

OPUS2

Manchester Arena Inquiry

Day 128

July 6, 2021

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Tuesday, 6 July 2021

1 (9.30 am)

MR JOHN FLETCHER (continued)

Questions from MS CARTWRIGHT (continued)

MS CARTWRIGHT: Mr Fletcher, we were going through yesterday

the start of your involvement on the night of 22 May.

Can I ask you a question first of all, because

if we look at the underpinning call records -- sir, for

your reference it is {INQ004348/1}, and the breakdown of

calls made from your mobile phone that night, we can see

at 23.15 there was an 8-second call made to a 726

number -- it's not in fact on your schedule there,

Mr Fletcher --

A. That's all right.

Q. -- and I think you were assisted this morning in

identifying that that was the telephone number of

Mr Myers.

A. Yes, ma'am, that was my line manager.

Q. Thank you. We can see also that there was then

a follow-up call at 23.16, again for 5 seconds. But can

I ask you then what was the purpose of contacting

Mr Myers?

A. I think it was just to let him know about the incident

in case he hadn't already been aware of it, but his

phone was switched off, I think he was in bed, so

1

1 he wasn't aware of the incident until the next morning.

2 Q. You just described that he was your line manager.

3 A. That's correct, yes.

4 Q. In terms -- you identified yesterday that you were the
5 line manager for Mr Lawlor.

6 A. That's correct.

7 Q. And I think it's right, isn't it, that you were also the
8 line manager for Mr Gaskell?

9 A. Correct, yes.

10 Q. And for Mr Berry?

11 A. Yes.

12 Q. Can I go back to the first call so there's absolute
13 clarity of what was discussed and asked of you at the
14 time by Mr Berry when you made that first call we
15 discussed yesterday?

16 In terms of that call, is it right that Mr Berry
17 asked you during the call to make contact on his behalf
18 with the FDO?

19 A. Yes, he did.

20 Q. Did he tell you that he was having real difficulties in
21 getting in touch with the FDO?

22 A. He did. And also I was aware at that stage that he was
23 having problems with his journey into Philips Park.

24 Q. Can you just give clarity as to what he said about the
25 difficulty he was having about his journey to

2

Philips Park?

2 A. At the time I was speaking to him I think he had got to
3 the junction on the M56 and the slip road was blocked to
4 Manchester, so he had to continue, if you know the
5 junction, heading towards Wales. What I wasn't aware of
6 then was the -- just to repeat all the (inaudible) in my
7 mind he would have gone to the first junction, done
8 a U-turn and come back and headed in the right
9 direction.

10 Q. As his line manager when he is describing to you that he
11 was having severe difficulties, you have just described
12 you knew what junction he was at, so in your mind how
13 much longer do you think it was going to take Mr Berry
14 to get to where he was heading, namely Philips Park?

15 A. Where the next junction is, to do the U-turn, I didn't
16 think was that far, so it wouldn't have put that much
17 time on his journey there. The other aspect was I was
18 aware that two other NILOs had been mobilised, so if
19 there was a deployment of resources, the structure
20 should have been in place anyway.

21 Q. So you say that the structure should have been in place
22 in any event. But did that, when you received the
23 information directly from the on-call NILO, that he was
24 having difficulties in his journey, at a time 23.13, was
25 it not for you to be proactive then to ensure that there

3

1 was someone performing that role of the NILO and
2 deploying assets?

3 A. Well, as I say, the assets in my mind had already been
4 deployed. He'd requested the fire appliances, the
5 specialist response team, two further NILOs. Mr Berry
6 was sort of a conduit for new information. I don't
7 think I realised at the time until after the event the
8 level of calls that he was getting. So in my mind, the
9 response side, and I think I said in my statement, and
10 I didn't mean it in a negative way, but the response
11 side had been taken care of, ie resources had been
12 allocated to that incident.

13 I said I would try the force duty officer for him to
14 take some of that load off him and also, if I was
15 required, I would make my way into the command support
16 room.

17 Q. In terms of resources being allocated, you confirmed
18 yesterday you knew that they hadn't been deployed to
19 scene?

20 A. That's correct.

21 Q. And I think you also gave information that from what you
22 had been told at that time, even though there'd not been
23 formal confirmation, you had in mind that this was an
24 Operation Plato?

25 A. Correct, ma'am, yes.

4

1 Q. And so in terms of the need for there to be people being
2 proactive and getting a grip on what was happening, was
3 it not in your mind at that time that the assets,
4 particularly the assets that would assist, that could go
5 into the warm zone, were quite some considerable
6 distance away from Manchester Arena?

7 A. Yes. But as I said yesterday, when I spoke to Mr Berry
8 about the — and he identified Philips Park as the
9 rendezvous point, at that time those assets were
10 actually coming in towards the city centre — I will not
11 go into the locations as to where they are, but they're
12 outside, but they were coming in and we were
13 expecting — either if I'd got through or even the force
14 duty officer would get in contact with directly with
15 Mr Berry as he knew he was the duty NILO on the day, to
16 identify the forward command post or forward command
17 point at that time and they would subsequently deploy
18 straight to there.

19 SIR JOHN SAUNDERS: We know that NWFC and therefore GMFRS
20 act on action cards.

21 A. Yes, sir.

22 SIR JOHN SAUNDERS: If asked, which action card do you think
23 was being followed at this time or was there no action
24 card being followed?

25 A. Well, following the incident we was informed it was the

5

1 bomb action card that was being followed. Because Plato
2 hadn't been declared —

3 SIR JOHN SAUNDERS: Following the incident when?

4 A. When we had the sort of the debrief as such.

5 SIR JOHN SAUNDERS: Okay, well, that's leading everyone down
6 what may be a false path, but we'll have to consider
7 that later. Never mind.

8 At the time, what action plan was being followed, do
9 you think, ie what are the stages that are going to
10 happen which are laid out, as I understand it, on the
11 action cards?

12 A. Yes. I would have thought at that time possibly the
13 Plato, but as Plato hadn't been declared, Control hadn't
14 opened the card, so as I say I think there was confusion
15 with the action cards that were in place at the time.

16 SIR JOHN SAUNDERS: Should the Plato card be followed when
17 it hasn't been declared?

18 A. A very difficult question. I think it gives some
19 actions that could be followed, but because it hadn't
20 been declared and it hadn't been communicated to North
21 West Fire Control, really I can't have any complaints
22 that they didn't follow it. It may be an assumption
23 that that would be looked at, but on the night I don't
24 think it was looked at until we actually told them
25 Operation Plato had been declared.

6

1 SIR JOHN SAUNDERS: No, I'm really concerned with your view
2 at the time.

3 A. Like I say, the one I would have thought was the — like
4 I say the bomb, that's what was I was told after the
5 incident, but I believe that wasn't — the action card
6 of the bomb itself wasn't open and that was for a bomb
7 alert anyway.

8 SIR JOHN SAUNDERS: Okay. Thank you.

9 MS CARTWRIGHT: Mr Fletcher, you say in your witness
10 statement that on that telephone call Mr Berry seemed
11 significantly distressed and frustrated during this call
12 due to the adverse impact on his journey.

13 A. Correct, yes.

14 Q. So you, as his line manager, had noted not only that was
15 he having difficulties getting there, he was exhibiting
16 in the discussion you had a significant degree of
17 distress?

18 A. Yes, it was as he arrived at the junction because the
19 junction was blocked off.

20 Q. And in terms of him being the NILO on duty that night,
21 was it not important at that stage to perhaps relieve
22 some pressure off him to say: actually, look, you make
23 your way there, there are others in the NILO capacity,
24 I will task them up now to be the NILO and making the
25 decisions?

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1 A. At the time the consideration was that I was going to
2 take some of the load with trying to contact the force
3 duty officer. It is one of the things that I reflected
4 on afterwards. I probably could have taken the NILO role
5 and worked from home. It is something that we put in
6 place after the arena. On the night, as I said
7 yesterday, at that time I was also thinking of the wider
8 implication and the structure, so hence my subsequent
9 call to Mr Lawlor and then Mr Nankivell about myself
10 coming into the command support room. But definitely on
11 reflection, I think that is something that I could have
12 done from home and wished I had done.

13 SIR JOHN SAUNDERS: It has been identified subsequently that
14 actually having a NILO trying to make his way in and
15 find his way into Manchester and manage the whole GMFRS
16 response is actually unsatisfactory?

17 A. Yes, sir.

18 SIR JOHN SAUNDERS: Could that not have been foreseen? Did
19 you need the benefit of hindsight for that?

20 A. Being brutally honest, even at the time I didn't expect
21 the level of calls that Mr Berry was going to be
22 receiving or trying to make, and again the frustration
23 of not getting through to the force duty officer, if
24 he'd got through to the force duty officer straightaway,
25 I think a lot of that tension would have been removed if

8

1 he got the information. So again I think it was
 2 learning from the incident that led to the changes. We
 3 did make the changes straightaway. Like I say, from
 4 a personal reflection, I wish I had done that on the
 5 night, but I didn't; I concentrated on getting into the
 6 command support room.
 7 MS CARTWRIGHT: You have indicated you had thought about
 8 taking some of the load for him.
 9 A. Yes.
 10 Q. But you have just confirmed that one of the specific
 11 things that Mr Berry asked you to do was to make contact
 12 with the FDO.
 13 A. Yes.
 14 Q. I have looked at your mobile phone records and in terms
 15 of those mobile phone records, they've identified the
 16 additional call I've asked you about this morning with
 17 Mr Myers --
 18 A. Yes.
 19 Q. -- but they don't evidence that you made any attempt to
 20 contact the force duty officer until the call we'll deal
 21 with a little later at 00.04.
 22 A. I think the only reason that that's not shown on my
 23 record is because it was engaged. It didn't even go to
 24 an answerphone message. So as soon as I rang the force
 25 duty officer up, the number -- it was just engaged. So

1 the only thing I could think of is it's not registered
 2 on my phone.
 3 Q. So doing the best that you can now, the phone records
 4 don't support any connected call or any call to
 5 a voicemail facility?
 6 A. There was no voicemail facility.
 7 Q. What's your evidence then about the attempts you made to
 8 call the force duty officer's number?
 9 A. Well, I certainly tried. I think the first call I made
 10 after speaking to Mr Berry, I did speak to Mr Lawlor.
 11 I think I tried a couple of times, then it was engaged.
 12 I spoke to Mr Nankivell and then I tried several times
 13 and I also tried whilst I was en route to headquarters
 14 in my car.
 15 Q. So in terms of from the first call from Mr Berry when
 16 that ended and to the point when you arrived at the CSR,
 17 what is your evidence about how many attempts you made
 18 to call and make contact on the FDO line?
 19 A. Um... I couldn't put a definitive figure on it. It was
 20 several.
 21 Q. More than three?
 22 A. Oh definitely more than three, but probably less than
 23 10.
 24 Q. It's your evidence on every occasion it just rang
 25 engaged?

1 A. It was just engaged, yes.
 2 Q. In terms of that being what you were experiencing from
 3 your home, what consideration did you give at that point
 4 to other ways to contact the force duty officer?
 5 A. Well, when I phoned Control to book on duty, I asked
 6 them to put the ^{OS} channel on as a potential way of --
 7 oh, sorry, the Airwave -- the tactical Airwave channel
 8 on as a potential way of making contact.
 9 Q. We'll come on to deal with that subsequent call. But
 10 that's an Airwave channel to listen into to understand
 11 what's going on. But that wouldn't specifically get you
 12 directly to the FDO, would it?
 13 A. The intention when we had the Exercise Hawk River and
 14 the channel was discussed, that in my mind was being
 15 a direct line into the force duty officer or the OCB,
 16 where the force duty officer's located.
 17 Q. We've heard some evidence about the Hailing group that
 18 you as Greater Manchester Fire and Rescue Service could
 19 use to make contact with the police. Did you give any
 20 consideration to asking for a call to be put out on that
 21 Hailing group?
 22 A. No, I didn't. I didn't know about the channel at the
 23 time. I've only found out about that channel really
 24 during the inquiry.
 25 Q. Did Mr Berry also in that call -- was he asking you to

1 seek to identify where the forward command point was?
 2 A. It was one of the conversations that we had for the
 3 reason for contacting the FDO, yes.
 4 Q. Thank you. So was there any other routes you could go
 5 to to identify that information?
 6 A. I couldn't think of any at the time to get direct
 7 contact with the FDO. Even though I say -- I know e
 8 talked about the plan B, knowing he'd be busy, but
 9 I think that was the only plan B we had in mind at the
 10 time.
 11 SIR JOHN SAUNDERS: Could you have asked NWFC to do it?
 12 They could get through to the control room we know.
 13 A. Well, I didn't -- at one point during the conversation,
 14 I think it was with Janine Carden, after I'd mobilised,
 15 I asked was there any update on the active shooter.
 16 I asked specific questions, for an update on the
 17 active shooter from the Police Control and ambulances.
 18 But I didn't ask them to make direct contact with the
 19 force duty officer.
 20 SIR JOHN SAUNDERS: I think we've established that the
 21 failure of Mr Berry, or someone, to speak to the force
 22 duty officer effectively stalled the whole of the
 23 response by GMFRS.
 24 A. That's correct, sir, yes.
 25 SIR JOHN SAUNDERS: Did you think round the topic to say,

1 "Perhaps I'll try NWSAS"? After all, you are NILOs.
 2 A. Yes, sir.
 3 SIR JOHN SAUNDERS: That means you're meant to coordinate
 4 with your opposite numbers in the police and in
 5 ambulance.
 6 A. And again, it was something that I should have
 7 considered on the night. I focused too much on the
 8 force duty officer, I've got to hold my hands up to
 9 that. I did ask Control -- it wasn't Janine, I think
 10 she passed it on to another operator to try and get in
 11 contact with their Control to get any information, but
 12 I should have considered the NWSAS NILO; I didn't on the
 13 night, sir.
 14 SIR JOHN SAUNDERS: Would you have had the number of the
 15 on-duty NWSAS NILO?
 16 A. I wouldn't have had the number of the on-duty NWSAS NILO,
 17 but what I could have done was gone through their
 18 Control to get the number, and I didn't do that.
 19 SIR JOHN SAUNDERS: Why wouldn't you? I mean, as the NILO
 20 would have an FDO number, why would you not have a duty
 21 NILO number?
 22 A. For NWSAS?
 23 SIR JOHN SAUNDERS: Yes.
 24 A. At the time I think it was mentioned earlier on the only
 25 sort of formal contact was between the Fire Service and

13

1 the force duty officer. The night that the ambulance
 2 NILO didn't really -- although they'd done the course
 3 and it was a specific role, that sort of structure
 4 wasn't in place. I don't know why it wasn't in place.
 5 And after the incident, what we did was enforce with the
 6 NILOs the route through, which was via the Control, but
 7 it was later on that we put a more formal structure in
 8 so that North West Fire Control each day, as we phoned
 9 the force duty officer, they would get the number and
 10 the duty NILO would make direct contact with the NILO
 11 from the Ambulance Service so that the numbers were in
 12 each other's phones as a point of contact.
 13 SIR JOHN SAUNDERS: Okay.
 14 MS CARTWRIGHT: Can I just explore a little further the
 15 questions that the chairman's just asked you, bearing in
 16 mind your role as the group manager but also having
 17 a responsibility for the Contingency Planning Unit
 18 at the time. Would you agree from everything you told
 19 us when you came on the first occasion to give evidence,
 20 that had a key role in respect of a tri-service response
 21 and JESIP?
 22 A. Yes.
 23 Q. It also had to have a key role in terms of
 24 communication?
 25 A. Yes.

14

1 Q. So can you assist us as to how it was, when you were at
 2 home, not on duty, seeking to assist the response, it
 3 did not come into your mind when you couldn't get
 4 information from the police to seek to go to your other
 5 tri-service partner, NWSAS?
 6 A. As I said, I don't know why I didn't think about it.
 7 The first thought I had was asking our Control to speak
 8 to their Control. And also, although there was a time
 9 delay getting Mr Lawlor into the multi-agency control
 10 centre, to get that information, but that would have
 11 been further down the line.
 12 SIR JOHN SAUNDERS: I'm just wondering, going back to why
 13 these things -- we can know that things have been done
 14 since, but actually the question is: why hadn't they
 15 been thought of before, particularly when you would have
 16 been aware that the FDO was a possible point of failure,
 17 being overwhelmed?
 18 A. Yes. As I say, I think on the -- what we felt with the
 19 force duty officer was even though him as an individual
 20 would be overwhelmed -- and obviously listening to his
 21 dictaphone again I didn't realise how busy he would
 22 be -- we never envisaged -- whether we should have
 23 considered that we wouldn't get through on the number.
 24 We always thought we would be able to speak to somebody,
 25 the FDO, and the fallback we were putting in place was

15

1 the tactical Airwave channel. Yes, I think we should
 2 have thought about it further and we didn't have
 3 anything in place.
 4 MS CARTWRIGHT: We looked at the start of your evidence
 5 yesterday with the draft amendments you made to the
 6 mobilisation policy commencing in February of 2017,
 7 where because of the experience on exercising as to
 8 difficulties with the FDO you had thought about, if
 9 possible, if you can't contact the FDO -- so in your
 10 mind it should have been foreseeable, shouldn't it, that
 11 there could be a problem with getting access to the FDO
 12 on the night?
 13 A. Getting access to the FDO direct, yes. Getting access
 14 to the OCB and somebody sat with the FDO at that time
 15 wasn't in our thoughts. We always thought that we would
 16 get through somehow. We didn't expect the lines to be
 17 as swamped as they were.
 18 Q. We'll come on when we will deal with your time at the
 19 CSR to -- you give a description about it was actually
 20 when you had the Sky News on and you witnessed the
 21 ambulances at the scene that that caused a change and
 22 a need for further impetus in the CSR.
 23 A. Yes.
 24 Q. So just taking us back to this time shortly after 23.13,
 25 why was it not in your mind also at that time not only

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1 to contact NWAS to see if they'd managed to make contact
 2 with the FDO but also to get clarity from them as to
 3 whether they had deployed any assets to the scene?
 4 A. From NWAS, sorry?
 5 Q. Yes.
 6 A. I focused on the force duty officer. I should have
 7 thought about the Ambulance Service, I have no excuses
 8 for that. And then my focus then was to get into the
 9 command support room. I thought this incident was
 10 at the start and it was going to escalate further.
 11 I think maybe the phrase is tunnel vision and I just
 12 focused on getting in.
 13 SIR JOHN SAUNDERS: Okay. I think we've probably taken
 14 this as far as we can.
 15 MS CARTWRIGHT: Thank you.
 16 Just to complete the matter, in terms of the chain
 17 of emails, we've seen in the past when issues arose,
 18 certainly you had done co-working with a Mr Joe Barrett,
 19 who was an AITC commander.
 20 A. Yes.
 21 Q. But there are also the NWAS NILOs that would be
 22 information and numbers which you had in your phone?
 23 A. I don't know if I had all of the NILOs in the phone, but
 24 I did have my contact from the LRF. As I say, I have no
 25 excuses, I don't know why I just didn't think about

17

1 that. On the night I focused on the force duty officer
 2 and the need to get into the command support room.
 3 Q. Thank you. I think we can see from the MODAS records
 4 that you don't start to leave your home until about
 5 23.33. So you were at home for a period of 20 minutes
 6 or so after making that call. So can I ask you, did
 7 you have at home access to a laptop?
 8 A. Yes, I did.
 9 Q. You indicate now that you accept that you should have
 10 given more thought to taking on the role of the NILO,
 11 but did you access from your laptop the incident logs
 12 that now would be in existence that NWFC had created?
 13 A. No, I didn't at that time. I was focused on getting
 14 myself into the command support room.
 15 Q. Again, on reflection, would you accept it would have
 16 been helpful to log on to the computer and to look
 17 at the incident logs that were in existence that could
 18 have given you the capture of information that existed
 19 on NWFC's systems at that time?
 20 A. I absolutely do. As I say, after the incident, I know
 21 it's retrospective, that is one of the reasons that we
 22 changed the procedures. The only thing I'd say on that
 23 as well is, although from listening to the evidence last
 24 week, I put my laptop on, I suppose there's a 50%
 25 probability that I could have opened the wrong log

18

1 because of the time frame on that and the information
 2 I wouldn't have had access to at that time. I probably
 3 wouldn't have thought about looking if there was another
 4 log. I might have well looked at the one for
 5 Philips Park. That's just the thought process at this
 6 moment.
 7 Q. Thank you. Can I re-display, please, the WhatsApp group
 8 messages. {INQ019040/1}.
 9 We can see at 23.30, which would have been at a time
 10 before you left your home, that the NILO, Mr Dogget,
 11 indicated that he had picked up his daughter from the
 12 concert and that she was now home and safe. I think you
 13 sought to clarify yesterday messages that you had and
 14 hadn't seen. Before you left your home, did you see the
 15 WhatsApp message from Mr Dogget?
 16 A. No, I didn't. The only messages I saw on the WhatsApp
 17 was the initial one from Dave Keelan and Phil Nelson,
 18 and to be honest I think it was days later before I saw
 19 any of the other messages.
 20 Q. At any point then during that even, was there any
 21 situational awareness you became aware of that had come
 22 from either of the NILOs that we see on the WhatsApp
 23 messages who had had daughters at the concert and, in
 24 particular, for Mr Dogget had actually been, it seems,
 25 either to the arena or proximate to the arena to collect

19

1 his daughter?
 2 A. Not to myself, I wasn't aware, no.
 3 Q. Thank you. If you could have perhaps the schedule in
 4 front of you and we'll continue to work through the
 5 messages. We can see at 23.22 that you did make contact
 6 with North West Fire Control and so we dealt yesterday
 7 with the follow-on calls from Mr Lawlor and Mr Nankivell
 8 so I'm not going to deal with those.
 9 Mr Lopez, please could we display the transcript of
 10 that call at 23.22, {INQ001186/1}.
 11 In terms of this discussion with Joanne Haslam,
 12 we can see in that transcript displayed that --
 13 SIR JOHN SAUNDERS: Okay, are we looking at the right
 14 transcript?
 15 MS CARTWRIGHT: {INQ001186/1}. I do apologise if I gave the
 16 wrong reference. Thank you.
 17 We can see that you set out -- in this call at
 18 23.22, you inform North West Fire Control that you are
 19 going to book yourself on duty and make your way to the
 20 command support room.
 21 A. Um ... Sorry, are these timings correct? It says
 22 22.15.
 23 Q. No, ignore the timings in the column on the left-hand
 24 side. We know that the call commenced at 23.22.15.
 25 Ignore the timings in the left-hand side.

