

OPUS2

Manchester Arena Inquiry

Day 124

June 29, 2021

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Tuesday, 29 June 2021

(9.30 am)

MS MICHELLE GREGSON (continued)

Questions from MR DE LA POER (continued)

SIR JOHN SAUNDERS: Good morning, Mr de la Poer.

MR DE LA POER: Sir, good morning.

Ms Gregson, at the conclusion of the evidence yesterday, you indicated that you would go away and give consideration to some specific issues. We are going to reach those issues at the end of your evidence, so we are going to carry on with the narrative of the night of 22 May before we get to that.

A. Okay.

SIR JOHN SAUNDERS: Is that all right by you?

A. That's absolutely fine, yes.

MR DE LA POER: We had reached a stage in that narrative last night by considering the explosion action card, which was the prompt that Mr Ellis had attached to the incident that he had created but had not mobilised.

Having considered the content of that action plan as GMFRS held it, and I think your evidence was that you had never seen the format that we've looked at last night, we are going to look at a similarly formatted document in relation to a bomb.

So {INQ004360/1}. Again, had you, before

1

22 May 2017, ever seen the bomb action plan in this format?

A. No.

Q. We can see that the first action of the "Bomb -- general" action plan is to:

"Inform the duty NILO, request guidance on actions to be carried out before proceeding further (pre-mobilisation)."

A. Yes.

Q. And if we set aside the question of which action plan you were following, that is the first step that you determined was necessary; is that correct?

A. That's right, sir, yes.

Q. If we go over the page {INQ004360/2}, we can see the sort of other actions that might need to be followed up in connection with this action plan, don't we?

A. Yes.

Q. Do you agree that it is clear from all of those that what this plan is contemplating, as may be inferred from this document, is an unexploded bomb?

A. Yes.

Q. If we can go back to the first page {INQ004360/1}, please.

Was it your understanding on 22 May 2017 that the bomb action plan related to an unexploded bomb?

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A. Sorry, could you just repeat that?

Q. Was it your understanding on 22 May 2017 that the "Bomb -- general" action plan related to a scenario in which the bomb had not exploded?

A. I didn't know whether it related to a bomb that had exploded or unexploded.

Q. So your belief was that if a bomb was involved, whether it had detonated or not, this was the relevant action plan?

A. Yes.

Q. Had you ever received any training in this action plan specifically?

A. No.

Q. So what was the extent of your knowledge about this action plan before 22 May 2017?

A. I would say fairly limited. It would possibly have tied in with some of the training that we'd had with the -- I don't know if it was in the MTFA presentation.

I can't remember if there was anything that alluded to this in the presentation that we received from Mr Gaskell, but I would say that it was fairly limited.

Q. Does it come to something as straightforward as this: it was entitled "Bomb -- general", so when you heard that a bomb was involved on 22 May, your first thought was, "This is the action plan"?

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A. Yes.

Q. Can we have a look at {INQ035466/1}.

Is this a reasonable representation of how it will appear on an operator's screen or do you not recognise that?

A. Um... No, it doesn't look like that on the CAD system.

SIR JOHN SAUNDERS: Is it not possible to get a screenshot?

MR DE LA POER: We are going to come to a screenshot in a moment, sir.

A. The left-hand side of it looks -- that's how it would be listed. But yes, it doesn't look like that on the mobilising system.

Q. All right. We can take that down, thank you very much indeed, Mr Lopez.

The one thing you say in your statement about the bomb action plan is, and I'm quoting here:

"It is important to note that both Lisa and I had a thorough understanding of each plan [that's referring to both explosion and bomb] and what they required."

In the light of your evidence, do we need to adjust that statement slightly, and I'll suggest the way to. Clearly, you had a thorough understanding of what actions each plan required?

A. Yes.

Q. Do you think now, looking back, that you had a thorough

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1 understanding of what GMFRS intended these plans to be
 2 used for in terms of the scenario that they related to?
 3 A. No.
 4 Q. Again, we need to ensure that we give a complete
 5 picture, because what you say in your second statement
 6 is that:
 7 "[Your] training for bomb-related terrorist, MTFA
 8 and JESIP-type incidents... told [you] secondary devices
 9 might be present."
 10 A. Yes.
 11 Q. Did you have that possibility in your mind as you were
 12 deciding whether to contact the NILO first or to
 13 mobilise?
 14 A. Yes, and I was aware that that had been said on the
 15 call.
 16 Q. On the call?
 17 A. Yes.
 18 Q. Which call are you referring to?
 19 A. I think it was the one from the police.
 20 Q. So Mr Ellis' call?
 21 A. Mr Ellis' call, yes.
 22 SIR JOHN SAUNDERS: Could you keep your voice up slightly?
 23 I don't know whether anyone else is having a little
 24 difficulty. Is that all right? Don't feel you need to
 25 strain in any way, otherwise we can just turn the mics

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1 up, I think.
 2 A. No problem.
 3 MR DE LA POER: So plainly, if there was an unexploded
 4 secondary device or might be, within the way in which
 5 GMFRS have described the action plan, then the
 6 unexploded bomb action plan might be relevant?
 7 A. Yes.
 8 Q. Do you agree?
 9 A. Yes, I agree.
 10 Q. I just want to give you the opportunity to comment upon
 11 what Chief Fire Officer O'Reilly has said in his witness
 12 statement; we'll hear from him before the summer break.
 13 He, as I think you know from your reading into the
 14 case, has expressed the view that resources should have
 15 been mobilised straightaway. What is your comment on
 16 that, please?
 17 A. I strongly disagree with that opinion. Through
 18 mobilising experience and through the years of carrying
 19 out the job, I had learnt how to dynamically assess
 20 situations and this situation told me — everything
 21 about it told me that I wasn't happy to mobilise
 22 resources immediately without trying to gain some more
 23 information, and the main thing that changed my mind,
 24 I understand that the work — the terminology that was
 25 being used was explosion, but as soon as I was aware

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1 that was caused by a bomb, that immediately indicates
 2 some kind of terrorist activity and all my training and
 3 experience tells me that I can't send crews to
 4 a situation that potentially could also put them at
 5 risk.
 6 Q. You had undertaken the MTFA training with Mr Gaskell?
 7 A. I had, yes, sir.
 8 Q. He has already told us that part of that training was to
 9 indicate that a bomb exploding may form part of
 10 a marauding terrorist firearms attack.
 11 A. That's right, yes.
 12 Q. Had you understood that to be the information that he
 13 was conveying to you?
 14 A. Absolutely, yes, sir.
 15 Q. Did it occur to you on the night to consider the MTFA
 16 action plan, so the Operation Plato standby or
 17 implementation phase action plan?
 18 A. Not at the time until Janine arrived. So in that time
 19 period where it was just me and Lisa in charge, there
 20 was so much happening I don't think the Plato procedure
 21 had sort of entered my head at that time.
 22 Q. In fairness to you, I'm sure you can confirm this and we
 23 heard it from Mr Gaskell, that had you thought mentally
 24 to follow the "Operation Plato — standby" action plan,
 25 that would have required you to contact the NILO before

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1 mobilisation, wouldn't it?
 2 A. Yes.
 3 Q. So in terms of the practical effect, you would have done
 4 exactly the same thing, had you been thinking of that
 5 plan as opposed to the "Bomb — general" plan?
 6 A. Yes, and as I briefly touched on yesterday, I didn't
 7 know exactly which plan it fitted into because the
 8 information was so vast and also at the same time so
 9 vague. So whilst it didn't fit for me into one
 10 particular scenario, it did fit to get the NILO, who is
 11 an expert and has the contacts, to get that — to help
 12 with that decision.
 13 SIR JOHN SAUNDERS: Can we go back to that card which you
 14 had setting out the direction for the bomb?
 15 MR DE LA POER: The first one or the second one we looked
 16 at?
 17 SIR JOHN SAUNDERS: The second.
 18 MR DE LA POER: {INQ035466/1}.
 19 SIR JOHN SAUNDERS: Right. So "inform duty NILO" is the
 20 first one. But then we do have:
 21 "Send CSU to RVP. Send TRU to RVP."
 22 And sending some pumps to an RVP. We know that
 23 an RVP had been declared.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: If you were actually following that

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1 card, would you not have sent those people or those
 2 vehicles to an RVP?
 3 A. I wasn't sure if it was a bomb, but then I wasn't sure
 4 if that's what we needed to follow because of the
 5 potential MTFA —
 6 SIR JOHN SAUNDERS: So is this a proper summary, you're not
 7 actually following any card, you are actually saying: we
 8 need to contact the duty NILO so we know what to do
 9 next?
 10 A. Yes, and I purely wanted direction.
 11 SIR JOHN SAUNDERS: If that's not right, tell me.
 12 A. No, that's quite right, sir.
 13 MR DE LA POER: I think, Ms Gregson, if we look at the third
 14 action, in fact the bomb action card, as rendered here,
 15 expects you to get the RVP from the NILO, not from
 16 a partner agency.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Okay.
 19 MR DE LA POER: I think, as we will see in the phone call,
 20 you told Mr Berry of the RVP that you had been given by
 21 GMP and he effectively countermanded that by saying
 22 Philips Park?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: That's helpful. You didn't obtain the
 25 wind speed or direction?

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1 A. I didn't.
 2 MR DE LA POER: I said we were going to have a look at
 3 a screenshot and this won't be a complete screenshot,
 4 I'm sure, but can we have a look at {INQ001245/1}.
 5 We have in this document, across three pages,
 6 screenshots of various action plans. Do you recognise
 7 that presentation?
 8 A. Yes, and that is exactly — what you're seeing now,
 9 that's what an action plan looks like on the mobilising
 10 system.
 11 Q. We have the Operation Plato activation phase. Can we
 12 scroll down to {INQ001245/2}? I want to check one
 13 detail with you and then we'll have a look at the bomb.
 14 Mr Lopez, could you please crop into the very centre
 15 of the page because clearly this document has been
 16 produced for the purposes of the inquiry and I just want
 17 to check with you whether or not, when we come to look
 18 at the bomb action plan, it is rendering it as it was
 19 back in May of 2017 so far as you can remember.
 20 The reason I query it with you is that we can see
 21 that in the blue line beneath the double red line,
 22 Mr Levy is identified as an area manager and we know
 23 that on the night he was a group manager. So this
 24 clearly has been updated, at least in some way,
 25 post-incident; do you agree?

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1 A. I agree, yes.
 2 Q. I just want us all to have that caveat in mind and
 3 I just want to seek your views on the bomb action plan,
 4 which is on {INQ001245/3}.
 5 It's the top box. We're going to need to crop as
 6 far in as we can because the text is very small.
 7 The red line — we'll deal with what we can see
 8 first and then you can perhaps help us with whether or
 9 not everything that is under this action plan is in fact
 10 captured on this action plan. What it says is:
 11 "If explosion has occurred due to bomb, change
 12 incident type to 'explosion' and follow actions and
 13 resource proposal and action plan for 'explosion — bomb
 14 — general'."
 15 A. So that's been added.
 16 Q. That's new, is it?
 17 A. Yes. I know for definite that that action plan — the
 18 action plans were updated post-incident.
 19 Q. So it was not the case that there was a prompt under the
 20 "Bomb — general" action plan that, if the bomb
 21 explodes, you should then change to the explosion action
 22 plan?
 23 A. No.
 24 Q. Is it your understanding, and I know that you don't work
 25 for North West Fire Control now, but is it your

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1 understanding that this is the resting position, at
 2 least at the point you left, within the North West Fire
 3 Control system?
 4 A. Yes, at the point I left, yes.
 5 Q. That being the case, can I just seek your views about
 6 that and what position that resting position might put
 7 somebody like a team leader in.
 8 Because on the one hand we know that your training
 9 was that a bomb exploding may be a precursor to an MTFA
 10 or an MTA, as it's now referred to.
 11 A. Yes.
 12 Q. And therefore, if you took the view, as a team leader,
 13 that the bomb exploding was such a precursor then you
 14 would follow the Operation Plato style card; is that
 15 right?
 16 A. Tell me that again, sorry.
 17 Q. Yes. If you as team leader took the view under the
 18 current system that the exploded bomb is forming
 19 a precursor event to an MTFA or MTA —
 20 A. Yes.
 21 Q. — which action card would you follow?
 22 A. Yes, the MTA, because... I mean, but then... I don't
 23 know if... That's what I would do but there's no
 24 indication on that action plan... It's an instruction
 25 that if the explosion's occurred due to the bomb, that

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1 to me says regardless, you mobilise to a bomb.
 2 Q. That's if you're following the "Bomb — general" as it's
 3 currently rendered?
 4 A. Yes.
 5 Q. If instead your thinking took you down the line of,
 6 "This is an MTA", would the instruction not be not to
 7 mobilise but to speak to the NILO?
 8 A. Yes. I think so. But it would all depend — we're back
 9 to incident types again I think. It would all depend
 10 what incident type you select as to what action plan
 11 will —
 12 Q. Isn't that a little bit arbitrary that you can have the
 13 same information and, depending on which incident type
 14 you select, either you are doing one thing or you are
 15 doing something very different —
 16 A. Yes.
 17 Q. — on the same facts?
 18 A. Yes.
 19 Q. All right. We'll perhaps take that up with those who
 20 are currently dealing with the action plans as they are
 21 now. That's not your responsibility, as you have since
 22 left.
 23 SIR JOHN SAUNDERS: But we need to understand your position.
 24 You are not following any action plan, you are simply
 25 seeking advice from the NILO because you're not clear

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1 which to follow?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: That's your position?
 4 A. Yes.
 5 MR DE LA POER: Sir, unless you have any questions following
 6 up about that, we'll take it down.
 7 I think I've reached the end of the questions that
 8 I want to ask you about action plans because, to
 9 whatever degree they're relevant, and you've told us how
 10 they operated in your mind, and I think you'd accept
 11 there was a degree of confusion in your mind as you
 12 sought to recreate matters, you reached the conclusion
 13 that speaking to the NILO was the appropriate thing for
 14 you to do, rather than mobilising?
 15 A. Yes.
 16 Q. And it appears that your colleague Lisa Owen also
 17 reached the same view?
 18 A. Yes, sir.
 19 Q. That is how you came to be making the telephone call to
 20 Station Manager Berry?
 21 A. That's correct, sir.
 22 Q. We've heard it several times, but in fact it will be
 23 more efficient for us to play it than try and track it
 24 through the transcript, so let's listen to it one final
 25 time, I expect.

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1 Mr Lopez, {INQ004449/1} is the audio, {INQ001198/1}
 2 is the transcript.
 3 (Audio played)
 4 We can come back to the transcript if we need to
 5 refer to any particular parts, but just to ask you some
 6 questions about the language in it.
 7 SIR JOHN SAUNDERS: Before we do the language, how did you
 8 feel after that call?
 9 A. None the wiser.
 10 SIR JOHN SAUNDERS: Okay, but to an extent you didn't know
 11 what to do before that call, and Andy Berry was giving
 12 you clear instructions what to do?
 13 A. He was.
 14 SIR JOHN SAUNDERS: So you knew where to go next?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: So is there a feeling of relief, "I now
 17 know what to do"? I really don't want to, as has been
 18 said so often when asking a leading question, put words
 19 in your mouth, but just try and describe it if you can.
 20 You say you're not much the wiser, but you actually do
 21 know what to do, don't you?
 22 A. I know what to do but you'll notice in a point of the
 23 call where he says, "We would normally muster, wouldn't
 24 we, at a location nearby", or something.
 25 SIR JOHN SAUNDERS: At a fire station nearby.

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1 A. Yes. That throws me because I'm not aware that that's
 2 the procedure.
 3 SIR JOHN SAUNDERS: So what would you expect to happen?
 4 A. To go to the rendezvous point which I'm giving. I've
 5 given a clear rendezvous point.
 6 SIR JOHN SAUNDERS: But you don't query it?
 7 A. No, and again, with time to reflect on these things,
 8 I don't query it, and I wish I had, but when I think
 9 about the reasons I didn't, it's because I'm speaking to
 10 a NILO who — you know, the NILOs are held in very high
 11 regard because of the things they've had to go through
 12 to get to their position. He's given me an instruction,
 13 so has it changed, has he got intelligence in Manchester
 14 that I'm not familiar with? I just take it —
 15 SIR JOHN SAUNDERS: For whatever reason, you don't challenge
 16 it?
 17 A. Yes. So that's my reason that I'm kind of thrown.
 18 That's why I go, "Okay, just bear with me one second",
 19 because I'm thinking, have I got to find a fire station?
 20 And then he kind of rescues me a little because then he
 21 says, "Okay, so we'll go for Philips Park", because I'm
 22 not sure — I feel like is he waiting for me to suggest
 23 something, and if that's the case, I don't know what to
 24 suggest because, again, I don't know the topography of
 25 Manchester. I'm not familiar with it like I am with the

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1 Fire and Rescue Service that I came from.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR DE LA POER: I think your immediate words when he says,
 4 "We'd normally muster at one of the stations, wouldn't
 5 we", you say, "Right okay".
 6 A. Yes.
 7 Q. Is that you effectively nonplussed?
 8 A. Yes.
 9 Q. Shortly before we get to that section of the call, you
 10 used the word "obviously" about, "We've not mobilised,
 11 obviously". Can you just talk to us about why you used
 12 that word and was it obvious?
 13 A. Yes, so it was so obvious to me, and because I knew that
 14 myself and Team Leader Owen were strongly in agreement
 15 that this was the action to take, it was so obvious to
 16 me, and I... Because I've said the word "bomb", I think
 17 when I said it to him, it's like: obviously we're not
 18 mobilising because we wouldn't.
 19 Q. It's right to say that he doesn't challenge your use of
 20 that word.
 21 A. No.
 22 Q. You gave him a summary of information from the log;
 23 is that right?
 24 A. Yes, that's right, yes.
 25 Q. That was the source of your information as opposed to

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1 having had it reported to you by someone else?
 2 A. That's correct, yes.
 3 Q. Were you tracking the log as you were on the call to
 4 him?
 5 A. I can't remember, because -- I remember a point where
 6 I'm talking and I'm still ... I'm unfamiliar with what
 7 Mr Berry has asked me to do so that's thrown me a little
 8 bit. Then I'm also aware that Mr Casey has now got
 9 a call coming in from the public and ordinarily,
 10 I shouldn't really be the person making the phone call
 11 to the NILO. In an ideal scenario, an operator should
 12 be doing that so that I can manage or continue to manage
 13 the room.
 14 So I'm... I think ... I must have looked at the log
 15 to be giving him what I'm giving him, but I can't
 16 remember if I was tracking and I can't also remember at
 17 what point -- because I know David, Mr Ellis, was typing
 18 and then he would periodically then update the log.
 19 Q. The first question that arises from the answer you have
 20 just given, bearing in mind in an ideal world you
 21 wouldn't be making the call, why did you decide that you
 22 were the one to make that call?
 23 A. I had to make a really quick judgement, partly because
 24 of the seriousness of the incident I deemed it necessary
 25 to speak to the NILO, but also when I looked around the

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1 room, I had nobody else to do it for me. I had
 2 Mr Ellis, who I'd given a direction to to keep the line
 3 open, and I'm 100% happy with that decision because
 4 I thought that would have the best -- give us the best
 5 chance at getting information as soon as it was coming
 6 in.
 7 Next to him you've got Dean, Mr Casey, who did
 8 shortly, obviously, take a call. I can't be sure of the
 9 exact timings without looking at transcripts. But also,
 10 mindful of his limited time in the role, I wouldn't have
 11 wanted him to be in a position where I'm asking him to
 12 ring a NILO with such critical information. That's the
 13 Lancashire pod, the two people, Mr Ellis, Mr Casey.
 14 On the Manchester pod, I've got Ms Haslam, who --
 15 SIR JOHN SAUNDERS: It actually just seems realistic, you
 16 don't know what to do in this situation, and you're in
 17 charge, so really it just seems logical for you -- it
 18 may be in normal circumstances you wouldn't, but for
 19 something like this, isn't it the logical thing for you
 20 to be talking to the NILO?
 21 A. Um... No.
 22 SIR JOHN SAUNDERS: No? Okay.
 23 MR DE LA POER: Do you think it was the wrong decision for
 24 you to call Mr Berry?
 25 A. Knowing some of the information that I know -- I didn't

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1 think so and I was confident that having that
 2 conversation was the right thing to do. Knowing some of
 3 the information that I know now, I think that had I not
 4 been temporarily taken out of the equation,
 5 I potentially could have --
 6 Q. Done what?
 7 A. Continued to manage the room better.
 8 SIR JOHN SAUNDERS: But this incident is going on, you don't
 9 know what to do, you can't manage them to do things if
 10 you don't know what's the right action to take.
 11 A. No.
 12 SIR JOHN SAUNDERS: So isn't it best for you to find out
 13 what needs to be done so you can give the instructions
 14 directly rather than getting someone to do it who has
 15 then got to report back to you and then you decide to
 16 give the instructions?
 17 A. Yes, but I'm also just aware now that the information
 18 that was coming in...
 19 MR DE LA POER: You didn't leave the room unsupervised
 20 because Lisa Owen, who was the equivalent grade to you,
 21 and a competent team leader, I'm sure you would say, was
 22 available to manage the room.
 23 A. Yes.
 24 Q. The reason I asked whether you were tracking the log is
 25 in the duration of that phone call we know that there

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1 were two entries which are timestamped, so presumably
 2 uploaded to the log at that point by Mr Ellis. One was
 3 by Ms Haslam. One, that NWSA were aware of the incident
 4 and, secondly, that BTP were aware of the incident
 5 because the BTP log number — do you think you were
 6 aware of those two facts as you were speaking to
 7 Mr Berry?
 8 A. I'm sorry, I couldn't honestly say.
 9 Q. At that stage of the incident were you thinking in terms
 10 of what is the multi-agency response going to be or were
 11 you thinking in terms of what does GMFRS need to do?
 12 A. A bit of both, really, because I knew that if — with
 13 the type of incident that it would be a multi-agency
 14 response, hence my announcement to the room about JESIP.
 15 Q. When you had concluded that call, did you consult the
 16 log to see what had occurred and was occurring in the
 17 immediate aftermath? Information was coming in all the
 18 time, wasn't it?
 19 A. Yes. I can't remember how many times I looked at the
 20 log because my problem — not problem, but the thing
 21 I then was tied up doing after my call to Mr Berry was
 22 then working out how best to get four appliances to
 23 Philips Park. So it was at that point that I thought,
 24 right, now I need to create another incident, I can't
 25 put it on 9074, so I was then for the next few minutes

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1 looking at how best to manage the situation. I had to
 2 create the incident myself in the mobilising system to
 3 Philips Park and then go through the normal actions of
 4 proposing resources to find my four nearest pumps to
 5 mobilise them. But I also wanted to make sure that
 6 I made Philips Park aware because they were
 7 ultimately — I didn't know how long it was going to
 8 take the appliances to get there. So I ultimately
 9 didn't want appliances turning up at a fire station and
 10 them not knowing what was happening.
 11 Q. We'll come to that incident log in a moment, which
 12 I think is timed at 22.48. Let's just deal with the
 13 immediate aftermath and what you knew about what was
 14 going on.
 15 Firstly, Mr Berry had said that he was going to
 16 contact the FDO.
 17 A. Yes.
 18 Q. At the time that he said that, did you have any
 19 awareness at all that that might be difficult for him to
 20 do?
 21 A. No, it wasn't a consideration at all.
 22 Q. So was it your assumption that he would, within a very
 23 short period of time, succeed in speaking to the FDO?
 24 A. Yes.
 25 Q. We'll come back to that as we progress through the

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1 incident. Secondly, I think the first thing you did,
 2 and tell me if I'm wrong about this, after you concluded
 3 that call, was to listen to the end of Mr Casey's call
 4 involving a member of the public calling 999; is that
 5 right?
 6 A. It's right, but until I watched Mr Casey yesterday,
 7 I can't remember doing that.
 8 Q. You don't have a positive memory of it but you don't
 9 dispute what he says about it?
 10 A. Absolutely, yes. If that's what he says I've done, it
 11 wouldn't be unusual for me to do that as part of my
 12 management.
 13 Q. And it is plain from your call with Mr Berry that
 14 you were aware that he was speaking to a member of the
 15 public?
 16 A. Yes.
 17 Q. The phrase dirty bomb is a highly significant one if
 18 you have an awareness of what it means; do you agree?
 19 A. I agree.
 20 Q. Did you know what a dirty bomb was in general terms in
 21 May 2017?
 22 A. No, I did not.
 23 Q. This is probably a difficult, if not impossible,
 24 question for you to answer, but we'll try it anyway.
 25 Bearing in mind you don't remember the call with

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1 Mr Casey, do you have any sense of whether or not you
 2 heard that part of the call or do you think that if you
 3 did hear the phrase dirty bomb that might have stuck in
 4 your memory?
 5 A. I don't have any recollection, but I think that, yes,
 6 it would be something I would remember if I'd heard it.
 7 Q. You have indicated that you needed to contact
 8 Philips Park, and that is what you did at 22.45,
 9 speaking to Watch Manager Helmrich; is that right?
 10 A. That's right.
 11 Q. By that stage of the development of the log, the fact
 12 that there were gunshot wounds had been entered into it.
 13 We can see from your call with Mr Berry that you didn't
 14 mention active shooter or gunshot wounds at all, and no
 15 doubt you'll tell me that's because in fact that wasn't
 16 reported into North West Fire Control until after that
 17 call had concluded?
 18 A. That's correct.
 19 Q. What you said to Watch Manager Helmrich was that
 20 Mr Berry was calling the FDO and you indicated that
 21 Philips Park had been made a muster point?
 22 A. Yes.
 23 Q. Is that a fair summary of the key features of your call
 24 with Mr Helmrich?
 25 A. It is, sir, yes.

