 207:14
 209:14 210:17 211:21
 212:21 213:24 214:1
 215:15
 ways (1) 102:3
 wed (9) 26:22 45:11 90:21
 91:8 105:22 109:3 166:9
 191:19 224:3
 week (2) 67:24 169:5
 weeks (10) 145:15
 146:7,15,16,17,24 175:3
 184:18,21 201:18
 welfare (1) 73:22
 went (11) 37:7 83:5 89:19,25
 95:24 117:14 124:11
 149:25 162:19 178:11
 199:8
 werent (13) 38:18 65:9 83:3
 89:15 92:4 95:17 105:6
 108:25 110:10 153:2
 178:15 186:23 230:11
 west (46) 1:7 10:19 12:20
 42:21 43:15 50:7,19 68:3
 71:11 75:2 78:12 90:9
 94:1 95:10 116:24
 120:11 124:4 125:17
 139:20,25 140:8 144:12,12
 146:13 148:4,10 164:20
 165:8 173:19,21 176:14
 199:14 202:9 204:10
 206:18,23 209:7,25 210:17
 211:4,22,24,25 212:3
 230:10
 weve (39) 11:24 12:1 13:19
 14:6 21:2 27:12 29:21 32:5
 37:9 42:13 49:9 51:5 56:25
 57:13 58:9 19:66:4
 68:12,25 80:22 85:16,17
 94:5,9 107:20 118:14
 119:5 120:14,20,21 156:20
 164:7 168:8 191:9 215:14
 221:21 226:4 227:8,15

whatever (4) 114:5 116:15
 196:9 197:7
 whats (17) 4:20 27:16 41:13
 55:13 64:23 69:19 91:14
 99:3 109:22,22 118:18
 122:25 138:11 186:13
 191:8 224:25 231:13
 whenever (1) 62:25
 whereas (2) 75:9 221:4
 whichever (2) 191:14 224:2
 whilst (1) 222:3
 whod (1) 38:25
 whoever (2) 73:1 203:2
 whoevers (1) 185:13
 whole (7) 24:11 46:12 50:25
 113:20 180:8 220:4 230:5
 wholesomely (1) 101:18
 whom (1) 169:4
 whos (3) 41:6 122:22 133:1
 wide (1) 90:5
 wife (1) 113:8
 wilson (3) 12:20 110:2
 162:18
 wilsons (1) 22:5
 winchester (3) 12:12 101:14
 213:15
 wish (5) 86:1 87:20 116:2,7
 183:10
 wishing (1) 57:9
 witness (17) 42:12 73:6
 115:12,14,17,21 139:6
 166:23 205:15 209:3
 216:1,2 218:12
 222:1,18,25 223:1
 witnesses (4) 2:2 4:7 168:8
 212:20
 wonder (4) 103:3 173:10
 215:25 232:21
 wondered (3) 55:10 79:1,16
 wondering (1) 59:21
 wont (10) 114:1 115:10
 116:11 135:11 165:23
 187:25 194:14,18 198:14
 221:20
 wording (1) 123:6
 work (19) 30:2 32:20 43:14
 74:16 76:13 77:2 108:9
 127:1 177:11,23 210:19
 211:25 214:16
 219:11,11,14 220:9 221:9
 225:12
 worked (7) 8:9 75:15 77:10
 95:13 102:24 126:18 183:5
 working (18) 11:19 43:11
 45:21 49:17 55:4 65:5 66:4
 75:7 77:7 82:13 89:17
 102:3 126:16,23 138:6
 183:20 207:23 218:18
 works (1) 74:19
 workstations (1) 99:16
 worried (1) 113:1
 worry (2) 77:23 182:22
 worst (6) 59:7,14,15,24 60:1
 231:22
 wouldnt (43) 9:12 23:5
 26:6,14 27:18 28:7
 32:12,20 33:21 40:24
 61:13,18 77:9,16 95:22,23
 97:20 102:17 107:13 110:3
 111:9 114:15 126:12 135:3
 171:1 176:11 179:19,20
 180:1,12 181:2 182:11,12
 190:20 191:1 193:17
 197:25 199:25 202:4
 204:17 207:2 220:19
 230:13
 wounds (3) 103:14,15 159:17
 writing (5) 74:13 205:3
 221:23 222:11 223:12
 written (2) 2:9 186:3
 wrong (13) 32:5 77:18,22
 79:6 105:6 106:21 112:23
 117:10 137:11 138:10,11
 178:12 194:24
 wrongly (1) 195:16
 wrote (1) 213:23