20

1 So at 23.22, this call commenced. But we can see
 2 that you set out to North West Fire Control that you
 3 were going to book yourself on duty.
 4 A. Yes.
 5 Q. And that's so they would be clear that you were being
 6 deployed, effectively, at that point?
 7 A. Yes. I was going to go on blue lights so I needed to be
 8 on the log.
 9 Q. We can see that you go on to indicate about the number
 10 of NILOs and the number of NILOs that would be at
 11 Philips Park.
 12 A. Yes.
 13 Q. You also confirm that you had just spoken to
 14 Mr Nankivell.
 15 A. Yes.
 16 Q. You say this:
 17 "I think there's obviously a load of confusion at
 18 the moment but I'll make my way to the CSR, but if you
 19 can book me on duty."
 20 A. Yes.
 21 Q. In terms of identifying in your mind in the situation at
 22 that time there was a lot of confusion, did you not seek
 23 to ask North West Fire Control, in the absence of having
 24 access to the log, what information they could give to
 25 you at that time to give you the most up-to-date

21

1 position of what the picture, the full picture, was
 2 about what was needed and where things were up to?
 3 A. Yes, I possibly could have done on that call. I got
 4 subsequent calls before I actually did set off from
 5 Janine Carden. I fully expected that -- I'd had
 6 a briefing off Mr Berry that he would be in possession
 7 of all the relevant information and, as I said when
 8 I spoke to Janine, I didn't have for a full briefing, so
 9 I asked specific questions about the status of the
 10 active shooter.
 11 Q. Let's not deal with the Janine Carden call. I just want
 12 to deal with the Joanne Haslam call at the moment.
 13 A. Okay.
 14 Q. You say you thought Mr Berry would be in full possession
 15 of all the information?
 16 A. Yes.
 17 Q. But from what you'd already gleaned at 23.13, he'd been
 18 in the car for some time?
 19 A. Yes, although as I said yesterday, I thought -- I didn't
 20 know how long he'd been in the car.
 21 SIR JOHN SAUNDERS: Just stop for a minute. Presumably
 22 you're talking about that any information NWFC had they
 23 would have given to Mr Berry?
 24 A. That's correct, sir, yes.
 25 SIR JOHN SAUNDERS: So that's what you mean by "having all

22

1 the information"?
 2 A. Yes, sir.
 3 SIR JOHN SAUNDERS: You knew he hadn't been in touch with
 4 the FDO?
 5 A. Yes, sir.
 6 SIR JOHN SAUNDERS: Is that in your mind how it should
 7 happen that NWFC don't tell everybody who comes in all
 8 the information they know unless they're asked for it
 9 but they give it to the duty NILO?
 10 A. I would have expected every officer who'd been mobilised
 11 to that incident, ie the three NILOs, to be in
 12 possession of all of the information at that time.
 13 SIR JOHN SAUNDERS: But not you.
 14 A. Not me at that time, no.
 15 SIR JOHN SAUNDERS: Because you were going to the CSR?
 16 A. I was going to the CSR, yes.
 17 SIR JOHN SAUNDERS: Would you expect the NILOs going to the
 18 scene, would you expect them to ask NWFC for the
 19 information or would you expect NWFC to volunteer it to
 20 them, or a mixture of the two.
 21 A. I would expect a mixture of the two really. Once they
 22 are mobilised, and I think looking at Mr Levy he asked
 23 for the information. That is, for myself, if I have
 24 mobilised as an officer to an incident, I would always
 25 speak to them: what information have you got?

23

1 SIR JOHN SAUNDERS: Okay, thank you.
 2 MS CARTWRIGHT: We can see that you go on within the call to
 3 request what the incident channel was for Philips Park,
 4 so the channel that was the Greater Manchester Fire and
 5 Rescue Service channel?
 6 A. The ops channel, yes.
 7 Q. You go on to also identify the multi-agency, the
 8 interoperable channel, the tactical -- what's been
 9 described as the tactical commander's channel that is
 10 also one that you identify should be put on at North
 11 West Fire Control?
 12 A. Yes, that's right.
 13 Q. Before we deal with that, you set out again that:
 14 "They're all rendezvousing at Philips Park but we're
 15 getting so much different information you know, I don't
 16 know whether this is on the news or anything."
 17 Sorry, that's North West Fire Control.
 18 So again, when North West Fire Control were talking
 19 about getting different information, again was that not
 20 an opportunity for you to seek to get a grip of what
 21 they had to seek to assist them in the understanding
 22 about the incident?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Can you tell me what page we're on?
 25 MS CARTWRIGHT: Page 1. It's the third entry up from the

24

1 bottom, sir.
 2 So it reads — North West Fire Control, after they'd
 3 identified the operational channel, says:
 4 "The job — we've not got anybody on at the moment
 5 for the arena — well, we've not got anybody on, so
 6 we've not got an ops channel yet. They are all
 7 rendezvousing at Philips Park but we're getting — we're
 8 getting so much different information, you know. We
 9 don't — it's — I don't know whether this is on the
 10 news or anything."
 11 And you respond:
 12 "I'm not looking at the thing now but we'll try.
 13 Have we got — I'm trying to get it in? Have we got
 14 [blank] on?"
 15 And you identify that interoperable channel:
 16 "Because that might be the way if..."
 17 So really the person you were speaking to at North
 18 West Fire Control was really expressing to you, would
 19 you not agree, that they were struggling with the volume
 20 of information?
 21 A. Yes, and I think the first thought that come to my head
 22 to try and get sort of some clarity was speaking to the
 23 force duty officer and that's why at that time I thought
 24 about the tactical Airwave channel. I could have looked
 25 at other options. As I say, that was the first thing

25

1 that came into my mind.
 2 Q. Thank you. If we turn over the page {INQ001186/2},
 3 please. We can see at the top you say:
 4 "This is what we were putting in after doing the
 5 exercises. Is Janine there?"
 6 Joanne Haslam confirms she is. And you say:
 7 "Right, just — I don't they think about it, but
 8 just say about putting that channel on the SAN J that
 9 you have in Control."
 10 And then you identify — and North West Fire Control
 11 identify the channel and you say:
 12 "Because it might be a way that the Police Control
 13 can get in touch with yourselves."
 14 Yes?
 15 A. Yes, ma'am.
 16 SIR JOHN SAUNDERS: So that's the thing which never got
 17 operated, not put in existence until immediately after
 18 22 May?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: You thought it might work and it was all
 21 set up, but no one had actually got it going?
 22 A. That's correct, sir. The background work had been done,
 23 we knew it was there, but the button hadn't been pressed
 24 to —
 25 SIR JOHN SAUNDERS: So you just hope it might be working?

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1 MS CARTWRIGHT: Can I ask you about that tactical
 2 multi-agency Talk Group? Because obviously the work
 3 that you'd been involved in and the testing that
 4 Laura Lewis and Jo Hoyte had done and confirmed in April
 5 that North West Fire Control could listen into that
 6 channel, but we know in terms of how that channel had
 7 been intended, or that Airwave, to operate was as
 8 a tactical Talk Group that the tactical commanders could
 9 talk to one another on an open channel.
 10 A. And listening to the information as well between the
 11 relevant control rooms, yes.
 12 Q. Yes. But in terms of that having been a channel that
 13 had been identified, had been in existence for a number
 14 of years, how did it operate at Greater Manchester Fire
 15 and Rescue Service, leaving aside the control room to
 16 control room, as to who would listen from a tactical
 17 commander's point of view?
 18 A. At the time the procedures weren't in place. It was
 19 going to be the — certainly — after the night of the
 20 attack, the NILOs were certainly listening to it and
 21 they were given an extra Airwave handset so basically
 22 they could listen to that channel and the ops channel
 23 for the incident they were proceeding to.
 24 Q. Again that's just after the attack?
 25 A. That's after the event, ma'am, yes.

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1 Q. But certainly in advance of 22 May 2017, we know that
 2 there was work going on, control room to control room,
 3 but certainly there hadn't been any work about even
 4 commanders themselves using that channel to communicate?
 5 A. No, we'd identified the sort of shortcuts and I think
 6 the proper — what I would say the real testing and the
 7 benefits and the involvement with the commanders, we
 8 explored during the Powerhouse exercise, which was later
 9 on in the year.
 10 Q. Thank you. So from 23.22 you had effectively requested
 11 North West Fire Control to listen into that tactical
 12 multi-agency Talk Group?
 13 A. Yes, and I was listening to it myself in my car.
 14 Q. So you say you were listening in in your car. We know
 15 at this time, at 23.22, from the MODAS records, that you
 16 weren't on the way at that point.
 17 A. I had — my SAN J is a mobile device so that's in my
 18 house. I take that with me when I get into my car.
 19 Q. When did you first put that Airwave channel on to your
 20 radio?
 21 A. I would imagine it would be probably when I turned the
 22 radio on, when I booked mobile.
 23 Q. So we can look at the timing for mobile. I think we
 24 will come on to look at that and I think it's 23.33.
 25 That would be when you would switch your radio on to

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1 that tactical multi-agency Talk Group?
 2 A. Yes, it would.
 3 Q. So in listening to that tactical multi-agency Talk
 4 Group, you wouldn't have been able to listen to the NILO
 5 Talk Group, would you?
 6 A. Not at that time, and I don't think the NILO Talk Group
 7 was in place at that moment in time; I think that came
 8 later on on the night.
 9 Q. But you wouldn't have had an ability to listen to two
 10 Talk Groups?
 11 A. No, you can only listen to one Talk Group at any one
 12 time on the radio. That's why, after the event, the
 13 NILOs were given two SAN J radio sets.
 14 Q. Thank you.
 15 SIR JOHN SAUNDERS: And what you were listening to on that
 16 Airwave channel was nothing?
 17 A. There was nothing come on to it, no.
 18 MS CARTWRIGHT: When you hear nothing broadcast on that
 19 channel, did that not cause you even further concern
 20 about North West Fire Control not having information,
 21 talking about confusion, you being unable to get hold of
 22 the FDO and you being met with complete silence on that
 23 tactical multi-agency Talk Group?
 24 A. Yes, I was still trying to get hold of the force duty
 25 officer and I was also making a number of other phone

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1 calls. I suppose on that one, as I said when I was
 2 previously here, it was more in hope than expectation
 3 that we would pick something up. Like I say, I was
 4 hoping something would come on but I wasn't ultimately
 5 certain anything would.
 6 SIR JOHN SAUNDERS: Sorry, NWFC were able to get through to
 7 a police control room. We're aware now there were
 8 three -- did you know there were three control rooms?
 9 A. I didn't know there was three, sir. I knew there was
 10 more than one.
 11 SIR JOHN SAUNDERS: Right. You could have said to NWFC,
 12 "Get hold of the police control room and get the FDO to
 13 ring the duty NILO?"
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Isn't that the most obvious thing?
 16 A. Well, yes.
 17 SIR JOHN SAUNDERS: Perhaps I'm just being naive.
 18 A. Again, these are the things on the night. We focused
 19 probably in the wrong direction. I didn't ask Control
 20 to phone the Police Control. I'm not sure that the
 21 force duty officer would have contacted us in any case,
 22 but that's immaterial.
 23 SIR JOHN SAUNDERS: We're talking about the procedures.
 24 A. The procedures, sir. I didn't do that, no, sir.
 25 SIR JOHN SAUNDERS: Okay.

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1 MS CARTWRIGHT: Mr Lopez, if we can briefly just re-display
 2 {INQ001186/2}, please. We can see that you indicate
 3 that you might speak to Andy Berry and:
 4 "If you need owt, I'm making my way in now so give
 5 me a call while I'm en route."
 6 A. Yes.
 7 Q. And so in saying you might seek to Andy Berry, what were
 8 you intending to communicate to the -- Joanne Haslam at
 9 that time?
 10 A. That I'd speak to Mr Berry while I was en route, see if,
 11 (1), he'd had any more luck if the force duty officer
 12 had contacted him and also let him know that I'd been
 13 trying and unable to get through and just basically the
 14 status of where I was at that moment in time. And I --
 15 obviously I think we'll come on to that, I did speak to
 16 Mr Berry while I was on route to the CSR.
 17 Q. Before you speak to Mr Berry again we can see you
 18 referenced it was Janine working.
 19 A. Yes.
 20 Q. But at 23.25, Janine Carden called you for a call
 21 lasting 1 minute and 13 seconds.
 22 A. Yes.
 23 Q. So can you assist us about what you discussed in that
 24 conversation, please?
 25 A. I think on that one Janine had informed me that they'd

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1 put the channel on the radio that they had in Control.
 2 And as I said before, during that conversation I asked
 3 the specific questions: have we got any further updates,
 4 particularly on the status of the active shooter and the
 5 ambulances, where are the ambulances going? Janine --
 6 I heard in the background that she asked one of the
 7 other Control operators and they didn't have any updates
 8 at that moment in time.
 9 Q. So we're clear, at 23.25 you made a specific request
 10 about ambulances?
 11 A. Yes.
 12 Q. And where the ambulances were up to?
 13 A. Yes.
 14 Q. And you were told by North West Fire Control that there
 15 was no information about the ambulances?
 16 A. There was no further updates and I think that's because
 17 of the way I phrased the question. I didn't have any of
 18 the information that obviously I've seen on the log
 19 since about where the ambulances were.
 20 Q. So in terms of information that did exist on North West
 21 Fire Control's system about ambulances and deployment,
 22 are you saying it was really a poorly phrased question
 23 by you or the assumption that no ambulances had gone at
 24 that point?
 25 A. Yes, I'd agree with that.

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1 SIR JOHN SAUNDERS: So it was a misunderstanding between the
2 two of you as to what you were asking about?
3 A. I'd say so. It was a specific question that I'd asked
4 rather than what the status was. I asked if there was
5 any further update.
6 MS CARTWRIGHT: At 23.26, Mr Lawlor contacted you in a call
7 lasting 1 minute 73 seconds and we have heard
8 Mr Lawlor's account of that conversation. Are you able
9 to assist us any further with your recollection of what
10 you discussed at that time?
11 A. Yes. I think that was -- it was ringing up, asking what
12 the outcome of my conversation with Mr Nankivell was.
13 I told Mr Lawlor that I was going into -- he'd asked had
14 he to go into the CSR, he specifically -- he had said,
15 "I don't want anybody self-deploying", but I did say to
16 Mick to carry on to force command module and I'll clear
17 it with Mr Nankivell and Mr Etches when I actually got
18 into the CSR. At that time I was aware that there
19 was -- from my perspective there was nobody making their
20 way to the force command module.
21 Q. Thank you. We then next see, by way of the chain of
22 calls before you set off for the CSR, a 1-minute
23 22-second call at 23.28 when you called ACFO Keelan.
24 I don't think it's specifically -- and can you assist us
25 with what was discussed in that call, please?

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1 A. Yes. I was just informing Mr Keelan that I'd said
2 I would go into the command support room. He thanked
3 me. And he informed me that the chief fire officer was
4 on his way to the command support room also.
5 Q. Were you seeking any other information from ACFO Keelan
6 at that time or approval for you deploying to the CSR?
7 A. I probably wasn't seeking approval. If he'd had any
8 issues with me going, I think he'd have said there and
9 then. I also think I did inform him that I'd asked for
10 Mr Lawlor to go to the force command module as well and
11 again he didn't have any specific issues with that.
12 Q. Do you recall whether you said anything to ACFO Keelan
13 about difficulties you were having with getting hold of
14 the FDO?
15 A. I don't recall specifically saying that, but that's not
16 to say that I didn't pass that information on to him.
17 Q. Then, please, moving to the next call, we can see
18 a further 1-minute and 93-second call at 23.33 when
19 Mr Lawlor called you. Again, can you assist with your
20 side of recollection of that conversation?
21 A. On that one, ma'am, I can't unless I'm getting the
22 previous call with Mr Lawlor mixed up.
23 Q. Thank you. I think that is the last call we see before
24 you then are shown as mobile at 23.33.43 on the MODAS
25 system. More or less, I think that's an accurate

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1 timing, give or take a few seconds. So that's you on
2 the way to the command support room?
3 A. Yes.
4 Q. Thank you. Can I ask you, first of all, if we identify
5 the place of the CSR, please, and there are in fact some
6 images that assist with what the command support room
7 was.
8 Mr Lopez, please can you display {INQ041614/1}.
9 This is the command support room at Greater Manchester
10 Fire and Rescue Service's headquarters?
11 A. It is, ma'am, yes.
12 Q. I think how we see the photograph in that image is not
13 how the room was configured on the night; is that
14 correct?
15 A. No, as you see where the partition doors are open, those
16 doors would have been closed. That room next door is
17 a meeting room.
18 Q. Thank you. If we work through the photographs, we can
19 see -- the next photograph, please, Mr Lopez
20 {INQ041614/2} -- I think that's looking at the room from
21 a different angle.
22 A. Yes.
23 Q. And moving through, please, Mr Lopez {INQ041614/3}. So
24 the partitions we saw before, we can see those drawing
25 across now, like whiteboards, that would give the

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1 impression or the view as the room would have been on
2 the night when you attended?
3 A. Yes, ma'am.
4 Q. Thank you. So we see in that image there a number of
5 computers on the desk. So would they be the computers
6 that would display -- we've heard some evidence already
7 about an ability to access CCTV, those being viewed in
8 the force command module. Would those be the computers
9 where the CCTV could have been shown?
10 A. The ones shown there on the right-hand side at the far
11 end just on the -- I'm pointing to it (indicating).
12 They're the police computers which were put in there to
13 look at the CCTV, if that makes sense.
14 Q. So that's the screen we see to the right?
15 A. Yes, just adjacent to the whiteboard and the windows.
16 Q. So was that the terminal that had been placed in to
17 allow access to the CLIO system?
18 A. It is, yes.
19 Q. So can you assist then with the screens that we see on
20 the left-hand side?
21 A. There'd be various -- depending on how they want to look
22 at the incidents, I think the two ones on the -- far to
23 the right, one's I think displaying the officers' rota.
24 The one next to it is displaying hazard manager weather
25 information. The one on the far left is -- I think

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1 that's the ongoing incident and I think that's how he
 2 got into the logs for the jobs.
 3 Q. And Mr Lopez, could you continue through the images,
 4 please? {INQ041614/4}. So the screen then we see at
 5 the end of the room is that the television screen or
 6 is that a screen for something different?
 7 A. The screen in the left-hand corner, the small screen,
 8 that's the TV screen. The big screen, that is --
 9 I can't remember whether... You may be able to get the
 10 TV through there, I'm not sure. You could have
 11 displayed on there -- there's a facility to show the
 12 various computers, the full screen. So as we mentioned
 13 before, if you wanted to look at one of the incident
 14 logs you could put it on one of the computers -- in
 15 fact, the desk that's on the right-hand side, next to
 16 the cabinet, you could put the logs on there and there's
 17 a facility probably at the back of the -- near the
 18 defibrillator, a touch pad that you can determine which
 19 computer screen you want to display on the big monitor.
 20 Q. So there would be an ability, if needed, to display so
 21 the whole room could see an incident log and to work
 22 through it on that large screen?
 23 A. That's correct, yes.
 24 Q. Thank you. I think there's one other photograph -- no.
 25 Those can be removed from the screen, please.