24

1 Q. You have told us that you then went on to create that
2 Philips Park incident log, and I'm going to come to that
3 in just a minute. That is timed at 22.48.12. At around
4 22.48, and whether the timings we have in the
5 transcripts are accurate to the second is open to
6 question because they all appear to start at the start
7 of the minute, which seems inherently improbable. But
8 certainly within the minute of 22.48, Mr Casey took
9 a call from Station Manager Berry. Were you aware
10 at the time that he had taken such a call?
11 A. No.
12 Q. Bearing in mind what you told us a few moments ago about
13 the fact that you did not think with his experience
14 Mr Casey should be nominated to make that first call to
15 the NILO, do you think you should have given an
16 instruction to the room that if they received a call
17 from the NILO, you should be notified so that you could
18 conduct it?
19 A. Yes, possibly.
20 Q. Bearing in mind what you of said about Mr Casey's
21 experience, was it really appropriate that he should be
22 put in the position where he is having a conversation
23 with the NILO only minutes after you have spoken to him?
24 A. No, but I would expect — and we had a very strong
25 established way of working on my team because I made

25

1 sure that that was how we worked — that anybody could
2 attract the attention of a team leader at any time and
3 would do so. So yes, I absolutely take that point.
4 Equally, if Dean had got — when he got that call, he
5 could have asked for one of us to assist.
6 Q. I appreciate the ethos being instilled was that you
7 asked for help if you need it. Of course, the situation
8 that the control room was dealing with that night was
9 unlike any other that they had.
10 A. It was.
11 Q. Do you recognise that, in a leadership role, it falls to
12 you to remind people of the most important procedures,
13 as you did with JESIP, to make sure that in the moment,
14 people don't forget their training?
15 A. Absolutely, yes.
16 SIR JOHN SAUNDERS: Just let's look slightly at the other
17 side of it. Is there a distinction to be drawn in your
18 mind, or would there be, between you actually getting
19 hold of Andy Berry to query him as to what you should do
20 and him ringing in in order, presumably, to make
21 a request from Control? Do you see what I mean? It may
22 be a different scenario and require different people.
23 Perhaps all of these things are not things which are
24 actually going through your mind at the time.
25 A. Yes, potentially not going through my mind at the time.

26

1 SIR JOHN SAUNDERS: Okay.
2 MR DE LA POER: Was the information that Mr Berry
3 communicated to Dean Casey, namely that having been
4 trying for at least 6 minutes he had failed to get
5 through to the FDO, conveyed to you?
6 A. No.
7 Q. Mr Casey has frankly accepted that he didn't enter it on
8 to the log. He's also said that he didn't recognise the
9 significance of that information. Would you have
10 expected your CROs to know which action plan was being
11 followed?
12 A. Ordinarily, yes, but in this scenario, because there
13 wasn't an action plan being followed, and I hadn't said
14 to the room — because it wasn't a conscious, "We are
15 not following an action plan", um...
16 SIR JOHN SAUNDERS: You were still awaiting advice as to
17 which one to follow?
18 A. Yes.
19 MR DE LA POER: Would you ordinarily expect your CROs to
20 understand that if the NILO is contacting the FDO, the
21 plans all wait for that conversation to take place?
22 A. Yes.
23 Q. You would expect them to know that?
24 A. Yes.
25 Q. But the evidence we've received from other people, and

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1 I seek your comment on it, is that there wasn't
2 a plan B, as it has been termed, in terms of if that
3 contact didn't take place quickly. Was that your
4 understanding?
5 A. Yes. And that situation had never occurred, so I don't
6 even think there was — or to my knowledge it had never
7 occurred. If you needed the FDO, you got hold of the
8 FDO, and it was like an instant response.
9 Q. Had you ever had cause to phone the FDO directly?
10 A. Yes.
11 Q. Did you have the telephone number for the FDO available
12 to you at North West Fire Control?
13 A. No. You have to ring the police control, you speak to
14 an operator and you ask for — at one time it was called
15 the FIM, the force incident manager. They changed it to
16 the force duty officer so you would ring and ask for the
17 FIM or the FDO.
18 Q. And you would be put through?
19 A. You would be put through, yes.
20 Q. So it wasn't a call to the FDO line directly, it was via
21 the control room?
22 A. Correct.
23 Q. I'm going to turn now to the creation of the second
24 incident log for Philips Park. We touched on this
25 yesterday and part of the feedback you gave in the

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1 course of the review that followed was that having three
 2 incident logs, as it came to be, created a problem.
 3 A. Yes.
 4 Q. This is the second substantial incident log that has
 5 been created and it's for the muster point at
 6 Philips Park; is that right?
 7 A. That's correct, yes.
 8 Q. There may be limits to your answer in terms of your
 9 technical understanding of the IT system, but why was it
 10 necessary to create a second incident log rather than
 11 simply continuing the current incident log, which
 12 contains all of the early information?
 13 A. So in my mind, when I was faced with this situation, if
 14 I'd have put the four pumps — the address on 9074 is
 15 the Manchester Evening News arena, the rendezvous point
 16 says cathedral car park. The incident type is
 17 explosion. If I then mobilise my four pumps on to that
 18 incident, they think they're going to that location.
 19 Q. Which location?
 20 A. To the arena or to the cathedral car park, whichever —
 21 the address would say Manchester Evening News Arena, the
 22 RVP, I think, was populated on the log by Mr Ellis
 23 saying cathedral car park. So they would think that's
 24 the location, but actually I'm not asking them to go
 25 there, I'm asking them to go somewhere else.

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1 SIR JOHN SAUNDERS: So are you saying the automatic
 2 instruction or the instruction to go out would include
 3 the information from the first incident log on it?
 4 A. Yes, if I don't create another incident, and I'm only
 5 working off log 9074, I can't change the location.
 6 SIR JOHN SAUNDERS: So you couldn't instruct them to go to
 7 Philips Park?
 8 A. Yes, I could, but I would have had to ring each one
 9 individually, each appliance. Once I'd seen which four
 10 appliances were proposed for me, then I would have had
 11 to contact them individually to say, "Disregard incident
 12 location, proceed to Philips Park".
 13 SIR JOHN SAUNDERS: Can't you just change the RVP point to
 14 Philips Park and send them there on the same log?
 15 A. Yes, I could have done.
 16 SIR JOHN SAUNDERS: Okay.
 17 MR DE LA POER: It seems to be that the situation that you
 18 were confronted with, so far as your understanding of
 19 the technology was concerned, was just not contemplated?
 20 A. Yes.
 21 Q. Your system, so far as you understood its operation,
 22 didn't envisage circumstances in which there would be an
 23 incident that an emergency partner would give you an RVP
 24 and that you would send pumps to a third location.
 25 A. No. And actually, what Mr Saunders has just said

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1 actually would possibly —
 2 SIR JOHN SAUNDERS: Would have worked?
 3 A. Yes, it would have worked.
 4 SIR JOHN SAUNDERS: So is this something that didn't occur
 5 to you?
 6 A. It didn't occur to me until you just said it.
 7 SIR JOHN SAUNDERS: It may be all wrong, I have no idea how
 8 systems work, so I could have got it entirely wrong.
 9 MR DE LA POER: At all events, you felt that the technology
 10 required you to create a new incident. We'll fast
 11 forward to your reflection of the incident now and that
 12 includes a third incident log that was created a little
 13 bit later in the evening, relating to the CSR; is that
 14 right?
 15 A. Yes, that's right.
 16 Q. So that third incident log, we're fast forwarding some
 17 way in time now, was for the deployment of officers to
 18 the CSR so you could keep track of that?
 19 A. I believe so, yes.
 20 Q. So just explain to us why the creation of the second and
 21 then the third incident log created problems.
 22 A. So the way of working when a command support room is
 23 opening, we would always open a different, a separate
 24 log for command support room, and as far as I'm aware —
 25 well, that's what the way the working has been and up to

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1 3 March this year that's what we still do.
 2 Q. So the system did not envisage that against an original
 3 incident, you could populate a CSR field where you could
 4 deploy people to the CSR?
 5 A. No.
 6 Q. So that's how it's working practically. Why did it
 7 create problems in your view?
 8 A. Because the 9074 and the other incident, the
 9 Philips Park incident, it then became unclear which
 10 incident to put information on. So if you could have
 11 read all the information on one log, I think it just
 12 didn't flow because you have to click into one incident,
 13 click into another incident — sorry, I've just lost my
 14 train of thought slightly.
 15 Q. Not at all. Let's just look at it in this way. All of
 16 the early information from the emergency service
 17 partners, from the 999 call, was on Mr Ellis' log?
 18 A. Yes.
 19 Q. You then created the second log, the focus of which was
 20 the deployment of resources to Philips Park?
 21 A. Yes.
 22 Q. Do you see that there is a risk that people could focus
 23 upon the new incident log as thinking that's the one
 24 we are working to now, and the risk is that they won't
 25 remind themselves of what is going on on the original

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1 incident log?
 2 A. Yes, and without wanting to jump too far forward,
 3 because I'm sure you'll get to it, but I made that
 4 mistake myself.
 5 Q. Are you there referring to a conversation you had with
 6 Mr Levy?
 7 A. I am.
 8 Q. We will come to that.
 9 So let's just continue the narrative through. That
 10 log was created at 22.48.12, you've explained your
 11 reasons behind creating it. Shortly after that,
 12 a telephone call took place between Vanessa Ennis and
 13 Station Manager Berry. That's timed at 22.52. Sitting
 14 there now, are you aware of that call?
 15 A. I am, yes.
 16 Q. Were you aware of it at the time?
 17 A. No.
 18 Q. Vanessa Ennis, as I understand it, was properly
 19 described as a trainee that night; is that right?
 20 A. Yes, that's correct.
 21 Q. Does that mean that she was in the phase that Mr Casey
 22 has described to us of having shadowed, being shadowed
 23 or shadowing someone?
 24 A. Yes, she was still in the period of being over and above
 25 the numbers, yes.

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1 Q. Was she entitled to act unsupervised when taking and
 2 making calls?
 3 A. No, she had a mentor sat next to her.
 4 Q. Who was her mentor?
 5 A. Rochelle Fallon.
 6 Q. Should Ms Ennis have been put in the position of
 7 speaking to the NILO that night?
 8 A. No, and I believe that I'd asked Ms Ennis to actually
 9 stand back from taking calls. It was also apparent, as
 10 everybody was, that she was very shaken. I think she'd
 11 only been in the job around — I couldn't be exact but
 12 a couple of months, and what I needed was Ms Ennis to
 13 not become involved in anything because while she's
 14 involved and Ms Fallon is meant to be mentoring her,
 15 I then haven't got Ms Fallon as a member of staff who
 16 can do things for me.
 17 Q. You gave an instruction to Ms Ennis to step back?
 18 A. I did.
 19 Q. At what stage in the evening did you do that?
 20 A. It was fairly soon into when everything was unfolding.
 21 I can't be exact on the time.
 22 Q. Doing the best you can, was it before offer after 22.52
 23 when she found herself speaking to Station Manager
 24 Berry?
 25 A. I think it was before that.

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1 SIR JOHN SAUNDERS: The mentor has nothing to do but
 2 supervise? She's just sitting beside them, seeing what
 3 they do, full —time?
 4 A. Yes. They shouldn't be. They shouldn't be.
 5 MR DE LA POER: Just focusing on Ms Ennis for the time
 6 being, and again jumping forward in our chronology, she
 7 also spoke to British Transport Police at 23.17. Were
 8 you aware of that?
 9 A. No.
 10 Q. Even sitting there now with all the work that you've
 11 done?
 12 Let me summarise the content of that call and you
 13 may be familiar with it. That was the call in which she
 14 told the BTP operator that the Fire and Rescue Service
 15 was rendezvousing at Philips Park. Were you aware of
 16 that call?
 17 A. Sorry, no.
 18 Q. Again, let me try to summarise the content fairly and
 19 the comments that have been made about it. One of the
 20 observations that was made in the context of the BTP
 21 evidence was that Ms Ennis didn't ask for any
 22 information from BTP, and neither did they offer any.
 23 Again, should Ms Ennis have been in a position where she
 24 was speaking to an emergency service partner at that
 25 stage of the evening?

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1 A. No.
 2 Q. So we're just going to track some log entries now across
 3 the different logs, which is most helpfully done via the
 4 sequence of communications produced by North West Fire
 5 Control at {INQ041473/25}, and we'll try and track what
 6 is unfolding.
 7 We can see the entry relating to Ms Ennis there.
 8 Following that entry, we can see —
 9 SIR JOHN SAUNDERS: Just what does that entry mean at
 10 22.54.07?
 11 MR DE LA POER: That is an entry on the log.
 12 Can you assist us with that?
 13 A. Yes. It looks like she has... So GS098 is the call
 14 sign of a station manager.
 15 Q. That will be Mr Berry who she spoke to at 22.52, I'm
 16 sure.
 17 A. Yes. So that looks to me like that's where — is that
 18 where he's asking for NILOs three and as she's put, MTS
 19 capability, but that's incorrect to RVP —
 20 SIR JOHN SAUNDERS: So we've got three NILOs and the?
 21 A. Yes, it looks to me like that's her logging his request.
 22 MR DE LA POER: Yes, that's right. That is the incident —
 23 the record on 9074 by Ms Ennis about the conversation
 24 she'd had 2 minutes earlier with Mr Berry?
 25 SIR JOHN SAUNDERS: And Andy Berry had rung her to give the

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1 instruction?
 2 MR DE LA POER: Indeed.
 3 A. That's where she says "by phone" so you log on the
 4 incident whether it's been by radio or by phone.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR DE LA POER: We can then see an entry that has been made
 7 on log 9078. That's the next one in time. Do you see
 8 that?
 9 A. Yes.
 10 Q. If we go over to page {INQ041473/27}, we will see at
 11 22.56.51, Ms Ennis' entry on 9074 appears to have been
 12 carried across to 9078.
 13 A. Yes.
 14 Q. Essentially, the same information, do you agree?
 15 A. I agree.
 16 SIR JOHN SAUNDERS: Who would do that?
 17 A. Who would log --
 18 SIR JOHN SAUNDERS: Who would do the duplication?
 19 A. Well...
 20 SIR JOHN SAUNDERS: Either Vanessa Ennis or her supervisor?
 21 A. Yes, Vanessa, if she has done that action. I think
 22 she's just logged the same information on both
 23 incidents, she's physically typed it, so yes, she has
 24 physically typed it on to both logs. Again, that maybe
 25 an example of why -- people don't know which log to

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1 operate on.
 2 MR DE LA POER: This is exactly why I have selected this.
 3 We seem to have a position where a call takes place at
 4 22.52. There's a log entry on 9074 at 22.54. There is
 5 a semi-duplicate of the information -- it's not
 6 a perfect rendering of everything that's recorded on
 7 9074 -- on 9078, nearly 3 minutes later.
 8 Then if we go to {INQ041473/33}, we'll see the entry
 9 at 23.03.52 where your colleague Ms Haslam has mobilised
 10 Carlos Meakin as a NILO.
 11 A. Yes.
 12 Q. We'll just track this through and then I'll ask you
 13 about it. We can see at {INQ041473/34}, at 23.04.15,
 14 that Mr Levy has been mobilised as a NILO.
 15 A. Yes.
 16 Q. And we know from the pager information that we looked at
 17 that the timing of the pager, it's recorded there
 18 against Mr Berry, is 23.06.
 19 A. Yes.
 20 Q. Thank you very much. We can take that down.
 21 The reason I focused on those entries, not only did
 22 they illustrate the two logs operating, but Mr Berry
 23 asks at 22.52 for three NILOs to be deployed to
 24 Philips Park. It takes between 22.52, or whenever that
 25 call ends, to 23.06 for the mobilising page to be sent.

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1 A. Mm.
 2 Q. Is that an acceptable period of time for that
 3 instruction to be carried out?
 4 A. No, and it seems quite strange to me.
 5 SIR JOHN SAUNDERS: Why is it being done by Joanne Haslam
 6 and how does she get the instruction to do it?
 7 A. Yes. I'm wondering... I don't know what has happened,
 8 whether they've handed it over to the Manchester pod,
 9 whether Ms Haslam has offered to send the NILOs, I don't
 10 know, but I'm assuming, because that's been logged by
 11 Vanessa, so she has got that request, that for some
 12 reason that's been handed over for somebody else to do.
 13 MR DE LA POER: On the face of it, that has built in
 14 substantial, in terms of the timing of the incident,
 15 delay?
 16 A. Yes. If you get a request from an officer, there's no
 17 reason to delay that. You carry out the action you've
 18 been asked to carry out by --
 19 SIR JOHN SAUNDERS: We have heard things being said about if
 20 it's something to do with Manchester, then you hand it
 21 over to the Manchester pod. Obviously, sensibly, it
 22 would have been all hands on deck, as it were, in this
 23 situation.
 24 A. Absolutely, yes.
 25 SIR JOHN SAUNDERS: But Vanessa Ennis was not on the

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1 Manchester pod, so that could have been what she did?
 2 A. Well, yes, but I'm hoping that at some point I get the
 3 opportunity to be able to talk to you a little bit more
 4 about the pod management way of working because it was
 5 actually myself that implemented that at North West Fire
 6 Control.
 7 If you get the request, you carry out the sends, as
 8 we would call it, the sending of anything. You don't
 9 hand that over, you carry out the request. The
 10 handing-over is more for administration purposes.
 11 MR DE LA POER: In this case the person who would be
 12 expected under that system to carry out the request from
 13 the NILO, only 21 minutes after the explosion, was
 14 someone who should not have been taking a call?
 15 A. Correct. That's where I'm thinking -- but what I'm not
 16 sure about is why then... I would expect the mentor to
 17 take that over.
 18 SIR JOHN SAUNDERS: How physically does Joanne Haslam get
 19 the message to do it, however it comes about and why it
 20 comes about?
 21 A. I can only think they've shouted across or got up out of
 22 their seat to go and ask. That's something that we
 23 would ordinarily -- it's quite common for us to do that.
 24 SIR JOHN SAUNDERS: Right.
 25 A. And I can completely understand. I wouldn't have

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1 expected Vanessa to action that at all because I've
 2 asked for her not to do anything.
 3 SIR JOHN SAUNDERS: And Mr de la Poer, at the convenient
 4 moment, in the way you're doing it, will give you the
 5 opportunity --
 6 MR DE LA POER: Undoubtedly.
 7 SIR JOHN SAUNDERS: You will get that chance and if you
 8 don't, then tell us before you go.
 9 A. I will, thank you.
 10 MR DE LA POER: Let's pause in this process and mark
 11 11 o'clock. At this stage we are 30 minutes
 12 post-explosion and 20 minutes since you have spoken to
 13 the NILO. At that point, you have not received any
 14 information to suggest that Mr Berry has succeeded in
 15 contacting the FDO.
 16 A. No.
 17 Q. Did that thought strike you at that point?
 18 A. No. I can honestly say that the time in the initial
 19 stages of that incident was... The time went so fast
 20 because I was having to process, as we all were,
 21 everybody was having to process so much information, so
 22 at that point I can't honestly recall that it had
 23 consciously come into my mind that we hadn't heard
 24 anything, nor did I know -- I know the information had
 25 come into the control room but I didn't know that

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1 Mr Berry had had the conversation that he was struggling
 2 to make contact.
 3 Q. As the duty team leader, do you think it formed any part
 4 of your role that night to, on occasions, take a step
 5 back and assess how the response was unfolding?
 6 A. Yes.
 7 Q. Do you think you did that?
 8 A. No.
 9 Q. Why do you think you didn't do that?
 10 A. Again, my explanation can only be that in those initial
 11 stages I didn't have the chance to step back to do that.
 12 I'd obviously become involved in the Philips Park, the
 13 creating of that incident after the conversation with
 14 Mr Berry. I also had -- I considered because I thought
 15 we were about to get even busier with calls, so
 16 I considered a recall to duty. I was thinking about the
 17 wider -- trying to think about the bigger picture of the
 18 operating of the control room rather than what was
 19 happening at the other end because in my mind I'd handed
 20 that bit over for somebody else to gain that situational
 21 awareness but what I needed to do was make sure that the
 22 control room could continue to operate with an incident
 23 that I knew was going to be protracted and also to try
 24 to keep business as usual for the Fire and Rescue
 25 Services that were not involved.

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1 Q. JESIP requires, as one of its five principles,
 2 co-location.
 3 A. That's correct.
 4 Q. Wasn't it essential to find out where the other
 5 emergency services were basing themselves for the
 6 purpose of achieving co-location?
 7 A. Yes.
 8 Q. Speaking to the FDO might produce all of that
 9 information across GMP, BTP and NWAS, but equally do you
 10 agree it might not?
 11 A. Yes.
 12 Q. Did it occur to you that one of the things that North
 13 West Fire Control could be doing is contacting the other
 14 control rooms to find out where their rendezvous points
 15 were?
 16 A. No, not on the night.
 17 Q. Did it occur to you to review the log with a view to
 18 seeing what has been said about what the other emergency
 19 services are doing?
 20 A. No.
 21 Q. Why do you think those thoughts didn't occur to you?
 22 A. Just because the activity was overwhelming, it was
 23 something that, as busy as I'd experienced control
 24 rooms, and as... I'd dealt with some really unusual
 25 incidents, this was unprecedented.

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1 SIR JOHN SAUNDERS: I need to know how far your
 2 responsibility stretches as compared with the NILO. So
 3 you've rung the NILO up, the NILO has given you
 4 instructions as to what to do. You didn't personally
 5 know that he was having difficulty contacting the FDO.
 6 Who is running the incident as far as you're concerned
 7 then or are you jointly running the incident? Where are
 8 your responsibilities between you and the NILO?
 9 A. We don't have the command of incidents, so -- and
 10 because of the nature, more so, for me it was over to
 11 the NILO and what I hadn't considered is that --
 12 obviously we know now, you know, that was a point of
 13 failure, but I hadn't considered ever being faced with
 14 that situation.
 15 SIR JOHN SAUNDERS: The failure is no contact with the FDO.
 16 A. Yes, exactly, yes.
 17 SIR JOHN SAUNDERS: And although the NILO had said, "I'm
 18 having difficulty getting hold of him", he didn't
 19 actually say, "Would you contact them for me and get
 20 them to ring me back?" So you weren't actually asked to
 21 do anything. So how much would you say, "It's my
 22 responsibility to take the initiative", and how far is
 23 it for you to say, "The NILO's in charge, we'll carry
 24 out his instructions, but really he has to be the guy
 25 managing the situation"?

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1 A. Yes, I mean, there's definitely -- I came from the
 2 ranking structure of a disciplined service and as much
 3 as we came away from that when we were coming to North
 4 West Fire Control, you still respect the levels of
 5 a senior ranking officer. But I would also -- there's
 6 got to be a degree of -- a fire control room has got to
 7 work with its fire services. They can't work
 8 independently. They have to work together. So as much
 9 as -- I would be steered by Mr Berry, you kind of have
 10 to -- you work with each other, really.

11 SIR JOHN SAUNDERS: So you still have some independence to
 12 do things?

13 A. Yes.

14 SIR JOHN SAUNDERS: By now you haven't mobilised anyone
 15 except to go to a fire station quite a long way away?

16 A. Yes.

17 SIR JOHN SAUNDERS: That the whole response is not working,
 18 would you regard that as your responsibility, of being
 19 aware of that at the time?

20 A. I certainly think that -- yes, making the assumptions --
 21 I didn't realise that something wasn't working because
 22 in terms of a bomb that's exploded, I'm thinking it's
 23 not necessarily a Fire Service--led incident, it's
 24 a police--led incident, and I very much had that in my
 25 mind. So if I'd thought -- if it was an incident that

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1 would deem the Fire Service to lead on it, I would
 2 undoubtedly be thinking, something's wrong here, we are
 3 not receiving guidance, but I just had nothing to
 4 indicate that something was going wrong.

5 SIR JOHN SAUNDERS: Thank you.

6 MR DE LA POER: Just picking up the issue of where your
 7 responsibility ends and it becomes somebody else's
 8 responsibility, one of the things that we've had a lot
 9 of evidence about is how much training the SRT and the
 10 Hazardous Area Response Team from NWS had done
 11 together. Were you aware that they were organisations
 12 or parts of those two organisations that worked
 13 regularly together?

14 A. No. I knew about the two separate entities but I didn't
 15 realise they worked together.

16 Q. Would it have formed any part of your responsibility on
 17 the night to think to yourself, "I can support the NILO
 18 by finding out information from NWS, which I might be
 19 able to give to him that he hasn't got from the FDO"?

20 A. Potentially. I was just mindful of the very disjointed
 21 information that we'd received through the ambulance, so
 22 I don't think it occurred to me to ask somebody to
 23 recontact them to see if we could maybe speak to
 24 somebody different or get some further information.

25 Q. Had you received any training before the night of 22 May

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1 that instilled in you the principle that, "I need to
 2 find out where all of the emergency services are, not
 3 just the lead agency, so we can co-locate"?

4 A. No, because I thought that that was the Fire and Rescue
 5 Service's responsibility to do.

6 Q. So let's just continue. That was just pausing at
 7 11 o'clock as a convenient moment. Just tracking some
 8 other actions that you do, you've mentioned trying to
 9 call up off duty members of staff and you ended up
 10 speaking to a team leader at just after 11 o'clock;
 11 is that right?

12 A. That's correct.

13 Q. And she agreed to come in?

14 A. She did.

15 Q. You then spoke to Tessa Tracey at 23.08; is that right?

16 A. That's right.

17 Q. Just briefly introduce us to Tessa Tracey. She hasn't
 18 been mentioned frequently up until this point, so who
 19 was she on the night?

20 A. She was the senior operations manager.

21 Q. Did she sit in the hierarchy as your line manager's line
 22 manager?

23 A. Yes.

24 Q. So above you, Janine Carden, and above her,
 25 Tessa Tracey. Did she ask you to tell Janine Carden to

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1 contact her when Janine Carden arrived?

2 A. Yes, I think so. I've read the transcript and I think
 3 that was what was said.

4 Q. Just so that we've got a moment in time so far as
 5 Janine Carden is concerned, who we'll hear from next,
 6 during that call do you say, "Janine's just arrived", or
 7 words to that effect?

8 A. Yes.

9 Q. So we know that it's some time around 23.09 that she
 10 comes in.

11 Did it occur to you at that point to discuss with
 12 Ms Tracey what the other emergency services were doing
 13 as part of your update to her?

14 A. No, I don't think so.

15 Q. Had you reviewed the log by the point of speaking to
 16 Tessa Tracey?

17 A. No.

18 Q. Did you know, for example, that about 15 minutes before
 19 you called her, it had been recorded on the Ellis log
 20 that the Bronze paramedic commander was on scene?

21 A. No.

22 Q. Considering lessons for the future, do you think that
 23 that was an important piece of information?

24 A. Yes.

25 Q. How can the system be improved to ensure that that

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1 important piece of information makes its way to you as
 2 team leader so that you know that as soon as it comes
 3 in?
 4 A. To have a dedicated manager or — yeah, manager maybe
 5 working closely with an operator or two operators,
 6 looking through the incident so they become possibly
 7 dedicated to that incident. Because I'd already — I'd
 8 obviously made the announcement about sharing
 9 information, which I think people took to mean sharing
 10 it with other agencies, but not necessarily handing it
 11 up to me. But there is the escalation to team leader
 12 kind of process, where, especially in an incident like
 13 this, I would kind of expect to be shouted up to. It
 14 would have been impossible for people to keep walking up
 15 to the top desk, but they can shout me, they can
 16 intercom me, if I'm not on the phone. But perhaps that
 17 information could have been — but equally I didn't seek
 18 that information either at that time.
 19 Q. Do you think that if you had reviewed the Ellis log and
 20 seen that it was plainly the case that the police were
 21 saying that they were sending officers to the scene and
 22 it was plainly the case that NAWAS was mobilising to the
 23 scene and had a commander at the scene, that if you had
 24 seen that, it would have occurred to you to phone
 25 Andy Berry to tell him that?