X

x (1) 234:1

Y

yeah (4) 68:15 110:19 123:9
 137:1
 year (5) 10:17 89:25 90:1
 101:8 212:4
 years (3) 31:19 45:21 59:22
 yet (3) 18:1 160:3 205:16
 yo (1) 181:22
 youd (44) 11:11 28:10 29:23
 40:25 41:3,14 54:15 65:18
 66:1,3 75:14 77:6,11 92:23
 98:16 99:14 129:2 131:3
 133:13,14,16 152:22 168:3
 174:23 176:11,16,18
 177:14 179:17 180:11
 181:10 182:9 185:13
 190:11 191:14 194:15
 199:17 200:6,25 201:21
 203:4 211:9 215:3 226:5
 youll (13) 4:8 50:4 51:16
 64:25 96:21 185:4,12
 188:18 209:4 213:12
 215:23 221:15 225:19
 youre (52) 25:14 41:4 47:16
 53:15,22 59:11 60:21 79:9
 82:21 85:23 93:4 16:6 96:6
 104:18 105:17 116:4
 121:18 123:1,3,6 146:7,19
 155:23 160:22 161:21
 162:12 164:24 169:20
 176:2,22 177:15,21
 178:11,12 180:17,19 182:5
 187:9 189:5 194:3
 195:19,22 197:21 206:1
 214:15 215:24 219:9
 220:6,9 221:11 224:10
 225:2
 yours (1) 66:8
 yourself (14) 3:11 12:21 37:4
 71:7 73:20 89:1 115:23
 145:19 147:21 193:10
 198:5 201:5 213:1 214:9
 youve (42) 12:12 20:11
 23:19 29:23 38:21 45:3
 47:4 49:11 51:19 54:13
 64:11 98:9 102:19 110:22
 111:2 119:11
 123:9,10,14,23 128:6
 129:20,21 134:11 137:14
 142:5 150:25 164:25
 179:22 184:4 185:8
 192:19,21 199:2 200:1,3
 202:6 209:21 215:7 220:4
 221:7 231:21

0

0030 (2) 112:11,12

1

1 (26) 5:2,15 6:14 8:2 18:20
 20:6,10,12
 22:8,14,16,18,20
 23:5,13,18,25 24:24 70:1
 116:20 144:22,23 147:13
 192:24 234:3,4
 10 (8) 4:5 10:14 26:18,25
 27:5 42:17 150:23 185:16
 100 (3) 92:13,14 116:12
 102 (1) 127:20
 1033 (1) 42:24
 1045 (1) 43:1
 10minute (1) 73:25
 11 (5) 41:4 130:8 188:11,16
 189:6
 1100 (1) 128:16
 1138 (1) 74:5
 1146 (1) 74:7
 116 (1) 234:12
 12 (1) 4:25
 12month (1) 144:24

13 (2) 112:24 153:22
 139 (1) 234:13
 14 (4) 8:7,13 153:22 193:9
 144 (2) 234:15,16
 15 (4) 116:8 185:16 190:17
 191:1
 16 (10) 9:22 10:3,17 45:21
 59:22 93:21 185:3,7,24
 186:9
 17 (3) 10:13 36:21 37:4
 171 (1) 234:17
 175 (1) 234:18
 18 (4) 36:10 37:2,16 111:23
 19 (1) 111:23
 196 (1) 234:19
 1995 (1) 96:8