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1 A. Sorry, if you can put it back on? Where you see the two
 2 desks on the left-hand side, with the two seats, and the
 3 monitors, that is where the command support room
 4 administrator would sit, so they would be doing the
 5 decision log for the room.
 6 Q. Thank you. In terms of the purpose of the command
 7 support room, it's right, isn't it, that there is
 8 guidance that was in existence at time that made clear
 9 what the command support room was and its function?
 10 A. That's correct, yes.
 11 Q. Just to check that that accords with your understanding
 12 at the relevant time, the command support room and the
 13 team then operating in the command support room during
 14 an emergency response are there to provide ongoing
 15 support to the principal officer acting as the Fire
 16 Service Gold at a strategic coordinating group?
 17 A. Yes.
 18 Q. Secondly, to establish and maintain direct communication
 19 with the SCG?
 20 A. Correct.
 21 Q. Thirdly, to provide ongoing support to the Fire Service
 22 Silver liaison officer at a remote command location?
 23 A. Yes. That would be, as I say, into the SCG, the
 24 strategic coordinating group would be a separate
 25 meeting, but that's all based at the force command

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1 module where obviously the liaison officer would be as
 2 well.
 3 Q. The support functions also of the command support room
 4 were to provide support to the incident commander or
 5 commanders?
 6 A. Correct.
 7 Q. To provide technical and professional guidance to the
 8 incident commanders if requested or deemed appropriate?
 9 A. Yes.
 10 Q. To actively monitor and manage Greater Manchester Fire
 11 and Rescue Service's resources on an ongoing basis to
 12 the conclusion of the incident?
 13 A. That's correct. Looking at reliefs and making sure that
 14 we had fire cover in all the relevant areas.
 15 Q. Where appropriate, make decisions on whether to mobilise
 16 resources or vary the service's response to incidents?
 17 A. Yes. I'm trying to... Just read that one again?
 18 Q. Where appropriate, make decisions on whether to mobilise
 19 resources or vary the service's response to incidents.
 20 A. Yes. That could be in liaison with Control for, I think
 21 on Bonfire Night and things like that, yes.
 22 Q. And also to implement and coordinate the major incident
 23 guidance, where appropriate?
 24 A. Yes.
 25 Q. To initiate business continuity management arrangements,

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1 if required?
 2 A. Yes.
 3 Q. And to maintain appropriate decision logs?
 4 A. Yes.
 5 Q. But it's right, isn't it, that the guidance on the
 6 functioning of the command support room and those in the
 7 command support room makes clear that when the CSR is
 8 activated, the PO, the assistant officer, the APO, or
 9 the command support room officer are not in command of
 10 the incident?
 11 A. Correct. Well, the tactical command is carried out
 12 at the scene, ma'am, yes.
 13 Q. And it was also made clear in the guidance that the
 14 command of an incident is the sole responsibility of the
 15 incident commander at the scene?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Where are we talking about the scene
 18 being?
 19 A. The incident itself. So on the night, that would be --
 20 obviously if everything had gone to plan, that would be
 21 at the arena itself. The incident commander would be
 22 located there, they'd be in charge of the resources and
 23 the command support room would be a support function to
 24 help them.
 25 SIR JOHN SAUNDERS: I just wonder, when they haven't got

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1 there, which is what the position was when you got to
 2 the CSR, who then — and it is principal officer who is
 3 there but there's no one at the scene who is actually
 4 then running the show?
 5 A. There's obviously nobody running the show as such.
 6 I would always say that on the night — and there were,
 7 I think, gaps, we have to acknowledge that, in the
 8 command structure on the night. I would say that the
 9 first NILO that turned up at the rendezvous point then
 10 would be who I would deem in charge. If that was the
 11 incident ground, they turned up on scene, the NILO 1
 12 would be in charge of those specialist resources there
 13 and then.
 14 MS CARTWRIGHT: Sir, for your note, the relevant guidance,
 15 and we'll hear more about it when Mr Keelan gives
 16 evidence, is {INQ004450/1}.
 17 So the principles set out in the guidance, would
 18 they have been well-known to you as you made your way to
 19 the command support room?
 20 A. Yes.
 21 Q. So distilling down what's in the policy and the
 22 guidance, the command support room is there to support
 23 and assist but it is not to make command decisions;
 24 is that correct?
 25 A. It is. There may be odd situations where, like I say,

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1 the mobilisation of resources we've talked about —
 2 I think Mr Levy covered it last week — about wide-area
 3 types of response, so flooding and things like that.
 4 Some decisions may be made in the command support room.
 5 But you would have an on-scene commander in charge of
 6 the resources at the appropriate place.
 7 Q. Thank you. I think you've already told us that, as you
 8 made your way to the command support room, you were
 9 monitoring the tactical multi-agency channel?
 10 A. Yes.
 11 Q. Is that the channel you maintained and listened to
 12 throughout?
 13 A. Um... At some point in the command support room, I was
 14 notified by Mr Lawlor of changing to the NILO channel.
 15 I think I put my radio set on to that when I was in the
 16 command support room. But one of the other radios —
 17 I'm not 100% certain, I think we put that on to the
 18 tactical command channel, so we were listening in, and
 19 then there's a fixed radio in the CSR that we would put
 20 on to the appropriate operational channel, and that was
 21 when the resources — we mobilised to the scene.
 22 Q. Thank you.
 23 SIR JOHN SAUNDERS: Okay, but throughout the evening,
 24 nothing in effect happened on the multi-agency channel?
 25 A. No, sir. There was a (overspeaking) —

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1 SIR JOHN SAUNDERS: I know there was a dial-up to see, "Are
 2 you are listening?", or whatever, but apart from that
 3 nothing happened on it at all?
 4 A. Not on that, sir, no.
 5 MS CARTWRIGHT: In terms of the multi-agency operational
 6 Talk Group, at any point were you monitoring that in the
 7 command support room?
 8 A. No. Obviously we hadn't got anybody at the scene at
 9 that time and we hadn't been informed — on that one, if
 10 the operational channels are being used, we should be
 11 informed because obviously there's a number of them and
 12 to be allocated which channel. So as we hadn't had any
 13 notification, the function, if that's the right word,
 14 was that there wasn't one being used.
 15 SIR JOHN SAUNDERS: It's the job of the FDO to say, "The
 16 operational channel is", whatever it is?
 17 A. To use the on-scene operational channel, sir, that would
 18 be done with the — probably the three, I would say,
 19 on-scene commanders. As we said, with JESIP,
 20 co-location is the desired outcome, but then you might
 21 have — some of the officers might need to move around,
 22 so then they would set up that channel. But then that
 23 has to be allocated and I think it would be through the
 24 FDO then that one would be allocated to the incident.
 25 SIR JOHN SAUNDERS: And that never happened?

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1 A. Not to my knowledge, sir, no.
 2 MS CARTWRIGHT: You have already told us why you went on to
 3 the tactical multi-agency channel and why you instructed
 4 North West Fire Control to do that. But can I ask you
 5 then why at any point you didn't make a check on that
 6 other channel bearing in mind that operational
 7 multi-agency channel was the channel that was in
 8 existence before the trial that was being looked at,
 9 that was tested on the weekly testing?
 10 A. They're the channels that I have just talked about,
 11 ma'am, but they'd have to be — a channel would have to
 12 be allocated from the incident and we would be notified
 13 of that. As we wasn't notified, to my mind there was no
 14 reason to monitor it. We wouldn't know which channel it
 15 was. As I say, there's a number of them. One channel
 16 would be allocated to that incident at that time. So
 17 then you can monitor it, but you can't monitor a number
 18 of channels simultaneously on the radio.
 19 Q. Thank you. We see then, as you're making your way to
 20 the command support room, that you make a call — again,
 21 this is on your telephone logs, it's not on the schedule
 22 you have in front of you — they were shown to you this
 23 morning. We see at 23.36 you make a call to
 24 Neil Gaskell. It's a call lasting 77 seconds. Again,
 25 sir, that's on the call records, {INQ004348/1}.

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1 So why was Mr Gaskell being called at that time?
 2 A. I was just phoning him up to let him know that we
 3 obviously — of the incident, it was an MTFA, and he's
 4 the MTFA lead officer. Again, if there was any sort of
 5 advice and support that he could give to the incident.
 6 Again, just to emphasise, I would not have deployed
 7 Mr Gaskell without consulting the APO or the duty group
 8 manager; it was just to make him aware of the incident.
 9 Q. And what was Mr Gaskell's response?
 10 A. He didn't answer, it went to voicemail and I left
 11 a voicemail. Then I think he phoned me back a short
 12 time later.
 13 Q. And perhaps then if we briefly deal with that. I know
 14 it's slightly out of chronology, but at 23.56 I think we
 15 see a further call and then there's a subsequent one
 16 with Mr Gaskell at 00.01.
 17 Just dealing with those calls together now, what
 18 were those further calls to Mr Gaskell about?
 19 A. The only thing I think is that Mr Gaskell was letting me
 20 know that he'd picked the message up, asked if I wanted
 21 him to come in. He said he'd been out and he'd had
 22 a drink, so he couldn't drive, but he could — if
 23 I wanted him to come in, he could get a taxi. I told
 24 him just to wait where he was at the moment and if
 25 I needed him, again after speaking with Mr Nankivell and

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1 Mr Etches in the CSR, I'd get back to him. But at that
 2 time I didn't need — didn't see any further need for
 3 Mr Gaskell at that point in time.
 4 Q. Could we deal with the call at 23.37 which lasted for
 5 2 minutes and 78 seconds when you called Mr Berry.
 6 A. Yes.
 7 Q. So first of all, in terms of when you called Mr Berry,
 8 he had still not made his way to the rendezvous point,
 9 had he?
 10 A. I think round about that time he was either just about
 11 arriving or he was close by. Whether he was there or
 12 not, I can't say for certain.
 13 Q. You have described how stressed and frustrated he'd
 14 seemed in the earlier call. How did Mr Berry seem on
 15 the telephone during this call?
 16 A. Well, he seemed fine. I mean, Mr Berry's quite a calm
 17 sort of person. That's his natural demeanour, so he
 18 didn't come across as sort of what I would say
 19 distressed. The distress at the time was the fact that
 20 the road was blocked and he had to detour. We also had
 21 the discussion then about the — whether he'd got
 22 through — the FDO had got back to him, he hadn't, I'd
 23 not been able to speak to the FDO, and again thinking
 24 about the potential escalation of the incident — again,
 25 obviously, they were looking at the Paris-type scenario,

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1 discussing — and recommended then that we put another
 2 FRS's MTFA on standby so we had more resilience.
 3 Q. So that was specifically discussed with Mr Berry in this
 4 call?
 5 A. Yes.
 6 Q. And was — the impetus for putting another MTFA crew on
 7 standby, did that come from you or from Mr Berry?
 8 A. I can't remember which one it came from. I thought it
 9 was me that said to him, "I'll see about getting the
 10 other MTFA stood up", so we had a bit of resilience, and
 11 then I made a call to Mr Etches.
 12 Q. During this call, you have already dealt with that you
 13 weren't provided information in the earlier call from
 14 Mr Berry about the cathedral car park rendezvous point
 15 that he'd been told about in a call much earlier on at
 16 22.40. Did he say anything to you during this call
 17 about effectively it had been almost an hour now since
 18 he had been made aware of the incident and how
 19 effectively you were still really no clearer about
 20 what was going on?
 21 A. Not really, ma'am, no.
 22 Q. So at this time, had you an appreciation as to when the
 23 explosion had taken place?
 24 A. Honestly, I don't think I did. As I said yesterday,
 25 when I first spoke to Mr Berry, I didn't realise — and

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1 again I know I probably should have done, but I didn't
 2 ask about the time. I made assumptions that the
 3 incident was much younger in its timeline and, again,
 4 it's not an excuse, I've heard it so said many times
 5 before, I totally agree with it, you just lose complete
 6 track of time as the situation progresses.
 7 Q. Can you assist, bearing in mind the MTFA teams that had
 8 been effectively put on (inaudible: distorted) at
 9 Philips Park and not deployed to scene at that time, so
 10 there was a resource that hadn't been used for what was
 11 in your mind a potential Operation Plato; yes?
 12 A. Yes.
 13 Q. Why was it then you were getting other MTFA crews on
 14 standby?
 15 A. Because I was expecting to deploy the Greater Manchester
 16 MTFA capability. Again we're looking at resilience and
 17 the potential for this being a multi-seated attack. As
 18 I say, I think we got too focused on the Paris-type
 19 incident, but I was in my mind expecting that there was
 20 going to be further incidents during that night.
 21 I didn't think at that time that was the only one
 22 we were going to be dealing with.
 23 Q. You say, "I was expecting to deploy", which makes it
 24 sound you were making decisions about deployment of the
 25 SRT and the TRU.

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1 A. Sorry, that was probably a poor choice of words. I was
 2 expecting the deployment to take place rather than me --
 3 it wouldn't be for me to deploy, I wasn't in the acting
 4 command structure, although I was coming in as an
 5 adviser.
 6 Q. You've told us that in the first conversation with
 7 Mr Berry you had suggested that you would have kept the
 8 pumps at Manchester Central. But bearing in mind how
 9 much time had passed now, was there anything you said in
 10 this call about moving the pumps nearer to the arena,
 11 bearing in mind that station at central was outside the
 12 exclusion zone area?
 13 A. I didn't, ma'am, no.
 14 Q. Thank you.
 15 You describe in your witness statement that your
 16 journey to the CSR was under blue lights and you
 17 expected it to take about 15 or 20 minutes.
 18 A. Correct.
 19 Q. We can in fact see the time that you arrived at the CSR
 20 because in fact we can hear it at the end of a call that
 21 Mr Nankivell makes. So we can hear him tell the room,
 22 over the phone, that you and Mr O'Reilly were in the
 23 command support room now.
 24 Sir, I'll give you the INQ reference. I can't give
 25 you it at the moment. It's a call we've looked at.

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1 It's a call that starts at 23.46, ends at 23.49, with
 2 him indicating that you and Mr O'Reilly were in the
 3 room. And I think that broadly fits with your
 4 recollection of when you arrived at the CSR?
 5 A. It does, ma'am, I recollect it was about 23.50.
 6 Q. Thank you. I think you described that as you arrived at
 7 headquarters, you walked in with Mr O'Reilly?
 8 A. Yes, correct.
 9 Q. Before then you'd had a further conversation as well
 10 with Janine Carden at 23.41, which followed on from the
 11 call from Mr Berry where you'd asked her to put that
 12 additional MTFA on standby?
 13 A. That's correct.
 14 Q. Perhaps then if we look at that, please. It's
 15 {INQ001180/1}.
 16 If you could expand it, please.
 17 We can see that after you had the discussion with
 18 Mr Berry about deploying the additional MTFA, you called
 19 Janine Carden at 23.41 and set out -- asked Janine to
 20 put the other MTFA capability on standby.
 21 But you also said this:
 22 "Yeah, obviously don't mobilise it yet until we know
 23 more. I don't know if you've got any further details
 24 because obviously I've been a bit info-blind while I've
 25 been en route on headquarters. I'm nearly there now,

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1 but if we put them on standby as a heads-up, then they
 2 can be ready to deploy."
 3 Then you also reference not just one but another
 4 area that had an MTFA capability.
 5 A. Yes.
 6 Q. And then the call ended shortly thereafter.
 7 So again in terms of saying to Janine Fletcher at
 8 22.41 you were info-blind, did you not seek to ask her
 9 at that time about what additional information she could
 10 give to update you about what was known at that time?
 11 A. I think I do in the message. I said, "I don't know if
 12 you've got any further details". That was more of
 13 a question, but I didn't get any response.
 14 Q. So I think that's then the extent of that conversation
 15 at 23.41?
 16 A. Yes, ma'am.
 17 Q. And in terms of you then putting the other crews on
 18 standby, did you have to seek approval from anyone else
 19 to do that?
 20 A. Yes, I didn't -- as I say, before that phone call to
 21 Control, I think on the log I spoke to Mr Etches, who
 22 was the assistant principal officer. That was
 23 a suggestion that we put it on and if needed, they'd
 24 approve it, and he agreed that.
 25 Q. Thank you. So you arrived just before 23.50 and you

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1 walk in with Mr O'Reilly?
 2 A. Yes.
 3 Q. Could you please explain or describe that meeting with
 4 him and the conversation as you made your way into the
 5 room that we've seen on the images?
 6 A. I was just -- gave him sort of an update, that we'd
 7 just put Merseyside's capability on standby. I can't
 8 remember whether it was when we got inside or we were
 9 outside the command support room, I did ask him was he
 10 not going up to the force command module, there'd be
 11 an SCG taking place at some point. He said that he
 12 would go when the SCG was called. I think again, at
 13 that point, he might have informed me that he's asked
 14 Mr Harris, the ACO, to come in and I said, "Why don't
 15 you send Mr Harris up there?", and he said, "I'll decide
 16 who goes to the SCG when it's called."
 17 Q. Thank you. So just breaking down the information the
 18 discussion you had with Mr O'Reilly -- so firstly when
 19 he was aware that there were other MTFA crews on
 20 standby, was Mr O'Reilly content that that had taken
 21 place?
 22 A. Yes, I think he said it was a good call.
 23 Q. And were you surprised to see Mr O'Reilly making his way
 24 into the command support room?
 25 A. No. I think originally, when I spoke to Mr Keelan, he

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1 had informed me that the chief was making his way to the
 2 command support room, but I felt, and certainly because
 3 a major incident hadn't been declared, the normal
 4 protocol is for a senior officer, usually the principal
 5 officer or an APO, to go to the force command module,
 6 and as I said yesterday, we sent Mr Lawlor as the
 7 liaison, as a support.

8 Q. Did you say because a major incident had been or hadn't
 9 been declared?

10 A. No, in the major incident guidance, it stipulates that
 11 usually the duty PO will go to the force command module,
 12 but a major incident at that point hadn't been declared,
 13 so again there wouldn't be anything -- the plan wouldn't
 14 have been opened, I don't think there'd be anything from
 15 North West Fire Control to send the chief to police
 16 headquarters or any sort of decision within the CSR at
 17 that time.

18 SIR JOHN SAUNDERS: Are we talking about the police not
 19 having not declared a major incident or the Fire Service
 20 not having declared one?

21 A. It'd be us, sir. But in our major incident guidance --

22 SIR JOHN SAUNDERS: The requirement to go to the force
 23 control module comes about when the Fire Service declare
 24 a major incident?