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1 A. Maybe so.
 2 Q. It's important that we try and strip out hindsight here.
 3 A. Yes.
 4 Q. And I'm not suggesting that that was a glib answer in
 5 any way, but just thinking about it, was your training
 6 such that if you had looked at that log as it turned
 7 past 11 o'clock, that you would have thought,
 8 "Andy Berry might not know this, no reason to think that
 9 he does, he needs to know it because it's important"?
 10 A. Yes, I think my experience could have told me to do
 11 that, not necessarily the training.
 12 Q. Not the training?
 13 A. Not necessarily, but my experience.
 14 Q. Let's see if we can, just before I invite the chairman
 15 to take a break, if you're all right to continue for
 16 a few more minutes, see if we can deal with the Group
 17 Manager Levy call.
 18 We'll just bring up the transcript. We've dealt
 19 with it already with Mr Levy. It's {INQ001185/1}. I'm
 20 just going to remind us of the salient points of it,
 21 because as I'm sure you appreciate, Ms Gregson, the
 22 significance of this call may be not what's in it but
 23 what isn't in it.
 24 We can see it starts with Mr Levy contacting you.
 25 About a quarter of the way down you indicate to him that

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1 you've mobilised to Philips Park and you then begin to
 2 give him an update, indicating the reports of an
 3 explosion. You go on to say that you told Mr Ellis to
 4 stay on the phone to get JESIP information to make sure
 5 you're sharing information. And you said, "Don't
 6 mobilise", that you rang Andy Berry. You then go on to
 7 indicate there was a report of gunshots and people
 8 wounded and that you had created a muster point at
 9 Philips Park.
 10 Then over the page, {INQ001185/2}, you then say,
 11 having given the casualties number:
 12 "At the moment that's what — that's all we have.
 13 The operator at the police, the supervisor asked her to
 14 end the call because we then need to liaise with Silver
 15 control. I've just recommended that we set up a link so
 16 that we can speak to them, to again make sure we
 17 maintain this JESIP information, that we are all sharing
 18 the information that we are getting in."
 19 And then the conversation continues being led by
 20 Mr Levy. There's a discussion about a hazard zone
 21 towards the bottom.
 22 Over the page, please {INQ001185/3}. We've got
 23 really a discussion about the practicalities around the
 24 deployment to Philips Park, would you agree?
 25 A. Yes, I would.

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1 Q. Then over the page, {INQ001185/4}, we can see that you
 2 conclude the call by indicating:
 3 "It sounds a bit disorganised at the minute, just
 4 been absolute bedlam with the staff we've got on duty,
 5 but what we'll do is — we're going to gather our
 6 thoughts, get all the resources on to a piece of paper
 7 to brief Janine, then anything else you need, I promise
 8 you I'll sound like I know what I'm talking about."
 9 And he reassures you to say:
 10 "It sounds like you're doing okay."
 11 And that ends the call.
 12 He has made the call in. Had it just come to your
 13 phone to answer by chance?
 14 A. No — oh sorry, it rings round the whole room.
 15 Q. And you happened to be the one to pick it up?
 16 A. Yes.
 17 Q. So it wasn't part of a plan that if one of the NILOs
 18 called in, they should come to you?
 19 A. No.
 20 Q. And consequently, it was not a call that you were
 21 necessarily expecting to answer at that moment when the
 22 telephone rang?
 23 A. No.
 24 Q. You give him some information about the incident. Was
 25 that derived from the log or did you get that

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1 information from a different source?
 2 A. I think I got the information from what I already knew
 3 rather than...
 4 SIR JOHN SAUNDERS: You're doing it from memory basically?
 5 A. Yes, because I was looking at the Philips Park incident
 6 rather than 9074.
 7 MR DE LA POER: Would you agree that the Philips Park
 8 incident log had virtually no relevant information about
 9 the emergency service partners on it?
 10 A. I agree.
 11 Q. So do we get to the point that you have already
 12 foreshadowed, that this is a problem with having two
 13 logs running?
 14 A. Yes.
 15 Q. I undertook this exercise with Mr Casey, I'm not going
 16 to go through it with you because you clearly are aware
 17 of the matters that you did not mention to Mr Levy from
 18 the log, but they include, don't they, that which we've
 19 touched on already, such as the fact that the Bronze
 20 paramedic commander was on scene, the fact that the
 21 police and Ambulance Service had mobilised to the scene?
 22 And do you think that's information you should have
 23 given to GM Levy?
 24 A. Yes.
 25 Q. Having had the time to reflect upon it, what is the

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1 reason, do you think, why you didn't?
 2 A. Because I hadn't had time to sit back and take stock and
 3 have a look at the information. I just hadn't had time.
 4 I'd been on the phone and doing all the other things
 5 that I'd done leading up to that moment.
 6 Q. We know that at Exercise Winchester Accord, one thing --
 7 and there is a degree of contention to this bearing in
 8 mind what the objective of that exercise was, but one
 9 thing that may have emerged from it was that the FDO
 10 would get overwhelmed. You've told us that you had not
 11 done any exercising of a mobilisation to a large-scale
 12 incident. Do you think, had you had such prior
 13 experience, that might have improved your ability to
 14 recognise that you needed to step back?
 15 A. Absolutely.
 16 Q. Had you been told as part of your training, "If there is
 17 a very large spontaneous incident, you as duty team
 18 leader need to take a step back"? Had that ever formed
 19 part of your training?
 20 A. No.
 21 Q. As we have established, you hadn't had the opportunity
 22 to practice either?
 23 A. No.
 24 SIR JOHN SAUNDERS: Would it have been practical on the
 25 night to take a step back?

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1 A. Absolutely, yes.
 2 SIR JOHN SAUNDERS: You could have done it?
 3 A. No, I couldn't, no, I couldn't do it, but it would
 4 have...
 5 SIR JOHN SAUNDERS: I'm sure it would help, but do you
 6 actually have the staff in order for you to be able to
 7 take a step back?
 8 A. No, which is why I found myself in the situation that
 9 I was in because I'd become involved in things -- you
 10 lose your supervision the minute you become involved in
 11 something.
 12 SIR JOHN SAUNDERS: Okay.
 13 MR DE LA POER: Sir, I'm nearly at the conclusion of my
 14 questions about the night. I wonder if we might proceed
 15 for 5 minutes more if Ms Gregson is content to do so.
 16 A. Yes, that's fine.
 17 Q. By this stage, as is apparent, Janine Carden has arrived
 18 at North West Fire Control, hasn't she?
 19 A. She has.
 20 Q. We see that she was mentioned in that call. Did you
 21 regard yourself as being relieved of responsibility of
 22 being in charge of that control room at the point that
 23 she arrived?
 24 A. Not when she arrived, no, because there would have to be
 25 a...

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1 SIR JOHN SAUNDERS: A handover, we call it.
 2 A. Yes.
 3 MR DE LA POER: Was there such a handover?
 4 A. Yes, eventually we got there.
 5 Q. About how long after she arrived did --
 6 A. It wasn't too long. But obviously she's arrived, I'm on
 7 the phone to Mr Levy, I think then there was a phone
 8 call, I think she was -- because she was the Manchester
 9 SPOC, the single point of contact, I believe she was in
 10 the best position that night to -- she had the contacts,
 11 et cetera. So I think that at first there was a brief
 12 phone call, but yes, the first thing she did was check
 13 we were okay, and then pretty soon after that, we
 14 started to tell her what was happening.
 15 Q. Once you had completed that handover, did you regard
 16 yourself as from then on acting under her direction?
 17 A. Yes.
 18 Q. At 23.40, there was a call between you and Lancashire;
 19 do you recall that call?
 20 A. I do.
 21 Q. We'll just bring up a summary of it from the NWFC
 22 document, {INQ041473/54}.
 23 This is a call that you participated in with the
 24 assistant chief fire officer, Dave Russell, of
 25 Lancashire Fire and Rescue Service; is that right?

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1 A. That's right.
 2 Q. We can see it up on screen. You give him the
 3 information that North West Fire Control had at that
 4 stage.
 5 A. Yes.
 6 Q. You don't mention to him the multi-agency information
 7 that is on the Ellis log; do you agree?
 8 A. I agree.
 9 Q. Would we be right to infer from that that by this stage,
 10 23.40, you still didn't know that information?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: So why are you telling him all this?
 13 A. I think phoned -- I think the start of the conversation
 14 was to see if Lancashire could offer any assistance, so
 15 Mr Russell had obviously heard what was happening and
 16 he's made contact and then offered the assistance of
 17 Lancashire if anything is needed, any extra NIOs, any
 18 resources.
 19 SIR JOHN SAUNDERS: By this time it's a decision for GMFRS
 20 whether they want to call in mutual assistance?
 21 A. Yes. Because Mr Russell possibly didn't have who the
 22 duty PO -- I don't think the Fire and Rescue Services
 23 share with each other who the duty principal officer is
 24 on each day, so --
 25 SIR JOHN SAUNDERS: If Lancashire are not going to be

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1 required, do they need to have that information or are
 2 you just -- he may be interested. I'm not suggesting it
 3 was wrong of him to call, but do you need to give him
 4 all that information at that time?
 5 A. Potentially not, but I also then went on to tell him
 6 that someone from the service had family involved.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR DE LA POER: The final call that I want to deal with,
 9 with you, and we'll see if you recollect it, I'm sure
 10 that you will. Did you receive a call, that is North
 11 West Fire Control, receive a call from NWS at 00.21,
 12 and it was taken by a colleague of yours, and you then
 13 spoke to Vicky Worrall?
 14 A. Yes.
 15 Q. And in the course of that conversation, was it
 16 communicated that NWS wanted 12 firefighters and one
 17 officer to go to the Victoria Railway Station?
 18 A. Yes, that's right.
 19 Q. The last question that I'll just ask you before I invite
 20 the chairman to take a break, and when we return we'll
 21 just have a short section in relation to your
 22 reflections and recommendations, is: we have seen across
 23 all of your participation that there doesn't seem to be
 24 any clear evidence that you were thinking about the
 25 other agencies, other than the police, and there you

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1 were leaving that to the FDO; do you agree?
 2 A. Yes, I agree.
 3 Q. What do you think the explanation for that is? As you
 4 take a step back now from the whole incident and
 5 you have candidly acknowledged that that doesn't seem to
 6 have entered your thinking, why do you think that was,
 7 bearing in mind that you clearly immediately thought
 8 about JESIP, you clearly told everybody else to remember
 9 JESIP, and coordination, co-location, communication is
 10 central to that?
 11 A. The only explanation that I can offer is just because of
 12 the nature of this incident. It was something that I'd
 13 never dealt with before.
 14 Q. Is the consequence of that that JESIP just can't work
 15 for an incident of this size or, in your view, can it
 16 work, and if so, what needs to be different to make it
 17 work?
 18 A. I've had so many conversations with myself about this
 19 and sometimes I err to the side that it can work and
 20 others I think it can't. I think if it can work at all,
 21 and I don't just talk for the Fire and Rescue Service,
 22 I talk for -- all the agencies need to train and they
 23 need to train together, including the control rooms,
 24 they need to be -- the control staff need -- in any
 25 training they need that knowledge and they need the

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1 experience, and how they get that experience if they are
 2 not long in service, the experience is through training,
 3 exercises.
 4 SIR JOHN SAUNDERS: Can we just think about the
 5 practicalities of what is really required? We're
 6 talking basically about NWS. If you're saying the FDO
 7 is dealing with Mr Berry, so we think that's dealt with,
 8 what is needed, isn't it, is for you to tell NWS what
 9 you're doing and NWS to tell you what they're doing?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: And the police?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Is there any way in which incident logs
 14 can be actually connected up?
 15 A. I believe that -- and this hasn't been implemented at my
 16 point of me leaving.
 17 SIR JOHN SAUNDERS: But it may be happening?
 18 A. I believe there's something that can be happening.
 19 SIR JOHN SAUNDERS: Right. Otherwise, it's a matter of
 20 a phone call from someone at your office, your control
 21 room, to NWS, saying, "This is what we're doing", and
 22 for them to say, "Well, this is what we're doing?"
 23 A. Yes.
 24 SIR JOHN SAUNDERS: And then you give the information from
 25 NWS to your NIO, or whoever is the incident commander,

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1 so they know what everybody else is doing?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: And maybe that includes giving an area
 4 for co-location or for a forward control point,
 5 information like that?
 6 A. Yes. I mean, I think that -- North West Fire Control
 7 have taken steps from the learning and again, please
 8 tell me if I'm jumping too far ahead, but North West
 9 Fire Control will push for that information a lot more
 10 now. So there's an acceptance that that has to happen:
 11 if we're not getting the information, why are we not
 12 getting it, let's go and find where we get that
 13 information from. We need to know that information is
 14 reliable.
 15 SIR JOHN SAUNDERS: In a way that's always been what JESIP
 16 has been about, so why wasn't it part of the system
 17 before?
 18 A. Whether they are not tried and tested enough, I don't
 19 know, but there was an assumption that that would just
 20 automatically happen, I believe.
 21 SIR JOHN SAUNDERS: Or is it something one recites, JESIP,
 22 but actually one never talks about what the
 23 practicalities mean?
 24 A. Quite possibly, sir.
 25 SIR JOHN SAUNDERS: Okay.

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1 MR DE LA POER: Would that be a convenient moment?
 2 SIR JOHN SAUNDERS: It would. A quarter of an hour,
 3 thank you.
 4 (11.05 am)
 5 (A short break)
 6 (11.31 am)
 7 MR DE LA POER: Ms Gregson, I would like to return to the
 8 questions that you were asked to reflect upon overnight
 9 by the chairman, by me and by Mr Cooper QC. We'll just
 10 start, please, with what your experience of the night
 11 has led you to conclude needs to change.
 12 A. We kind of touched on it just before the break, really,
 13 so I don't want to repeat myself too much. I appreciate
 14 there was a level of extra pressure and stress on the
 15 night, an unprecedented incident, as I've said. But the
 16 big part of my reflection is training, because clearly,
 17 as we have demonstrated now in several different
 18 examples, there was an absence of sharing critical
 19 information. Was that because the operators didn't know
 20 what information to share?
 21 There was almost a reliance on the team leaders,
 22 which obviously we were not free to help or provide the
 23 level of supervision that we would ordinarily provide on
 24 a day-to-day, business-as-usual situation. So it
 25 therefore relied on operators being well trained and

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1 I think it has to be demonstrated that they are trained
 2 all to the same level, be it the level of experience...
 3 That would be my...
 4 SIR JOHN SAUNDERS: Just talk about the practicalities just
 5 for a moment and see if you can help me with that.
 6 Suppose you do have a team leader who's freed up
 7 sufficiently to take an overall look at it and not be so
 8 busy as you were with dealing with things at the time.
 9 Would it work, for example, to have a team leader who
 10 can actually be watching the log and, if there is
 11 information which she or he thinks is important to pass
 12 on, in some ways highlighting it so that anyone who's
 13 then talking to people knows actually that's really
 14 important information which needs to be sent on? That's
 15 one thing. Could that work?
 16 A. Yes, that could definitely work. If you don't mind me
 17 providing maybe another example.
 18 SIR JOHN SAUNDERS: Carry on. You have the floor.
 19 A. Thank you. The way that I would run a large incident,
 20 like a fire, a building fire, which we get a lot of, so
 21 if for example you have a 15-pump fire, the way that
 22 I -- my way of working to manage that situation is that
 23 if it's an incident, for example, in Lancashire then
 24 I will, either myself, probably myself because you tend
 25 to go to the person who's more confident in the Fire and

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1 Rescue Service they came from, so I would go and sit
 2 with the operators and I would -- the old-fashioned way,
 3 piece of paper, pen, count up my appliances, make sure
 4 I've got 15 appliances, make sure the information they
 5 are taking is all going on to the log, making sure that
 6 the officers that are ringing in are getting the
 7 information.
 8 So almost applying that to the incident that we are
 9 obviously here to discuss, which again was so different,
 10 but almost the same principle.
 11 SIR JOHN SAUNDERS: So unhappily, big house fires, you
 12 probably have quite a lot of experience of?
 13 A. And a lot of confidence.
 14 SIR JOHN SAUNDERS: Equally, hopefully, you'll never have
 15 the degree of experience of this sort of incident, so
 16 you can't get it like that. The other thing that
 17 concerns me -- it has been pointed out that certain
 18 information wasn't passed on by NWFC, which would have
 19 been important, and they've said they need to know it,
 20 to the NILOs and the other people, GMFRS. And they are
 21 things like they have a -- the ambulance service have
 22 a Bronze on scene, police are going to the scene, things
 23 like that. That was relevant because the NILOs were
 24 making up their minds as to what they should be doing.
 25 Would you necessarily know while an incident is

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1 going on that that is likely to be information that they
 2 need to know?
 3 A. No.
 4 SIR JOHN SAUNDERS: That worries me, your identification of
 5 it. In a way, it can only work, can't it, if the NILO
 6 or somebody running the event and knows what's going on
 7 on the ground is actually looking at the log?
 8 A. Yes, and I don't know if this is maybe where something
 9 like a command support function is — you've got that —
 10 SIR JOHN SAUNDERS: You've got that, but the trouble is it
 11 may be too late by then, by the time you've set up
 12 a command support room or something like that?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: I interrupted you. Do you have other
 15 things to say on your list?
 16 A. Well, that was the main point about the — because I'd
 17 raised about the inadequate time spent on the training.
 18 Then further on from that, you asked me what difference
 19 it would have made on the night in my view.
 20 SIR JOHN SAUNDERS: Yes.
 21 A. Having had chance to look at all the information that
 22 I know now, then yes, if we'd shared that information
 23 I know that — North West Fire Control could have been
 24 instructed at any point to mobilise appliances. But
 25 if we had shared the information that I now know had

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1 been given to us —
 2 SIR JOHN SAUNDERS: Which is the sort of information I have
 3 been talking about.
 4 A. Yes, then it may have been that, yes, different
 5 decisions would have been made by officers regarding the
 6 deployment.
 7 SIR JOHN SAUNDERS: It just does concern me how you would
 8 realise on the night that that particular information
 9 was important, particularly when you have a NILO running
 10 the incident, who's at least trying to contact the FDO,
 11 and although he says after a certain amount of time to
 12 you, I haven't contacted them, you weren't actually to
 13 know how long it would take or whether he would succeed
 14 in the future.
 15 A. I'm unsure how we can really immerse ourselves in that
 16 incident. There will always be a certain element of
 17 being removed because we are not there, we can't see,
 18 and operators and team leaders alike are trained to try
 19 to gather as much information because we have to build
 20 a picture where we can, but obviously the one thing we
 21 can't do is see what is happening.
 22 SIR JOHN SAUNDERS: Right. Okay. That's all very helpful.
 23 Thank you very much.
 24 MR DE LA POER: Two matters that I just want to ask you
 25 about. The first is about the way the system is set up

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1 and what the operators see. One thing that appears to
 2 be apparent is that a person wanting to find out
 3 information needs to go through the log. What doesn't
 4 seem to be in place is that relevant information about
 5 partner agencies is extracted from that so that you can
 6 see in one place what are the police doing, what are the
 7 Ambulance Service — effectively JESIP information
 8 where, if you wanted to find that out, you could very
 9 quickly do so. Do you think introducing something like
 10 that, where relevant JESIP information is extracted,
 11 whether manually or automatically, to a single place so
 12 that it can be seen quickly and easily would be
 13 something that would be an improvement or would it just
 14 overcomplicate things?
 15 A. No, I think it would definitely be an improvement.
 16 Q. Just explain to us why you think in practice that would
 17 be so.
 18 A. Because then you've got the relevant information without
 19 having to go to search for anything. If there's
 20 something that can be done where you can look and it
 21 takes you straight to that information, it's very clear
 22 what needs to be — what we know and perhaps what we
 23 don't know.
 24 Q. Do you think if that information was being extracted,
 25 that would act in and of itself as a reminder to call

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1 operators that they need to find that out?
 2 A. Yes.
 3 Q. That's the first question. The second question is about
 4 the concept of North West Fire Control as a whole and as
 5 part of that, the pod system. I know that you told us
 6 yesterday that the pod system was something you took
 7 a leading role in. So can you speak to that as an
 8 introduction to this and we'll come to the bigger
 9 question once you've explained that?
 10 A. Yes. When we first went live at North West Fire
 11 Control, there was no specific ways of working in place.
 12 We were practically starting from scratch, this had
 13 never been done before, where four Fire and Rescue
 14 Services ultimately became into one room. As a manager,
 15 I quickly came to the realisation that there was just
 16 no... There was no order to the way things were
 17 happening and everything was so new to us. I'd listened
 18 to staff sort of saying, you know, comments, feedback,
 19 that you just couldn't tell — there was incidents,
 20 people were not familiar, it's a new system they were
 21 using, everything was new.
 22 I went to a team leader meeting and discussed with
 23 my peers that we needed to do something about that
 24 because the information coming — it was basically for
 25 want of a better word, it was just like a free-for-all.

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1 So I said my proposal for how we overcome that, and we
2 need to overcome it quickly, because operators are
3 feeling the pressure of how that room is running,
4 I split the room into pods, basically, and again it was
5 a work in progress for me because I sort of had all the
6 ideas in my head but I needed to work out how I was
7 going to apply that.

8 So as you saw on the picture that you showed,
9 I think in Mr Ellis' evidence, of the control room,
10 I made the far pod the Lancashire pod, the middle pod in
11 the room Manchester, and the pod on the bottom of the
12 picture that you could see, the Cheshire and Cumbria
13 pod, into one.

14 Then the way that it ended up working, I won't go
15 through all the ways I got there, but it took me
16 a while. But I then wrote a document, which I believe
17 is still used in the training now of the recruits that
18 come to the company.

19 The calls can come in, the emergency calls come in,
20 and anybody can answer those, they are not — we can't
21 split them into pods. But what happens from there you
22 would take the call and do the mobilisation and you
23 would do any of the sends on the action plan, so
24 anything that says send SM, send station manager, send
25 group manager, any sends, the person that's taken the

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1 call and completed the mobilisation carries out the
2 sends.

3 Then, if for example it's a building fire, they will
4 shout over to the relevant pod and say, "Manchester,
5 you've got a building fire". When — subsequently then
6 from there, any requests to speak that are coming in
7 from radio Talk Groups, from the incident grounds, they
8 should be answered by the respective pod, and the stop
9 message is put on, the closure of the incident should
10 all be done — it's more of an admin function to keep
11 the room tidy, so that everybody knew what was expected
12 of them.

13 SIR JOHN SAUNDERS: So just in practice, to see how this
14 works, anyone answers a call, then they set the first
15 thing in progress, then you tell Manchester that they've
16 got it, and they would then presumably put up the log,
17 would they?

18 A. Yes, they will then click on the log and they'll go into
19 the action plan and then they'll do any informs, so
20 inform environment agency, inform police.

21 SIR JOHN SAUNDERS: The sends, the immediate things, are
22 done by the person who answers. Informs are done by the
23 relevant pod. And if anyone's ringing in on a radio, as
24 opposed to on a telephone, then those calls would be
25 answered by the relevant pod?

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1 A. Yes. Because the idea behind it is that then, if the
2 house fire is in Manchester, you're taking the radio
3 message, any then subsequent requests that may come from
4 the incident ground, the pod would maintain and they
5 kind of know what's happening, whereas before you were
6 dipping into a Lancashire, dipping into a Cheshire
7 incident, and it was just so disjointed.

8 SIR JOHN SAUNDERS: Would the people operating the
9 Manchester pod have knowledge of Manchester, the
10 geographical knowledge? Not necessarily?

11 A. No.

12 SIR JOHN SAUNDERS: Thank you.

13 MR DE LA POER: When you created that system, did you also
14 create a plan for how the pod system would work in the
15 event of a major incident?

16 A. We had a separate plan for what's termed spate
17 conditions. So spate conditions would be Bonfire Night,
18 any event that we are expecting to receive high
19 activity. So the plan was there for if there was
20 a notice, notice of a significant event. If it was an
21 incident, for example 22 May, no, there was no such
22 plan, but because the staffing is reduced after 10 pm at
23 night, and we have seven on duty, that's two team
24 leaders and five operators, everybody kind of just used
25 to — it was more relaxed, shall we say, the pod way of

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1 working, when we were down to minimum staffing.

2 Q. So no preconceived, documented plan as to how the pod
3 system would work in the event of a no-notice major
4 incident?

5 A. No.

6 Q. Have you had a chance to consider the evidence of
7 Dean Casey?

8 A. I have, yes.

9 Q. You have heard what he had to say?

10 A. It wasn't available on YouTube but I have looked at the
11 full transcript, including Mr Cooper's questioning.

12 Q. Did he describe the pod system and his thoughts about it
13 and its relevance on the night correctly to your mind or
14 were you not expecting call handlers to approach it
15 in that way?

16 A. Yes, so I made some notes on this from the reading that
17 I did last night, and he was slightly incorrect, and
18 I don't mean that in any negative way towards Mr Casey,
19 I realise he's not worked there for a long time, so it
20 may have — he may have forgotten. But what he said
21 yesterday about taking the request and then giving it to
22 the Manchester pod, that's not what you would do.

23 If you take a request and you're on another pod, you
24 would action that, you wouldn't just leave it or hand it
25 over to the Manchester pod, because you've ultimately

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1 taken that request.
 2 Q. Taking a step back and just looking at North West Fire
 3 Control overall, a number of witnesses have talked about
 4 the fact that it brings advantages and disadvantages.
 5 To your mind, having worked there for the time that you
 6 did -- we'll first ask the question generally: do you
 7 think the advantages outweigh the disadvantages?
 8 A. No.
 9 Q. Why not?
 10 A. I think one of the big advantages that North West Fire
 11 Control has is the technology. The systems that have
 12 been developed to make it work are better than any
 13 system I've kind of worked with before in my mobilising
 14 experience. However, you've basically got four separate
 15 control rooms in one, because the idea of North West
 16 Fire Control was to converge on ways of working to make
 17 it easy for staff. That hasn't happened. The four Fire
 18 and Rescue Services are probably more further apart now
 19 than or up to the point of me leaving than you've ever
 20 known.
 21 Even small examples like SRT in Manchester stands
 22 for something completely different in Lancashire,
 23 there's a different acronym. It's too big and --
 24 SIR JOHN SAUNDERS: They ought to get a common way of
 25 working, if at all possible?