2

2 (20) 18:20 26:12 27:12
 70:6 89:23 118:2,15
 119:7,8,10 127:19 143:24
 146:16,17,24 147:14,25
 148:4 196:17 201:18
 200 (1) 127:22
 2001 (1) 43:9
 2004 (1) 206:5
 2009 (1) 206:9
 2013 (1) 96:11
 2014 (3) 43:14 209:10
 210:19
 2015 (9) 4:25 5:10,15 6:14
 8:2,7,13 118:2 119:10
 2016 (20) 9:21,22 10:3 43:23
 94:17,20 118:10,14,24
 144:13,17 145:11
 212:20
 185:3,7,24 186:9
 2017 (22) 2:16 10:6,11,13,14
 44:4 61:25 85:1 93:23
 94:10,19 132:4 136:21
 138:10 145:8,20 148:9
 155:17 196:17 207:24
 212:23 216:16
 2018 (4) 93:21 95:13 139:17
 140:2
 2021 (2) 1:1 233:8
 205 (2) 234:21,22
 207 (1) 127:24
 21 (2) 120:15 192:8
 22 (27) 1:12 2:16,21 3:10
 44:4 74:21 76:11 85:1 91:4
 93:23 94:10,19 101:21
 120:15 132:4 136:21
 138:10,14 145:18 148:9
 186:19,24 208:9,12 209:15
 212:23 216:16
 2232 (1) 39:8
 2234 (1) 217:13
 223550 (2) 14:18 21:22
 223655 (1) 13:9
 2237 (3) 47:8,13 48:20
 2238 (3) 14:7 21:7,15 222:23
 223848 (2) 14:15 225:17
 223849 (1) 14:12
 223851 (1) 225:25
 223953 (1) 157:7
 223955 (2) 16:14,21
 2240 (3) 21:2,3 28:1
 224042 (1) 226:17
 2241 (4) 149:11 194:21
 195:22 196:1
 224111 (1) 157:18
 224121 (1) 226:24
 2242 (2) 29:20 226:13
 224220 (1) 52:7
 224221 (1) 28:1
 224225 (1) 151:14
 2243 (1) 56:23
 224303 (1) 158:2
 224311 (2) 52:21 53:1
 2244 (3) 56:23 86:4,12
 224426 (1) 158:9
 224432 (1) 72:14
 224514 (1) 53:15
 224541 (1) 158:19
 224543 (1) 53:23

224604 (1) 126:1
 224617 (1) 159:4
 2247 (1) 159:11
 224750 (2) 55:24 56:7
 224752 (1) 159:10
 2248 (1) 173:25
 224801 (1) 200:20
 224833 (1) 159:15
 224849 (1) 159:22
 2249 (1) 61:5
 224902 (1) 141:2
 225126 (1) 156:2
 2252 (5) 47:9 67:2 69:7
 87:22 120:13
 2253 (1) 168:9
 2254 (1) 128:12
 225407 (1) 140:22
 2255 (2) 67:14 87:23
 225641 (1) 79:17
 225737 (1) 129:19
 229 (1) 144:2
 22nd (3) 90:3 177:23 187:24
 230111 (1) 39:9
 2305 (1) 80:3
 230521 (2) 69:22 79:25
 2306 (4) 47:9 68:4 80:11,17
 230840 (1) 70:3
 231350 (2) 72:16,17
 2322 (3) 47:10 70:15 73:2
 2324 (1) 113:5
 233 (1) 144:4
 2333 (1) 171:5
 233608 (1) 72:20
 2342 (1) 168:20
 24 (3) 9:21 85:5 174:21
 247 (1) 2:8
 25 (1) 102:21
 28 (2) 1:1 10:6
 29 (1) 233:8

3

3 (8) 10:7 70:4 88:22,24
 157:3 200:16 212:4 222:7
 30 (10) 94:17,20
 118:10,14,19,21
 184:12,13,15,25
 3072 (1) 16:2
 31 (1) 10:11
 3115 (4) 16:5 226:14,18,25

4

4 (11) 18:15 21:1,25 51:15
 145:15 146:7,15 175:3
 184:18,21 234:5
 400 (1) 205:18
 410 (1) 205:20
 43 (2) 234:7,8
 430 (1) 206:2
 45 (1) 4:4
 450 (1) 233:6
 4week (3) 145:9 184:17,19

5

5 (4) 25:9 79:17 162:20,24
 50002 (2) 72:21 78:13
 50032 (2) 55:24 126:2
 50085 (1) 156:3
 50091 (1) 140:23
 510 (1) 51:11

6

6 (2) 25:10 203:17
 60 (3) 56:5 57:20 121:3
 61 (1) 158:10
 63 (1) 22:6
 6foothigh (1) 211:12
 6month (1) 212:7

7

7 (1) 218:12
 78 (2) 231:23 234:9

8

8 (3) 144:16 222:4,8
 800 (1) 26:9
 81 (1) 234:10
 88 (1) 234:11

9

9 (1) 50:2
 9074 (14) 13:2
 28:7,14,16,17,20 29:3,7
 39:6 125:22 127:1 140:19
 220:17 225:14
 9075 (4) 126:3,5,8,17
 9078 (6) 28:4,17 29:1,4,4,6
 930 (3) 1:2 232:2,7
 999 (2) 149:1,10