25 A. Certainly, if it's a multi-agency major incident -- on

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1 this incident, even though at that time it hadn't been
 2 declared, for me it would have been obvious that it was
 3 a major incident, and that's sort of the structure that
 4 I would have envisaged being put in place.

5 SIR JOHN SAUNDERS: I think we know that NWS had declared
 6 it a major incident --

7 MS CARTWRIGHT: Yes.

8 A. Yes.

9 SIR JOHN SAUNDERS: -- but you wouldn't have known that?

10 A. No, we didn't know that, sir, no.

11 SIR JOHN SAUNDERS: Because you hadn't had any communication
 12 with NWS?

13 A. No -- sorry, sir, I don't know whether any of that had
 14 gone to Control but certainly it hadn't come to me.

15 MS CARTWRIGHT: The conversation you're having with
 16 Mr O'Reilly was on your understanding that a major
 17 incident hadn't been declared?

18 A. No, I hadn't heard of a major incident being declared,
 19 but no.

20 SIR JOHN SAUNDERS: But it obviously was one?

21 A. It obviously was one, yes.

22 MS CARTWRIGHT: But notwithstanding that, you were still
 23 asking him about going why he wasn't going to the SCG?

24 A. Yes. It wasn't so much the SCG -- I said to him was,
 25 "Are you not going" -- and it was phrased again in

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1 a question really, I said, "Are you not going to the
 2 force command module or police headquarters," I think
 3 I said, rather than the FCM, "as there will be a SCG at
 4 some point?", and the chief said, "I'll go to police
 5 headquarters when they call the SCG".

6 MS CARTWRIGHT: Did that response surprise you.

7 A. A little bit. I was probably more surprised when we
 8 ended up with two principal officers in the command
 9 support room, I would have thought it was an opportunity
 10 for at least one of them to go up to the police
 11 headquarters at that time. I don't think we needed two
 12 principal officers in the command support room.

13 Q. And again, in terms of the history as to how Mr Lawlor
 14 found his way to the Silver room at force command
 15 module, that was because the discussions you'd had about
 16 deploying him there?

17 A. Yes.

18 Q. So before you'd been involved to that extent, no one
 19 else within Greater Manchester Fire and Rescue Service
 20 had addressed their mind to sending anyone to the force
 21 command module?

22 A. Not to my knowledge. I asked -- when I phoned
 23 Mr Nankivell, after I'd made that suggestion, it was
 24 clear that nobody else was on the way and that's why
 25 I told Mr Lawlor to carry on.

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1 Q. But in terms of, again, a site where multi-agency
 2 discussions would be taking place, it was well-known
 3 from policies and procedures in place that it would be
 4 at Greater Manchester headquarters?

5 A. Police headquarters, yes.

6 Q. Yes. So as well as there being a need for a tactical
 7 command tri-service, there was also a need for a Gold or
 8 a strategic tri-service view, would you agree?

9 A. I would agree on that, yes.

10 Q. So again, we've got knowledge that the force command
 11 module and people were there and it was being set up,
 12 but still no strategic or Gold presence from
 13 Greater Manchester Fire and Rescue Service?

14 A. Correct.

15 Q. And Mr O'Reilly is saying to you he would in fact wait
 16 until they were called upon?

17 A. Yes. Again, it's a while back. I think he said last
 18 time he was there it was a bit chaotic, he felt he'd be
 19 better off in the command support room and he would go
 20 when the SCG was called. You get notice that an SCG is
 21 going to be called in about half an hour or something of
 22 the like. But when he informed me that he'd asked
 23 Mr Harris to come in I suggested why don't you send
 24 Mr Harris up there and the chief said, "I'll decide who
 25 goes there when they call the SCG". That was the end of

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1 the conversation really .
 2 Q. I don't know what the last time would have been when
 3 Mr O'Reilly would have gone to the SCG, but certainly
 4 what was happening that night was something very
 5 significant in the history of Manchester, would you
 6 agree?
 7 A. Certainly.
 8 Q. And it was known at that time that there had been some
 9 form of terrorist attack?
 10 A. Yes.
 11 Q. Where numerous individuals were dead?
 12 A. Yes.
 13 Q. And from Greater Manchester Fire and Rescue Service's
 14 position at that time, still a lack of information?
 15 A. Yes.
 16 Q. So would you have expected there should have been more
 17 expedition for there to be a strategic presence at force
 18 headquarters?
 19 A. Yes.
 20 MS CARTWRIGHT: Sir, the INQ of the call from Mr Nankivell
 21 where he identifies at the end of the call that
 22 Mr O'Reilly and Mr Fletcher are now in the room was
 23 {INQ001140/1}. I apologise I didn't have that. The
 24 call starts at 23.46 but certainly, due to the length of
 25 the call, it's clear that by 23.49, you and Mr O'Reilly

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1 are present in the command support room.
 2 Can you assist in identifying, once you went into
 3 the room, who else was present, please?
 4 A. Like I say, the CSR was still being set up. The people
 5 in the room at the time was Mr Nankivell, Mr Etches and
 6 Mr Lafferty, who was the admin support — our command
 7 support room administrator.
 8 Q. Thank you. And can you help us as to how long after
 9 that Mr Harris arrived?
 10 A. To be fair I thought it was within the next 5 or
 11 10 minutes, but I believe it may have been a little bit
 12 longer from looking at the evidence of the log from
 13 North West Fire Control.
 14 Q. Thank you. So when you say you were surprised that
 15 there were two principal officers, are you referring
 16 then to Mr O'Reilly and Mr Harris?
 17 A. Yes.
 18 Q. Can I ask you, when Mr Harris did arrive was he
 19 surprised that you were present in the command support
 20 room?
 21 A. I don't register him showing any surprise, to be
 22 perfectly honest.
 23 Q. Did anyone present express any issue about you having
 24 self-deployed as someone who'd not been on duty that
 25 night?

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1 A. No, nobody said anything — and if I just caveat,
 2 I didn't self-deploy, I cleared it with Mr Nankivell
 3 before I did set off.
 4 Q. Thank you. So Robert Lafferty's role, he is an
 5 administrator, is he doing the practical things in terms
 6 of setting up the room and getting everything turned on?
 7 A. Correct, and he maintains the decision log for the
 8 command support room.
 9 Q. Thank you. Is it right also that later on, there came
 10 another individual into the room in a communications
 11 role?
 12 A. Yes, I think that was the — I can't think of the name
 13 now, the communications director.
 14 Q. Shelley Wright?
 15 A. Yes.
 16 Q. So what's the role of the communications director?
 17 A. I think as they — when she came in, I think she would
 18 have been monitoring any social media feeds and Twitter
 19 and so on and so forth.
 20 Q. Thank you. So in terms of the gathering in that room,
 21 was there any thought or consideration or identification
 22 of who was the incident commander at that time?
 23 A. I don't think there was. Obviously, I was party to one
 24 side of a conversation where I think Mr Levy had said
 25 that he was the incident commander, but what time that

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1 was, I couldn't definitively say.
 2 Q. So in terms of when you all gathered together in the
 3 room, would that not be the first thing that needed to
 4 be known: who's operating at each level of command here?
 5 A. Yes. And I think like I say it was just — the three
 6 NIOs were at Philips Park, but I believe at that time,
 7 but, as I say, I can't state at exactly what time it was
 8 communicated, Mr Levy identified that he was the
 9 incident commander.
 10 Q. So was that well-known by everyone in the room, that
 11 Mr Levy was the incident commander?
 12 A. Um... I couldn't actually say. I think I picked it up
 13 on hearsay and also at that time I think that's when we
 14 was going on to the ILO channel so I might have heard
 15 something on that, but I couldn't actively state now
 16 that I definitely knew Mr Levy at that time was the
 17 incident commander.
 18 Q. Thank you. It's a very fair concession by you, but is
 19 it not somewhat surprising that for all those gathered
 20 in the command support room, there was not absolute
 21 clarity of who was the incident commander for
 22 Greater Manchester Fire and Rescue Service?
 23 A. I think it is, but again to be fair to everybody,
 24 I think the sort of command structure and the procedures
 25 that were in place were a little ambiguous at that time.

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1 As I say, it was based on the specialist response. The
 2 NILOs in this specific role would be on scene, on-scene
 3 commanders. I think I've got to admit there was a gap
 4 in the overall structure.
 5 Q. Is that something that only occurred to you as a result
 6 of what had happened on the night or had it been
 7 identified in advance of the night about the gap --
 8 A. No, it was purely what had happened on the night.
 9 SIR JOHN SAUNDERS: Is it that when you go to the scene, so
 10 fire engines go, there's a clear command structure, the
 11 first one there is in command until the next most senior
 12 comes along?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: But if you actually go to an RVP or
 15 a muster point, whatever you like to call this, that
 16 provision just doesn't apply?
 17 A. The way that the system was put in place for the
 18 procedures is -- again, we never envisaged that we'd end
 19 up at a rendezvous point, we envisaged that we'd go to
 20 the scene. There's obviously -- it needed, it did need
 21 tightening up but my overwhelming view was the first
 22 NILO on scene -- well, I'll track back.
 23 If the SRT turned up first, even though it wasn't
 24 written down in the procedures, I feel that one of the
 25 watch managers would have taken the initial command role

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1 and deployed resources.
 2 SIR JOHN SAUNDERS: Are we talking about at the scene?
 3 A. At the scene.
 4 SIR JOHN SAUNDERS: So if the SRT goes to the scene, you
 5 think they then take control?
 6 A. This wasn't written down. The thought process all along
 7 was they'd end up as a unit, but in reality I think
 8 because of the geography of where the NILOs were, there
 9 could have been a time factor on that. My -- if I'm
 10 being just strict on the chronology, and as I thought
 11 it would be, from my position, the first NILO to turn up
 12 would be in command.
 13 SIR JOHN SAUNDERS: So the first NILO at Philips Park?
 14 A. I'm talking on scene, but obviously --
 15 SIR JOHN SAUNDERS: No, no, it's important to make the
 16 distinction because, as I understand it, it's getting
 17 rather more muddled than I thought it was before, but if
 18 people go to the scene then you understand there is
 19 someone who's clearly in charge --
 20 A. Yes.
 21 SIR JOHN SAUNDERS: -- who may be replaced by someone else,
 22 if someone else turns up, but someone's in charge
 23 immediately.
 24 But if you're at an RVP point it appears that,
 25 particularly when it's so far away, no one is in charge

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1 automatically, there's no provision for who is in
 2 charge.
 3 A. No, there isn't. Again, it's making assumptions that
 4 the first senior officer who would turn up at that point
 5 would be incident commander, which is what Mr Levy
 6 ultimately did, but it wasn't written down that that's
 7 what it should be.
 8 SIR JOHN SAUNDERS: Okay, thank you.
 9 MS CARTWRIGHT: In terms of then the other levels of command
 10 envisaged by everything to do with JESIP and responding
 11 to major incidents, who was the Greater Manchester Fire
 12 and Rescue Service strategic commander?
 13 A. For me, that would be the principal officer on the
 14 night.
 15 Q. In your discussions, as you walked in with Mr O'Reilly
 16 and from everything you witnessed during the time in the
 17 command support room, was it clear to him that he was
 18 in that role?
 19 A. I think it was very clear to the chief he was the
 20 principal officer of the night, yes.
 21 Q. You have said as you walked in there was some suggestion
 22 about sending Mr Harris up to force headquarters and
 23 a discussion about that.
 24 A. Yes.
 25 Q. Would that not suggest that there was some discussion or

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1 it wasn't clear at one point who the strategic commander
 2 for Greater Manchester Fire and Rescue Service was?
 3 A. No, it was clear to me that the chief was the strategic
 4 commander on the night: he was going to decide who went
 5 to the strategic coordinating group; he did ultimately
 6 go himself.
 7 SIR JOHN SAUNDERS: So he did go, and so any confusion if
 8 Mr Harris had gone, we're not really concerned with?
 9 A. No.
 10 MS CARTWRIGHT: Then in terms of tactical commanders,
 11 I appreciate we dealt with the incident commander, but
 12 in the command support room, was there a thought or
 13 identification of who else was in a tactical commander
 14 role for the Fire and Rescue Service?
 15 A. The tactical commander role for me at that time would
 16 have been one of the NILOs who would ultimately go to
 17 the scene, and I believe Mr Levy stated that he was
 18 taking command.
 19 Q. So for incident commander, we also see that as the
 20 tactical commander?
 21 A. We do. I think just one thing for clarity: I think
 22 again on the procedures, you know, we thought we'd got
 23 it right; clearly we hadn't. The NILO is an on-scene
 24 commander and I think it had sort of to -- if it makes
 25 it clear, it might make it a bit more ambiguous.

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1 It would be a similar role, I would say, to what the
 2 tactical firearms commander and the debate that we've
 3 had about that. They would be in charge of the
 4 specialist resources at the scene, but then we didn't
 5 have an incident commander overall.
 6 As it would work out, the JESIP side of it would
 7 have been perfect. The NILO 1 would have been sat next
 8 to or stood next to Steve Hynes and Mark Dexter at the
 9 outside of the building, and the NILO 2 would have gone
 10 in with the specialist response team. But we didn't
 11 have the overarching sort of area manager, which is
 12 something that we put in place after the event.
 13 Q. Then turning to the operational commanders, when you
 14 were in the room, who had been identified as the
 15 individuals at the Fire and Rescue Service who would be
 16 the operational commander?
 17 A. I don't think anybody had been identified as operational
 18 commander — well, the on-scene commander was the NILO
 19 and I think that's where the disparity is.
 20 SIR JOHN SAUNDERS: So in effect we've got the NILO,
 21 Mr Levy, is being the operational commander and the
 22 tactical commander?
 23 A. Yes, sir.
 24 MS CARTWRIGHT: Can I just be clear then where Mr Berry fits
 25 in with all of that in terms of his role on the night?

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1 A. Mr Berry, and again I think I've got to be fair to both
 2 parties here because I listened to Mr Levy's evidence.
 3 Mr Berry was the NILO, so basically getting the
 4 information and the passage of information. He
 5 mobilised two further NILOs with the specialist response
 6 team. Again it's a loose command structure but it's not
 7 the command structure that should have been in place.
 8 On the night, when he was sent, and there was the
 9 discussion with Mr Levy — again, I was hearing one half
 10 of a conversation, and somebody said to me, "Who is the
 11 duty NILO?", and I said, "It's Andy Berry", and I think
 12 that might have influenced then the chief's decision as
 13 to — when they eventually got resources to go down why
 14 Mr Berry was allocated that role and not Mr Levy.
 15 Q. So in terms of — it seems from the evidence that a lot
 16 at Philips Park was really waiting for the arrival of
 17 Mr Berry? But on what you have just told us, is it not
 18 fair to say that actually more could have been done in
 19 the absence of Mr Berry arriving physically at
 20 Philips Park?
 21 A. Yes, I think so, and obviously there was a facility to
 22 contact Mr Berry direct themselves.
 23 MS CARTWRIGHT: I'm wondering whether that's an appropriate
 24 time to take our morning break.
 25 SIR JOHN SAUNDERS: How much more have you got?

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1 MS CARTWRIGHT: There's the rest of the involvement on the
 2 night. There's only, I think, one other transcript of
 3 a call and then there's just some debrief information,
 4 so I suspect I still probably have about 40 minutes,
 5 sir. It's whether you want me to finish it in this
 6 portion ...
 7 SIR JOHN SAUNDERS: No, no, I think we need to have a break.
 8 Quarter of an hour.
 9 (11.08 am)
 10 (A short break)
 11 (11.26 am)
 12 MS CARTWRIGHT: Mr Lopez, please could you display
 13 {INQ019097/1}.
 14 Just to identify these notes, we can see on page 1
 15 you describe that:
 16 "The log below was commenced on 23 May whilst events
 17 of incident were still fresh in my mind."
 18 A. Yes.
 19 Q. Thank you. Mr Lopez, please can we now move to
 20 {INQ019097/3}. We can see:
 21 "Times from this point are approximate."
 22 But below that text we see something that locates us
 23 to a time about midnight in the command support room and
 24 you recorded on 23 May this:
 25 "At approximately midnight, it was of real concern

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1 to me that we had still not been able to deploy the SRT
 2 capability due to the fact that we could not get
 3 a stated FCP from GMP. The nomination of the FCP is
 4 a critical component of the command structure for the
 5 type of incident we had been informed of and the basis
 6 of multi-agency procedures detailed in the JESIP joint
 7 operating principles doctrine for an MTFA response. It
 8 was still not clear to me what police or NWSAS resources
 9 had been deployed and if coordinated command and control
 10 protocols had been established anywhere."
 11 So in terms of those notes that expressed that was
 12 your state of mind at midnight, is that an accurate
 13 summary?
 14 A. Yes. Just one thing I'd just like to clarify in there:
 15 although I commenced the notes on the 23rd, I didn't
 16 complete them on the 23rd, it wasn't all done on the
 17 same day. It took me a couple of days to finish it.
 18 Q. But certainly even if it's a couple of days they were
 19 made very proximate after your involvement with the
 20 incident?
 21 A. That's correct, yes.
 22 Q. And I think after identifying that time at midnight you
 23 go on then to say that, following a telephone
 24 conversation between the chief fire officer and GM Levy:
 25 "I was made aware that the RVP was now being

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1 relocated to G16 Manchester Fire Station and the NWS
 2 resources were also locating there."
 3 A. Yes.
 4 Q. Thank you. Can I ask then a question in terms of a lost
 5 opportunity to get information from Greater Manchester
 6 Police. Because you'd not been able to get hold of the
 7 FDO yourself, we know that you had asked North West Fire
 8 Control to monitor the Talk Group, the multi-agency
 9 tactical Talk Group. And we know that at 23.58.02 the
 10 call was put out by Greater Manchester Police on that
 11 channel.
 12 Mr Lopez, can we briefly display {INQ030816T/1},
 13 please. This is a very short summary we've looked at
 14 before in other evidence and we know that in response to
 15 that transcript in terms of Mr Carter, PC Carter asking:
 16 "Any ambulance or fire monitoring this channel
 17 please?"
 18 And Janine Carden confirmed that fire is monitoring
 19 the channel.
 20 A. Yes, but I must admit I didn't hear the test.
 21 Q. In terms of what could have taken place at that time
 22 when PC Carter asked if anyone was listening, would it
 23 be fair to say that that was a real opportunity where,
 24 if proper instructions had been given to North West Fire
 25 Control, that could have been an opportunity for the

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1 contact straight in to Greater Manchester Police to say,
 2 "Please can you confirm where the forward command point
 3 is?"
 4 A. Yes, that's a fair point.
 5 SIR JOHN SAUNDERS: When you say you couldn't get a forward
 6 command point, what efforts had been made to do that?
 7 A. It was literally the call, sir, to try and get through
 8 to the FDO.
 9 SIR JOHN SAUNDERS: So you were still trying to get through
 10 to him?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: But you know that Silver control has
 13 been set up by then?
 14 A. Yes, and that's why we'd sent Mr Lawlor as the liaison
 15 officer --
 16 SIR JOHN SAUNDERS: I'm afraid I can't remember when he
 17 arrived, Mr Lawlor.
 18 A. I think it was slightly after midnight, sir. I think it
 19 was slightly before -- slightly after this radio
 20 message.
 21 SIR JOHN SAUNDERS: Once he had arrived, did you say, "Get
 22 us a forward control point?"
 23 A. That was the request and anything from the
 24 Ambulance Service as well.
 25 SIR JOHN SAUNDERS: Okay.