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1 A. Absolutely. And that is exactly what was meant to
 2 happen.
 3 MR DE LA POER: That's generally. Let's be specific to the
 4 events of the night. Did the advantages of North West
 5 Fire Control outweigh or not outweigh the disadvantages
 6 on the night in your view in terms of what was expected?
 7 A. Did the advantages --
 8 SIR JOHN SAUNDERS: Can I phrase it differently? You have
 9 identified some disadvantages in your mind of NWFC as
 10 opposed to the old system of individual control rooms.
 11 Did that, or any of those disadvantages, affect the
 12 response on that night? I suppose one thing would be
 13 everyone would be working -- it would be Manchester, so
 14 you'd have one big pod for Manchester.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: But other things, any other things that
 17 actually affected things on the night?
 18 A. One of the things that I've really personally struggled
 19 with is that I don't have any local knowledge of
 20 Manchester, so when -- and I've had this conversation --
 21 I have a lot of conversations in my head --
 22 SIR JOHN SAUNDERS: You should have them with other people!
 23 A. I really should!
 24 One of the things that when Mr Berry said to me
 25 about Philips Park, and I've heard so many times, why

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1 did appliances drive away from an incident, they drove
 2 further away. I didn't know they were going further
 3 away because I don't know where Philips Park is.
 4 SIR JOHN SAUNDERS: Okay. But would you actually, if a NILO
 5 said that to you, would you actually challenge him on
 6 it?
 7 A. If I can take it back to my own Fire and Rescue Service
 8 and, for example, the incident was -- am I okay to name
 9 places?
 10 MR DE LA POER: Are you going to name a town or?
 11 A. A landmark in a town, like a tourist --
 12 Q. I'm sure you can.
 13 A. If for example there's an incident at Blackpool Winter
 14 Gardens, and I tell a NILO and he says -- and I know
 15 that's Blackpool's area, and he said, "Send Blackpool to
 16 South Shore", I would say, "Really?", because I know
 17 that they are going to have to drive down Blackpool
 18 Promenade, past the incident, and they're going to go
 19 further away from the incident.
 20 So it's not so much -- I would never not carry out
 21 an instruction --
 22 SIR JOHN SAUNDERS: No, but you might give them information
 23 they might not possibly have?
 24 A. I might say, "So we are absolutely certain?" I would
 25 probably word it respectfully, "We're absolutely certain

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1 what we're going to send appliances past and further
 2 away, is that right?"
 3 SIR JOHN SAUNDERS: So local knowledge helps from that point
 4 of view?
 5 A. It does, yes.
 6 SIR JOHN SAUNDERS: You might have said, "You're going past
 7 Central Station, which is closer, is that what you
 8 really want to do?" Which actually was what he really
 9 wanted to do so he would have said yes as it happens.
 10 Okay.
 11 A. For me personally that's one -- I could have done
 12 a couple of things differently but that has always
 13 played quite a key part that I didn't ask Mr Berry,
 14 and... And I think that as -- the point that you just
 15 made before, had it been Manchester, we would have had
 16 dedicated Manchester staff, I think they had the command
 17 support room there. We had the same in Lancashire, we
 18 had a command support room upstairs, we used to send
 19 somebody to run between the two.
 20 SIR JOHN SAUNDERS: You could just go next door? Right,
 21 thank you.
 22 MR DE LA POER: Finally from me, if North West Fire Control
 23 is to remain and continues to be the operating centre,
 24 is a solution to a number of the problems that were
 25 encountered to have a representative of all Fire and

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1 Rescue Services, so a firefighter of rank, possibly
 2 a NILO, actually on site so that they could be spoken
 3 to, so that they can look at the log, so that they can
 4 speak for the Fire and Rescue Service when it comes to
 5 making a decision?
 6 A. Yes, absolutely, and in certain scenarios they do that
 7 now.
 8 SIR JOHN SAUNDERS: So for Bonfire Night, you'd have one
 9 there, would you?
 10 A. On Bonfire Night we have an officer from each of the
 11 Fire and Rescue Services there, we get the whiteboards
 12 out, we plan -- when we do fallback exercises, the
 13 officers are all there. When we had the protracted
 14 moorland fires of 2019, they went on for 3 weeks, we had
 15 officers there to assist. They're valuable. They are
 16 immersed in their Fire and Rescue Service world and they
 17 can bring that to North West Fire Control, where they
 18 can be somewhat detached.
 19 MR DE LA POER: Bearing in mind the disparate ways of
 20 working between them though, is it practical that one
 21 firefighter officer could be there to represent all Fire
 22 and Rescue Services or would, in fact, in practice, you
 23 need four?
 24 A. I think you'd just end up with the same problem having
 25 one there, because that officer wouldn't be familiar,

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1 just as we're not, with the four different ways of
 2 working. So it would have to be --
 3 SIR JOHN SAUNDERS: So we need more unity of working in the
 4 first place and then one officer might be sufficient?
 5 A. Yes.
 6 MR DE LA POER: Those are all the questions that I wish to
 7 ask you at this stage.
 8 Sir, unless you have any more --
 9 SIR JOHN SAUNDERS: No, thank you.
 10 MR DE LA POER: -- can I turn to Mr Warnock QC on behalf of
 11 GMCA?
 12 Questions from MR WARNOCK
 13 MR WARNOCK: Ms Gregson, I just have three, hopefully brief,
 14 areas on which I seek your help, if you're able to give
 15 it.
 16 The first is you've told the inquiry that it was
 17 obvious to both you and Ms Owen that you shouldn't
 18 mobilise but speak to the NILO first. You're nodding.
 19 There were two potential options for mobilising
 20 before you called the duty NILO. One was to mobilise
 21 appliances to the scene, the second was to mobilise
 22 appliances to the RVP, which the police had provided.
 23 Could you assist with this, your reasoning as to why you
 24 thought it was obvious you shouldn't respond to the RVP
 25 the police had given?

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1 A. Because of the nature of the information that we were
 2 receiving, I didn't deem it appropriate without speaking
 3 to the NILO in the first instance.
 4 Q. What in particular about the nature of the information
 5 that the police had given you?
 6 A. The fact that there was a bomb, the fact that they'd
 7 mentioned a secondary device on the call transcript.
 8 Q. And did that cause you, I think you're saying that it
 9 did, to decide not to mobilise or not to accept the RVP
 10 the police had given?
 11 A. Sorry, could you just repeat?
 12 Q. Did that cause you to decide not to mobilise to the RVP
 13 which the police had given before you spoke to Mr Berry?
 14 A. I thought that the NILO may go to the RVP.
 15 Q. But you had already decided before you called the NILO
 16 not to go to the RVP without speaking to the NILO;
 17 is that right?
 18 A. Yes.
 19 Q. Why had you decided not to go to the RVP?
 20 A. Because I wanted to get that authorisation from the
 21 NILO.
 22 Q. Was there anything in the information the police gave
 23 you which caused you to doubt the appropriateness of
 24 that RVP?
 25 A. No.

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1 Q. The second matter I would just like to clarify with you
 2 is the chairman asked if you were waiting for advice as
 3 to which action card to follow, and you agreed. In
 4 fact, you didn't ask Mr Berry for advice as to which
 5 action card to follow, did you?
 6 A. No.
 7 Q. So is it really correct to say that you were waiting for
 8 advice as to which action plan or action card to follow?
 9 A. It may be that the information that he'd given me then
 10 made that fit into an action plan.
 11 Q. Were you following any particular action plan on the
 12 night?
 13 A. No.
 14 Q. The third matter I want to ask you about relates to
 15 this, and I wonder if Mr Lopez could be so good as to
 16 put up {INQ040391/1}. It's the incident logs.
 17 If we could go, please, to {INQ040391/7}.
 18 If I could just ask you about this, Ms Gregson.
 19 At the bottom of page 7 you will see at 23.02.42,
 20 reference to a resource, which is operationally
 21 sensitive, being mobilised to G18.
 22 There's another entry, 23.02.43, just beneath it,
 23 towards the bottom of the page:
 24 "Resource. Comment... mobilised for requirement
 25 SRV."

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1 SRV, is that the special response vehicle?
 2 A. Um...
 3 Q. It's about four lines up from the bottom of the entry.
 4 A. Yes.
 5 Q. Is that the special response vehicle?
 6 A. I believe so.
 7 Q. Underneath it, again at 23.02.49, another resource is to
 8 be mobilised. It's really this: you've been asked about
 9 the fact that in his call with Ms Ennis, Mr Berry had
 10 asked for three NILOs to be mobilised and in that call
 11 he had also asked for two of the MTF capability to be
 12 mobilised. You may recall that call was at 22.52.
 13 A. Yes.
 14 Q. But it looks like they are not being mobilised until
 15 23.02.43. Are you able to cast any light or help with
 16 why that delay occurred or is it, do you think, similar
 17 to the situation which occurred with the mobilisation of
 18 the NILOs?
 19 A. Yes, that would be my comment, that it's the same as
 20 what I discussed earlier this morning with the NILOs.
 21 MR WARNOCK: Thank you very much, Ms Gregson. Those are the
 22 only issues I had for you.
 23 SIR JOHN SAUNDERS: Thank you, Mr Warnock.
 24 MR DE LA POER: Mr Horwell QC on behalf of Greater
 25 Manchester Police, please.

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1 Questions from MR HORWELL
 2 MR HORWELL: First of all, command. You were the lead staff
 3 member in the North West Fire Control room until
 4 Janine Carden arrived; is that correct?
 5 A. That's correct.
 6 Q. Who did you regard as being in command for GMFRS?
 7 A. At that time I would have said Mr Berry.
 8 Q. Because he was the duty NILO?
 9 A. Yes.
 10 Q. And he was making command decisions, how many pumps to
 11 deploy and where to deploy them?
 12 A. Yes.
 13 Q. Situational awareness. Your training and experience
 14 taught you that situational awareness is always
 15 critical?
 16 A. Yes, that's right.
 17 Q. Would you agree that it is especially important when you
 18 do not deploy to the scene?
 19 A. Yes.
 20 Q. Because you are, I'm stating the obvious, but you are
 21 wholly reliant on the reports of the other services?
 22 A. Yes.
 23 Q. The duty NILO is driving to Philips Park. Did you know
 24 how long that was going to take him?
 25 A. No, I had no idea.

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1 Q. And how did you believe that he was going to obtain
 2 situational awareness when driving to Philips Park in
 3 his car?
 4 A. I'm unsure. However, they would normally gain
 5 situational awareness while proceeding to an incident.
 6 When we mobilise officers to incidents, because they're
 7 on a flexi duty system, they would always drive in their
 8 own cars to the incident.
 9 Q. Just so that we follow the point, the importance of that
 10 being?
 11 A. Sorry, I don't follow.
 12 SIR JOHN SAUNDERS: What's the importance in terms of the
 13 question of the fact that he was going in his own car to
 14 the point of him getting situational awareness?
 15 A. You just talked about how he would gain situational
 16 awareness while he was driving. I don't know. However,
 17 they would normally gain — I don't know what they do as
 18 they're en route to an incident.
 19 MR HORWELL: Did you consider, whilst the duty NILO was
 20 driving to Philips Park, and indeed when he was at
 21 Philips Park, obtaining as much situational awareness as
 22 you could from other agencies, BTP, NWS and indeed GMP?
 23 A. No.
 24 Q. You have told the chairman that you did not know that
 25 Mr Berry could not contact the FDO. The question I ask

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1 is: what would you have done if you had known that he
 2 could not contact the FDO?
 3 A. Phoned the police control room and asked for the FDO.
 4 Q. That's what I wanted to ask you about. When you say the
 5 police control room, do you mean the 999 call centre?
 6 A. Well, if that's where — yes, I believe... We have
 7 short dials, we don't need to dial 999 when we're in the
 8 control room. We have numbers that directly go through
 9 to the control room, so we've —
 10 Q. I'm sorry, I didn't mean to interrupt you. The reason
 11 I ask you these questions is that GMP had three control
 12 rooms, and you have told the chairman that you did not
 13 have the number for the FDO.
 14 A. Yes, I didn't have the direct number for the FDO.
 15 Q. So that wasn't on your short dial system?
 16 A. Not that I know of.
 17 Q. Does it also follow that you did not have the number for
 18 the FDS? That was not on your short dial system?
 19 A. I must apologise, I saw the term FDS —
 20 SIR JOHN SAUNDERS: You're not aware of what that is?
 21 A. I don't know what that is, I'm sorry.
 22 SIR JOHN SAUNDERS: She has no knowledge of an FDS.
 23 MR HORWELL: Ms Gregson, I'm not criticising you in any way
 24 for not having that knowledge, but plainly, you had
 25 received no training as to who the FDS was, the

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1 importance of his position, and why you might want his
2 telephone number?
3 A. No.
4 Q. So when you say that either you or somebody from your
5 control room would have spoken to somebody at a GMP
6 control room, you don't at the moment know which control
7 room that would have been?
8 A. I didn't know there was more than one.
9 Q. All right.
10 A. Sorry, I don't know. I'm not aware. You've just taught
11 me something.
12 Q. All right, all right. The multi-agency Hailing Talk
13 Group. I'm sure you have seen references or read of
14 references to this. This is the Airwave channel that
15 enables the other emergency services to contact the GMP
16 control room, which monitors the channel 24 hours a day.
17 Did you know the existence of that channel and its
18 obvious usefulness on the night of this attack?
19 A. I know we can't discuss Talk Groups. If it is the Talk
20 Group that I think you're referring to, then yes I was
21 aware of its existence.
22 SIR JOHN SAUNDERS: I think what we're not allowed to talk
23 about is the channels on which those Talk Groups
24 operate.
25 MR DE LA POER: I think we're describing it as the tactical

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1 multi-agency Talk Group. Does that title give you
2 a degree of certainty? Alternatively, I can write down
3 the channel number for you.
4 A. Yes, please. I just want to be sure that I'm talking
5 about the same thing.
6 SIR JOHN SAUNDERS: And you would know it by the channel
7 number, would you?
8 A. Yes.
9 MR HORWELL: I'm going to send Mr de la Poer what I hope he
10 has written down, but I'm going to send him a message
11 now.
12 SIR JOHN SAUNDERS: Do you want to activate a Talk Group so
13 you can talk to each other about it?
14 MR HORWELL: If only we could, sir. I've sent it through to
15 his phone.
16 MR DE LA POER: I think I mistook you -- I'm going to
17 provide -- it's just as well you did that, Mr Horwell.
18 Let me provide the correct ...
19 (Handed)
20 SIR JOHN SAUNDERS: Would you read that and then give both
21 back?
22 MR DE LA POER: It may be that Mr Horwell will also have
23 a question about that, but we will see.
24 MR HORWELL: The Airwave channel that you have just
25 received, were you aware of the existence and the

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1 usefulness of that channel on the night of this attack?
2 A. I was aware of the channel, but I wasn't necessarily
3 fully aware of its use.
4 Q. Is that because you were not trained sufficiently?
5 A. Yes. I think that either I can't ... I can't recall the
6 training. I've tried to look in my training records.
7 I don't know, somebody may be able to correct me on it,
8 but it's not something that I was sure of.
9 Q. All right. I'm not going to press the point any
10 further.
11 SIR JOHN SAUNDERS: The use of the Talk Group for you would
12 be if you had difficulty getting through to the police
13 control room?
14 A. At that time, I believe so, yes.
15 MR HORWELL: Trying to cut across a number of different
16 issues, the problem seems to have been that you had
17 received no training that met these admittedly unusual
18 circumstances; is that right?
19 A. Yes, obviously you will have seen the evidence that
20 I gave, I've had MTF A training, I've had JESIP training,
21 but yes, I suppose specific to this situation ...
22 SIR JOHN SAUNDERS: You wanted practical, live experience
23 practice? That's what you said, I think.
24 A. Yes.
25 MR HORWELL: The point being, fire appliances are normally

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1 mobilised, either to the scene or to an RVP. Here, as
2 we know, they were deployed away from the scene.
3 A. Yes.
4 Q. Is that a situation in which you believe you had
5 received no training?
6 A. Yes, I would agree with that, sir.
7 Q. You have been asked a number of questions, some by me,
8 about the importance of situational awareness in such
9 circumstances, and it seems that that is not a thought
10 or a consideration that you had on the night, obtaining
11 information from other services.
12 A. Yes, I would agree with that. It's really hard to place
13 myself back on the night.
14 SIR JOHN SAUNDERS: I understand that.
15 A. And I don't want to talk hindsight because...
16 MR HORWELL: No.
17 A. You can only achieve certain things through talking
18 about hindsight. It's really hard to place myself back
19 there. I don't know if I'm doing myself a slight
20 disservice, because one of the things that -- I pride
21 myself on how I did my job and my confidence in my role,
22 obviously and -- at an incident of this nature, no,
23 I don't know how confident I could have felt, but
24 I think I was expecting that situational awareness to
25 come from -- at any point from the NILO.

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1 Q. Can I just --
 2 SIR JOHN SAUNDERS: If you thought the NILO needed you to
 3 obtain situational awareness for him, if he'd asked for
 4 it, you'd have got it?
 5 A. Absolutely I would have done, yes.
 6 SIR JOHN SAUNDERS: As far as you could?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: Thank you.
 9 MR HORWELL: And just perhaps one of the inadequacies of
 10 JESIP training that you had received. You wrote a short
 11 report or a statement on 28 June 2017. I want to refer
 12 to it, only one sentence. Would you prefer to have the
 13 document in front of you?
 14 A. Yes, please.
 15 Q. Then of course you must. It's {INQ019406/3}.
 16 SIR JOHN SAUNDERS: Have you had an opportunity to look at
 17 this beforehand?
 18 A. If it's the one I think, it's just a short statement.
 19 MR HORWELL: It's in the evidence proposal, sir.
 20 SIR JOHN SAUNDERS: Thank you very much.
 21 MR HORWELL: If we could look at the centre of that
 22 document. There is a sentence that begins:
 23 "I then announced to the whole room..."
 24 Do you have that?
 25 A. Yes.

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1 Q. "I then announced to the whole room, 'Can I have
 2 everyone's attention for a minute, please. Be aware
 3 that, with a view to the reports that we are receiving,
 4 our JESIP principles are vital at this moment'."
 5 And then this sentence:
 6 "'Any information you receive, no matter how small
 7 you may think this is, please share it with the relevant
 8 parties. If you are unsure who that is, please ask
 9 a team leader and we will advise you accordingly.'"
 10 And we can put that document down. Thank you.
 11 Were you there emphasising to controllers to pass on
 12 information to the other agencies, no matter how small
 13 it might appear?
 14 A. Yes.
 15 Q. What is lacking in that no doubt well meant statement is
 16 also, "Pass on to members of the Fire Service any
 17 information, no matter how small, that may appear
 18 important"?
 19 A. Yes.
 20 Q. Do you agree?
 21 A. Yes, I wholly agree. I think that there may have been
 22 an automatic expectation that we would share internally.
 23 Q. Two or three further issues and then I've finished.
 24 The importance or the relevance of the fact that
 25 this was not a fire. One of the questions one of your

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1 controllers asked GMP was whether or not there was
 2 a fire. The fact that there was not a fire reported,
 3 and therefore you were not going to be the lead agency,
 4 did that have an impact on the importance of your being
 5 at the scene that night?
 6 A. No, I don't think so, because we have a rescue element
 7 as well. It's a Fire and Rescue Service.
 8 Q. Exactly, that's the point. There was much that the Fire
 9 Service could have done at the scene if it had arrived
 10 at an early stage?
 11 A. I agree.
 12 Q. And you knew, obviously, the importance of time?
 13 A. I did.
 14 Q. One of your controllers was a trainee, Vanessa Ennis,
 15 and it was your understanding that she would not be
 16 taking an active role that night once the reports of an
 17 explosion had come through?
 18 A. Yes, it was my understanding.
 19 Q. We know that she did continue to take an active role
 20 that night. And just examining the role that she might
 21 have played, at 23.17 GMP asked her if there was
 22 anything being required or being asked of ourselves at
 23 this point. She replied:
 24 "Just for information, yes."
 25 And didn't follow it up, didn't say to GMP what it

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1 was that she wanted from them, for example situational
 2 awareness. That is not a position Vanessa Ennis should
 3 have been in that night, is it?
 4 A. No, it's not.
 5 Q. One final matter, and if we've heard evidence about this
 6 already, I apologise, but Mr de la Poer asked you if
 7 there was any system of emphasising the importance or
 8 relevance of entries in the incident log, and especially
 9 as to whether or not there should be in the future.
 10 By looking at the log, it is obvious that there are
 11 a number of asterisks, and on occasions there are
 12 sometimes two, sometimes five and sometimes four
 13 asterisks. They can be seen to accompany relevant
 14 information such as "Paramedic Bronze commander is at
 15 scene", "Police have confirmed a gunshot to leg", and
 16 then, "Not gunshot wounds". They appear with more
 17 asterisks than normal and some entries have no asterisks
 18 at all. Are those asterisks there automatically or have
 19 they been entered manually on to the incident log? And
 20 if you want to see an example, I am happy to show you
 21 one.
 22 A. Yes, I would need to see that, please. I was just
 23 automatically say to you, are they not system generated,
 24 but I may be able to help with that.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR HORWELL: I'm going to be very selfish here and I am
 2 going to give you a reference to the log from the
 3 document that I have been working from that's exactly
 4 the same as the one that you have. It's {INQ004281/4}.
 5 If that can be put on the screen. It's the entry
 6 in the centre at 22.48.33. Do you see that entry, from
 7 police:
 8 "Not gunshot wounds. Looks like shrapnel wounds."
 9 And there are three asterisks at the beginning and
 10 four at the end.
 11 A. My initial thought on that is that that's been entered
 12 by the operator, but I can't say 100%. What makes me
 13 think it is is because there's three at the beginning
 14 and four at the end -- and looking at the time of it,
 15 that's potentially Mr Ellis, however --
 16 Q. It is Mr Ellis.
 17 A. Entering that -- sorry, yes. Position 5, yes. So, he's
 18 possibly putting it -- inputting it in like that.
 19 SIR JOHN SAUNDERS: I think we'd better check that that's
 20 right.
 21 MR HORWELL: I agree, sir.
 22 SIR JOHN SAUNDERS: We'll ask him. Thank you.
 23 MR HORWELL: Yes, I agree.
 24 SIR JOHN SAUNDERS: But thank you for raising it.
 25 MR HORWELL: But is there that facility within the system

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1 for an operator to indicate the importance of an entry
 2 through the use of asterisks? Is that something an
 3 operator can do?
 4 A. Yes, they could. I don't think there's a specific way
 5 of working or training. I think people have just
 6 followed and --
 7 SIR JOHN SAUNDERS: Is it part of the system? Because it's
 8 quite important that if you're going to put asterisks in
 9 order to mark how important they are that the people who
 10 are reading it realise what the asterisks are there for.
 11 A. Yes.
 12 SIR JOHN SAUNDERS: So was there any system like that?
 13 A. No.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR HORWELL: Those are my questions. Thank you.
 16 SIR JOHN SAUNDERS: Thank you, Mr Horwell.
 17 MR DE LA POER: Mr Cooper QC, please.
 18 Questions from MR COOPER
 19 MR COOPER: I want to ask you, if I may -- and as you
 20 probably realise, I represent the bereaved families for
 21 these lines of questioning.
 22 I want to just go back with you over your evidence
 23 about North West Fire Control generally and about how it
 24 was configured (sic) at the time, helped or hindered
 25 with your response. You gave that evidence a moment

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1 ago. I'm just looking back at -- I will take you to it
 2 in a moment, some previous evidence we've had and I'm
 3 going to ask you the same question I asked another
 4 witness on this point.
 5 Had the regional version, that is before North West
 6 Fire Control, been in existence on 22 May, would you
 7 agree that there would have been a good chance that
 8 Fire Control would have had far more direct information
 9 and accurate information as to what was going on at
 10 ground level?
 11 A. I think there's a possibility of that because you would
 12 have been -- you're looking after a smaller area.
 13 Q. I ask you that question. It's simply for the reference
 14 for the inquiry, it's an identical question that I asked
 15 Mr Dark on Day 72 at page 198 {Day72/198:1}.
 16 SIR JOHN SAUNDERS: That's helpful, thank you.
 17 MR COOPER: Mr Dark said:
 18 "Given the binary choice of yes or no, I would say
 19 yes. But actually I couldn't evidence that."
 20 So he was giving what his feelings were and he
 21 agreed with you.
 22 So would it be your evidence that, had there been
 23 a regional structure on 22 May 2017, North West Fire
 24 Control in its regional manifestation would have enabled
 25 you to do your job far more effectively?

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1 A. Um...
 2 SIR JOHN SAUNDERS: Okay, let's go back a step. Mr Cooper
 3 is suggesting, and you've agreed, that you would have
 4 more situational awareness and I think we've all
 5 accepted that if everybody had more situational
 6 awareness, that would have enabled the Fire Service to
 7 do their job better.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: So in that way it would help the whole
 10 thing, if I can just explain that. Just tell me why you
 11 think -- what's the evidence or the reason for saying
 12 there was a possibility you'd have had more situational
 13 awareness? Where would you get that from that you
 14 didn't have on the night?
 15 A. I don't know if we'd have... I mean, maybe the thought
 16 processes still would have been the same. I don't have
 17 evidence as such.
 18 SIR JOHN SAUNDERS: In a way, it's the reasons rather than
 19 the evidence.
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Okay, so you'll be next door to people
 22 in the Fire Service?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Would that help to go next door? Would
 25 it have helped? Would you have done it?