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1 MS CARTWRIGHT: I think you accept that this would have been
 2 a real opportunity when North West Fire Control could
 3 have spoken directly to GMP to get the information that
 4 you needed in the CSR.
 5 A. Yes.
 6 Q. Thank you. If that could be removed, please.
 7 So if we look at the next aspect of your statement,
 8 you set out that, at midnight, you were aware of
 9 a conversation between Mr O'Reilly and Mr Levy, where it
 10 was agreed to relocate the resources from Philips Park
 11 to Manchester Central Fire Station to co-locate with
 12 NWS resources.
 13 A. That's correct, and at that time I'm then thinking that
 14 that's the multi-agency RVP.
 15 Q. But in terms of -- had any new information been received
 16 in the CSR that had caused this change then to move the
 17 pumps from Philips Park to Manchester Central?
 18 A. No -- well, what I believe is during the call between
 19 Mr Levy and the chief fire officer, Mr Levy had informed
 20 the chief of the information that was received at
 21 Philips Park about ambulances initially turning up at
 22 Manchester Central Fire Station and rendezvousing there,
 23 so the decision was made then to co-locate our resources
 24 with theirs.
 25 Q. You say that you continued your efforts to get hold of

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1 the FDO and you did eventually manage to get through to
 2 the FDO.
 3 A. Yes.
 4 Q. If we could please turn to the transcript of that call
 5 we have, it's {INQ018836T/3}.
 6 SIR JOHN SAUNDERS: Did everybody know in the control room
 7 that -- sorry, where you were, that you were still
 8 trying to get hold of him? Were you saying, "I'll keep
 9 trying?"
 10 A. Yes, sir.
 11 MS CARTWRIGHT: The timing of this call, I think, is around
 12 00.04. But we can see, and if we just track through
 13 from the middle of the page, Mr Myerscough indicates
 14 that he is speaking. You identify yourself. And you
 15 say this:
 16 "Hi mate, just a quick one, I'm letting you know
 17 that we are monitoring police..."
 18 And then the tactical channel we've had the
 19 discussion about:
 20 "Our command support room is open."
 21 Over the page {INQ018836T/4}, please:
 22 "I've got Mick Lawlor going up to Silver. I'm
 23 assuming Silver are going to be open soon. What --
 24 quick one, what have we got? We're going to be
 25 rendezvousing our appliances at Thompson Street Fire

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1 Station in central. Can we have a police presence
2 there, just coordinating so we've got that contact?"
3 And Mr Myerscough indicates that he'll speak to the
4 FDO and then you set out any problems to call back and
5 you leave your mobile phone number. And then you
6 confirm to Mr Myerscough that you are one of the NILOs
7 in the command support room, so it's where they're
8 coordinating your response from to be spoken to if they
9 need to be tied up with you. And then you go on:
10 "Just to confirm I've got police [and that's the
11 multi-agency tactical channel] and I think our Control
12 are in the — the appliances at the rendezvous point
13 have got that, so if you need to do that you can contact
14 us through that radio channel."
15 And then over the page {INQ018836T/5}, we can see
16 shortly after there was the pleasantries and the call
17 ended.
18 So that's the complete capture of your discussion
19 with the FDO line and Mr Myerscough?
20 A. Yes.
21 Q. We don't see any request within that call for where the
22 forward command point is, do we?
23 A. No.
24 Q. And we don't see you requesting any other information
25 from the FDO line, do we?

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1 A. No. The only time I knew what was in the transcript was
2 when we got that through the disclosure. Up to that day
3 I was convinced that I'd asked for an FCP. The only
4 thing I can think of on that is that, just previously to
5 that point in time, we were going to Manchester Central
6 as the rendezvous point, so maybe there was a doubt in
7 my mind as to whether an FCP had been actually declared
8 at all and that was the multi-agency rendezvous point.
9 But I was — when I read the transcript, I was quite
10 stunned that I hadn't asked for an FCP.
11 Q. If we look then, please, now at how you had described
12 that conversation in your notes made — started on
13 23 May, but which you have told us took over a couple of
14 days.
15 {INQ019097/4}, please, Mr Lopez.
16 Sorry, {INQ019097/4}.
17 I'm starting with the second paragraph where we can
18 see recorded:
19 "I eventually managed to get through to the FDO
20 number."
21 Would you agree that there's only one call where you
22 managed to get through to the FDO line?
23 A. That's correct, yes.
24 Q. "A support officer answered the call and I asked if
25 an FCP had been nominated."

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1 That's not accurate, is it?
2 A. No, and I — like I say, I was convinced. I don't know
3 where that's come from.
4 SIR JOHN SAUNDERS: Okay. That was your recollection?
5 A. It was, sir, until I got the transcript.
6 MS CARTWRIGHT: You went on then to indicate that you
7 recorded that he'd appeared to be unsure what an FCP
8 was.
9 A. Yes.
10 Q. But you have not asked him the question about an FCP?
11 A. No.
12 Q. You also recorded:
13 "During the conversation I asked him if the
14 active shooter threat had been neutralised which he was
15 unable to do and I confirmed with him that at this time
16 there was still a viable threat."
17 Again, in terms of that entry about a discussion
18 about an active shooter and whether it was neutralised,
19 that's not accurate, is it?
20 A. No.
21 Q. And can you assist me as to where then that information
22 came from, bearing in mind this is the only call you had
23 with the FDO line?
24 A. Yes, I really, really don't know. Obviously, as it goes
25 on, it mentions the five ambulances, so whether I picked

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1 something up in the command support room at that time or
2 I've read something on the log, I really do not know.
3 I suppose to put some context — because it sounds
4 ridiculous, and I was absolutely convinced that was the
5 conversation that I'd had. I think the FCP bit might
6 have been — I'd had a discussion with Mr Berry possibly
7 the day after and he'd had a discussion with, I think it
8 was Mr Myerscough as well. I've heard the evidence and
9 it seems very similar to his discussion.
10 So I've got no explanation for that. I think it's
11 something that I probably made up in my head as I've
12 gone through. As I say, when I was writing this log,
13 this went over several days. I was...
14 SIR JOHN SAUNDERS: You got the information from somewhere
15 but you have not got it from the —
16 A. I haven't got it from the force duty officer.
17 SIR JOHN SAUNDERS: And that goes for the ambulances as
18 well, the next bit?
19 A. The only thing I can think of is either I've heard
20 something in the command support room at that point or
21 I've picked it up from the log, but I don't know when
22 I've done that either.
23 MS CARTWRIGHT: Then if we just look briefly at the next
24 paragraph, that actually seems to accurately summarise
25 the extent of the discussion —

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1 A. Yes.
 2 Q. -- with Mr Myerscough, as we've just looked at in the
 3 transcript.
 4 Thank you.
 5 SIR JOHN SAUNDERS: Did he ever ring back, Mr Myerscough.
 6 A. No.
 7 SIR JOHN SAUNDERS: Did you keep trying again?
 8 A. No because after we'd gone to Manchester Central by the
 9 time that the appliances arrived, things started to move
 10 at that point, and then shortly afterwards resources
 11 were deployed into the scene. So I never contacted him
 12 again.
 13 MS CARTWRIGHT: So in terms of what you've recorded, are
 14 those the sorts of things you should have been raising
 15 with the FDO line at that time?
 16 A. Absolutely.
 17 Q. I want to ask you next -- I'm not going to go through
 18 every call backwards and forwards, but it's right, isn't
 19 it, that you became aware of an Operation Plato from
 20 Mr Lawlor?
 21 A. That's correct, ma'am, yes.
 22 Q. But during the time as well there is discussions around
 23 deployment of the SRT and I think there was some
 24 difference of opinion about the deployment to the scene
 25 of the SRT; is that correct?

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1 A. That's correct.
 2 Q. So can we just deal with what happened about that and
 3 the response to deploying the SRT in the command support
 4 room.
 5 You set out that:
 6 "Within 3 or 4 minutes, [you'd] spoken to the FDO's
 7 officer and then Mr Lawlor had arrived at GMP Silver.
 8 The TV was switched on and at this point we could see
 9 lots of ambulances, presumably going to the arena. All
 10 went quiet in the CSR as seeing the ambulances deploying
 11 was a game changer."
 12 A. Yes, I think as well there was discussions going on
 13 between the chief and Mr Levy. This might have -- I've
 14 always thought it was the TV going on that was the
 15 prompt -- that when the chief went outside to make his
 16 phone call, that might have been the discussion that
 17 Mr Levy was telling me that ambulances were leaving
 18 Thompson Street and so then he spoke to Steve Hynes from
 19 the Ambulance Service.
 20 SIR JOHN SAUNDERS: The CCTV or the things you were watching
 21 the ambulances arriving, is that on a television?
 22 A. It's on the news channel, sir, on Sky News.
 23 SIR JOHN SAUNDERS: Did you ever get to use CLIO?
 24 A. No, sir.
 25 SIR JOHN SAUNDERS: Because you don't know how to log on to

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1 or something?
 2 A. No. There's the -- with the CLIO system, it has to be
 3 secure and there are only certain people who can do it,
 4 which are the command support room administrators.
 5 There's a token that they have to use. I'm not sure
 6 whether Rob Lafferty had had the training on the night
 7 but again there was a lack of confidence because every
 8 time -- there was something wrong with the computers and
 9 since they've been in, they'd never worked properly.
 10 SIR JOHN SAUNDERS: These computers are put there to help
 11 you liaise with the police? And no one --
 12 A. In theory, yes.
 13 SIR JOHN SAUNDERS: -- (overspeaking) and see what's going
 14 on?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: How long had they been there?
 17 A. I think the computers had been there for a couple of
 18 years.
 19 SIR JOHN SAUNDERS: Presumably at some cost?
 20 A. Yes. As I say, they never worked.
 21 SIR JOHN SAUNDERS: I understand that. They never worked.
 22 Did you ever think people would get them sorted out?
 23 A. Yes. Part of the problem was although the computers
 24 were put in, they needed a line, a fibre optic line,
 25 I think. This was being done by the -- through GMP and

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1 our comms department and I think it took something like
 2 12 months before the line was put in place. So the
 3 computers were there as, I would say, a white elephant
 4 for most of the time.
 5 SIR JOHN SAUNDERS: Do they work now?
 6 A. I have no idea, sir.
 7 MS CARTWRIGHT: Mr Fletcher retired in 2019.
 8 SIR JOHN SAUNDERS: Sorry, yes, absolutely. Thank you.
 9 MS CARTWRIGHT: I just want to then deal with the first
 10 conversation because this is at a time before Mr Lawlor
 11 is notified of his knowledge about a declaration of
 12 Operation Plato.
 13 So you've described in your witness statement seeing
 14 the ambulances deploying was a game changer. You have
 15 now indicated that you think as well it was the
 16 conversation Mr O'Reilly was having with Steve Hynes?
 17 A. It was possibly a combination of both, yes.
 18 Q. You say that:
 19 "Following that conversations the chief said that
 20 the Fire and Rescue Service were going to send three
 21 pumps and [you] specifically asked him if you were going
 22 to send the SRT."
 23 A. Yes, that was just before the Plato declaration came
 24 through as well.
 25 Q. You indicated in your witness statement that:

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1 "As far as [you were] concerned, the area was still
 2 a potential hot warm zone because, [you] had not had any
 3 definitive update regarding the status of the
 4 active shooter."
 5 A. Yes.
 6 Q. And you yourself in the witness statement commit that,
 7 based on what you had known at that time personally, you
 8 would have sent the SRT in?
 9 A. I would have mobilised the SRT, yes.
 10 Q. I think how you described it in the witness statement
 11 is:
 12 "[You] would have sent the SRT in."
 13 A. Yes.
 14 Q. We know the pumps were mobilised and you say at about
 15 00.20 — and we heard from Mr Lawlor about that — the
 16 information came that Plato had been declared and you
 17 say this: that you then spoke to the chief again about
 18 sending the SRT.
 19 A. Correct.
 20 Q. Why, now you knew it was a Plato, was it important that
 21 the SRT was deployed?
 22 A. As it's the specialist response and again with the
 23 Plato, we were thinking that Plato had been declared at
 24 that moment in time, so I envisaged that the specialist
 25 response was the most appropriate — sorry, the

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1 specialist response team was the most appropriate
 2 response to send at that time.
 3 Q. You say that the conversation ran as follows with
 4 Mr O'Reilly:
 5 "I asked him if we were still sending normal
 6 appliances in and not the SRT and Mr O'Reilly said yes."
 7 A. Correct.
 8 Q. You say:
 9 "I think the rationale for not sending the SRT was
 10 that there might be a second attack."
 11 A. Yes.
 12 Q. What gave you that impression?
 13 A. I don't know whether it was that at that time or we had
 14 a similar discussion when the second phase of resources
 15 was mobilised. As I say, obviously I've only heard one
 16 side, I didn't hear any of this conversation with
 17 Steve Hynes, so I don't know what information the chief
 18 had in his possession at that time to come to that
 19 conclusion and make that decision.
 20 Q. Again, in terms of the sending forward of the pumps and
 21 the decision as to what pumps went forward, that's
 22 a command decision, isn't it, that should be being made
 23 by the incident commander?
 24 A. Yes.
 25 Q. So why was it Mr O'Reilly that was making those

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1 decisions in the CSR?
 2 A. I think to be fair to him, because nothing had gone
 3 forward before that time.
 4 Q. You say in respect of this challenge after the
 5 declaration of Operation Plato and your discussion with
 6 Mr O'Reilly about still sending the non-standard —
 7 sorry, the standard pumps rather than the SRT, that you
 8 also remember a challenge being made in a call to the
 9 CSR from either GM Levy or GM Meakin and:
 10 "Due to the receipt of this information, perversely
 11 in this incident we were thinking our assumptions had
 12 been right to this point."
 13 A. That it was an MTFA yes.
 14 Q. Yes. So not only was it you saying to Mr O'Reilly, "Why
 15 not send the SRT", directly from the scene of the
 16 incident Mr Levy and Mr Meakin were challenging that
 17 decision also?
 18 A. That was from the rendezvous point at Thompson Street,
 19 yes.
 20 Q. And again Mr Levy should have been able as incident
 21 commander to decide what was deployed?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Okay. Operation Plato is declared.
 24 Isn't it the critical thing actually what the zoning is?
 25 So Operation Plato can be declared for a complete area,

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1 as I understand it.
 2 A. Yes, sir.
 3 SIR JOHN SAUNDERS: So you want to know, don't you, and
 4 what's vital to you is what about the arena itself?
 5 A. Yes, sir. And at that stage — I don't think we had any
 6 information on the zoning and that's why I would have
 7 probably sent the specialist response team down there
 8 because they're geared up to work in the warm and the —
 9 well, bordering on the hot zone —
 10 SIR JOHN SAUNDERS: But the chief had actually been speaking
 11 to someone at the scene?
 12 A. The chief had been speaking to someone at the scene and,
 13 like I say, sir, to be fair to him I don't know —
 14 SIR JOHN SAUNDERS: What information he had been given?
 15 A. — what context or the information that he had.
 16 MS CARTWRIGHT: So when the challenge came in from Mr Levy
 17 and Mr Meakin, you recorded this, as someone that was
 18 in the room with Mr O'Reilly:
 19 "The chief however stood by his original decision
 20 and mobilised the three appliances with a NILO,
 21 Mr Berry."
 22 A. Yes. And as I said before, again this is being fair to
 23 both parties, at the time I was asked who the duty NILO
 24 was and I said it was Mr Berry, and that might have
 25 influenced the decisions as to why Mr Berry was sent

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1 down as opposed to Mr Levy at that time.
 2 Q. But in terms of that, that when assets were deployed
 3 including a NILO that wasn't Mr Levy, just in terms of
 4 someone who was in the room, did this not seem as an
 5 undermining of Mr Levy and his decision-making?
 6 A. At the time I don't think so. I think it was just
 7 a relief that we'd actually got some resources en route
 8 at that time.
 9 Q. I want to now deal with a third occasion when there was
 10 a discussion between you and Mr O'Reilly about the SRT.
 11 You say this in your witness statement:
 12 "A bit later, Mr Berry made a request asking for
 13 everything to be sent from the rendezvous point at
 14 Central Station."
 15 A. Correct.
 16 Q. "Mr Etches and Mr Nankivell were about to action this
 17 with North West Fire Control and ACFO Harris told them
 18 to hold off."
 19 A. Yes.
 20 Q. "The chief was at this time on the phone, again to
 21 Steve Hynes from NWAS. I got frustrated with
 22 ACFO Harris and said that Mr Berry was at the scene and
 23 our role in the CSR is to support him as the incident
 24 commander and that as Mr Berry had asked for resources
 25 we should send them. However, ACFO Harris said to wait

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1 for the chief."
 2 A. That's correct, ma'am.
 3 Q. And so in terms of the discussion at this stage with
 4 Mr Harris, can you assist as to -- did it get heated at
 5 this point bearing in mind now we did have Mr Berry
 6 at the scene and he was saying to send everything from
 7 Central Station?
 8 A. Obviously the discussion I had, I do think -- I did
 9 swear at him at one point, as to, "We've got somebody
 10 there, he's asked for resources, just send them to him".
 11 I think he came back with a -- he needs to be more
 12 specific in what he's asking for. I think I say, "For
 13 god's sake, he's been at the rendezvous point all night,
 14 he knows what's there, just send what he's asking", and
 15 he said, "No, let's wait for the chief to come in".
 16 Q. I think in one of the accounts you provided after the
 17 incident you described it as -- I think the response
 18 that came back was that Mr Berry had made a poor
 19 request.
 20 A. Yes. I think the words that was used was he needed
 21 to -- I think it was poor but he needs to be more
 22 specific in what he's asking for. Normally, if we're
 23 sending an assistance message from the Fire Service, you
 24 will say, "Make pumps four, SRTs two". And I think
 25 that's where Mr Harris was sort of coming from, but at

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1 that stage we were so far down the line, he'd asked for
 2 resources and we should have just sent them to him.
 3 Q. Can I ask you then in terms of your role, within one of
 4 the debriefs you gave -- and I can take you to it
 5 if we need to -- (inaudible: distorted) role on the
 6 night as being a tactical adviser.
 7 A. Yes.
 8 Q. And so in terms of your role in the Fire and Rescue
 9 Service and your role in that room, would everyone else
 10 have seen you as someone there to provide tactical
 11 advice?
 12 A. Yes, on the MTFA capability.
 13 Q. And so you yourself were saying, in addition to
 14 Mr Berry, that they should respect and send everything?
 15 A. Yes, what they had asked for.
 16 Q. And that included the SRT?
 17 A. Yes.
 18 Q. And that was ignored as well?
 19 A. Yes, it was. The SRT wasn't mobilised.
 20 Q. When Mr O'Reilly came off the phone, I think he gave
 21 information as to what had been requested from
 22 Steve Hynes.
 23 A. He did, yes.
 24 Q. So had any other information been gathered at that time
 25 about zoning?