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1 A. Absolutely, yes.
 2 SIR JOHN SAUNDERS: So rather than ringing the NILO, you
 3 might have initially gone next door to get more
 4 information?
 5 A. At the time of the incident occurring, there wouldn't
 6 have potentially been anybody, but the response time and
 7 the procedures for setting up, getting somebody to the
 8 control room, we were more familiar with -- we had
 9 a very strong working relationship with the Fire and
 10 Rescue Service. So even -- it makes a difference to me,
 11 it might not... You may not agree, but to me it made
 12 a difference that I knew the officers, I knew how they
 13 worked, you have the professional working relationship
 14 with them, and again I didn't know Mr Berry at all,
 15 which again is another reason why I would never
 16 challenge what a senior manager is asking of me.
 17 But I think if you know somebody and you're more
 18 familiar, you want to support them.
 19 SIR JOHN SAUNDERS: And maybe you have more understanding of
 20 their competencies as well?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: And how you rely on them?
 23 A. I think that's the thing I'm driving at. I don't have
 24 any concrete evidence. We would have still gone to the
 25 NILO, my decision still would have been the same,

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1 I wouldn't have wanted to deploy, but we didn't have
 2 action plans, we weren't so big, and looking after that
 3 one Fire and Rescue Service, you knew your way of
 4 working.
 5 SIR JOHN SAUNDERS: Okay.
 6 MR COOPER: One of the expressions Mr Dark used, and it was
 7 a very succinct expression he used, and I want to know
 8 whether you'd agree with this, was:
 9 "North West Fire Control has distanced itself from
 10 the FRS family."
 11 "North West Fire Control distanced itself from the
 12 Fire and Rescue Service family."
 13 That's what Mr Dark said. I wonder whether you
 14 would agree with that.
 15 A. I agree with Mr Dark.
 16 Q. Can I just go on to your training now, because a lot of
 17 your evidence has been about that and you've perfectly
 18 properly expressed your concern about that level of
 19 training. I want to just look at the training you'd had
 20 previous to this event taking place.
 21 So can I take you, please, to {INQ040642/1}, your
 22 training record.
 23 Again, as you'll anticipate, I have looked at this
 24 and looked for reference, for instance, to JESIP
 25 training and MTF training. Let's just put it into

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1 context.
 2 If you look at that first page, we see:
 3 "24 November 2014, ad hoc JESIP training."
 4 Can you recall what that was?
 5 A. Sorry, I'm just turning to my own records.
 6 Q. By all means, if it helps.
 7 A. I've made some notes that I thought may be helpful.
 8 I believe, first of all, that the JESIP training on
 9 24 November 2014 is incorrect because I was absent from
 10 work at that time, but I believe that that did take
 11 place.
 12 Q. But you didn't attend it?
 13 A. I didn't attend it but I believe that was actually
 14 attended in the February, I think, of 2015. So the date
 15 is actually incorrect. I'm struggling to find my...
 16 Q. Take your time.
 17 A. Here it is, I've got it.
 18 Q. These things can be missed by all of us, but I'm not
 19 aware of a February reference to JESIP training here.
 20 SIR JOHN SAUNDERS: You're saying the reference is wrong,
 21 but you think you did do it?
 22 A. Sorry, yes, January.
 23 SIR JOHN SAUNDERS: I wonder if it's possible, and I'm not
 24 going to stop you, as I understand the witness's
 25 evidence so far, she said: yes, I knew what JESIP meant,

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1 the actual difficulty was applying it in a live
 2 situation and that's not what I'd had the training for.
 3 Something like that. That may be inadequate and it may
 4 be more needs to be thought about it. But are there
 5 more things, did you think --
 6 MR COOPER: No, sir. The only matter that I was
 7 highlighting that may or may not assist you is the
 8 general consistency, if I may put it that way, of people
 9 having a lack of JESIP training. It wasn't simply
 10 a one-off. I can move on from the point.
 11 SIR JOHN SAUNDERS: Do you think you could have benefited if
 12 you'd have had more JESIP training as to the principles?
 13 A. Yes, I've not had, and I think I said it in my
 14 statement, I have not actually had external JESIP
 15 training, which -- I believe there is a course to attend
 16 for external.
 17 SIR JOHN SAUNDERS: So you agree, more would have helped?
 18 A. Yes.
 19 MR COOPER: The only point we are highlighting, perhaps
 20 unnecessarily, is that it's an across the board problem
 21 with everyone, they weren't getting enough. Thank you.
 22 I will move on.
 23 Let me take you then, if I can, please, to some
 24 other aspects of your evidence and your statements as
 25 well, please, and just clarify a few points that you

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1 mention there.
 2 If we can go to your statement, please, and you made
 3 two statements, let's go to the first one, which is
 4 {INQ023879/1}.
 5 I just want to ask you about a few matters. Can
 6 I take you, please, to paragraph 10 of your statement.
 7 {INQ023879/3}. Down to 11, please, Mr Lopez. I think
 8 that's just context. Paragraph 11. {INQ023879/4}.
 9 Thank you.
 10 Generally within those two paragraphs, the essence
 11 of it is that crews are not sent into volatile areas.
 12 That's the essence of it, isn't it, that's the principle
 13 you're working to?
 14 A. Yes.
 15 Q. Is that something that is handed down in training and
 16 guidance, that sort of not sending crews to volatile
 17 areas? How is that taught to you and your colleagues in
 18 the control centre?
 19 A. I think that comes from the zones, the hot zone.
 20 Q. I see. That's what you mean by the volatile areas?
 21 A. Yes.
 22 Q. In terms of an assessment of risk, that's not for you,
 23 I presume, you simply interpret the zoning areas, or is
 24 it? Do you have to yourself in some way consider the
 25 risk or assess risk?

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1 A. Not of the zones. That would be for the incident ground
 2 to determine.
 3 Q. Paragraph 13, please --
 4 SIR JOHN SAUNDERS: Before you do that, sorry, the first
 5 sentence of paragraph 11. Looking back now, is that
 6 actually correct? You speak to Mr Berry and then
 7 you have a discussion with Lisa Owen as to whether he's
 8 got it right or not? Do you remember that now anyway
 9 taking place?
 10 A. No.
 11 SIR JOHN SAUNDERS: Okay, thank you.
 12 MR COOPER: Paragraph 13, please:
 13 "At 22.44 Team Leader Lisa Owen contacts the duty
 14 [operator], Janine Carden, as per the... escalation
 15 document."
 16 I've looked at that document, it's a document which
 17 is within Ms Carden's statement. Can you just explain
 18 what an escalation document is?
 19 A. At North West Fire Control, there is a lot of documents
 20 that are called G&Is, guidance and information, and one
 21 of the guidance and information documents is escalation
 22 documents. So that tells you when you need to escalate
 23 an incident.
 24 So the first part of the document, I think you have
 25 the document here, I think it's got an INQ number, the

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1 first part of it is where CROs need to escalate to team
 2 leaders, and then team leaders need to escalate to ops
 3 managers. So we've looked -- well, I say we've looked
 4 at the document, we know that this would have been
 5 escalated to above.
 6 Q. When you say escalated to above, what do you mean?
 7 A. So we needed to escalate it to the on-duty operations
 8 manager, that we need to inform them.
 9 Q. One of the references, and we can look if needs be, in
 10 fact the INQ is a reference to Miss Carden's statement.
 11 The document appears after the statement, it's actually
 12 not a separate INQ. But within that document, there's
 13 references to excessive workloads. I just wanted you to
 14 explain, if you could, what that expression means.
 15 A. Is that -- did you say that's in Janine's statement?
 16 Q. Yes, it is -- no, in the escalation document. We can
 17 look at it if it helps you.
 18 A. As one of the criteria that we would inform?
 19 Q. Yes, excessive workloads. Would it help to look at it?
 20 A. Yes, it may do.
 21 Q. Let's do that then. INQ001234/63, please.
 22 In fact, I have given you the wrong reference,
 23 Mr Lopez. It's {INQ023877/63}.
 24 That's the statement of Sarah-Jane Wilson,
 25 escalation document. If we scroll down, please. This

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1 is just to allow you to familiarise yourself with the
 2 document.
 3 A. Yes.
 4 Q. Again, please, Mr Lopez.
 5 There's an example, for instance, {INQ023877/65}:
 6 "Excessive workloads (spate conditions)."
 7 What does that mean?
 8 A. Something I briefly touched on before, if we were
 9 getting flooding or -- yeah, basically if there's
 10 a period of high activity, so there is a spike of calls
 11 coming into the control room because there's bad
 12 weather, then we would report that we're in spate
 13 conditions, which is classed as excessive workload for
 14 the control room.
 15 Q. That's really what I was trying to get to. Was that
 16 a condition that existed on 22 May so far as the control
 17 room was concerned?
 18 A. No, we wouldn't have declared spate conditions.
 19 Q. Why not?
 20 A. Because I had another route to go down, which was recall
 21 to duty. I sent a text out to recall staff. But it
 22 wouldn't be -- the activity... Spate conditions is if
 23 we're getting a high number of emergency calls coming
 24 into the control room that obviously there's not -- they
 25 can't all be answered by the people you've got in the

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1 room at the time, but there wasn't an excessive amount
 2 of calls coming in.
 3 Q. But there were a lot of calls coming in, weren't there?
 4 One of the problems was, if I have understood it
 5 correctly, and in fact we are going to deal with it a
 6 little later, was that there was a high degree of
 7 pressure (sic) calls coming in, some of them calls which
 8 distracted people, for instance?
 9 A. Not emergency -- maybe I'm not making myself clear.
 10 Q. It's my fault for not understanding, it's helpful.
 11 A. It's the emergency call side of it.
 12 Q. Oh I see.
 13 A. Because the 999 calls have to be answered as quickly as
 14 they possibly can. So they are something that -- if you
 15 are doing something else that's not deemed critical, you
 16 would put that down and you would answer the 999 call,
 17 but we weren't busy as such with emergency calls being
 18 received.
 19 Q. I see. That's when the excessive workload criteria
 20 would kick in, as it were?
 21 A. Yes.
 22 Q. I see. So you took the other option, which did the same
 23 job as the excessive workload criteria, but it was
 24 a different process? Would that be it?
 25 A. Yes. I got to the same result but for a different

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1 reason.
 2 Q. I understand it now. Thank you. I'm sorry to have
 3 taken so much time to understand that. We can move on,
 4 thank you.
 5 I want to deal with the call that Dean Casey
 6 received and we've seen it on a number of occasions --
 7 we don't necessarily need to look at it again unless it
 8 helps you -- when he took a call from a member of the
 9 public, do you remember, in the very early stages of
 10 this event? That member of the public was clearly
 11 referring to a potentially catastrophic incident at the
 12 arena and indeed that member of the public was
 13 indicating, at the very least, that ambulances, fire
 14 services, and implicitly the police were urgently
 15 required. Do you remember?
 16 A. I agree.
 17 Q. We all remember that particular call. When that call
 18 came in and Mr Casey received it, what should he have
 19 done with it? Because there was, within minutes of the
 20 event happening, there was a member of the public,
 21 effectively saying what had happened, the severity of
 22 it, and what was needed, in other words the emergency
 23 services. What should Mr Casey have done with that
 24 call?
 25 A. I think what he did with the call was to duplicate it to

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1 incident 9074 because it was classed as a further call
 2 coming in for the same incident, which he knows we've
 3 already got some form of action in progress.
 4 Q. But there is a call which is, very early on, indicating
 5 that the emergency services should go right down to the
 6 scene, straightaway to the scene, no messing about. And
 7 that didn't happen, did it?
 8 A. No, it didn't.
 9 Q. Again, I don't want to go over all the evidence we have
 10 heard, but that didn't happen because of a series of
 11 procedures and protocols that kicked in, for want of
 12 a better expression. Is that a matter of concern for
 13 you as an experienced and clearly assiduous individual?
 14 Is that a matter of concern to you professionally that
 15 sometimes a call like that, which actually makes it
 16 clear what's going on and was right, was not taken more
 17 seriously?
 18 SIR JOHN SAUNDERS: Not fair, I think. It was taken
 19 seriously. I am sorry, I don't think the word is "not
 20 taken seriously".
 21 MR COOPER: Was not acted upon more promptly.
 22 A. I think that ... I know you're not asking me to speak on
 23 behalf of that individual because he's given his
 24 evidence, but I don't think he would have thought it
 25 wasn't being acted upon because in our eyes, in the

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1 control room, we were acting on it. We had gone to the
 2 route that we needed to go to, which was the NILO and so
 3 on and so forth, contact the FDO, et cetera.
 4 Q. I see. I want to ask you a little now, please, about
 5 the number of people who were working in the control
 6 centre at the time that the bomb was detonated. There's
 7 a sort of rota, isn't there, as to the number of
 8 people--hours and the number of people that work
 9 in the --
 10 A. Yes. It's referred to as a demand-led roster.
 11 Q. That's what I was going to ask you about, the demand
 12 level: is that how the rota is organised by reference to
 13 what's considered to be demand level?
 14 A. Yes, it is.
 15 Q. Therefore, the demand level was considered therefore to
 16 be at its lowest at night?
 17 A. That's correct.
 18 Q. Why was that? Do you know how that came about?
 19 A. For the most reliable evidence you'll have to ask the
 20 head of the organisation. But I believe that the
 21 statistics were based on activity from a few years
 22 before.
 23 SIR JOHN SAUNDERS: Did it accord with your experience that
 24 after 10 o'clock at night, demand was at its lowest?
 25 A. Yes. And it wasn't an area that I'd had particular

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1 concern over at night. I'd had concerns over other
 2 times of the day but not the middle of the night.
 3 SIR JOHN SAUNDERS: Do you mind, Mr Cooper, if I just ask
 4 this as well? When you're calling people in off rota as
 5 you did on this night, are you calling the people who
 6 live closest or you're calling them off a rota again?
 7 A. We have a text messaging system --
 8 SIR JOHN SAUNDERS: Okay. You just send it out to
 9 everybody?
 10 A. So you just send a blanket text out: recall to duty.
 11 People then know that means something's happening and
 12 anybody that is free to respond can respond.
 13 SIR JOHN SAUNDERS: Or should respond or can respond?
 14 A. Can. Completely optional, which is why we only got one
 15 person.
 16 SIR JOHN SAUNDERS: Right, okay.
 17 A. I do believe now that the reason should go on the text,
 18 whereas on the night I didn't want to put the reason,
 19 because at the end of the day, in my mind, if you're
 20 free to respond, you're free to respond. It shouldn't
 21 matter what it is, you know that something's occurring.
 22 MR COOPER: So people are given an option effectively
 23 whether they want to come in or whether they don't or
 24 can't.
 25 A. That's correct, or even whether they want to be on the

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1 recall list. You don't have to go on it. It's not
 2 mandatory.
 3 Q. On this particular night one person extra turned up?
 4 A. That is right.
 5 Q. Out of how many approximately?
 6 A. Sorry?
 7 Q. Out of how many approximately?
 8 A. Maybe... I would not want to -- I'm going to err on the
 9 side of caution, maybe around about 30 people on the
 10 recall, maybe. I know some people have actively chosen
 11 not to be on that list because they want work/life
 12 balance, et cetera.
 13 SIR JOHN SAUNDERS: They didn't know the reason for it.
 14 Okay.
 15 MR COOPER: Has that assessment of personnel at night in the
 16 control centre, are you aware whether it has changed,
 17 whether it has been reassessed as a result, for
 18 instance, of threats to venues which have concerts
 19 in the evening or events in the evening?
 20 A. Not as far as I am aware, sir.
 21 Q. You describe, use a number of words to describe this
 22 situation in the control room. I've got the reference
 23 here. It has already been referred to. One of the
 24 expressions you used was "absolute bedlam".
 25 A. I did.

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1 Q. What did you mean by "absolute bedlam"?
 2 A. Just because there was so much happening at the same
 3 time and I think what's been really helpful to highlight
 4 that is the document that was -- the timeline document
 5 that's been produced. I think you can actually see
 6 there how much is occurring. It felt probably more so
 7 that way for myself and Ms Owen because to then have to
 8 manage a situation unfolding and also being involved in
 9 potentially making some calls, creating incidents that
 10 I shouldn't be creating, that I should have somebody
 11 else to do that for me, felt like bedlam. I can't
 12 really put it any other way. That's just how it felt to
 13 me at the time.
 14 Q. And would you say that from what you could see, and from
 15 what you knew, your colleagues felt the same?
 16 A. Yes. And I took time through the night to check on
 17 everybody because I know it had been a somewhat
 18 harrowing incident for people.
 19 Q. I understand.
 20 A. And they also said, "What's gone on, what's happened?"
 21 Because they're in a zone, they're just doing whatever
 22 they can do to --
 23 SIR JOHN SAUNDERS: Presumably the fact that you're being
 24 called over or you and Lisa Owen are being called over
 25 to more calls, that helps create that sort of

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1 atmosphere?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Because they're waving and shouting over
 4 to you to come?
 5 A. Yes.
 6 MR COOPER: Are there suggestions that you can make to
 7 assist the chair as to how -- one recognises the
 8 enormity of the event that was happening, of course --
 9 as to how nonetheless that atmosphere of bedlam can be
 10 alleviated? What could be done to help that? What
 11 steps could be taken, what protections could be given to
 12 you and your colleagues, for instance, to enable you to
 13 focus on the job in hand?
 14 A. I think potentially, to have more people readily
 15 available, should the need occur, because to -- to even
 16 out that workload, maybe, would allow you to kind of
 17 take stock a little bit and think about what's happening
 18 during the bigger picture.
 19 Q. In other words, more staff?
 20 SIR JOHN SAUNDERS: More people to come in?
 21 A. Yes, because it's really hard because you could have...
 22 SIR JOHN SAUNDERS: I think we understand that you need more
 23 people.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: You also perhaps need more practice at

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1 dealing with those sorts of situations .
 2 A. Yes.
 3 SIR JOHN SAUNDERS: The more people only comes if you have
 4 a reserve list who actually have to come in if they're
 5 summoned in.
 6 A. I think it's very much the preparedness. You can't take
 7 away from the fact that there are some shifts that you
 8 can leave after a night shift and it's been really
 9 quiet, you're just getting the normal automatic fire
 10 alarms, run-of-the-mill incidents, what we would call
 11 our bread and butter, really .
 12 It's how far you find that line as your
 13 preparedness, how many people do you want sitting there
 14 in the event that actually nothing happens. So it's
 15 quite difficult to --
 16 MR COOPER: I understand. Of course as you've already
 17 indicated, the control room wasn't just dealing with
 18 Greater Manchester, was it?
 19 A. No, it wasn't.
 20 Q. In fact it was dealing with Cumbria, Lancashire and
 21 Cheshire as well, wasn't it?
 22 A. That's right.
 23 Q. And during the developing tragedy in the arena, do
 24 I understand from your evidence that you and your
 25 colleagues were still receiving calls on different

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1 matters from Cumbria, Lancashire and Cheshire?
 2 A. We were and we also had what we would term a five-pump
 3 fire in Manchester at the same time.
 4 Q. Were some of your colleagues being effectively taken out
 5 of dealing with the arena to focus primarily upon those
 6 incidents?
 7 A. Yes.
 8 Q. And of the staff that were there on the 22nd, how many
 9 were effectively being taken out of the arena to deal
 10 with these other matters that were developing in
 11 Cumbria, Lancashire and Cheshire?
 12 A. Well, I tried to keep -- because I'd asked Vanessa,
 13 Ms Ennis, to step away from the lines, I tried to keep
 14 Ms Fallon free to take any emergency -- you've got to
 15 make sure somebody's free to take emergency calls at any
 16 time. And Ms Jabin, I don't think I've even heard her
 17 referred to because she was dealing with -- she was
 18 at the Manchester pod but she was dealing with the other
 19 Manchester incident.
 20 Q. That was what I was going to ask you. In addition to
 21 staff being taken completely out of dealing with the
 22 arena, were there staff that were part dealing with the
 23 arena and part dealing with other matters, say in
 24 Manchester?
 25 A. They may well have been, yes.

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1 Q. So taking that sort of calculation into account, given
 2 the number of people that were working with you at the
 3 time, how many people were actually dedicated to the
 4 Manchester Arena tragedy on the night?
 5 A. I think we were all dedicated to it .
 6 Q. I understand that, I don't mean dedicated in the sense
 7 of --
 8 A. I understand what you mean. I think... I mean, one of
 9 the amazing talents that control room operators have is
 10 to multi-task. It's admirable when you see a control
 11 room operator at work, it really is. So without any
 12 evidence I don't know what the activity was -- you know,
 13 what other incidents they were clicking into. We were
 14 all, as necessary, dealing with the arena.
 15 Q. But the reality is, if I can put it this way, it's not
 16 meant of a criticism of you, far from it, you and your
 17 colleagues really shouldn't have to be doing that,
 18 should you? You shouldn't have to be -- I have in mind
 19 the image of these conjurers on stage trying to keep
 20 plates spinning without them falling off a pole. Do you
 21 know the image?
 22 A. I do.
 23 Q. That's what you and your colleagues were doing on the
 24 night, wasn't it, keeping the plates spinning over
 25 Cheshire, Lancashire, Cumbria and Greater Manchester

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1 generally, whilst dealing with one of the biggest
 2 catastrophes the country's faced in years?
 3 A. Yes, I'd have to agree with that.
 4 Q. And that's an intolerable task to put on people, isn't
 5 it?
 6 A. Taking the catastrophe out of the situation, it is --
 7 the activity at North West Fire Control is something
 8 we've kind of become used to dealing with. None of us,
 9 I don't think, had ever been as busy as what we had when
 10 we arrived at North West Fire Control, so I think we had
 11 kind of got used to --
 12 SIR JOHN SAUNDERS: Okay. I think the critical thing is:
 13 was there any occasion when you didn't have enough
 14 operators to answer the phones when the people were
 15 ringing them?
 16 A. Not that I'm aware of. I think we -- well, I don't
 17 know, fell lucky, I don't know --
 18 MR COOPER: It's funny you should use that word because my
 19 next question was going to be, was that more by luck or
 20 judgement? It is funny you should use the word lucky.
 21 A. If something else had happened, if the five-pump fire
 22 that we were dealing with had gone to, say, for example,
 23 15, 10 pumps even, we would have found ourselves with
 24 a problem, I think.
 25 Q. Right on the edge?

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1 A. Yes.
 2 MR COOPER: All right. I want to ask you, and I'm conscious
 3 of the time, it will take about 5 minutes, to ask you
 4 a little bit about a matter we've been pursuing,
 5 certainly on behalf of families, the matter of
 6 a monitoring officer, a duty NILO or someone in command
 7 being in the room and it's a matter the chair will be
 8 aware we raised many months ago.
 9 Sir, would that be a convenient moment now or start
 10 it after lunch?
 11 SIR JOHN SAUNDERS: Is this your last topic?
 12 MR COOPER: No, it's not. It's a self-contained topic which
 13 I can deal with in, say, 5 minutes, but I'm in the
 14 tribunal's hands.
 15 SIR JOHN SAUNDERS: Let's deal with it at 2 o'clock.
 16 Thank you.
 17 (1.01 pm)
 18 (The lunch adjournment)
 19 (2.00 pm)
 20 (Delay in proceedings)
 21 (2.07 pm)
 22 SIR JOHN SAUNDERS: Mr Cooper, thank you.
 23 MR COOPER: Ms Gregson, can I carry on by asking you about
 24 the imposition of what I'm calling a monitoring officer
 25 or a duty NILO or someone of rank being in the control

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1 room during events such as occurred on 22nd. I think
 2 you have already told the chair that that would have
 3 been of great assistance.
 4 A. Yes, it would.
 5 Q. What we've been suggesting to a number of witnesses
 6 is that this, we've referred to it as a monitoring
 7 officer, certainly of rank, could, for instance,
 8 quality—assure decision—making being made, for instance,
 9 by an incident commander. Would that be the sort of
 10 thing that you'd be looking for to assist?
 11 A. Yes, because you'd have to assume that they would be the
 12 most familiar with their own ways of working within
 13 their own Fire and Rescue Service.
 14 Q. For instance, effectively providing that reassurance for
 15 everyone in the room that, as far as decision—making was
 16 concerned, the correct decisions in the circumstances
 17 were being made?
 18 A. Yes.
 19 Q. And that would, no doubt, enable you and your colleagues
 20 to do your work at the time?
 21 A. Yes.
 22 Q. All right. Is there any reason why that had never been
 23 thought about before, or perhaps it had been thought
 24 about before and not acted upon?
 25 A. Prior to the arena incident, I'm not aware it had been

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1 thought about. I think it certainly is something
 2 that — or up to the point of when I left the company,
 3 they were certainly looking at a command support
 4 function. Whether that be that they are placed there
 5 all the time, I don't think that would be the case, but
 6 certainly for ...
 7 Q. For events such as affected the arena?
 8 A. Yes.
 9 Q. Was it something that you had thought about, for
 10 instance as a manager whilst you were there, before the
 11 arena incident that it might have assisted, something
 12 that crossed your mind?
 13 A. I don't recall it would have exactly crossed my mind
 14 prior to — I don't think I necessarily had ever had...
 15 I don't think I'd ever thought that that may be an
 16 option because I knew that the command support rooms all
 17 set up remotely in each of the Fire and Rescue Services.
 18 Q. We'll come back to a similar matter a little later.
 19 I want to go on to another matter now that you raised in
 20 evidence before the chair yesterday when you were
 21 telling the chair about different Fire Service regions'
 22 attitudes to discretion and the following of action
 23 plans. What you told the chair yesterday was to the
 24 effect that Manchester, Greater Manchester, for
 25 instance, encouraged absolutely no discretion but the

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1 following of action plans, but other regions or other
 2 areas had a different attitude.
 3 A. Yes.
 4 Q. So are we referring there to Cumbria, Cheshire and
 5 Lancashire?
 6 A. When I gave my example yesterday, I was mainly aiming
 7 that towards Lancashire because I had a specific example
 8 towards that. I'm not able to apply any exact examples
 9 to how Cheshire or Cumbria felt about that or would
 10 apply — or how they felt about discretion.
 11 Q. Help us, if you can, compared to Manchester encouraging
 12 absolutely no discretion, how did Lancashire operate?
 13 A. They want or encourage the mobilising officer to call
 14 upon their experience, but then sometimes I think
 15 there's been scenarios where they've called upon mine
 16 because they knew who they were speaking to, some of the
 17 officers in Lancashire know me, and they know of my
 18 10 years' experience in Lancashire, so they would be
 19 happy to apply that to me personally.
 20 Q. We're going back to the impression, the expression
 21 Mr Dark used about North West Fire Control, I can't
 22 remember the exact quote now, but losing connectivity
 23 with the family of the Greater Manchester Fire Service.
 24 There's an example, perhaps, of Lancashire still
 25 remembering you're part of the family, as it were,

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1 trusting you and trusting your discretion?
 2 A. Yes.
 3 Q. In what way — and not just you, I presume, it wasn't
 4 simply you?
 5 A. No, the same could happen if — for example. Ms Owen,
 6 they would tend to ask her if there was something for
 7 Manchester. You sort of resort to who you know has come
 8 from your Fire and Rescue Service.
 9 Q. Would you say that in fact, as far as Greater Manchester
 10 are concerned, the Greater Manchester Fire Service are
 11 concerned, that that more flexible attitude being taken
 12 by Lancashire is a far more helpful attitude to take in
 13 times such as, God forbid, it should ever happen again,
 14 as far as the arena situation is concerned?
 15 A. Absolutely, as long as it's applied in the right way.
 16 Q. What do you mean, applied in the right way?
 17 A. Some of the team leaders are not as experienced as
 18 others. Some of the team leaders are in development.
 19 So it may be — I think that there's got to be a certain
 20 element of mobilising experience.
 21 SIR JOHN SAUNDERS: I just want to get back to where we were
 22 actually based. On this particular night, you did
 23 actually use your discretion, didn't you?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: And you decided, "I need advice". So

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1 you may well be right that GMFRS would be better off if
 2 they did allow more discretion to certain, anyway, of
 3 their operatives or their managers. But actually on the
 4 night, it made no difference, did it?
 5 A. No, because I was left with no choice but to use my
 6 discretion.
 7 MR COOPER: Can I ask, please, us to go to {INQ035438/1},
 8 which is the second statement that you made, in
 9 particular if I may, Mr Lopez, paragraph 24
 10 {INQ035438/4}:
 11 "Further, I have read the witness statement of
 12 Peter O'Reilly. He suggests that we should have
 13 mobilised to the incident ground and followed the
 14 explosion action plan. In my view, he is wrong. The
 15 incident was no longer an explosion, it was caused by
 16 a bomb with reports of a shooter, an MTFA incident. All
 17 my training and experience would tell me that
 18 a mobilisation to the scene would have been a high-risk
 19 choice which could potentially have put firefighters at
 20 risk."
 21 In that paragraph you're very clear, no
 22 prevarication about it, "In my view, he is wrong".
 23 Were you surprised when a man, supposedly of the
 24 experience and ability of Mr O'Reilly, said that?
 25 A. I was, yes.