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1 A. Again I'm trying to put the chronology in line. I know
 2 Mr Berry had had a conversation with the chief about
 3 zoning but I can't remember whether that was before or
 4 after this request.
 5 Q. You say that as Mr O'Reilly was asking then for two more
 6 pumps, which he was going to send, and you say this in
 7 your witness statement:
 8 "Myself, Mr Nankivell and Mr Etches argued with him
 9 and asked would it not be better to send the SRT?"
 10 A. Yes.
 11 Q. So again, the description of arguing gives a certain
 12 impression, but as one someone in the room at that time
 13 and what was taking place, can you just give clarity as
 14 to what was taking place?
 15 A. As I say, the chief came back in, obviously the decision
 16 was made. I think three of us went(?), "Why not send
 17 the SRT in?", and he seemed to get quite angry and
 18 Basically, "This is" -- I think words to the effect of,
 19 "This is what they've asked for, this is what we're
 20 sending", and I think again -- and I'm trying to be fair
 21 to the chief, again I don't know the detail of the
 22 conversation that he had with Steve Hynes. He was
 23 saying: well, send it in, send it in, we'll sort of lose
 24 the specialist response capability. Because again,
 25 I think he was expecting there was going to be an

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1 escalation of the incident somewhere else.
 2 But obviously that was one of the reasons that we
 3 put Merseyside on standby so once we had mobilised
 4 we would have brought them in.
 5 Q. You set out in your witness statement:
 6 "Given the injuries the crew would potentially be
 7 faced with, the equipment on the SRT vehicles would be
 8 more helpful."
 9 A. Yes. Obviously we didn't know at that time that most of
 10 the live casualties had been removed; maybe the chief
 11 did.
 12 Q. Again, in terms of just being clear about what time this
 13 was, this is at a time shortly after 00.20; would that
 14 be correct?
 15 A. I think it was -- it was after 00.20. I thought it was
 16 about 00.40 in the morning, but again I could be wrong
 17 on that.
 18 Q. Again in terms of knowledge about casualties, the
 19 numbers of them and those still in the arena, you didn't
 20 have information about that?
 21 A. No, we'd had something passed to us -- and again this is
 22 the time -- I think at the time there was -- I think it
 23 was confirming 19 fatalities and the number of P1, P2
 24 and P3 casualties. What we didn't know is whether those
 25 casualties were still at the arena. Obviously, a lot of

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1 them would have been taken to hospital by that time, but
 2 we were working on the presumption then -- I think
 3 in the control log they say what time the two pumps were
 4 mobilised so that might give an indication as to what
 5 time that discussion took place.
 6 Q. You have described how the chief got angry and you
 7 characterise it as this in your witness statement:
 8 "However, the chief got agitated that this was being
 9 questioned and said that the request was for trauma
 10 technicians. He stated that all firefighters are trauma
 11 technicians and he asked if this was wrong."
 12 Is that what happened?
 13 A. That's effectively word for word what was said.
 14 Q. And then you say this:
 15 "This is wrong. However, no one said so at the
 16 time."
 17 A. No, it was... Again, he was angry. I think he was
 18 obviously angry at the way the response had been all
 19 night. I think it was the culmination and he got
 20 information -- as I say, I don't know the full extent of
 21 the information he got from Steve Hynes, which might put
 22 some (overspeaking) rationale --
 23 SIR JOHN SAUNDERS: Okay, we all do, so that may put some
 24 context behind it, obviously.
 25 But he said there were requests for trauma

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1 technicians. He said:
 2 "All firefighters were trauma technicians, is that
 3 right?"
 4 He asked the question?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Is that right, he did ask the question?
 7 A. I don't think it was asked the -- as the question, it
 8 was, "Am I wrong?"
 9 SIR JOHN SAUNDERS: So he says, "Am I wrong", he was wrong,
 10 and nobody told him he was wrong?
 11 A. No.
 12 SIR JOHN SAUNDERS: He seemed to be getting angry?
 13 A. Yes, sir. And again, I suppose at least we were sending
 14 something down there, but we felt that the SRT should
 15 have gone.
 16 MS CARTWRIGHT: Can I break that down then, please?
 17 Firstly, is it not surprising that the chief fire
 18 officer did not know on 22 May, now we're into 23 May,
 19 that his firefighters -- that all of them were not
 20 trauma trained?
 21 A. I think at that time -- well, there's a difference
 22 between trauma trained and trauma technicians.
 23 Q. Yes.
 24 A. The trauma technicians, in my understanding, was that --
 25 these had had quite a lot more trauma training and we

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1 usually have one per fire appliance and there would be a
 2 marking on the helmet to show who they were.
 3 Trauma trained -- I think they had been more trauma
 4 training of firefighters -- again, I'm trying to get my
 5 timelines right -- I think at that time we'd been doing
 6 the -- responding to the red 1s, so the cardiac arrests.
 7 So normal firefighters would have had more trauma
 8 training at that point than what they would have had
 9 previously. But trauma technician to me is
 10 a different --
 11 SIR JOHN SAUNDERS: Can I try and summarise it? As
 12 I understand it, on ordinary fire engines, one person
 13 has specific training for trauma and they then train the
 14 others on the appliance?
 15 A. They're designated as trauma technicians. So going back
 16 to when I was responding to incidents, I would always
 17 look for a trauma technician if there were casualties
 18 and get them to do it. They might bring other
 19 firefighters into assist them, but they would lead on
 20 the trauma side.
 21 SIR JOHN SAUNDERS: HART are all trauma -- on SRT, sorry,
 22 are all trauma technicians trained?
 23 A. Again, I wouldn't say that they're all trauma
 24 technicians. What they are specifically trained in is
 25 the type of injuries and the equipment that's contained

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1 on the SRT vehicle.
 2 SIR JOHN SAUNDERS: Thank you.
 3 A. They have enhanced trauma training, sir.
 4 MS CARTWRIGHT: But again, in terms of it being — it should
 5 have been known in terms of how a composition of
 6 a pump's non—MTFA and MTFA as to the composite of who's
 7 a trauma technician and who isn't, that should have been
 8 well—known by the chief fire officer, shouldn't it?
 9 A. Yes. Well, like I say, whether he was getting his
 10 terminology mixed with up trauma trained or trauma
 11 technician, I don't know.
 12 SIR JOHN SAUNDERS: The problem is, it appears, so there's
 13 a request to have ordinary fire engines going there.
 14 What was not thought about at that time was it was still
 15 a warm zone and you couldn't send ordinary firefighters
 16 into a warm zone. That was ultimately the problem
 17 rather than whether people were trauma trained.
 18 A. Yes. As I say, the timeline — I can't remember when
 19 Mr Berry had the conversation with the chief and
 20 Mark Dexter, when they were sort of discussing the
 21 zones.
 22 SIR JOHN SAUNDERS: It's just — it's not "just" — it is
 23 a lack of awareness of zones and the effect of zoning?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: Yes.

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1 MS CARTWRIGHT: In terms of that, was there a discussion
 2 with Mr O'Reilly about that because you hadn't had
 3 clarity at that time about the zones?
 4 A. I don't think there was any discussion about the zones,
 5 ma'am, no.
 6 Q. So in terms of if it was still a warm zone in aspects of
 7 the arena, it would need the SRT, they would be the only
 8 individuals that could go into that zone?
 9 A. Into the warm zone at that time, if that was designated,
 10 but again it depends on what information is available
 11 at the scene.
 12 Q. Again you say that:
 13 "What Mr O'Reilly was saying was wrong, but no one
 14 said so. He was getting angry and it was obvious that
 15 any further argument would be unhelpful."
 16 A. Yes.
 17 Q. So would you not have expected somebody in that room,
 18 bearing in mind the seniority present in the command
 19 support room, to make absolute clarity (sic) about what
 20 the training was of the firefighters that could be
 21 deployed that night to Mr O'Reilly?
 22 A. I think again that's a fair comment. But it was just
 23 the atmosphere in the room at that time.
 24 SIR JOHN SAUNDERS: Not conducive to making the right
 25 decisions, the atmosphere, was it?

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1 A. No.
 2 MS CARTWRIGHT: Actually, the overriding duty at that time
 3 should have been consideration of the protection of
 4 life?
 5 A. Yes.
 6 Q. You say:
 7 "After this, I queried whether a recall to duty for
 8 additional SRT personnel was required. I was still
 9 thinking about a potential follow—up attack and that the
 10 chief again still resisted further deployment."
 11 You said:
 12 "ACFO Harris said, 'This is not necessary as the SRT
 13 had not yet been deployed.'"
 14 A. Yes. I wouldn't put —
 15 SIR JOHN SAUNDERS: That's a non sequitur —
 16 A. Sorry, sir?
 17 SIR JOHN SAUNDERS: That's a non sequitur, the two parts of
 18 that. You wanted to have more people on reserve brought
 19 in —
 20 A. Yes.
 21 SIR JOHN SAUNDERS: — he didn't want to deploy the SRT.
 22 Was he resisting having more people brought in from
 23 reserve?
 24 A. I think he just felt that stage there wasn't the need to
 25 bring anybody additionally in. We have got — the SRT

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1 is still a capability and ready to deploy. Maybe he was
 2 also considering then we had got Merseyside —
 3 SIR JOHN SAUNDERS: Merseyside (overspeaking).
 4 A. — on stand by and we could bring another FRS in to
 5 support.
 6 MS CARTWRIGHT: Again, just so we're absolutely clear, the
 7 chief was well aware also that Operation Plato had been
 8 declared when he was making these decisions?
 9 A. Again on the time flying, at 00.20, yes, he was aware,
 10 but we thought that was the time that Plato had been
 11 declared. And then we got a further call, just before
 12 00.50 in the morning, from Mr Lawlor confirming that
 13 Plato was actually declared at 22.47.
 14 Q. Thank you. I think you then go on to tell us that at
 15 00.50, Mr Lawlor advised that Operation Plato had
 16 actually been declared by GMP at 22.47?
 17 A. That's correct, yes.
 18 Q. Can I just be clear about what was said at that time
 19 about the zones?
 20 A. I can't remember if — there might be something that's
 21 on the log for the command support room. Anything that
 22 Mr Lawlor put forward about the zones would have been
 23 annotated on the log.
 24 Q. Thank you. Perhaps then if we look at that log now.
 25 {INQ004453/1}.

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1 We can see recorded for 00.53, Mr Harris has
 2 recorded:
 3 "GMP declared curtilage inside the arena as a warm
 4 zone. Victoria Station and surrounding area is a cold
 5 zone."
 6 A. Yes.
 7 Q. Thank you.
 8 The rest of your statement deals with other kinds of
 9 involvement and the chairman has those. But I want to
 10 ask you, please, about METHANE and about your knowledge
 11 about METHANE messages that night. So were you made
 12 aware of the METHANE messages during your involvement?
 13 A. No.
 14 Q. Can you understand why — did you not look or ask about
 15 METHANE messages?
 16 A. I didn't ask. I suppose, again, the assumption is that
 17 if a METHANE message has been sent, it would be shared.
 18 SIR JOHN SAUNDERS: I think the training for JESIP, for what
 19 it's worth, says you should — (a), if you have a
 20 METHANE message, give it, make sure everyone has it, and
 21 if you're another responder who hasn't had it, you
 22 should be asking if there are any METHANE messages.
 23 Is that your understanding too?
 24 A. I didn't ask for and I don't know whether — obviously
 25 it's, to be fair to North West Fire Control — whether

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1 that was done — I believe North West Fire Control
 2 weren't aware of any METHANE messages sent on the night.
 3 MS CARTWRIGHT: Can I ask in terms of the incident logs for
 4 North West Fire Control, can you assist as to — was
 5 anyone accessing those from within the command support
 6 room to look at what was contained within them?
 7 A. At some point the logs were on — I can't remember
 8 whether they were on when I got into the command support
 9 room or were put on at a later point. Again, at what
 10 time they were looked at, which log was the one that was
 11 on, we've obviously discussed the potential areas of
 12 mistakes on that.
 13 I think the log itself, certainly after we deployed,
 14 was probably looked at more rather than a historical
 15 document, as a current — a document making sure that
 16 any information that had been passed was annotated on to
 17 log.
 18 My own perspective, I — it was the next morning,
 19 really, when I started looking at — I didn't realise —
 20 it was the next morning when I realised there four
 21 separate logs for the night. And I think originally,
 22 I opened the wrong one because at 23.50, sorry, at
 23 00.50, because of the Plato and certainly the second
 24 message, I said to the chief at the time, "This is
 25 Plato, we need to declare — it's a major incident for

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1 everybody". And I contacted Control, but I couldn't
 2 find it on the log the next morning, so
 3 I retrospectively put it on to through North West Fire
 4 Control in a message in the morning but later I did find
 5 that it had been put on, but it was done at 00.50, so it
 6 must have been when we got the second notification about
 7 Plato rather than the first one.
 8 Q. I'm not going to go through the rest of your involvement
 9 the night. You deal with it in your witness statement
 10 and we have plainly had logs of other calls and
 11 conversations.
 12 In terms — there's a summary of a call where it's
 13 recorded by Mr Levy saying that you were very, very low
 14 and very upset. That's captured. Can you just
 15 encapsulate at the end of your involvement your feeling
 16 about what had happened that night?
 17 A. Well, I was completely devastated. Everything that we
 18 had put in place for this type of scenario — I thought
 19 we had a really good capability, thought the procedures
 20 were fine, and it was just a catastrophe, really. It
 21 devastated me. I've never been in such a dark place in
 22 my life after that, at the end of that night.
 23 Q. You seem to be indicating from that answer that —
 24 do you accept that the Greater Manchester Fire and
 25 Rescue Service response failed on the night?

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1 A. Completely.
 2 SIR JOHN SAUNDERS: He's just described it as a catastrophe,
 3 I think we can take that.
 4 MS CARTWRIGHT: Are you able to identify, particularly in
 5 your role as manager of the Contingency Planning Unit,
 6 what you identified as the reasons for that failure?
 7 A. Poor communications. I think our procedures, although
 8 I thought the procedures were right at the time, there
 9 was gaps. Clearly, the information that we got at the
 10 start of the incident hadn't been passed on. I think
 11 there's a plethora of reasons. I think Kerslake
 12 described it as a Swiss cheese model: there was all
 13 sorts of holes everywhere. I think communication is
 14 probably the biggest failure, certainly in the early
 15 stages of the incident.
 16 Q. You go on in your witness statement to offer
 17 observations about the response of the Greater
 18 Manchester Police FDO and you say this:
 19 "In my opinion, the declaration of Operation Plato
 20 would have been a career-defining moment for the FDO.
 21 I simply cannot understand that it was not shared with
 22 us or NWAS for that matter at that time."
 23 And do you stand by that?
 24 A. Completely.
 25 Q. You go on to say:

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1 "We did know in the event of an attack the FDO would
2 be really busy and we may struggle to get through to
3 them. However, I never envisaged that on declaration of
4 Operation Plato that we would not be informed at all."
5 A. Yes.
6 Q. You then also offered an opinion that:
7 "This was a systematic, single point of failure
8 within GMP, with an over-reliance on the FDO."
9 A. Yes.
10 SIR JOHN SAUNDERS: Is that a systematic or systemic?
11 MS CARTWRIGHT: Systematic it says.
12 SIR JOHN SAUNDERS: Okay, never mind. It's a failure?
13 A. It's a failure, but I do acknowledge what was said
14 about, plan B and plan C should have been more robust.
15 MS CARTWRIGHT: You also say this:
16 "It was foreseeable that this officer would be
17 completely overwhelmed in the event of a major terrorist
18 incident."
19 A. That was picked up during the Hawk River exercises from
20 our perspective, yes.
21 SIR JOHN SAUNDERS: And Winchester Accord?
22 A. And Winchester Accord, but as I said when I was giving
23 testimony last time, sir --
24 SIR JOHN SAUNDERS: They had an explanation for it --
25 A. There was a bit of an explanation, so I didn't put as

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1 much of an emphasis on the comms failure, the FDO,
2 rather than the tactical firearms --
3 SIR JOHN SAUNDERS: As they said they'd be moving him?
4 A. Yes. It was working -- I think it said in the debrief
5 that he'd have a full team behind him. It was a --
6 they'd moved him for the purposes of that exercise, so
7 like I say, I didn't pick up the --
8 SIR JOHN SAUNDERS: I understand that.
9 A. -- other severity of it.
10 MS CARTWRIGHT: You indicate when giving that opinion, which
11 you have confirmed you stand by today in your evidence,
12 you indicate that:
13 "That is why we had looked for three-way
14 uninterrupted communications."
15 A. Yes. But I do accept maybe we should have had something
16 further as well.
17 Q. I'm not going to take you through all of your debrief
18 that you provided in terms of the account.
19 Sir, if we can identify them with the witness,
20 others may wish to take Mr Fletcher to them.
21 The debrief report is {INQ004498/1}. We can see
22 that you participated in that debrief. And if we turn
23 over the page, please, to {INQ004498/2-3}, we can see
24 lots of observations that were provided by others as to
25 areas for improvement. But it's right, isn't it, you're

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1 participant 25 in the debrief process?
2 A. I believe so, yes.
3 Q. And in advance of today, you've had an opportunity to
4 refresh your memory from that debrief document?
5 A. Yes, yesterday.
6 Q. And so in terms of all of the areas for improvement that
7 are identified by that document with a 25, do you stand
8 by those observations that you gave at the time?
9 A. Yes.
10 Q. Sir, in the circumstances, I'm not going to go through
11 each of those with the witness unless you would wish to
12 do so.
13 SIR JOHN SAUNDERS: No, I don't, thank you.
14 Am I right that this is the debrief which someone
15 else has described as being rather a hostile and
16 unhelpful one?
17 A. I wouldn't describe it properly as a debrief. It wasn't
18 conducive to proper learning, I would say.
19 SIR JOHN SAUNDERS: So it was more concerned with people
20 blaming each other?
21 A. That would be my perception, sir, yes.
22 SIR JOHN SAUNDERS: Thank you.
23 MS CARTWRIGHT: Again briefly, if we identify the notes of
24 that debrief: {INQ030902/1}.
25 Again have you had an opportunity before giving

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1 evidence today to review those notes?
2 A. I have.
3 Q. I think you're "John F" within the document?
4 A. Yes.
5 Q. And when you re-read through those notes, did broadly
6 what was recorded against your name reflect your
7 contribution in that discussion?
8 A. I'd say so, ma'am, yes.
9 Q. Thank you.
10 Can I then briefly take you to the account that we
11 do have by way of the conversations with Mr Goodwin of
12 the Kerslake Panel. That's {INQ000280/5}, which is
13 where we see the recording of your involvement,
14 Mr Fletcher.
15 SIR JOHN SAUNDERS: Have you read through these?
16 A. I have, yes.
17 SIR JOHN SAUNDERS: Are they accurate?
18 A. Yes, from what the notes take -- it was obviously a much
19 longer conversation.
20 SIR JOHN SAUNDERS: Yes, you're right, it's notes, yes.
21 MS CARTWRIGHT: Could we turn over the page to
22 {INQ000280/6}.
23 I think we can see that you describe again what
24 we've asked you about today about sending the SRT. You
25 confirmed, I think, within that:

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1 "[You] would have sent the SRT. Could still be warm
2 zone, secondary devices, other risks"?

3 A. Yes.

4 Q. Can I ask you then, a little bit further down the page,
5 we see reference to:
6 "Gold was mission creep. Chief making the
7 decisions. He said he would wait for SCG to get to
8 FCM."
9 What did you mean by "Gold was mission creep"?

10 A. I think it's more what the role of the -- what was
11 carried out in the command support room. And
12 particularly when the request was made for resources
13 from the scene, a decision was made not to send what was
14 asked for, but what was asked for from the
15 Ambulance Service. But as I say, I don't know the
16 context of the conversation the chief had with Mr Hynes.

17 Q. Finally for my purposes on this document, can I ask --
18 it's recorded:
19 "Our MTFA one of the best capabilities in country."
20 But then it goes on:
21 "In days after, some frustrations, can't say
22 anything or discuss incident."
23 It goes on:
24 "I spoke to Lancs and Merseyside to pass on comms
25 advice. Mick spoke to Cheshire."

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1 Where it says, "Can't say anything or discuss
2 incident", what were you summarising there?

3 A. Basically that's what we were told: don't discuss the
4 arena. It was just sort of a blanket approach that --
5 the comms advice, what that relates to, is the Airwave
6 protocol that we put in place. We were at critical at
7 that stage, I couldn't have lived with myself if the
8 same thing had happened again, and we hadn't told
9 (overspeaking) --

10 SIR JOHN SAUNDERS: We heard from Mr Lawlor about this, who
11 was saying we were all told not to discuss it until we
12 had a proper debrief.

13 A. I don't know if it said about until we had had a proper
14 debrief, but it was said: don't discuss the arena.

15 SIR JOHN SAUNDERS: Was it that you wanted to talk to the
16 firefighters to explain a bit what had gone wrong
17 because of the atmosphere between you all?

18 A. There was definitely an atmosphere, yes.
19 I think it was after that we found out that the
20 chief and some of the principal management had gone down
21 to Central Fire Station and had a discussion with the
22 crews.

23 SIR JOHN SAUNDERS: Didn't go well?

24 A. I believe so, sir. This is not on the night, this is
25 later on. It got fed back that the NILOs felt that the

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1 NILOs had been blamed and we -- although the NILOs
2 certainly are the ones who were in the command positions
3 on the night, they wanted an opportunity to go and speak
4 to the crews themselves. That wasn't allowed.

5 SIR JOHN SAUNDERS: So not a very constructive approach at
6 that stage to what had gone wrong?

7 A. No, sir.

8 MS CARTWRIGHT: You've identified a little moment ago that
9 when answering questions about the FDO and the
10 communication failure, you indicated about the
11 tri-service communication and when you gave evidence
12 last in February, on 10 February, and then it was picked
13 up on 22 February as well, you gave evidence about the
14 involvement you had after the event where implementing
15 the interim procedure that was agreed between the
16 tri-services about putting in place what had been
17 considered and worked towards in advance of the arena
18 attack.