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1 Q. Develop how you felt when someone of his position said
 2 that to you.
 3 A. I was shocked, I was... We've always had such — I'm
 4 used to having such good working relationships with the
 5 Fire and Rescue Service that that just felt ...
 6 SIR JOHN SAUNDERS: Can we just — I really want... I am
 7 sure that everyone likes to say nice things about
 8 colleagues and all the rest of it. What I'm concerned
 9 about is that's what he said.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: We'll hear why he says it in due course.
 12 You think he's wrong. You use your experience for that.
 13 What's the shock? People are entitled to have different
 14 views in a way, aren't they?
 15 A. Just the shock that he thought that we should have
 16 mobilised to the incident ground because if he thought
 17 that, why didn't he ask for that? I was... If that
 18 action was so wrong, he's the chief, he is the person
 19 that everybody has to answer to. So if you want that,
 20 ask for it.
 21 SIR JOHN SAUNDERS: We'll ask him.
 22 MR COOPER: Had you worked with Mr O'Reilly before?
 23 A. I've — no, I have never met him, never worked with him.
 24 Q. I'll move on. It's simply in the way you express
 25 yourself that causes me to ask you to clarify certain

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1 matters. On that same point, on a different subject,
 2 paragraph 32, please.
 3 This is to do, and I'm not going to ask you
 4 questions over that you've been asked about your — the
 5 importance of attending exercises such as this. You
 6 have given your evidence about that. You say this:
 7 "I can confirm that I played no part in the
 8 Winchester Accord training exercise, nor to the best of
 9 my knowledge did anyone else from NWFC. We have never
 10 been invited to participate in any joint agency MTFA,
 11 JESIP or Plato exercise, something I think is
 12 extraordinary."
 13 You have given your evidence on this, I'm not asking
 14 you obviously to repeat that. Again, it's terminology
 15 that I go to in this paragraph. You used the word
 16 "extraordinary". Not unfortunate, not desirable, but
 17 extraordinary. Why do you say extraordinary?
 18 A. I can't comprehend why a control room, where anything
 19 starts — without a control room you can't function.
 20 Any emergency service, they all start with a control
 21 room, and yet you are overlooked for the most important
 22 part of where an incident or exercise would start from.
 23 I find that extraordinary.
 24 Q. These exercises had been going on on a number of
 25 occasions, hadn't they, during the course of your tenure

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1 as team leader, manager?
 2 A. Before North West Fire Control?
 3 Q. During the time that you were at North West Fire
 4 Control, we've got a number of exercises that have been
 5 taking place. My question is: were you aware they were
 6 taking place?
 7 A. No, I wasn't.
 8 Q. You weren't even told of them?
 9 A. No.
 10 Q. My question would have been, therefore I think I can
 11 pre-empt your answer, if you knew they were going on,
 12 why didn't you ask or push as a manager, as it were, to
 13 get involved? Your evidence is, is it, that you simply
 14 did not know they were going on, you weren't even told
 15 they were going on?
 16 A. I wasn't aware.
 17 Q. Was anyone aware at North West Fire Control, as far as
 18 you're aware? There must have been someone who was
 19 aware that these exercises were going on.
 20 A. I'm not sure.
 21 Q. But whoever it was or might be wasn't cascading it down
 22 or up, sideways, to anyone there?
 23 A. No, sir.
 24 Q. Because I presume that, had you known these exercises
 25 were taking place, you'd have made representations?

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1 A. Absolutely.
 2 Q. And as far as you're aware, no such representations were
 3 made by anyone?
 4 A. No.
 5 Q. Paragraph 33:
 6 "In his report, Mr Hall suggests we should have
 7 asked other agencies what assets they were deploying and
 8 where. This is nonsensical. We have no training or
 9 understanding as to what assets other emergency services
 10 have available or how and when they might deploy them,
 11 so it would be meaningless to be told of this
 12 information."
 13 My question is simple: would it help if you were or
 14 your colleagues were in the future given this
 15 information or a degree of training and education take
 16 place to remedy the problem that you express in
 17 paragraph 33?
 18 A. Yes, I think it would certainly help to know what assets
 19 are available to everybody.
 20 Q. And you say at the time -- and I mean at the time of the
 21 arena -- training -- you dealt with it -- you had no
 22 understanding as to what assets other emergency services
 23 might have?
 24 A. No, and also just picking up on a further point from
 25 today, which of the assets all trained together either

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1 from various emergency services.
 2 Q. You would obviously have a rudimentary knowledge,
 3 I assume, of the assets available, for instance from the
 4 Ambulance Service in terms of medical care and provision
 5 for casualties?
 6 A. Sorry, could you just ask me that again?
 7 Q. I presume you would have been aware, for instance, of
 8 the assets provided by the Ambulance Service generally?
 9 A. Generally, yes.
 10 Q. But nothing above that?
 11 A. No.
 12 Q. Were you aware, for instance, of the assets that were
 13 available within the Fire Service?
 14 A. I would have to say that I wasn't completely aware of
 15 the full capability. I don't think I can name the --
 16 Q. For instance, were you --
 17 A. -- appliances.
 18 Q. Were you aware, for instance, of what medical equipment,
 19 tourniquets, stretchers for instance, were available on
 20 what units and in what quantity?
 21 A. No. I know -- from over the years, I know that some
 22 firefighters are trauma trained, but I don't know the
 23 details of what trauma training is. I think you can
 24 kind of work out the element of the fact that that would
 25 be more advanced than first aid, but I wouldn't have

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1 known the other things that you just asked me.
 2 SIR JOHN SAUNDERS: So obviously the more you know, the
 3 better it is, and you can of course think of endless
 4 things that you could know. Would it actually have
 5 helped you on the night to have known more about the
 6 training for fire officers and in doing your job
 7 generally?
 8 A. I don't think it would have made any difference on the
 9 night to know that part, because I think the failure was
 10 before that. Again, that would have then had to be me
 11 saying to somebody, "But what about this equipment, what
 12 about that?", and I don't think I would have done that.
 13 SIR JOHN SAUNDERS: In general, would it make any
 14 difference, in practice?
 15 A. Potentially to have an awareness, I think, because
 16 I think the more you think you have an awareness of, the
 17 better you feel at your job and the better equipped you
 18 feel to carry out your role. I'm thinking more as well
 19 for -- we've had serious road traffic collisions, other
 20 things like that. So it could help, but I don't think
 21 it could necessarily change an outcome, because that's
 22 why we've got the officers from the Fire and Rescue
 23 Services and the crews. That's what they're there for.
 24 MR COOPER: Can I suggest this, though, sometimes, despite
 25 having those personnel available, if you had

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1 a knowledge, for instance, at the time, on 22 May, of
 2 medical equipment available on certain units,
 3 tourniquets, stretchers or otherwise, if they weren't
 4 being mentioned by someone who, I don't know, was lost
 5 in the middle of the Cheshire countryside say, would it
 6 have helped for you to know of that and said, "Wait
 7 a minute, what about this and what about that?", as
 8 a prompter if nothing else?
 9 A. It may have done, but I don't feel strongly enough to be
 10 able to commit to that fully because I think --
 11 I promised myself I didn't want to talk too much about
 12 hindsight and I think that that's where --
 13 Q. I'm not asking you questions about hindsight. It's
 14 something I try to avoid myself. I'm asking you
 15 questions about if you were, and the chair is trying to
 16 consider the future as well as the past -- if, for
 17 instance, this catastrophe happened again, would it have
 18 been help for your or your colleagues to have a degree
 19 of knowledge of what resources were available so you
 20 could prompt -- a sort of verbal action card prompt, for
 21 instance -- people, help them: "What about this
 22 vehicle?", tourniquets, "How many tourniquets has it got
 23 on?", "Well, don't you think we should be sending
 24 that?", or, "Has it got stretchers on?", "I'm hearing
 25 for instance", hypothetically, "there's a shortage of

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1 stretchers, this vehicle has stretchers". For you to
 2 have that knowledge, would that not potentially help in
 3 the future?
 4 A. Potentially in the future, yes.
 5 Q. That's not hindsight, you see, that's trying to --
 6 A. I'm just trying to think about --
 7 SIR JOHN SAUNDERS: It actually is. It's using the benefit
 8 of what's happened for the future. We are inevitably
 9 going to use hindsight, we don't ignore it, but
 10 obviously when we're considering decisions you made
 11 at the time, we ignore it. But in deciding
 12 recommendations absolutely we use hindsight.
 13 A. I am just trying to think -- because if I'd known what
 14 we're talking about on the night, would I have done
 15 anything with that? No, I don't think I would because
 16 of --
 17 SIR JOHN SAUNDERS: Well, it didn't come up.
 18 A. Yes.
 19 MR COOPER: All right. The last document I want to take you
 20 to, just to make sure that you've expressed yourself as
 21 you need to, is one of your debriefs, please, which is
 22 {INQ001133/2}.
 23 Do you recognise this?
 24 A. I do, yes.
 25 Q. We see here issues identified, under the issues

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1 identified matter. And you highlight a number of
 2 things. You see there:
 3 "As we had three logs running, there was some
 4 confusion when officers were ringing to pass information
 5 to be recorded on the log as to which incident to put
 6 this on -- clearer ways of working should be established
 7 in future with a lead incident established and all
 8 messages recorded on that incident."
 9 Do you want to add to that or simply adopt it?
 10 A. I will adopt it.
 11 Q. Are you still of that view then?
 12 A. I am and I hope I've managed to express that in the
 13 other conversations I've had during my evidence about
 14 the confusion over the incident logs. It was obviously
 15 something I felt right from the beginning.
 16 SIR JOHN SAUNDERS: On the next one when you talk about
 17 Mr Lawlor. There's something about "mob rule entered
 18 against his call sign" and you said there should have
 19 been an incident log created for him as well, which
 20 would have created yet another incident log. Or
 21 am I misunderstanding what you put?
 22 A. No, you're not misunderstanding at all but I think,
 23 again, along the lines of where I say we would always
 24 create a separate incident -- regardless of the other
 25 incidents that have been created and how many there

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1 were, if there was a command support function or command
 2 support room opening, or in this instance police Silver
 3 control, they would run off a separate log.
 4 SIR JOHN SAUNDERS: Is that desirable or should they all be
 5 on the same incident log?
 6 A. No, I think if there's a command point, so Silver,
 7 command support, I think they probably need to stay on
 8 separate logs. But my point with this is that on the
 9 mobilising system, there is the list of resources and
 10 all it was is -- it's not easily visible at all where
 11 Mr Lawlor was going because it's just a note in his
 12 attribute if you will.
 13 SIR JOHN SAUNDERS: That's what you're calling mob rule, is
 14 it?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: I understand what it normally means, but
 17 this is clearly a different meaning?
 18 A. Yes.
 19 MR COOPER: One other reference I want to ask you about
 20 under any other issues:
 21 "Crew contacting Control to query PDAs to explosions
 22 and bomb and querying mobilisation decisions on that day
 23 have been unhelpful."
 24 What do you mean by that?
 25 A. So after the incident, we got a lot of calls from

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1 various fire stations basically trying to find out
 2 themselves what had happened, I think. And the
 3 questioning that was being applied from them was: what's
 4 the PDA, what's the predetermined attendance, which is
 5 PDA --
 6 Q. Yes.
 7 A. -- to an explosion and a bomb, because reading between
 8 the lines now, they were querying the mobilising
 9 decision.
 10 Q. They were querying the mobilising --
 11 A. Yes, they were querying the mobilising decision, yes,
 12 and at that point they were ringing the control room,
 13 speaking to control room operators, asking them to look
 14 at action plans and to look at the PDA to those incident
 15 types.
 16 Q. So these are other regions?
 17 A. No, this was just in Manchester, sorry.
 18 Q. Just in Manchester?
 19 A. Yes, just Manchester stations, sorry, I should have made
 20 that clear.
 21 Q. No, not at all, it's clear now, thank you.
 22 I want to finish by just asking you this: how long
 23 had you been team leader for at the time?
 24 A. I was a team leader as soon as North West Fire Control
 25 went live because I was already --

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1 Q. Which was when?
 2 A. May 2014.
 3 Q. You've given the chair obviously some interesting and
 4 potentially helpful observations as to what you say
 5 should be improved. You touch upon lack of training
 6 lack of JESIP knowledge, the failure of North West Fire
 7 Control to pass on information, and other important
 8 observations. I have to ask you: why did it take the
 9 Manchester Arena atrocity for you to do that? Couldn't
 10 you have done that much sooner?
 11 A. To raise the issues?
 12 Q. To raise these concerns that you raised properly with
 13 this inquiry, these are concerns that you must have had,
 14 as someone in management, well before the
 15 Manchester Arena atrocity.
 16 A. I have never seen any documentation within my evidence
 17 bundle, but I believe if you checked my emails and --
 18 there is actually one thing in my evidence bundle --
 19 Q. Then help us in your own interests.
 20 A. Because there was no training system at the time --
 21 I think the training system was brought online in 2018,
 22 I think, so prior to that, there was no official
 23 training system. So we had -- on my team, we kept
 24 a training record of everything that we tried to deliver
 25 training on. Every time I couldn't carry out training,

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1 I would highlight that in the document on red, in red,
 2 and put the reason as to why we had not been able to
 3 train.
 4 In one of those in here, and I've highlighted and
 5 asterisked it, I've put a note on the end of the
 6 training log:
 7 "Due to staffing in the mornings, the morning
 8 training sessions are proving to be too much of a strain
 9 on the rest of Control so this has now been adapted to
 10 morning sessions where staff can book individual time
 11 slots to utilise the time for phase work or training
 12 matrix, et cetera."
 13 And then in many asterisks I've put:
 14 "Staffing levels will be brought to the attention of
 15 team 4 operations manager."
 16 Q. When was that? When did you make that note?
 17 A. This particular one that's in here -- oh, it was called
 18 a monthly training validation sheet, I'm sorry. This
 19 one was submitted on 28 May 2016 --
 20 SIR JOHN SAUNDERS: Again, not wishing to cut across you,
 21 what you have identified to me, and perfectly
 22 reasonably, is the fact that you didn't get any live
 23 training, such as not using the activation system on
 24 large exercises and things like that which -- I well
 25 understand what you're saying. Did the lack or the

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1 difficulty of doing regular training with the staff,
 2 which -- you've expressed that difficulty because of the
 3 numbers, did that influence what happened on the night?
 4 A. It may well have done because hindsight -- would we have
 5 done more training with them on JESIP and made sure that
 6 everybody had the same training? Whereas sometimes it
 7 was if you were on duty and you could have that
 8 training. So when I had training from Mr Gaskell
 9 there's somebody else, a colleague of mine, that had had
 10 some from a specialist vehicle in Manchester but I never
 11 got that. So it very much all depended and it didn't
 12 flow and that's where I'm trying to -- I'm not trying to
 13 highlight the staffing here, that's not what I'm doing,
 14 but in answer to your question, and I feel like I'm
 15 going a very long way about it, is that I did try to
 16 raise the training and at points became very exasperated
 17 about...
 18 SIR JOHN SAUNDERS: The failure to provide sufficient time
 19 and regularity and the importance of training you had
 20 brought to the attention of management --
 21 A. Yes.
 22 SIR JOHN SAUNDERS: -- but they hadn't done anything about
 23 it?
 24 A. But the other thing I brought to the attention was the
 25 ad hoc training that it's been named as, that was being

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1 delivered by us. I am not a trainer. I know there is
 2 a certain element of training that would go with my
 3 role, I've done a mentoring workshop, but that's not
 4 training. To me, that's enhancing the capability or
 5 feeding on briefing notes of changes in procedure. If
 6 you actually look at what the documents are that we
 7 received that's been labelled as training, the titles of
 8 them -- that's not what I would consider --
 9 MR COOPER: Effectively that's training being delivered by
 10 someone who needed training?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: I think what's happening, can I see if
 13 this is right: someone sends down a bulletin of some
 14 sort with some more information that needs to be
 15 conveyed to people and how they're to do things, and
 16 it's sent to you as the manager and then you go through
 17 it with the staff as well as going through it yourself;
 18 is that what's happening?
 19 A. Yes, at the beginning of the set of shifts that we call
 20 a tour of duty, so at the beginning of the tour of duty
 21 on our first day back on, myself or one of the other
 22 team leaders would print off everything that we'd had in
 23 over our days off and create and -- call it a team brief
 24 and then try to take everybody to the back of the room
 25 to deliver that so that we were trying to communicate

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1 with them the things that they needed to know.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR COOPER: Would it be unfair of me, purely on the subject
 4 of training, because it's really in many respects
 5 overridden a lot of your evidence that we've heard, is
 6 it the case that at the time this atrocity occurred on
 7 22 May 2017, the level of training for people like you
 8 provided by north-west Fire Service was chronic? It was
 9 very poor indeed, wasn't it?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: That's his comment, what do you say
 12 about it?
 13 A. I don't know if I could agree with chronic, but
 14 definitely in need of --
 15 SIR JOHN SAUNDERS: Chronic, I think, just means keeping on
 16 occurring rather than that -- here it being used as a
 17 term to mean very poor, I think. Do you agree with that
 18 expression?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Okay, thank you.
 21 MR COOPER: Last question. The matters that you have told
 22 us about, about the pressure that you were under and
 23 your colleagues were under, the lack of communication
 24 that sometimes occurred between inter-agencies, these
 25 are all matters which were no doubt occurring in the

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1 control room before 22 May; yes?
 2 A. Yes.
 3 Q. My last question is this: so why, you as manager, didn't
 4 you make more of an effort perhaps, a tough question but
 5 I'm here to ask them, to bring it to the attention of
 6 those who might be able to remedy it?
 7 A. I believe I did, sir.
 8 Q. You did?
 9 A. I did.
 10 MR COOPER: There it is, sir.
 11 SIR JOHN SAUNDERS: Thank you.
 12 Further questions from MR DE LA POER
 13 MR DE LA POER: Before I invite Mr Smith, can I just ask
 14 a follow-up question to that?
 15 Can you just be precise, whose attention did you
 16 bring it to?
 17 A. I had several line managers, so whoever was the line
 18 manager at the time.
 19 Q. Are you able to say now who that was?
 20 A. Sorry, I've gone really blank. At the beginning...
 21 SIR JOHN SAUNDERS: Let's have the last one. Who was your
 22 line manager on 22 May? Janine Carden?
 23 A. No. Just give me a minute. Who was my line manager on
 24 22 May?
 25 SIR JOHN SAUNDERS: Remembering things in the witness box is

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1 always quite difficult. Perhaps you'd like to give
 2 us --
 3 A. I can certainly -- yes.
 4 SIR JOHN SAUNDERS: And specifically say those to whom you
 5 drew the attention of the problems.
 6 A. Yes.
 7 MR DE LA POER: Mr Smith QC, please.
 8 Questions from MR SMITH
 9 MR SMITH: I would like to begin by asking you some
 10 questions concerning training and your recent evidence.
 11 As far as training generally is concerned, you've been
 12 able to assist the chairman with the issue of the
 13 absence from live training exercises of the control room
 14 as a participant; is that correct?
 15 A. That's right, yes.
 16 Q. In due course, the chairman is going to hear from
 17 Tessa Marie Tracey, who was the senior operations
 18 manager at the time; is that correct?
 19 A. That's right, yes.
 20 Q. And one of the issues she's going to assist the inquiry
 21 about is the advantage of no-notice exercises that could
 22 have been put in place by the Fire and Rescue Service to
 23 bring the control room in to a live exercise. You
 24 appreciate what I mean by a no-notice exercise; is that
 25 correct?

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1 A. I do, sir, yes.
 2 Q. The chairman is going to hear that a genuine no—notice
 3 exercise, in other words not by telling anybody in
 4 advance, "You're going to have a no—notice exercise",
 5 but having a genuine no—notice exercise, do you consider
 6 that, generally speaking, effectively from the point of
 7 the call into the control room, that would be of value
 8 to the Fire and Rescue Service generally and to the
 9 control room if that was a situation that was adopted?
 10 A. Absolutely, yes.
 11 Q. Because that would bring the control room operators and
 12 the team leaders into a live exercise, wouldn't it?
 13 A. It would, sir, yes.
 14 Q. When Exercise Winchester Accord was conducted in May of
 15 2016, I don't know whether you remember, but the control
 16 room was notified that the exercise was to take place,
 17 but for one limited reason only, that if because of what
 18 was going on in the Trafford Centre, the control room
 19 was starting to receive calls from the public, concerned
 20 about the noise and the event, the control room was
 21 warned in advance; is that right?
 22 A. Yes. I wasn't aware of the notification, but that may
 23 be because I wouldn't have been on duty. It possibly
 24 didn't concern me.
 25 Q. But that would make sense, wouldn't it?

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1 A. Yes, it would make sense.
 2 SIR JOHN SAUNDERS: A no—notice exercise, I'm just wondering
 3 how that works in practice because you've got to carry
 4 on business as usual, haven't you?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Can it work?
 7 A. I have never done one, but I would imagine --
 8 SIR JOHN SAUNDERS: We'll hear perhaps in due course from
 9 another witness who may have thought about it.
 10 A. Again, if it was a no—notice exercise and they asked
 11 more staff to come in for it, then that would be the
 12 giveaway, so we would know something was happening, so
 13 I am not sure how that would work in practice.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR SMITH: Just moving on from there to deal with
 16 Mr Cooper's questions that he has just been asking you,
 17 are you able to identify how any of the concerns that
 18 you've expressed about training may have affected your
 19 ability to manage the incident on the night of the
 20 attack?
 21 A. I think potentially back to the subject of not being
 22 involved in exercises, that -- that I'd never had the
 23 chance to practice or, you know, act out something that
 24 could realistically happen, and also then I would have
 25 also -- if we'd had the chance to do live exercises,

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1 also maybe have been aware of the problems to contact
 2 the FDO. So again, having that awareness, because
 3 that's not something I'd ever known would ever be
 4 an issue, again being involved in the exercises you
 5 would then tend to probably go to the debriefs or be
 6 involved in the debrief process, so at some point I may
 7 have seen that the FDO could be an issue and I may have
 8 been able to react differently to that.
 9 Q. Have you followed the evidence in relation to Exercise
 10 Winchester Accord at all or gained an understanding of
 11 what the problems were?
 12 A. I have, yes, I've tried to follow it where possible.
 13 Q. Just taking that example, is the point you're making
 14 that if the control room had been involved from the
 15 point of call in that exercise, you as a team leader
 16 might very well have had the understanding of the
 17 difficulty that had arisen in that exercise in
 18 contacting the FDO?
 19 A. Absolutely, sir, yes.
 20 Q. And that in turn might have assisted you on the night;
 21 is that correct?
 22 A. It may have helped me to behave differently, yes.
 23 Q. To understand the communication difficulties?
 24 A. Yes.
 25 Q. And perhaps probe the issue more?

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1 A. Yes.
 2 Q. And ask more questions?
 3 A. Yes.
 4 Q. Moving on from there, please, can I ask you about the
 5 use of this word "bedlam". There's no doubt, is there,
 6 that the attack on the night tested the control room's
 7 ability to manage an incident such as this to a level
 8 that had never been experienced before?
 9 A. In this aspect of this incident type, yes.
 10 Q. Putting aside the demands of other exercises and
 11 incidents that you'd had to deal with, in these
 12 circumstances it was unprecedented from your point of
 13 view, wasn't it?
 14 A. It was, yes.
 15 Q. But in fact, only three emergency calls were received
 16 into the control room in relation to this; is that
 17 right?
 18 A. That's right, yes.
 19 Q. So is the situation that as far as emergency calls
 20 coming into the control room are concerned, putting the
 21 attack aside and the management of it, the emergency
 22 calls being received into the control room that night
 23 were as usual?
 24 A. Yes, from what I can remember I think -- I have asked
 25 for this information previously but I don't recall

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1 receiving it because what I'm interested to know from
 2 the night is actually how many incidents were ongoing
 3 at the time. I can only recall the five—pump fire that
 4 we had in Manchester, but I know that we will have had
 5 other things happen through the night. But yes, in
 6 answer to your question, it would have been business as
 7 usual for the other Fire and Rescue Services.
 8 Q. I don't know whether you remember, but the five—pump
 9 incident began at 02.53.
 10 A. No, I don't remember that.
 11 Q. One of the points you made, I think in answer to
 12 Mr de la Poer, or to Mr Horwell, I can't quite
 13 remember — if we go to page 6 of the sequence of
 14 communications schedule {INQ041473/6}, which I think
 15 you've been through; is that right?
 16 A. Yes.
 17 Q. Is that the document you're referring to as a timeline?
 18 A. Yes.
 19 Q. So I would just like to ask you to help the chairman
 20 about this.
 21 SIR JOHN SAUNDERS: Would you like it put up?
 22 MR SMITH: I would, please, sorry. I should have notified
 23 Mr Lopez. Forgive me.
 24 I'm going to ask you, Mr Lopez, to run it through
 25 with me page by page as I deal with it.