19 A. Yes.

20 Q. So I'm not going to take you to the emails that underpin
21 that and the various documents and what was then
22 approved. I just want to ask you this by reference to
23 a document that was provided to you by Mr Levy, I think
24 that we have looked at, which is the Devon and Cornwall
25 SOP.

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1 Could we have displayed, please, {INQ034530/1}. Do
2 you recall being provided with a copy of this document
3 in April 2017?

4 A. No. The first time I remember seeing that was in the
5 preparation for the inquiry under the disclosure.
6 I acknowledge -- I think I'm copied into an email from
7 Mr Levy, I think myself and Mr Gaskell, I possibly
8 opened the email, but I don't think I opened the
9 attachment, and I haven't -- the only way I'd sort of
10 think that's right is I would normally acknowledge
11 receipt of something like this from Mr Levy. I don't
12 think I sent any such response so I've got to be honest,
13 I think I missed it.

14 Q. If we look over the page {INQ034530/2}, please, we can
15 see this was a local resilience forum Airwave
16 interoperability standard operating procedure from March
17 of 2011. If we just move on to just one page that gives
18 an example of the procedures contained within this
19 document, at {INQ034530/18}, please.
20 We can see there diagrams. Even though you have
21 said you didn't see the policy, had you seen these
22 documents before within an MTIA (sic) guidance SOP from
23 2010?

24 A. No.

25 Q. Thank you. There are other examples but you had not

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1 seen those before?
 2 A. No. As I say, I'm not a technical expert on any gateway
 3 or form on Airwave. I have not seen any -- I don't
 4 recall ever seeing any such type of documentation.
 5 Q. Thank you.
 6 But in terms of seeing that in Devon and Cornwall
 7 LRF, they had such a SOP procedure in place from 2011,
 8 I think you accepted on the last occasion that JESIP
 9 makes clear the need for the tri-service communication.
 10 A. Yes.
 11 Q. So even if we don't look at the night of the attack but
 12 in advance of the attack, there should have been a clear
 13 SOP in place for tri-service Airwave communication,
 14 shouldn't there?
 15 A. Yes.
 16 Q. It should not have taken until April of 2017 to be
 17 looking at procedures tri-service communication?
 18 A. No.
 19 Q. Would you accept, Mr Fletcher, that you had a role
 20 within Greater Manchester Fire and Rescue Service and
 21 being the manager in the Contingency Planning Unit from
 22 2013 to progress matters in respect of an SOP and
 23 a clear procedure for Airwave communication?
 24 A. I've got a level of responsibility, but I hadn't seen --
 25 I wasn't aware of any such documentation. I think we do

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1 have a comms department that dealt with Airwave, but
 2 I think on the whole -- on the whole, yes, I've got
 3 a partial responsibility, probably, with the whole LRF
 4 structure.
 5 Q. In terms of what was identified in particular after the
 6 Winchester Accord and then the Hawk River debrief, there
 7 really should have been greater expedition to have
 8 a finalised and clear process for tri-service
 9 communication?
 10 A. Yes.
 11 Q. So just to complete that, in terms of your role from
 12 2013, at any point from 2013, before the attack, had you
 13 ever seen or had reference to a National Policing
 14 Improvement Agency document for the standard operating
 15 procedure guide on police-to-police and inter-agency
 16 Airwave interoperability?
 17 A. No.
 18 Q. For my purposes, Mr Fletcher, I'm not going to take you
 19 through the various different conversations you had with
 20 other GMP personnel after the attack. But in terms of
 21 your preparation for today and reading those aspects of
 22 your statement, is what's recorded in your statement of
 23 those conversations accurate?
 24 A. Yes, it is, ma'am, yes.
 25 Q. Then finally, Operation Powerhouse. Could you explain

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1 what the purpose of Operation Powerhouse was?
 2 A. Powerhouse was initially intended to be a full
 3 mobilisation exercise of all the assets and certainly
 4 the changes to procedure that we put in place after the
 5 arena. But predominantly it was also about testing the
 6 interoperability Airwave communication as well.
 7 Q. Was that why you wanted that to be in place before it
 8 was tested in Operation Powerhouse?
 9 A. Yes.
 10 Q. And how did that testing in Operation Powerhouse go?
 11 A. There was obviously some challenges. I put a report
 12 together from the Fire Service perspective with
 13 recommendations. As I say, some of the learning that we
 14 got from the arena, with the NILO who wouldn't mobilise
 15 and would manage that communication from our side,
 16 certainly the links in with -- between North West Fire
 17 Control, NWAS and the police operational control room.
 18 So that was the aspects that we were looking to test.
 19 Q. For my purposes, you conclude your witness statement
 20 with saying this -- and I think it's fair to you to
 21 record that and ask you to confirm it:
 22 "From a personal perspective, I think about the
 23 arena attack every day."
 24 A. Yes.
 25 Q. "This is something I feel that I'll never get over.

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1 It's devastating to think that after many years of
 2 planning and working with multi-agency partners that our
 3 response should fail in this manner. Many lessons have
 4 been learned and implemented but it is clear from this
 5 incident and the outcomes of previous terrorist
 6 atrocities that concise and accurate communication is
 7 essential in the immediate aftermath to ensure the best
 8 coordinated response possible."
 9 A. Yes.
 10 MS CARTWRIGHT: That concludes my questions. Is there any
 11 clarification you wish, sir?
 12 SIR JOHN SAUNDERS: No, thank you.
 13 MS CARTWRIGHT: Could I then turn to Mr Smith and ask if he
 14 could commence his questioning, please.
 15 SIR JOHN SAUNDERS: Mr Smith, how long do you anticipate
 16 being?
 17 MR SMITH: I'm going to be, I think, well within my time
 18 estimate for the Rule 10.
 19 SIR JOHN SAUNDERS: I don't know what that is, I'm afraid.
 20 MR SMITH: I will be less than 20 minutes.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR SMITH: The time estimate was greater than that. I think
 23 I'll be less than --
 24 SIR JOHN SAUNDERS: I'm just getting some information,
 25 that's all.

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1 Questions from MR SMITH
 2 MR SMITH: I hope I can deal with this quite efficiently.
 3 Mr Fletcher, when you looked at the message on
 4 WhatsApp, which had been sent at 23.11 that night,
 5 do you agree that it would be immediately obvious to
 6 you, because of Mr Nelson's message, that this was
 7 potentially an MTFA situation?
 8 A. Yes.
 9 Q. I want to separate out two aspects of the information
 10 that was given to Mr Berry for the purposes of my
 11 questions because I don't believe on the night that this
 12 was made clear to you by Mr Berry, with the greatest
 13 respect to him, in the circumstances.
 14 When you spoke to Mr Berry at 23.13, did you assume
 15 from what he told you that he had acted on the strength
 16 of information that there was an active shooter at the
 17 scene?
 18 A. Yes, sir.
 19 Q. Because that's part of the information that he gave you?
 20 A. It is, yes: "It's a bomb and an active shooter" was the
 21 information.
 22 Q. So what Station Manager Berry did not do was to inform
 23 you that when he made the decision to direct
 24 mobilisation of appliances to Philips Park, he had not
 25 yet received the information that there was an

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1 active shooter?
 2 A. No, he hadn't.
 3 Q. He didn't make that clear to you, did he?
 4 A. No.
 5 Q. You did indicate in your statement that you thought
 6 at the point when you were given this information that
 7 Greater Manchester Fire and Rescue Service would have
 8 had resources on scene and that the PDA had been sent?
 9 That's in your statement.
 10 A. Yes, sir.
 11 Q. I would like you to reconsider that, if you would,
 12 because in the light of Mr Nelson's message, did it
 13 occur to you at the time that it might be the case that
 14 appliances had not been sent?
 15 A. Not at that moment in time, sir. I got the -- just
 16 looking at that, it said explosion in the message
 17 from... on the Sky News link. So again -- I suppose at
 18 that time, it looked really bad, that it was certainly
 19 a terrorist -- and I'm sorry, I'm probably backtracking
 20 a bit about the MTFA. I thought there was obviously
 21 something really bad had happened, but I've got to just
 22 confirm that it was only when I spoke to Mr Berry that
 23 I was aware about the MTFA. So sorry if I misled you
 24 earlier.
 25 Q. Not at all. It's just that point in time that I'm

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1 asking about. You have seen Mr Nelson's message on
 2 WhatsApp?
 3 A. I did see the message, yes.
 4 Q. Which made reference to the MTFA?
 5 A. Could you just repeat what it actually says, please?
 6 Q. Can I bring it up on the screen, please, {INQ019040/1}.
 7 If we look at Mr Nelson's message:
 8 "Andy Berry is NILO and stepping up MTFA
 9 capability."
 10 A. Yes.
 11 Q. So what I would like you to consider is, first of all,
 12 that's Mr Nelson's message that you read; is that
 13 correct?
 14 A. It is, sir, yes.
 15 Q. Secondly, Mr Berry gave you information that it was
 16 believed there was an active shooter as well as an
 17 explosion?
 18 A. Yes.
 19 Q. So I would like you to consider your statement and
 20 reconsider the proposition that at that point you
 21 thought that GMFRS would have had resources on scene and
 22 that the PDA had been sent. My question is: did it
 23 occur to you at that time, in the light of this
 24 information, that GMFRS might not have had resources on
 25 scene?

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1 A. The honest answer at that time with the information, no.
 2 I thought that the PDA would have gone because it said
 3 initially the explosion -- but then, obviously, Andy
 4 started setting up the MTFA capability or corralling it.
 5 It does then start leading to the potential of an MTFA
 6 incident, and obviously we've been looking at the
 7 Paris-style type of attack.
 8 So when I read the message, no, I thought that the
 9 initial PDA may well have been sent. But obviously, on
 10 the further information that I received, as it went down
 11 the line, I fully understand as to why there wasn't
 12 resources on scene at that time.
 13 SIR JOHN SAUNDERS: I'm sure that you and Mr Smith were
 14 entirely at ad idem, but I got lost as to at what time
 15 you were being asked actually whether you thought there
 16 was an MTFA and appliances hadn't been sent to the
 17 scene.
 18 A. When I read this initial message it said:
 19 "Officers responding to an incident, reports of an
 20 explosion" --
 21 SIR JOHN SAUNDERS: When you saw that message, did you think
 22 that appliances would have been sent to the scene?
 23 A. Because it didn't -- yes, because --
 24 SIR JOHN SAUNDERS: "Yes" will do fine.
 25 When you spoke to Mr Berry or after you spoke to

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1 Mr Berry, did you think that appliances had been sent to
2 the scene or would have been sent to the scene?
3 A. No, I was clear after I spoke to Mr Berry that --
4 SIR JOHN SAUNDERS: Because he told you --
5 A. -- he had set a rendezvous point and I fully understand
6 (overspeaking) at that time the reason and rationale
7 behind it, sir.
8 SIR JOHN SAUNDERS: Thank you.
9 MR SMITH: That's clear, and thank you, sir.
10 What I would like you to do, please, Mr Fletcher,
11 because I do want, with respect to the chairman, I want
12 the chairman to have real clarity of information in
13 terms of your evidence on the next issue I'm going to
14 ask you about.
15 A. Okay.
16 Q. I'd like you to look at {INQ041473/1}, which is the
17 sequence of communications. If Mr Lopez could put
18 {INQ041473/5} on the screen, please, and scroll down to
19 {INQ041473/6}, please.
20 If we pick up the call at 22.40 to Mr Berry from
21 North West Fire Control at the very bottom of the page.
22 Then we'll scroll over to {INQ041473/6}. That's the
23 extract from the transcript.
24 For the sake of completeness, if we can go to
25 {INQ041473/9}, because the transcript is broken at this

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1 point in the sequence because other things are
2 occurring.
3 {INQ041473/9}, please. That's the call still in
4 progress, picked up at 22.41.58?
5 A. Yes.
6 Q. Have you already had a chance to go through this
7 document, the sequence of communications?
8 A. I've looked at this, sir, yes.
9 Q. That's very helpful. So what I would like you to do is
10 to consider the information that was provided to
11 Mr Berry at that time by North West Fire Control. This
12 is the aspect that I would like to have your answers
13 in relation to really clear, please.
14 Would you bear in mind that, at this point, Mr Berry
15 had not been told of the presence of an active shooter,
16 and North West Fire Control did not have that
17 information. So we're looking at the material which you
18 have just looked at on screen as having been passed to
19 Mr Berry.
20 A. Yes.
21 Q. And this is what I want clarity about: although you may
22 have made a different decision to that made by Mr Berry,
23 please put that aside. Would you agree with me that you
24 would not characterise Mr Berry's decision, which he
25 made at that time, to deploy resources to Philips Park

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1 as an unreasonable one on that information?
2 A. It's a difficult one -- deploying to the scene or the
3 RVP, possibly not. I wouldn't have gone to
4 Philips Park.
5 Q. I'm not asking what you would have done.
6 A. Yes.
7 Q. What I'm asking you is whether you consider that
8 Mr Berry's decision, given your experience in the Fire
9 Service, given your position, on the information given
10 to him was an unreasonable decision.
11 A. I think it would be reasonable at that time to get --
12 because it's saying it's a bomb that's gone off, a short
13 conversation with the force duty officer --
14 SIR JOHN SAUNDERS: I'm really sorry to stop you but it's
15 for my benefit to get clarity, so I'll do that.
16 It was, in your view, a reasonable decision not to
17 go to the scene, ie to the arena; is that correct?
18 A. In that instant, sir, to try and clarify with the force
19 duty officer -- that's why Control phoned Mr Berry.
20 SIR JOHN SAUNDERS: At this time, before he's spoken to the
21 force duty officer, was it reasonable for him not to
22 deploy to the scene at that stage before he had spoken
23 to the FDO?
24 A. I would have got more information off the FDO just
25 before pressing the button to mobilise, sir

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1 (overspeaking).
2 SIR JOHN SAUNDERS: So your choice would have been:
3 actually, I would have waited until I'd spoken to the
4 FDO before I did anything?
5 A. It's difficult to say. I think it's probably easier if
6 I say what I think I would have done. If I'd been told
7 there's a bomb has exploded, I would have asked for the
8 PDA, but would have said, "Just don't mobilise them
9 straight at this incident from Manchester Central before
10 I've had chance to speak to the force duty officer".
11 And I'd have tried the force duty officer and if I'd got
12 the engaged sign for a minute or so, at that point
13 I would have said, "We've got an RVP, then we go", and
14 I would have corralled then the MTF resources to
15 Manchester Central.
16 SIR JOHN SAUNDERS: Right. So you'd have found out what
17 would be the pre-mobilisation decision, but you wouldn't
18 have mobilised then?
19 A. I would have told Control, "Just give me a minute to
20 speak to the force duty officer".
21 SIR JOHN SAUNDERS: And if you hadn't done it in a minute,
22 you'd have said, "Send them to Manchester Central"?
23 A. No. At that stage, if I hadn't got through to the force
24 duty officer, I'd been given a rendezvous point, I would
25 probably have mobilised the resources to the RVP at that

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1 stage with the caveat that I couldn't get through to the
 2 force duty officer , because at that stage it's an
 3 explosion that's happened.
 4 SIR JOHN SAUNDERS: Which RVP?
 5 A. I think the one the police have given.
 6 SIR JOHN SAUNDERS: Cathedral car park?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: Okay. Right. So now the question is:
 9 was it unreasonable for Mr Berry to do what he did or
 10 is that a question you can't answer?
 11 A. It's... It is a difficult one to put things in
 12 different minds. I think when I was told about the
 13 Philips Park, it was -- and it's an active shooter, not
 14 that the explosion bit had come in as a separate entity.
 15 MR SMITH: Well, can we therefore turn to what you would
 16 have done? You're obviously finding that easier to
 17 answer; is that correct?
 18 A. Yes, sir. I think given, as I've just said to the
 19 chair --
 20 SIR JOHN SAUNDERS: I think he just said what he would have
 21 done.
 22 MR SMITH: I was going to just clarify that, if I may, for
 23 you, sir.
 24 SIR JOHN SAUNDERS: Yes.
 25 MR SMITH: Would you have considered, on receiving that

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1 information, "I need to get in contact with the force
 2 duty officer"?
 3 A. Yes.
 4 Q. "I'm going to leave G16 appliances where they are"?
 5 A. I would have asked for the PDA to be tasked to the
 6 incident.
 7 Q. So what you had not have done until you had spoken to
 8 the force duty officer , is this correct, is have
 9 deployed to the arena? You would have wanted more
 10 information?
 11 A. I would have -- yes, I would have tried to get hold of
 12 the force duty officer , but if I couldn't get hold of
 13 them at that time, I think I've got a decision to make
 14 that I would -- I have been given a rendezvous point,
 15 I would deploy at that time but I would absolutely try
 16 and get hold of the force duty officer first .
 17 Q. And you'd have deployed to the arena then, would you
 18 not, if you hadn't been able to get hold of the force
 19 duty officer ; is this what you're saying?
 20 A. To the cathedral car park.
 21 Q. To the cathedral car park, the RVP?
 22 A. Yes.
 23 Q. Would that have been with a view to obtaining
 24 situational awareness from whatever crews were deployed
 25 or mobilised to that location --

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1 A. Yes, it would be to start to deal with the incident.
 2 Q. -- because we've assumed on your answer that you haven't
 3 been able to get hold of the FDO.
 4 A. That's correct. If the phone was constantly engaged
 5 then at that stage I've got a decision to make.
 6 Q. My second question in relation to this is: do you agree
 7 also that on the basis of that information supplied to
 8 Mr Berry, the information contained within that call , it
 9 was reasonable for the control room at North West Fire
 10 Control to call the duty NILO before mobilising
 11 appliances to the incident scene or for the RVP? In
 12 other words, before taking any mobilising step to call
 13 the duty NILO for advice?
 14 A. Yes, I think obviously we'd all been focusing probably
 15 too much on the Paris-type event --
 16 SIR JOHN SAUNDERS: I'm really sorry, I really don't want to
 17 stop you saying what you want to say, but you may be
 18 able to give me a shorter answer and then if you need to
 19 give me an explanation why -- could you do that first?
 20 Give me the answer and then explain it if necessary.
 21 A. Could you repeat the question, please?
 22 MR SMITH: The question is this: based on the information
 23 that Michelle Gregson passed to Mr Berry at 22.40
 24 in that call , do you agree that it was reasonable for
 25 North West Fire Control to decide to contact the duty

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1 NILO first before mobilising?
 2 A. Yes, on the information that a bomb -- that the
 3 explosion involved a bomb, I think it's a reasonable
 4 step to take.
 5 SIR JOHN SAUNDERS: I just want to take one thing out.
 6 Can you just explain to me why you would need to
 7 speak to the FDO before deploying to the RVP? What
 8 would you want to know from him? Because if you didn't
 9 speak to him, he's just going to deploy to the RVP
 10 anyway.
 11 A. Like I say, it's stuff that we're conditioned to that --
 12 a bomb's gone off, is there something else going on?
 13 The force duty officer would probably be the first
 14 person of note if there's any firearms, and as I've
 15 said, it is a thing that we were thinking, is there
 16 a firearms attack on the back of this as well? So
 17 I would, from my perspective, like to speak to him.
 18 Also, it is not just about a risk element to crews,
 19 there's also without the right resources in the right
 20 place because on a P --
 21 SIR JOHN SAUNDERS: Just let's stop for a moment:
 22 essentially , you want more information from the FDO
 23 because you want to ensure the safety of your crews
 24 going forward?
 25 A. And that we're sending the right resources to the right

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1 place, sir, yes.
 2 SIR JOHN SAUNDERS: Okay. So why then -- if you can't get
 3 through to the FDO, do you say: I will now send them to
 4 the RVP?
 5 A. Because I've tried that option. I probably put it on to
 6 the log that I can't get through to the force duty
 7 officer. But at that point, then, I think I'd mobilise
 8 to the RVP.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR SMITH: Would it be a question then, Mr Fletcher, of
 11 balancing the risk? I'll just put these alternatives to
 12 you -- not alternatives but these choices. You need
 13 situational awareness?
 14 A. Yes.
 15 Q. But you haven't been able to get through to the FDO?
 16 A. Yes.
 17 Q. The safety of the fire crews needs to be borne in mind?
 18 A. Yes.
 19 Q. But a balance has to be struck between the importance of
 20 obtaining situational awareness and preferring the
 21 safety of the fire crews?
 22 A. Yes.
 23 Q. So is that why you would have then made the decision,
 24 "I can't get hold of the FDO, I can't get the
 25 information I need, I am going to send the fire crews on

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1 balance down to the RVP?"
 2 A. Yes.
 3 Q. Two short questions, please. When you spoke to Mr Berry
 4 at 23.13, did he make it clear that he expected the Fire
 5 and Rescue Service appliances then mustered at G18,
 6 Philips Park, to move forward as soon as an FCP was
 7 nominated?
 8 A. Yes, sir.
 9 Q. Do you agree that you'd have no doubt that if North West
 10 Fire Control had been instructed by Mr Berry to mobilise
 11 to the RVP, for example, or to the arena, they would
 12 have acted on his instructions, given what you knew the
 13 way the control room operated?
 14 A. Yes.
 15 Q. I don't want to go through all these action plans,
 16 there's no need, but we do know, is this correct,
 17 Mr Fletcher, that on 21 June 2017, the Fire and Rescue
 18 Service decided that it was necessary to amend the "Bomb
 19 -- general" action plan to give the specific instruction
 20 that if a bomb had exploded, North West Fire Control
 21 were then to use and act on the explosion action plan
 22 and mobilise to the scene?
 23 A. Yes, sir.
 24 Q. Was that because you and others considered that it may
 25 have been the case that the way the action plans had

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1 been drawn and were available on the night of the
 2 attack, one could become confused about the application
 3 of any particular plan?
 4 A. I think that's a fair comment, yes.
 5 Q. I just want to give you one example, which is not the
 6 circumstances on the night, but just an example. If the
 7 control room received a report from GMP that a bomb has
 8 exploded in a public location but that there is
 9 a secondary device which might explode at any moment,
 10 you'd be caught between two action plans, wouldn't you?
 11 A. Yes, I think there was confusion in the action plans,
 12 sir, yes.
 13 Q. And then you'd have to expect an operational decision:
 14 what's the advice of the NILO because we're dealing with
 15 something here that his expertise is required
 16 in relation to?
 17 A. Yes.
 18 Q. Is all that in your judgement a reasonable approach to
 19 the problem of potential confusion arising from the
 20 action plans?
 21 A. Yes.
 22 MR SMITH: Thank you very much, Mr Fletcher.
 23 MS CARTWRIGHT: I've had an indication from Ms Roberts, but
 24 could I ask her to confirm, has she any questions,
 25 please?