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1 The point you were making, I think, is that the
 2 timeline does demonstrate what is taking place at the
 3 same time and sequentially. I just want to take you
 4 from your call with Station Manager Berry at 22.40 into
 5 {INQ041473/6} there and, if we move on from there,
 6 picking up the red and green points to {INQ041473/7},
 7 we've got the incident log entries the control room
 8 staff were being responsible for, the call still in
 9 progress with Mr Ellis and GMP, and then at
 10 {INQ041473/8}, a public call comes in, the
 11 Ambulance Service call is in progress, incident log
 12 entries are being added.
 13 Then {INQ041473/9}. Call to Mr Berry still in
 14 progress with you. And that shows what's gone on in
 15 between: a second call from GMP and, over to
 16 {INQ041473/10}, the nature of calls coming in but at the
 17 same time the incident log is being kept updated by
 18 staff.
 19 I think finally for these purposes, {INQ041473/11}
 20 shows us that Mr Waterhouse was on the phone to North
 21 West Fire Control at 22.42.31.
 22 Is that just a snapshot, would you agree?
 23 A. Yes.
 24 Q. You're obviously thinking about something and I...
 25 A. I was thinking about something that I learned this

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1 morning. It's not relevant to this conversation but
 2 I just spotted something on there.
 3 Q. Is it something you wanted to say to the chairman that
 4 you've just spotted?
 5 A. No. Thank you.
 6 Q. I was just trying to be helpful, that's all.
 7 A. I'm not quite sure how I...
 8 Q. What that does is give us a snapshot, as the document is
 9 intended to do, of what is taking place, often
 10 consecutively or simultaneously. There's no doubt about
 11 it, is there, that this to some extent can demonstrate
 12 the intensity of the management of the incident in the
 13 control room at the time; is that correct?
 14 A. That's correct, yes.
 15 Q. It must be very difficult for you to get that over to
 16 the inquiry in words; is that right?
 17 A. It is really hard, yes.
 18 Q. But this would really test you; is that right?
 19 A. Very much so. I don't think I've ever been as tested
 20 since.
 21 Q. Moving on from there to this question of the experience
 22 you had at Lancashire with what I am going to call the
 23 old control room system. Can you help the inquiry with
 24 the issue of to what extent, had this been the old
 25 control room system, at that time of night, the response

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1 of the control room might have been different or
 2 improved under the old regime?
 3 A. When you say the system, do you mean the mobilising
 4 system or the —
 5 Q. The mobilising response.
 6 A. Of the actual response?
 7 Q. Yes.
 8 A. I think I may have said briefly before, but I don't
 9 think — the decision would still have been the same.
 10 Q. You would have still wanted to speak to the duty NILO?
 11 A. Yes. We wouldn't have had the action plans, we didn't
 12 have action plans before, but... I think that's why
 13 I didn't necessarily follow one because I wasn't...
 14 I... I knew that I needed the NILO and whichever
 15 brigade, Fire and Rescue Service, I'd have been working
 16 in, it would have been the same.
 17 Q. The course of the information coming in and the
 18 circumstances, your thought process, is this correct,
 19 was that, "I need the advice of a specialist in the Fire
 20 and Rescue Service"?
 21 A. Yes.
 22 Q. "Who has the ability to advise me, the team leader, on
 23 how I should respond to this information"?
 24 A. Yes, that's correct.
 25 Q. Simple as that, isn't it?

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1 A. It is.
 2 SIR JOHN SAUNDERS: I think the distinction you made was if
 3 it had been you being in Merseyside — sorry,
 4 Lancashire.
 5 A. Lancashire.
 6 SIR JOHN SAUNDERS: Had it been somewhere where you normally
 7 work, you'd be talking probably, when you rang someone
 8 up, to someone you knew well?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So you would have had a relationship?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: That's how it differed?
 13 A. Yes.
 14 MR SMITH: If we go back to the sequence of communications,
 15 {INQ041473/6}, please, and just pick up the last part of
 16 that large paragraph, the longer paragraph at the top of
 17 page 6. I would like to ask you about these words:
 18 "I've just phoned you while we are still on to the
 19 police. Would it be all right for you to get in touch
 20 with them? Obviously we are not mobilising at the
 21 moment so can you just speak to them and we'll hang
 22 fire?"
 23 Clearly, the point you were making to Mr Berry was
 24 at that moment the control room was actually in contact
 25 with the GMP control room responsible for dealing with

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1 the call.
 2 A. Yes.
 3 Q. So what point did you have in mind when you were asking
 4 Mr Berry to make contact with GMP, having regard to the
 5 fact that the control room, the fire control room, was
 6 actually speaking with GMP at that time?
 7 A. To speak to the FDO.
 8 Q. What was your reasoning behind the need to speak to the
 9 FDO at that time? What did you want to learn as the
 10 team leader at the control room?
 11 A. I wanted to learn what was happening, a better
 12 understanding of what's happening, because I know that
 13 the FDO can discuss matters with the NILO that neither
 14 can necessarily discuss with a control room operator or
 15 a team leader.
 16 Q. So when you said to Mr Berry that, "We'll hang fire",
 17 effectively was that a clear statement by you that until
 18 you got that information, the control room would be
 19 waiting before mobilising?
 20 A. Yes. And I think as well at the end, because I said,
 21 "I'll speak to you shortly", or, "We'll speak to you
 22 shortly", because I thought it would be shortly.
 23 Q. You probably thought that Mr Berry would be back to you
 24 very quickly?
 25 A. I did.

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1 Q. So therefore, when Mr Berry gave you these instructions,
 2 to move or mobilise appliances to Philips Park, did you
 3 consider those to be, if you like, interim or temporary
 4 mobilising instructions until the point at which more
 5 information was available?
 6 A. Yes.
 7 Q. So the advantage of mustering appliances at a particular
 8 fire station, do you agree, would be to assemble those
 9 appliances in one location so that when further
 10 information came in, is this right, you would expect the
 11 duty NILO to give you further instructions?
 12 A. Yes.
 13 Q. And would you have mobilised in accordance with his
 14 instructions?
 15 A. Yes.
 16 Q. As far as the action plans were concerned, I think this
 17 is already clear so will you forgive me, and I hope the
 18 inquiry will forgive me for asking again and duplicating
 19 this, but you didn't actually follow, to use that term,
 20 you didn't actually follow any action plan, did you?
 21 A. No.
 22 Q. There is within this sequence of communications at
 23 page 5 {INQ041473/5}, at 22.38.50, a reference to the
 24 ambulance call to Fire Control. I would like to take
 25 you to the right-hand column, please, where a comment

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1 has been added. It reads:
 2 "Timeline prepared by Station Manager Michael
 3 Lawlor."
 4 Who you probably knew, did you?
 5 A. To be honest, I didn't really know him. I knew the name
 6 and I knew the call signs.
 7 Q. Fire and Rescue Service. What has happened is, so you
 8 understand the point I'm asking you about, Mr Lawlor,
 9 after the event, prepared what he described as
 10 a timeline, which we have available to us, and in that
 11 timeline he has put those two entries, numbered 1 and 2.
 12 Mr Lawlor's view is that he has listened to the
 13 conversation, the call, the recording, and he's heard in
 14 the background the words, "Bomb is for a bomb threat".
 15 He's also heard the words, "Not going to mobilise
 16 anyone, we'll go to NILO".
 17 I'm not advancing any position in relation to the
 18 accuracy or otherwise of that, but that's Mr Lawlor's
 19 view, having listened to the audio. My question is
 20 this: do you consider, trying to remember and with the
 21 assistance of that, whether, within the control room,
 22 you were involved in any discussion as to whether the
 23 bomb action plan then in existence was or was not the
 24 action plan that had to be followed?
 25 A. I'm really sorry, I can't recall.

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1 Q. We do know that it has been said by the Fire and Rescue
2 Service that the action plan for a bomb was designed for
3 bomb threats.
4 A. Yes.
5 Q. The advantage of the action plan for a bomb, is this
6 correct from your point of view, was that it required
7 you to inform the duty NILO and the duty group manager
8 as the priority actions?
9 A. Yes.
10 Q. And to take advice?
11 A. Yes.
12 Q. Whereas the explosion action plan required the control
13 room to send appliances to the incident and possibly,
14 you may agree, to a rendezvous point if necessary?
15 A. Yes.
16 Q. Moving on from there, your position, I think, is this,
17 therefore, that the available action plans did not fit,
18 so far as you were concerned, the circumstances
19 portrayed by the information that was coming into the
20 control room?
21 A. That's quite right, yes, sir.
22 Q. And do you agree that it was impossible at that stage
23 for North West Fire Control to gauge the seriousness or
24 otherwise of the situation which you were being
25 confronted with?

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1 A. Yes, sir.
2 Q. Did you also consider that, on the information that you
3 had, there was a risk that this incident could escalate
4 in terms of secondary devices and further casualties?
5 A. Absolutely, yes.
6 Q. When you were involved with Mr Gaskell in the training
7 exercise in December of 2015, and he gave the
8 presentation which was based upon the attack in Paris in
9 November of that year, was it your understanding from
10 that presentation that the circumstances of the attack
11 in Paris involved explosions which were followed by
12 secondary action in the form of firearms, shooting and
13 further explosions?
14 A. Yes, that's right.
15 SIR JOHN SAUNDERS: So were you given any indication during
16 that presentation as to what you were to do if there was
17 an exploded bomb?
18 A. Not that I can recall, no.
19 MR SMITH: And it's certainly the case, isn't it, I think as
20 Mr Gaskell agreed, that at the time of that
21 presentation, no guidance was given in relation to the
22 action plans and how one should respond to the
23 perception that this could be a developing terrorist
24 incident?
25 A. No.

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1 SIR JOHN SAUNDERS: I'm afraid I'd forgotten that, so
2 thank you for reminding me.
3 MR SMITH: I would like to take you, if I may, to
4 paragraph 19 of your second statement, which is at
5 {INQ035438/3}. It begins, "For me".
6 The relevant words that I want to take you to are
7 these:
8 "Given what we are hearing about the seriousness and
9 circumstances of this incident, would it be prudent to
10 follow an action plan which will automatically result in
11 sending firefighters to the ground or an action plan
12 which would direct judgement on mobilisation to a senior
13 fire officer who has been trained to make such
14 decisions?
15 "A NILO would be able [I think you conclude the
16 paragraph] to access more accurate and detailed
17 information and have a more direct link to the highest
18 level police and security agency officers on the ground,
19 which would allow him to make more informed decisions."
20 Do you abide by that as your opinion still?
21 A. I do, yes.
22 SIR JOHN SAUNDERS: Right. I'm not sure that's how I've
23 understood your evidence so far.
24 A. Okay.
25 SIR JOHN SAUNDERS: It's been put there, as it were, as

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1 a choice between two action plans to follow. And the
2 impression given by that paragraph is perhaps you
3 decided to follow the bomb action plan.
4 A. Sorry, I was --
5 SIR JOHN SAUNDERS: My understanding --
6 A. -- referring to the last part of the paragraph about the
7 accurate and detailed -- more information with the link.
8 Sorry.
9 SIR JOHN SAUNDERS: So my understanding is, you'll have to
10 tell me whether I'm wrong, in consideration of what
11 you have heard, my understanding is you're saying: we're
12 not actually following any action plan, we're getting
13 advice because we don't know what to do?
14 A. That's right, yes. Sorry, the whole paragraph as a...
15 I've agreed we didn't really follow an action plan
16 because it didn't fit.
17 SIR JOHN SAUNDERS: Sorry, I just wanted to clarify that.
18 MR SMITH: Certainly. I will try and deal with it as well,
19 if I can, to assist you.
20 If we go back to the initial words:
21 "Given what we are hearing about the seriousness and
22 circumstances of this incident, would it be prudent to
23 follow an action plan which will automatically result in
24 sending firefighters to the ground or an action plan
25 which would direct judgement on mobilisation to a senior

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1 fire officer ..."
 2 I'll ask you without suggesting the answer, because
 3 that might be more helpful to the chairman. So my
 4 question is: did you have in mind when you said that two
 5 particular action plans?
 6 A. Yes, I did.
 7 Q. Which ones did you have in mind?
 8 A. The bomb action plan and the explosion action plan.
 9 Q. On the night, although you didn't follow any action
 10 plan, did you have those two plans in mind in terms of
 11 what they required of the control room?
 12 A. Yes.
 13 Q. I would like to ask you briefly, if I may, about two
 14 possibilities that I asked Mr Ellis about. Did you
 15 watch his evidence and listen to it?
 16 A. I did, yes.
 17 Q. Following those words, "We'll hang fire", possibility 1:
 18 if the duty NILO had said, "I can understand your
 19 concerns and thank you for calling me, but mobilise the
 20 nearest crews and appliances to the incident in
 21 accordance with your mobilising instructions and do it
 22 now and I'll get back to you as soon as possible", what
 23 would you have done?
 24 A. Done what he asked me to do.
 25 Q. If he had said to you, "Send them to the RVP", what

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1 would you have done?
 2 A. Sent them to the RVP.
 3 Q. And if he had said to you, "Have you got any pumps at
 4 Manchester Central," and you had said, "Just a minute,
 5 I'll have a look. Yes, we've got G16 P1 and G16 P2",
 6 and he had said, "Leave those pumps there, send the TRU
 7 to G16 and I'll get back to you as soon as possible",
 8 what would you have done?
 9 A. I'd have carried that action out, sir.
 10 SIR JOHN SAUNDERS: So you'd have done what he said?
 11 A. Yes.
 12 MR SMITH: So you complied, didn't you, with Mr Berry's
 13 instructions to the letter?
 14 A. I did, sir.
 15 Q. And created, didn't you, incident log 9078 --
 16 A. I did, yes.
 17 Q. -- for the mobilisation of four pumps and appliances to
 18 G18, Philips Park?
 19 I think I can help you about part of your evidence
 20 and assist the chairman as well in relation to one
 21 respect. Could we go to the call at 23.12, involving
 22 Mr Levy, which is {INQ041473/40}.
 23 Again, it's the right-hand column I would like to
 24 take you to. When you read the sequence of
 25 communications, were you concerned at first that it

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1 appeared that this was information that you could have
 2 provided to Mr Levy and you did not?
 3 A. I was, yes.
 4 Q. I think you are now of the view, aren't you, that you
 5 were reading off incident log 9078?
 6 A. Yes. It's the only explanation I can provide as to --
 7 because he was asking me which officers we had going, to
 8 know that information I would have had to be looking at
 9 9078 because they weren't on 9074.
 10 Q. If we go now to incident log 9078, at {INQ004284/9}, and
 11 if we bear in mind that the call with Mr Levy was at
 12 23.12, what we can see is that 50014, which is you,
 13 am I right?
 14 A. Yes.
 15 Q. That shows that you viewed the 9078 log on the terminal
 16 at the time of that call, and to be absolutely clear
 17 about 9074, if we go to {INQ008376/10}, we will see that
 18 you didn't look at 9074.
 19 A. That makes it a lot clearer.
 20 SIR JOHN SAUNDERS: So every time a log is viewed, that is
 21 recorded on the log?
 22 A. It is, yes.
 23 SIR JOHN SAUNDERS: Okay.
 24 MR SMITH: Does that help you to be confident that you were
 25 in fact looking at log 9078?

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1 A. Yes, thank you.
 2 Q. I would like to turn, if I may, to the issue of risk,
 3 which I've touched upon already and I hope I'm not going
 4 to duplicate this very much.
 5 Do you consider that the control room staff,
 6 principally team leaders, owed a duty of care to
 7 firefighters in terms of what you were sending them
 8 into?
 9 A. Yes.
 10 Q. And in circumstances such as these, do you agree that if
 11 you had been instructed by the duty NILO to send the
 12 appliances either to the RVP or to the arena, at the
 13 time of the 22.40 call, what would have been lost
 14 perhaps is the few minutes involved in the call to
 15 Mr Berry but that you would then have the knowledge and
 16 satisfaction of knowing that even if crews were being
 17 sent to that dangerous situation, you were being
 18 instructed to do so on the strength of his experience?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Just let's look at that for a moment and
 21 this duty of care. As I understand it, your instruction
 22 from GMFRS is, "You follow the appropriate action card",
 23 and that's it.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: On the face of it, the appropriate

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1 action card was the explosion action card. I understand
 2 your reluctance for not using it but that, on the face
 3 of it, is the appropriate one and that's what GMFRS
 4 officers have said and we heard that's what the chief
 5 officer, Mr O'Reilly said. I'm not saying you're wrong
 6 not to follow it.
 7 So when they're giving you a clear instruction what
 8 to do, does your duty of care to them actually arise?
 9 You wouldn't want to send them to their death in any
 10 event --
 11 A. No.
 12 SIR JOHN SAUNDERS: -- if you thought there was a risk of
 13 that.
 14 A. I suppose ultimately, you don't really know what you're
 15 sending them to when you send them to a house fire,
 16 persons reported, or any of the other incidents they go
 17 to. But I think the initial -- I was considering the
 18 duty of care at that point of speaking to Mr Berry
 19 because I wouldn't send them into --
 20 SIR JOHN SAUNDERS: I understand you need advice from
 21 Mr Berry. I understand your evidence about that and
 22 (overspeaking) --
 23 A. If for example there had been a secondary device which
 24 then detonated and that was on me at that point, that
 25 I would have said -- I would have sent them in.

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1 SIR JOHN SAUNDERS: And if Mr Berry had said, "Send them
 2 in", even if you thought he was wrong, you would have
 3 sent them in, that's your instruction?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Okay, thank you.
 6 MR SMITH: So if you consider that there was a serious and
 7 obvious risk of fatality to fire crews, but you had been
 8 instructed by Mr Berry to get the crews to the incident,
 9 you would nonetheless do it, despite the duty of care?
 10 A. Yes, I can't refuse.
 11 Q. You can't refuse?
 12 A. No.
 13 Q. Because at that point, do you consider you would have
 14 discharged your duty of care by taking the step of
 15 consulting the duty NILO to obtain his instructions?
 16 A. Yes, sir.
 17 Q. Whereas, conversely, if you had simply mobilised crews
 18 to the incident without taking the step of asking the
 19 duty NILO for advice, do you think you might have not
 20 been acting in accordance with that duty?
 21 A. Yes.
 22 Q. May I briefly touch, before we leave this, or I conclude
 23 my questions, on the change in action plans. Do you
 24 recall that on 21 June 2017, the "Bomb -- general"
 25 action plan was amended by the Fire and Rescue Service?

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1 A. I do recall, yes.
 2 Q. And the amendment required that in the event that the
 3 bomb had exploded, the control room was then to use the
 4 explosion action plan, which required the control room
 5 to send the crews and appliances to the incident?
 6 A. Yes.
 7 Q. Do you know whether North West Fire Control, and
 8 particularly you, was ever consulted about that proposed
 9 change?
 10 A. Not as far as I'm aware.
 11 SIR JOHN SAUNDERS: So does the duty of care still arise?
 12 I'm not sure -- if you don't mind me saying so, I really
 13 understand the reasons why the witness has done things
 14 and one can obviously analyse things in terms of a duty
 15 of care. I'm not sure that's a positive thought process
 16 that she would have gone through necessarily. Would
 17 you?
 18 Now you've got clear instructions, if a bomb
 19 explodes, you follow the explosion one, it's in red on
 20 the top, and you send them straight to the scene. Even
 21 if you are worried there might be a problem?
 22 A. Yes. If I was worried there might be a problem and I'm
 23 following an instruction, I could -- whatever I think
 24 that problem may be, there are other means that I can
 25 contact the crews, I can go on the Airwave, I can

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1 contact them on the radio, I can contact them on the
 2 fallback appliance mobile phone, I can phone them at the
 3 station before they set off. There's something that
 4 I could do to -- whatever it is that's concerning me --
 5 approach with caution or --
 6 SIR JOHN SAUNDERS: You could have done that on the night as
 7 well on 22 May?
 8 A. Um... Potentially.
 9 SIR JOHN SAUNDERS: Okay.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: I'm just a bit concerned that you're
 12 saying, as I understand it, GMFRS have imposed this on
 13 North West Fire Control.
 14 MR SMITH: Imposed, yes, I suppose that is what I'm saying,
 15 yes.
 16 SIR JOHN SAUNDERS: And North West Fire Control have agreed
 17 to it despite the obvious reservations which must come
 18 to one's mind.
 19 MR SMITH: They can't agree to it, sir. They've got to
 20 follow the mobilising instructions provided to them by
 21 the Fire and Rescue Service. There's no question of
 22 North West Fire Control agreeing to it. The terms of
 23 their engagement are to the effect that they must apply
 24 the mobilising instructions given to them.
 25 SIR JOHN SAUNDERS: So if this situation arose again there

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1 could be no doubt, North West Fire Control would have to
 2 mobilise fire engines to the scene?
 3 MR SMITH: They would be required to, yes.
 4 SIR JOHN SAUNDERS: Right.
 5 MR SMITH: But I'd just like to pursue the point --
 6 SIR JOHN SAUNDERS: I'm not stopping you, I'm just trying to
 7 see where we are.
 8 MR SMITH: Of course.
 9 The question I was going to ask you was: if,
 10 following the amendment to the bomb action plan, in
 11 other words you follow the explosion plan if the bomb
 12 has exploded, and that had been in force on the night,
 13 do you think on the same circumstances you would have
 14 still called the duty NILO first?
 15 A. Yes.
 16 Q. And would you like to briefly state your reasons why?
 17 A. Because it still doesn't fit into the incident type,
 18 it's still ... There's still other things being stated
 19 that -- with the active shooter...
 20 Q. May I interrupt you, would you forgive me? I want you
 21 to look at this from the point of view that the
 22 information about the active shooter has not yet come
 23 in. That didn't come in until a little later.
 24 A. If I knew it was a bomb that's now exploded and the
 25 action plan says to mobilise them, then I would have...

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1 Q. May I interrupt you? What I'm asking you is that if
 2 you'd had the information that you conveyed to Mr Berry
 3 at 22.40, and you had the amended action plan as it was
 4 amended on 21 June: if the bomb has exploded, follow the
 5 explosion action plan --
 6 A. Yes.
 7 Q. -- would you still have consulted the duty NILO before
 8 mobilising?
 9 A. No, I'd have followed the action plan it told me to
 10 follow. I'd have followed the explosion action plan.
 11 Q. What about your duty of care in those circumstances?
 12 A. Um...
 13 Q. It's a difficult one, isn't it?
 14 A. Yeah, really hard, because then do I follow through...
 15 Do I carry out the action that ...
 16 SIR JOHN SAUNDERS: When they changed the action plan to get
 17 to this situation, did North West Fire Control give you
 18 any guidance as to what you should do?
 19 A. I don't know how widely that was... Yes, I think it
 20 must have been cascaded to everybody but I remember
 21 having a direct conversation about the clarity around it
 22 with Mr Levy. He was very helpful to me in explaining:
 23 so hopefully this gives us a little more of an idea with
 24 bomb exploded, a bomb hasn't yet exploded.
 25 MR SMITH: And that was when he in his role as specific

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1 point of contact?
 2 A. I think he was still the SPOC then, yes.
 3 SIR JOHN SAUNDERS: Single point of contact, I think.
 4 MR SMITH: Yes.
 5 When did you have that discussion with him?
 6 A. After the action plan had changed.
 7 Q. Had you had such a discussion with him before?
 8 A. No. Because it seemed so clear now -- after. Now it's
 9 changed, it does seem clearer that ...
 10 SIR JOHN SAUNDERS: It follows then that it's exactly the
 11 same, you have exactly the same information as you had
 12 on the night, and at that time you thought, because of
 13 the possible danger to fire crews, you had to speak to
 14 someone to get further information essentially?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Now you're saying: well, there may be
 17 the danger, but they've said do it, so let's do it?
 18 A. I don't know if I'd be comfortable with that though --
 19 SIR JOHN SAUNDERS: No, no, I'm sure?
 20 A. -- because I don't have all the information. We have
 21 very limited information at that time and that's where
 22 the FDO comes in. The FDO is there to provide that
 23 information to the NILO. So I'm not sure I would...
 24 SIR JOHN SAUNDERS: There's the problem. I don't think
 25 we can take it any further.

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1 MR SMITH: There's the problem, sir.
 2 And before I conclude my questions, could I take you
 3 to the "Operation Plato -- standby" action plan, which
 4 is {INQ004447/1}, which was current at the time.
 5 The point I want to draw to your attention is that
 6 the first two lines read:
 7 "NWFC actions upon receiving information from fire
 8 crews/GMP/NWAS that a firearms incident is ongoing."
 9 Given your perception that this might be an
 10 unfolding terrorist attack with further consequences, is
 11 there a reason why you didn't consider implementing or
 12 following the "Operation Plato -- standby" action plan
 13 and was it in any way connected with the fact that it
 14 was perceived that there would need to be a reported
 15 firearms incident before that action plan was followed?
 16 A. Yes, and I think Operation Plato was something that
 17 I think I had fairly limited -- I think I possibly could
 18 have done with some more training on that, but my
 19 understanding was that the police would declare that.
 20 Q. There's one matter I want to deal with, which the
 21 chairman I think will be helped by, which is of
 22 importance, I would suggest. As time went on that
 23 evening, did you ever come to consider why the
 24 appliances were still at Philips Park Fire Station?
 25 A. I think I did come to consider that, but by that point

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1 Janine had arrived. Janine was in contact with the
 2 officers, so I think I kind of just ... I didn't feel
 3 that there was any action from me or us.
 4 Q. It could be said that from the control room's point of
 5 view, it might have been apparent that the Fire Service
 6 response had stalled. Looking at the incident log 9074,
 7 for example, one would see that nothing was happening in
 8 terms of movement of the appliances from Philips Park
 9 Fire Station. So I just wonder whether you can assist
 10 the chairman on the question of whether you ever applied
 11 your mind to that issue.
 12 A. I did, but I just thought we weren't required. I just
 13 thought it's not a Fire Service-led incident, it's
 14 a police-led, we mustn't be needed.
 15 Q. And do you consider that the change, with the
 16 implementation of North West Fire Control's major
 17 incident action plan, which it brought into place after
 18 the attack, appeared to be designed to make the control
 19 room proactive in terms of seeking out information as to
 20 progress?
 21 A. Very much so.
 22 MR SMITH: Thank you.
 23 Thank you, sir.
 24 SIR JOHN SAUNDERS: Thank you very much.
 25 MR DE LA POER: Sir, unless you have any more questions for

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1 Ms Gregson, that brings us to the end.
 2 SIR JOHN SAUNDERS: I'm very grateful and you have obviously
 3 thought a huge amount about this incident and you have
 4 been following the inquiry as we've heard. It may be
 5 that after this session there are other things that
 6 occur to you. Don't just have a conversation with
 7 yourself: send it to the inquiry team so we have the
 8 benefit of your thoughts.
 9 A. Okay.
 10 SIR JOHN SAUNDERS: I'm grateful. Thank you very much.
 11 Ten minutes.
 12 (3.27 pm)
 13 (A short break)
 14 (3.39 pm)
 15 MR DE LA POER: Sir, we are joined for the remainder of the
 16 afternoon and into tomorrow by Ms Carden. May she be
 17 sworn, please.
 18 MS JANINE CARDEN (affirmed)
 19 Questions from MR DE LA POER
 20 MR DE LA POER: Please can you state your full name?
 21 A. Janine Carden.
 22 Q. Ms Carden, did you join Cheshire Fire and Rescue Service
 23 in September 2000?
 24 A. I did.
 25 Q. Were you seconded to the North West Fire Control project

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1 in 2012?
 2 A. I was.
 3 Q. At the point that you were seconded as part of the
 4 project team, did you hold the position of operations
 5 manager?
 6 A. When I started my secondment, yes. Before that I'd been
 7 a watch manager — in Cheshire, I was a watch manager
 8 and as soon as I started my secondment I became an
 9 operations manager.
 10 Q. I hope you don't mind saying, but you're speaking
 11 a little fast.
 12 A. Sorry.
 13 Q. Not at all. People are tracking your evidence, although
 14 there's a transcript, others are making a note, so if
 15 I can ask you to slow it down very slightly.
 16 A. Of course.
 17 Q. Thank you very much.
 18 Did you take up the role as substantive operations
 19 manager when North West Fire Control went live
 20 in May 2014?
 21 A. Yes, I was TUPE-ed across from Cheshire on 14 May 2014.
 22 (Pause)
 23 Q. Were you in the role of operations manager on
 24 22 May 2017?
 25 A. I was.

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1 Q. You don't work for North West Fire Control any longer;
 2 is that right?
 3 A. That is correct, I left in February 2019.
 4 Q. I would like to look at the role of operations manager
 5 in relation to an incident, so there are no doubt other
 6 aspects to the role, but just in an incident.
 7 A. Yes.
 8 Q. Did North West Fire Control operate an escalations
 9 procedure?
 10 A. It did, yes.
 11 Q. So was the ordinary state of affairs that incidents
 12 would be managed by the duty team leader in the senior
 13 role?
 14 A. Yes.
 15 Q. And they would be supported by the administrative team
 16 leader?
 17 A. That's correct, yes.
 18 Q. But there existed a procedure where, if certain criteria
 19 were met, the operations manager would be invited to
 20 join the management of the incident?
 21 A. That is correct, yes.
 22 Q. Mr Cooper QC showed parts of that document earlier.
 23 I want to deal with it in a slightly different way now
 24 that he's introduced that document.
 25 So far as 22 May is concerned, as we will come to

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1 see in the detail , you were contacted at 22.44 by
 2 Lisa Owen?
 3 A. That's right, yes.
 4 Q. And given the information that Ms Owen had at the time,
 5 was it appropriate that she contact you?
 6 A. Absolutely, yes.
 7 Q. Was that the appropriate time for her to contact you so
 8 far as you are aware?
 9 A. Yes. As soon as -- once they've told the Fire and
 10 Rescue Service involved, to tell me next, yes.
 11 Q. So there was, to your mind at least, appropriate
 12 escalation to involve you in the incident on 22 May?
 13 A. Yes.
 14 Q. Speaking generally about an operations manager who is
 15 mobilised and who attends North West Fire Control to
 16 become involved in the management of an incident, once
 17 the operations manager is on site, who is in charge so
 18 far as North West Fire Control is concerned?
 19 A. It can vary from incident to incident, depending on what
 20 you're called in for. You might go in as an advisory
 21 role and to give support if the incident is proceeding
 22 well without -- for example I know Michelle's been on
 23 today. If it was a Lancashire hotel fire in Blackpool
 24 that's 15 pumps, I will be in, but I am quite happy to
 25 leave that with Michelle because of her experience

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1 in that and if she needs me, I won't necessarily take
 2 charge.
 3 Going to incidents of this nature, I saw myself as
 4 being the one in charge once I'd got there and had got
 5 up to speed with everything that was going on.
 6 Q. So whilst you may be an adviser or you may take charge,
 7 when we come to 22 May 2017, following a handover, you
 8 regarded yourself as being in charge?
 9 A. I did, yes.
 10 Q. We will come to track ourselves through the events of
 11 the night to that point and beyond, but before we do,
 12 one of your roles as operations manager was to be the
 13 single point of contact so far as Greater Manchester
 14 Fire and Rescue Service is concerned?
 15 A. That's correct.
 16 Q. Did you have an opposite number at Greater Manchester
 17 Fire and Rescue Service in the form of Group Manager
 18 Levy?
 19 A. Yes, I think Group Manager Levy started as the SPOC in
 20 November 2015 until the time I -- just before I left.
 21 Q. As a result of his role, so far as that's concerned and
 22 your role so far as that's concerned, did you come to
 23 work closely with Group Manager Levy?
 24 A. Yes.
 25 Q. To your mind, was that a good relationship?

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1 A. It was, yes. We were able to discuss things, but also
 2 just to tell each other when you were overstepping your
 3 parameters. If he was coming too much into what was
 4 Control's job, because they know that's for me to do,
 5 and the same really with him, or if I had difficulties
 6 with one of the station managers, I could have a chat
 7 with him. So it was an extremely good professional
 8 relationship.
 9 Q. Ms Gregson has spoken from the point of view of team
 10 leader --
 11 A. Yes.
 12 Q. -- about the differences in approach between the four
 13 Fire and Rescue Services who were supported by North
 14 West Fire Control.
 15 A. Yes.
 16 Q. And I hope I do justice to her evidence to characterise
 17 it in this way, that she said that Greater Manchester
 18 Fire and Rescue Service were on the more
 19 prescriptive /less discretion side of how much they were
 20 expecting North West Fire Control to exercise its
 21 judgement. Was that your experience also?
 22 A. Yes, but it could vary from FRS to FRS. I know Michelle
 23 gave the example of rescue at height, but I know
 24 Cheshire's stance was similar to Greater Manchester's:
 25 no, we want you to do what we've asked you to do.

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1 I would also say that there was probably more chance of
 2 discretion with me, with Greater Manchester, because
 3 I had the closer working relationship with them that I'd
 4 built up, but also with Cheshire because it was my old
 5 FRS. So if they ask who's on duty, it's me, they're
 6 happy to leave it with me. So there were those
 7 relationships in a way that helped or hindered.
 8 I wouldn't have necessarily felt as comfortable
 9 making a decision for Lancashire as I would have done
 10 for Cheshire or Greater Manchester because I'm not sure
 11 where they stood on your more simple -- I say simple, a
 12 rescue from height is not always simple, but on that
 13 sort of incident where there's a standard set protocol.
 14 Q. Whilst there's no doubt positive relationships can often
 15 lead to benefits --
 16 A. Yes.
 17 Q. -- do you perceive there as being any risk if the
 18 attitude of the Fire and Rescue Service that North West
 19 Fire Control is supporting is affected by which person
 20 happens to be available for any particular incident?
 21 A. Absolutely, yes. I was quite often a bit insulted that
 22 we were professional Control staff, as managers who had
 23 worked in FRSs, making decisions for that FRS on our
 24 own, that now suddenly you've got to run everything past
 25 someone in another FRS, and I think it was because we

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1 hadn't necessarily worked together and people didn't
 2 know how others worked, you haven't built up that
 3 working relationship, so you don't know how they work.
 4 So it was easier to follow the procedures unless you're
 5 adamant that doesn't quite fit the procedures, but you
 6 would then tell them what you have done and why you have
 7 done it.
 8 Q. It sounds from what you're saying, and you tell me if
 9 I'm wrong about this, that even by May 2017, North West
 10 Fire Control had been operating on behalf of four Fire
 11 and Rescue Services for 3 years --
 12 A. Yes.
 13 Q. -- that old loyalties such as yours with Cheshire and
 14 potentially Ms Gregson's with Lancashire still counted
 15 for something?
 16 A. Yes. Because those people did know you and -- just as
 17 an example, crews ringing up about not wanting to go on
 18 reliefs, Cheshire crews, if they knew I was in charge,
 19 they wouldn't ring up because they know they are getting
 20 sent and I am not going to change my mind, it's them
 21 that I've picked and them that are going. If it's
 22 someone they don't know, or they know might be easier on
 23 that route, they'll try them, if that makes sense. That
 24 sounds a bit ... I don't know if that's a good example
 25 or a bad example -- yeah, you get to know who you work

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1 with.
 2 Q. I would like to come back to your particular
 3 relationship with Greater Manchester Fire and Rescue
 4 Service as the single point of contact. Your opposite
 5 number was Group Manager Levy but did you also develop
 6 a relationship with Group Manager Fletcher?
 7 A. Yes.
 8 Q. And again, characterise the nature of that relationship,
 9 please.
 10 A. That again was an extremely good working relationship.
 11 Sarah Wilson, my boss at the time, when I started at
 12 North West Fire Control as the SPOC once we'd gone live
 13 and took up SPOC role, her thing was: get in the Fire
 14 and Rescue Service, make your presence felt, make sure
 15 they don't forget us on things, because even in your own
 16 FRS, before North West Fire Control, sometimes they'd
 17 bring in a change of procedure about mobilising, "Oh, we
 18 forgot to tell Control". It's like we're the first
 19 point of contact but quite often we are the last to be
 20 told.
 21 Sarah's thing for the SPOC was: make sure everyone
 22 in Manchester knows who you are, make sure they're not
 23 forgetting you when they are looking at changing
 24 policies, procedures, embed yourself within that
 25 service. So I did. I basically got myself on as many

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1 different departments, groups, as I could, so I tried to
 2 get as close as possible to CPU, which is
 3 John Fletcher's department --
 4 Q. That's the Contingency Planning Unit?
 5 A. Yes. And also the training centres so I could see
 6 what was coming up and that sort of thing. So yes,
 7 I tried to make sure they didn't forget me.
 8 Q. One of the things that Greater Manchester Fire and
 9 Rescue Service provided to North West Fire Control were
 10 action plans.
 11 A. That's correct.
 12 Q. I would just like to examine briefly the process by
 13 which, from your point of view, those came to be part of
 14 North West Fire Control's procedure.
 15 A. Yes.
 16 Q. When Greater Manchester Fire and Rescue Service had an
 17 action plan that they wanted North West Fire Control to
 18 follow, was there a process of consultation or were you
 19 simply given the plan and told, "This is what you must
 20 follow"?
 21 A. We were given the plan and told what we would follow.
 22 I had a good relationship with my SPOCs and the SPOC
 23 before Ben, I had a good relationship with him as well.
 24 They would say to me: this is what we want to change,
 25 does it make sense. Because sometimes each FRS would

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1 put its own terminology within, so that's why I thought
 2 it was quite good, me being from a different Fire and
 3 Rescue Service, because if Manchester gave me something
 4 that the wording was Manchester-ised and didn't make
 5 sense to me, it won't make sense to half the control
 6 room.
 7 So I would go, "What does that mean," and they
 8 would -- well, we always call it like -- I can't think
 9 of an example off the top of my head, but it wouldn't
 10 necessarily mean anything to me from a different FRS
 11 even though you would think we'd all use the same
 12 terminology. So I would say, can we change that to
 13 a different word, so that it makes more sense, but not
 14 the actual actions themselves, just if there was a bit
 15 of ambiguity around the instruction.
 16 Q. We're going to have a look at two action plans that have
 17 featured a number of times in our process, and I'm going
 18 to ask for them to come up on the screen, not to
 19 scrutinise them, but just so we all know what we are
 20 taking about and in particular the format.
 21 The bomb action plan, {INQ004360/1}. Did you ever
 22 receive or see this action plan in the format it appears
 23 here?
 24 A. Yes. They're Greater Manchester Fire and Rescue
 25 Service's versions of the action plans that were then

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1 put into North West Fire Control's mobilising system.
 2 Q. And is the information taken principally from the large
 3 box?
 4 A. Yes.
 5 Q. And put into the computer system?
 6 A. Yes. Everything that says "North West Fire Control
 7 actions", all of that is put into the system.
 8 Q. If we scroll down to the second page, we'll see the
 9 version control data {INQ004360/2}. We can see it was
 10 created pre—North West Fire Control going live. The
 11 latest update was September 2015 — in fact, forgive me,
 12 December 2015, the last one with Mr Levy's initials.
 13 A. Yes.
 14 Q. What did you understand this action plan to be relevant
 15 to?
 16 A. This particular one?
 17 Q. If we go back up to the top if you want to see it. This
 18 is the "Bomb — general" action plan.
 19 A. I saw that as being bomb alerts, bomb threats,
 20 notification of say, World War II bombs found in
 21 gardens, grenades found in garden from wars a long time
 22 ago, that sort of thing.
 23 Q. Unexploded ordnance?
 24 A. Yes.
 25 Q. Can you see a potential problem with the title of this

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1 action plan?
 2 A. Yes.
 3 Q. What do you identify as the problem?
 4 A. "Bomb — general". General could be — now with
 5 hindsight that could mean anything. That is also an
 6 incident type action plan, so that was the incident type
 7 that was in for Control was "Bomb — general".
 8 Q. Can I just try and press this a little further. When
 9 you say that's the incident type, had Mr Ellis for
 10 example chosen to type the word "bomb", instead of the
 11 word "explosion", and both words were used in the course
 12 of the call that he had, that would have prompted this
 13 action plan to come up, would it?
 14 A. If he had picked that incident type and saved the
 15 incident, that action plan would automatically attach to
 16 the incident.
 17 Q. So what information would be available, either as part
 18 of training or when an operative is put in the position
 19 of receiving the call, that communicated that this
 20 particular action plan was for unexploded bombs?
 21 A. It doesn't, and this is where it's very difficult
 22 because I was involved with North West Fire Control for
 23 2 years before going live. At first, when we were
 24 creating everything for the mobilising system, we tried
 25 to put incident types in for everything, for as much as

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1 we could think of. It ended up there was something like
 2 over 400 incident types. It was obvious it was going
 3 become very onerous — for example, if I give you
 4 something completely different, hazmats, chemical sort
 5 of incidents.
 6 At first, because every FRS put in what they wanted,
 7 ooh, we could have these incident types, because you've
 8 got four, so you've got four different ways of thinking.
 9 And when we say — for example, hazmat's one, there
 10 ended up being over 20 different types of hazmat
 11 incident for an operator to pick by just putting
 12 "hazmat". When you're on an emergency call and you've
 13 got a ream of incident types to choose from, it's not
 14 practical, it's not feasible.
 15 So that ended up getting narrowed down to two of
 16 "hazmat — small", "hazmat — large", as an example,
 17 because it became too big — because if you put every
 18 scenario, when someone is on the phone, it's hard to
 19 explain what it's like being on a 999 call. When you're
 20 on a 999 call, that person needs you, and the result of
 21 not dealing with that quickly is horrendous or can be
 22 horrendous.
 23 So to be faced with a massive list that you have to
 24 scroll through going, "Just bear with me, I've got to
 25 find the action", it's not appropriate.

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1 So a lot of the incident types, they were cut down
 2 from over 400 to — I think it was 175, which is still
 3 a lot.
 4 Q. If I ask you to focus on this one.
 5 A. Sorry.
 6 Q. Not at all, not at all. Does it all come to this, that
 7 whether with or without hindsight, we can leave that
 8 question aside, this incident type was misnamed and it
 9 should have been clearer to the operatives that this was
 10 for an unexploded bomb?
 11 A. I would agree. What I would add is for me, the
 12 situation we were faced with, we could have picked any
 13 incident type in the world: I wasn't going until I knew
 14 more information and I know I wasn't there at the very
 15 start. It could have been an admin incident for the —
 16 and I appreciate it's really hard because you're looking
 17 at it as it is and you pick that incident type, so you
 18 follow that.
 19 My experience, my training, it didn't matter what
 20 incident type was put in, because you were always going
 21 to seek further clarification and advice. I don't know
 22 if that helps or hinders, sorry.
 23 Q. Let me just invite you to consider this in the context
 24 of that answer: the information we've received so far
 25 is that, so far as Greater Manchester Fire and Rescue

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1 Service is concerned, North West Fire Control's
 2 instruction was to select the appropriate incident type
 3 and do what it said.
 4 A. Yes.
 5 Q. You have indicated that the explosion action plan — and
 6 here I'm referring to the contents of your statement —
 7 may have been, within the terms of everything at the
 8 time, the appropriate incident type?
 9 A. Yes.
 10 Q. So let's just have a brief look at that, again
 11 a document we've looked at many times, {INQ004404/1}.
 12 Again, is this a document, in the format that it
 13 appears here, that you had seen before May 2017?
 14 A. Yes.
 15 Q. You can perhaps therefore help us with one issue that
 16 has led to a number of witnesses being questioned.
 17 Under the heading "Triggers", it doesn't, do you agree,
 18 actually list exactly what the triggers are?
 19 A. No.
 20 Q. What it says is that the causes of the explosion could
 21 trigger different incident type action plans. So
 22 instead of saying, "This action plan is for this event",
 23 what it says is, "Depending on the nature of the
 24 explosion, this might not be the right action plan". Do
 25 you agree that's the effect of what it says?

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1 A. Yes.
 2 Q. One of those that it indicates might require a different
 3 response is a bomb.
 4 A. Yes.
 5 Q. So when you saw this, what did you understand a person
 6 who was facing the situation of an exploded bomb who's
 7 taking that call in North West Fire Control should do?
 8 A. Personally, I wouldn't have chosen the incident type
 9 "explosion". I can't say what someone else has done,
 10 but I think it's just a case of getting — you can't
 11 create an incident on the mobilising system that's there
 12 without putting an incident type, so you've got to put
 13 something.
 14 I would have probably chosen bomb, but then again,
 15 if I'd chosen explosion, I'd have done exactly the same:
 16 tell a NILO.
 17 Q. I understand that that's your perspective. Do you agree
 18 that the position you were in, with all the knowledge
 19 and experience that you had, is potentially very
 20 different to the person taking the call?
 21 A. Yes, I would agree.
 22 Q. And the difference is that you may know an awful lot
 23 more than they do?
 24 A. I've certainly got a lot more experience than the
 25 operator taking the call, yes.

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1 SIR JOHN SAUNDERS: Sorry, just understanding this, the
 2 operator on his computer has just the things in the big
 3 box at the top?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: He doesn't have the triggers?
 6 A. No.
 7 SIR JOHN SAUNDERS: So is there a different action plan for
 8 a chemical bomb going off?
 9 A. Do you know what, without looking at the incident types,
 10 I think there is a particular — there's another type of
 11 incident type relating to ... I don't know whether I'm
 12 allowed to say anything — but to a chemical type
 13 incident, I don't know if I can use the abbreviation,
 14 I'm sorry —
 15 MR DE LA POER: Are you talking about CBRN?
 16 A. I am, yes.
 17 Q. I'm sure that's a phrase we've heard already in open
 18 session.
 19 A. Yes, there were incident types for that sort of thing as
 20 well.
 21 SIR JOHN SAUNDERS: Was there one for a gas explosion?
 22 A. Yes — well, no, sorry, it was explosion. For me,
 23 explosion, like I say, is ... It sounds awful to say
 24 a normal explosion, but not this type of incident, it's
 25 likes a gas explosion.

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1 SIR JOHN SAUNDERS: Okay. It says here:
 2 "Cause of explosion could trigger different incident
 3 type action plans."
 4 And then gives an example of gas.
 5 A. Yes.
 6 SIR JOHN SAUNDERS: So is there a different incident action
 7 plan for a gas explosion?
 8 A. No, it was just explosion from my memory of that.
 9 MR DE LA POER: So why does it say that, do you know?
 10 A. Do you know what, just thinking of it, I've seen these
 11 so many times and like I say, when I was — I would
 12 sometimes be sent these to change something that was in
 13 our system from Manchester, Manchester would send it to
 14 me and I'd just go through. My bit was the top actions.
 15 I don't actually know who at Manchester — sorry, when
 16 I say Manchester, I mean Greater Manchester Fire and
 17 Rescue Service — I don't know who ever wrote the
 18 triggers. I really don't know.
 19 SIR JOHN SAUNDERS: And that wouldn't be seen by any of your
 20 operatives?
 21 A. No, because it wasn't something that was in the system.
 22 I have put action plans into the system, created them,
 23 on behalf of Greater Manchester, and I have said in the
 24 past to Greater Manchester Fire and Rescue Service —
 25 I'm probably talking 2014 and before — "Why have you

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1 got that on there because we can't put that anywhere?"
 2 And they were like, "It's for our information".
 3 SIR JOHN SAUNDERS: Okay. Would an operative know that if
 4 it's a gas explosion being reported they put in for the
 5 action plan gas explosion?
 6 A. If they put in gas explosion, that is one of the
 7 incident types that comes up. The incident types work
 8 off keywords, so they could put keywords in to the
 9 mobilising system and each of the FRSs were asked to
 10 give keywords. So if you put in "gas", one of the
 11 things that will come up is "explosion" because I'm
 12 pretty sure that was a key word for the explosion
 13 incident type.
 14 SIR JOHN SAUNDERS: But if you put in "explosion", you'd
 15 simply get the explosion action plan?
 16 A. You'd get the —
 17 SIR JOHN SAUNDERS: You wouldn't get a choice?
 18 A. No.
 19 MR DE LA POER: I suppose what it all comes to is —
 20 I appreciate that you in your position had an
 21 opportunity to have a dialogue with Greater Manchester
 22 Fire and Rescue Service.
 23 A. Yes.
 24 Q. You get to see these, you get to propose word changes to
 25 make sure it aligns so that the operatives understand

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1 the words that they are reading.
 2 A. Yes.
 3 Q. But what training was there put in place specifically
 4 in relation to the explosion and bomb action plans so
 5 that every control room operative and every team leader
 6 knew exactly which action plan to follow?
 7 A. I don't know if there's anything... This sounds like ...
 8 I didn't really do much of the training. I did some of
 9 the training at the start for existing control room
 10 operators on the mobilising system. As for training
 11 staff, it wasn't really something I did, because I was
 12 the single point of contact for Greater Manchester; the
 13 operational support department did the training. I know
 14 training was put together around — I think they called
 15 it resilience training, around MTFA and bomb-type
 16 incidents.
 17 With regard to the action plans, I don't think there
 18 was any training on action plans as such, but if you
 19 remember there is incident type action plans, there's
 20 over 175 for each brigade — sorry Fire and Rescue
 21 Service, so everything you do, you times by four. There
 22 are thousands and thousands of action plans because, as
 23 well as your incident type action plans, there's
 24 floating action plans, that's where the Op Plato is
 25 a floating action plan, so if it's Op Plato that is

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1 declared, the operators know — more than being trained
 2 on the action plans and what's in them, because what's
 3 in them should be very self-explanatory, so rather than
 4 being trained on what's in them, they're trained when to
 5 use them, if that makes sense.
 6 Like if someone says rescue, "Rope rescue in use,
 7 assistance required" or "response required", an operator
 8 knows to go and search for that particular action plan
 9 because it won't be associated. So that's what I'm
 10 trying to say: there's thousands of action plans, so
 11 where do you stop with your training on them? So it's
 12 more — and this is something that I was always taught,
 13 old school, in Cheshire, at the very beginning: you
 14 don't need to know everything but you need to know where
 15 to find it.
 16 Q. Let's just —
 17 SIR JOHN SAUNDERS: Not an unusual instruction, I think.
 18 When you worked in Cheshire did they have action
 19 plans?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR DE LA POER: You have told us that you think that the
 23 explosion action plan, the one that we have up on the
 24 screen in the format that it's in, may have been the
 25 right action plan to choose based upon the information

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1 that the operative was getting.
 2 A. Not so much the action plan, the incident type and like
 3 I say, for me it didn't matter what incident type they
 4 picked. They could have picked a car fire. I was never
 5 going to mobilise and I know... As someone experienced,
 6 an old mobilising system that I worked on, there was an
 7 opportunity where you didn't have to enter an incident
 8 type. This one insisted you did. So I'm sort of trying
 9 to say in this situation, with the information that's
 10 coming in, the incident type to me wasn't important.
 11 Q. His view will be something for him to speak to when he
 12 comes along, but the chief fire officer, Mr O'Reilly,
 13 and indeed a number of the Fire and Rescue Service
 14 senior staff who the inquiry have heard from already,
 15 believed, their evidence, that the right response was
 16 the explosion action card, the action plan, followed by
 17 immediate mobilisation in accordance with that. You
 18 seem to have a very different view about it.
 19 A. I do.
 20 Q. And your view seems to align with both Lisa Owen and
 21 Michelle Gregson's actions when they were presented with
 22 that situation.
 23 A. Yes.
 24 Q. Does this not reveal a very significant breakdown in
 25 communication between North West Fire Control and

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1 Greater Manchester Fire and Rescue Service?
 2 A. If Greater Manchester Fire and Rescue Service at the
 3 time, on the information available, were happy to follow
 4 the explosion action plan that's in front of me, I'm
 5 shocked.
 6 Q. Why are you shocked?
 7 A. Because of the information coming in: the amount of
 8 casualties that are there, the fact that a bomb's gone
 9 off, with the severe state -- sorry, the severe status
 10 of the country at that time, that we were told that it
 11 was quite likely there was going to be a terrorist
 12 attack, there was going to be a terrorist attack in the
 13 UK, they just didn't know where, and I know a few places
 14 have been mentioned to me in training of where it could
 15 be, and Manchester was one of them. Knowing that, and
 16 knowing what they expected from a terrorist attack, that
 17 it wasn't just going to be a lone person, that it was
 18 going to be someone waiting to cause even more harm than
 19 they did -- sorry... That surprises me, that they would
 20 follow that, because -- it just really surprises me.
 21 Q. I do have one follow-up question but I want to check
 22 that you're all right.
 23 A. I'm okay.
 24 Q. We know that following this incident, you tell us
 25 whether you were aware of it or not, that

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1 Greater Manchester Fire and Rescue Service amended the
 2 "Bomb -- general" plan to make clear, as Ms Gregson has
 3 described it, that if there is a report of a bomb that
 4 then goes off, then the explosion action plan should be
 5 followed.
 6 A. Yes.
 7 Q. So did you, bearing in mind your shock that you have
 8 described, speak up at that point and say, "By doing
 9 this, you are doing the wrong thing"?
 10 A. Bearing in mind it was a very heightened state of
 11 emotion at that time, bearing in mind what we had just
 12 dealt with, I feel, and I still do, that it was
 13 a knee-jerk reaction -- I can't remember who I spoke to,
 14 do you really want this regardless of -- do you not want
 15 to see what other information is coming in? And it was
 16 like we've been told to do it, just put it in, just do
 17 it. OS [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 Q. Can I stop you there? I think that we have gathered
 25 enough from your answer, but we are being careful not to

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1 reveal any information that you may have that might
 2 assist anyone.
 3 A. Yes.
 4 MR DE LA POER: Sir, it's just after 4.15. I can probably
 5 do a short topic in 5 minutes, but it may be that we've
 6 reached a natural break.
 7 SIR JOHN SAUNDERS: I think we'll stop. Apparently the
 8 Prime Minister and the Leader of the Opposition have
 9 encouraged people to go home early, so how can I resist?
 10 We'll finish and come back at 9.30 tomorrow. Thank you
 11 very much.
 12 (4.16 pm)
 13 (The inquiry adjourned until 9.30 am
 14 on Wednesday, 30 June 2021)
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