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1 MS ROBERTS: I have no questions, thank you very much. But
 2 sir, I wish to apologise for failing to appear on cue
 3 yesterday. My normal method of communication failed me.
 4 Entirely my fault. No discourtesy meant.
 5 SIR JOHN SAUNDERS: Thank you for that.
 6 MS CARTWRIGHT: Could I next ask Mr Horwell on behalf of
 7 Greater Manchester Police to commence his questions,
 8 please.
 9 Questions from MR HORWELL
 10 MR HORWELL: Mr Fletcher, I have only got a few questions
 11 and I will very easily finish before 1 o'clock.
 12 We can see from your witness statement that you have
 13 had a long career in the Fire Service, a firefighter
 14 from 1991, when you were a probationer, and amongst the
 15 many tasks you have carried out, you indicate in your
 16 witness statement that you were tasked to carry out
 17 a feasibility study on the introduction of the NILO role
 18 to GMFRS.
 19 A. Yes, sir.
 20 Q. With all of your experience, you were unaware on the
 21 night of this attack of the multi-agency Hailing Talk
 22 Group?
 23 A. I was, sir, yes.
 24 Q. If we can just forget the title that we're using, does
 25 it follow that you were unaware of an Airwave channel

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1 that could link you to the GMP operations room? And the
 2 importance is this, a channel that was monitored
 3 24 hours a day? You were unaware of those
 4 circumstances?
 5 A. I was unaware of those circumstances, yes.
 6 Q. You've been asked about whether you considered --
 7 I think the question was this -- either yourself
 8 contacting NWS or asking NWFC to contact NWS, and
 9 you have said that that was not a thought that crossed
 10 your mind on the night.
 11 A. No, sir. I think what I actually said was I had asked
 12 North West Fire Control -- what I didn't do was contact
 13 NWS direct myself, which is something that potentially
 14 I should have done.
 15 Q. All right. Thank you. Were you aware of the scene
 16 itself, the arena?
 17 A. As in am I familiar with the arena?
 18 Q. Yes.
 19 A. I'm aware the arena is -- it's not something I've been
 20 into very regularly, sir, no.
 21 Q. The question I ask is this: the fact that it was above
 22 Victoria Station, close to Victoria Station, it would
 23 have been likely that BTP was the first force on scene;
 24 would you agree?
 25 A. I would agree with that, sir, yes.

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1 Q. And did you ever think of either yourself contacting BTP
 2 or asking NWFC to contact BTP?
 3 A. I didn't. I was expecting the coordination of the
 4 police response to come through GMP. Whether that's
 5 right or wrong, that's what my thought was on the night.
 6 Q. All right. Setting up the CSR, you arrived at about
 7 23.50 that night?
 8 A. Yes, sir.
 9 Q. In the CSR, you had access to the NWFC incident log?
 10 A. We did, sir, yes.
 11 Q. Did anyone look at it, Mr Fletcher?
 12 A. During the course of the night, sir, we looked at it.
 13 The honest answer I can say is: did we open the right
 14 log? I don't know. The first 15/20 minutes, it was
 15 quite chaotic. I don't think anybody looked at the log
 16 in any great earnest in that time. And from the point
 17 that we mobilised resources, I think we were looking at
 18 the log more, as I say, as a current document rather
 19 than a historical one. I picked up most of the
 20 information the next day.
 21 Q. All right. Final topic, Mr Fletcher. You have
 22 described, both in your witness statement and in
 23 evidence this morning, how Andy Berry had told you that
 24 he had attempted to contact the FDO and had not
 25 succeeded. You have told us how you attempted to

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1 contact the FDO and you had not succeeded. And there
 2 was plainly an information vacuum, Mr Fletcher, you
 3 agree?
 4 A. I do, sir, yes.
 5 Q. At 00.04, you made another call to the FDO, and on this
 6 occasion you were successful.
 7 A. Yes.
 8 Q. So after these efforts by Mr Berry and the efforts by
 9 yourself, eventually, at long last, you get through to
 10 the FDO. I know that you didn't speak to him direct,
 11 but you got through to the FDO's number?
 12 A. Yes.
 13 Q. Mr Fletcher, please, if it helps to have the transcript
 14 in front of you, say so, but it was a very short call
 15 and it can be summarised in this way: you informed
 16 Mr Myerscough, as we know the person to be, that you,
 17 fire, were monitoring one of the Airwave channels.
 18 A. Yes.
 19 Q. You told him that you were rendezvousing your appliances
 20 at Thompson Street.
 21 A. Yes.
 22 Q. And you informed him that you were one of the NIOs and
 23 that you were in the command support room?
 24 A. Yes.
 25 Q. And then you reminded Mr Myerscough again of the

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1 particular Airwave channel:
 2 "If you need to contact us, you can do it through
 3 that channel."
 4 And the call ended.
 5 SIR JOHN SAUNDERS: Okay, I think we may have missed out the
 6 request to get the police to go to Thompson Street to
 7 rendezvous.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Which you told us happened and is on the
 10 call. I think Mr Myerscough was going to ring you back.
 11 A. Yes.
 12 MR HORWELL: I was trying to take it as shortly as possible.
 13 Mr Fletcher, the point is this: having spent so
 14 long, either yourself or Mr Berry, and no doubt you must
 15 have thought others, to contact the FDO, once you had
 16 got through just, after midnight, you never asked
 17 questions such as, "What is going on? What's happening
 18 at the scene? Is there an active shooter? Where are
 19 the police? Where are the Ambulance Service?"
 20 Questions of that nature. I'm just asking you why that
 21 was, Mr Fletcher, why you didn't ask those questions.
 22 A. To be perfectly frank, sir, I'm at a loss. I always
 23 thought that I'd asked about certainly the FCP. The
 24 only thing that might have influenced that conversation
 25 was the fact that we'd then moved to the RVP at

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1 Thompson Street. I thought that that was then the
 2 multi—agency RVP and I wasn't aware of any FCP being
 3 declared. But I've got no tangible explanation as to
 4 why I didn't ask for that information. Whether
 5 something had come back to me over the Airwave radio
 6 from fire, the NILOs, I'm not sure. so I won't try and
 7 justify anything, I don't know why I didn't ask.
 8 Q. You can understand why I'm asking the question: after
 9 this length of time you're finally through and you
 10 didn't ask any questions about what was happening at the
 11 scene, Mr Fletcher?
 12 A. Yes. Like I say, I can't remember — I can't recall if
 13 I had had any further information via the NILO radio.
 14 I'm at a blank as to why. I thought I had a much deeper
 15 conversation with the force duty officer. Obviously,
 16 clearly, from the transcript, I hadn't.
 17 Q. You've been taken through your note and I'm not
 18 suggesting, let me make it clear, that you've ever
 19 attempted to mislead anyone, Mr Fletcher. That was your
 20 state of mind and you believed you had a much more
 21 detailed conversation, but we know from the transcript
 22 you did not. You can't give an explanation as to why
 23 you didn't ask what I would suggest are obvious
 24 questions. Is this an example of people under pressure
 25 not always doing the obvious thing, Mr Fletcher?

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1 A. I couldn't answer that, sir. I genuinely don't know why
 2 I didn't ask those questions. It's a loss to me,
 3 I can't explain it.
 4 MR HORWELL: All right. Those are my questions. Thank you,
 5 Mr Fletcher.
 6 SIR JOHN SAUNDERS: Thank you very much.
 7 MS CARTWRIGHT: It's 1 o'clock. We're going to next move to
 8 my learned friend Mr Cooper, but I wonder whether we are
 9 better starting after the luncheon adjournment.
 10 SIR JOHN SAUNDERS: We'll have lunch before you do. I have
 11 one question I want to ask. This is about the change in
 12 the directions to NWFC and what they had to do, the
 13 notes, the cards, the action cards.
 14 So the immediate reaction, I hesitate to say
 15 knee—jerk, from GMFRS was to change the bomb card to
 16 make it clear that if it was an exploded bomb, you went
 17 to explosion.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: The result of that was that people went
 20 to the scene immediately. That presumably was because
 21 of a belief within GMFRS, to which they were perfectly
 22 entitled to have at the time, that what had happened in
 23 NWFC is that having started with the explosion card,
 24 they'd gone off to the bomb card, which is why they
 25 contacted the NILO.

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1 A. Yes, sir.
 2 SIR JOHN SAUNDERS: We now know that's not correct and that
 3 they were concerned about the possibility of it being
 4 an MTFA because of the explosion, the location and
 5 various things like that. I think it has been agreed by
 6 all witnesses that it was reasonable of them then to ask
 7 advice from the NILO. I am just concerned that when the
 8 card was changed, it was changed to a position where
 9 even if they were worried it was an MTFA, they were
 10 still to be sending fire engines straight to the scene
 11 and to possible danger.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: So was that change simply a knee—jerk
 14 reaction without it being thought through?
 15 A. It's a really difficult one. The changes were made by
 16 senior management on the action cards.
 17 SIR JOHN SAUNDERS: If you had nothing to do with it —
 18 A. I didn't have anything to do with the changes. I think
 19 it was Mr Keelan.
 20 SIR JOHN SAUNDERS: Thank you. 2 o'clock.
 21 (1.01 pm)
 22 (The lunch adjournment)
 23 (2.00 pm)
 24 MS CARTWRIGHT: Can I ask, please, Mr Cooper on behalf of
 25 the families to ask his questions, please.

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1 Questions from MR COOPER
 2 MR COOPER: Can I just try and understand on behalf of the
 3 families, please, some basic issues. It's about who was
 4 advising who under that heading. Mr Lawlor, we know,
 5 for instance, was a tactical adviser.
 6 A. Yes, sir.
 7 Q. So who was he advising?
 8 A. He was the — he would have been advising the strategic
 9 commander or the senior officer, who would have gone to
 10 the force command module. He was also acting as the
 11 liaison with the multi—agency partners there.
 12 Q. But in the end Mr Lawlor didn't get to advise anyone,
 13 would that be about right?
 14 A. I don't believe so, no.
 15 Q. No. And you were advising as well, weren't you? Who
 16 were you advising?
 17 A. I was in the — the people in the command support room
 18 on sort of the MTFA capability.
 19 Q. Certainly the chief didn't take any advice on that, did
 20 he?
 21 A. He made his decisions based on the advice that I gave to
 22 him, but obviously he came to different conclusions.
 23 Q. Mr Berry, we know, obviously, he was I think — you
 24 describe him, I think, as your conduit of information?
 25 A. Mr Berry as the duty NILO would have been the conduit

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1 for the information in the initial stages of the
 2 incident, yes.
 3 Q. And that conduit was a little blocked up, wasn't it?
 4 A. Yes, sir.
 5 Q. In fact it remained blocked up, didn't it, for the whole
 6 of the event, more or less?
 7 A. I'd say more or less until probably we got the liaison
 8 in place at the force command module.
 9 Q. Before I go into some particularity, would it be right
 10 to describe, as far as fire is concerned on the night,
 11 lots of advisers but with no one to advise?
 12 A. Well, there was a command structure, as it was, in
 13 place, but it's probably fair to say so, yes.
 14 SIR JOHN SAUNDERS: It's the role of the NILOs in a way,
 15 isn't it? The NILOs are defined as being advisers —
 16 A. They are, sir —
 17 SIR JOHN SAUNDERS: — and communicators?
 18 A. Yes, sir, but on an MTFA and with the Plato they are
 19 also designated as on-scene commanders as well. It is
 20 a bit of an anomaly but that's what they're described as
 21 in the jobs.
 22 SIR JOHN SAUNDERS: Did they know that?
 23 A. The people who would mobilise, I would say, as the NILOs
 24 with the MTFA, they were going in a command capacity.
 25 The duty NILO would be the one picking the information

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1 up, but obviously we changed the procedures afterwards.
 2 MR COOPER: One of the criticisms made, and we'll hear the
 3 evidence, of the NILO at the time, and it's an
 4 expression you used, actually, this morning, is the risk
 5 of tunnel vision. And I heard you use that expression
 6 as far as your own analysis was concerned. You said you
 7 might have been getting tunnel vision, and it's
 8 certainly expressed within the papers if the evidence
 9 hasn't already been given, it certainly will be, but one
 10 of the criticisms of the NILO was that they had tunnel
 11 vision. That's a general observation being made about
 12 how NILOs think at the scene, as it were. You seem to
 13 be agreeing with that, is that right?
 14 A. I think ... I think the chair made the point last week
 15 about conditioning to this type of incident. We'd had
 16 a lot of training focused on the MTFA, I think we
 17 over-focused on that scenario and I think it affected
 18 the thinking on the night.
 19 Q. How can this tunnel vision be corrected in your view?
 20 A. I suppose it depends on the training, to look at all
 21 scenarios. Like I said, over the last few years, the
 22 main risk that's been identified was a Mumbai,
 23 Paris-type attack and I think it's fair to say that
 24 we've overemphasised and focused on that type of
 25 potential eventuality.

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1 Q. You've dealt with the matter I was just about to go on
 2 to. That is, as you've fairly conceded on a number of
 3 occasions today, the focus was on the Paris type of
 4 attack and not on the, as is called, the lone wolf type
 5 of attack?
 6 A. Yes, sir.
 7 Q. Was there any training, as far as you're concerned,
 8 associated with dealing with the sort of attack that
 9 this murderer engaged in on 22 May?
 10 A. All the exercises that we've been involved in, the
 11 terrorist-related exercises, have predominantly focused
 12 on the MTFA type of response. That's the multi-agency
 13 exercises.
 14 SIR JOHN SAUNDERS: Okay — Mr Cooper, I hope you don't mind
 15 me interrupting — I do think that there may have been
 16 too much focus maybe, we'll have to consider it, but
 17 equally they have to be considered. Every time you have
 18 a terrorist bomb, you are not going to know whether it's
 19 a single operator or whether it's an MTFA going on.
 20 A. No, sir.
 21 SIR JOHN SAUNDERS: The real thing that has to be done,
 22 isn't it, it has to be understood as quickly as possible
 23 whether there are other people involved, and
 24 particularly other people involved in the area where the
 25 Fire Service may be needed to go in order to carry out

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1 a rescue? For me at the moment, what went wrong on this
 2 night is actually no one went through the stages as they
 3 should have done or with enough speed in order to make
 4 sure the area was clear: you got the rescuers in as
 5 quickly as possible, they operated together to have an
 6 effective rescue, and for what reason we'll have to
 7 decide that just didn't happen on the night.
 8 A. No, sir.
 9 SIR JOHN SAUNDERS: I'm not suggesting, nor is Mr Cooper,
 10 I'm sure, that you just forget any sort of possibility
 11 of an MTFA taking place.
 12 A. Yes, sir.
 13 MR COOPER: No, and let me be clear, that's not what I'm
 14 suggesting.
 15 SIR JOHN SAUNDERS: I know you're retired anyway.
 16 MR COOPER: Let me take you now to some particularity, if
 17 I can, on a few issues. Paragraph 70 of your statement,
 18 please, {INQ026734/16}.
 19 Just to refresh your memory, Mr Fletcher, you say:
 20 "I make no particular criticism of NWFC in relation
 21 to this decision."
 22 Perhaps we could go to paragraph 69, please,
 23 Mr Lopez. Again it's the MTFA decision. Just
 24 familiarise yourself — just see that, please. Then
 25 I'll go into paragraph 70 again now:

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1 "I make no particular criticism of NWFC in relation
2 to this decision. They deliver a service that we ask
3 them to deliver which is based on call handlers
4 following a series of action cards for multiple incident
5 types which can be confusing. It is not the same level
6 of service that GMFRS had been used to when we had our
7 own Control working in GMFRS headquarters previously.
8 In particular, we had more experienced call handlers who
9 had a greater familiarity with our own procedures and
10 the geography of Greater Manchester. The system that we
11 put in place with NWFC is inferior to what we were used
12 to previously."

13 I'll be succinct with my question. You used the
14 word inferior and you mean inferior don't you?
15 A. Yes, as I said yesterday, sir, I think the system wasn't
16 as good as what we had with our own Control, but as
17 I say, that isn't a criticism of North West Fire
18 Control. That's the systems that the Fire and Rescue
19 Services put in place.
20 Q. And is there anything in your view, as someone who's
21 been at the sharp end of this now, that can be done to
22 correct that -- obviously, it's not a matter I'm
23 suggesting, but short of the disbandment of North West
24 Fire Control, what can they do to tweak their operation
25 perhaps to make them less inferior?

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1 A. It's a difficult one. The way that the operation --
2 I believe, I wasn't an expert on the North West Fire
3 Control, is -- people can sit at various desks or pods
4 and there's different procedures for each Fire and
5 Rescue Service. I know when North West Fire Control was
6 being developed and the concept was being put in place,
7 the idea was all fire services would have exactly the
8 same procedures.
9 SIR JOHN SAUNDERS: It seems to me extraordinary that that
10 hasn't happened. Sorry, subject to persuasion to the
11 contrary, it seems fairly extraordinary that can't
12 happen.
13 A. I think that's the concept and the desire but when it
14 came down to actually putting it into practice, it
15 proved more difficult, but I don't know what the reasons
16 for that were.
17 SIR JOHN SAUNDERS: It's not based on the geography of
18 particular areas, is it, that you have to have different
19 action cards?
20 A. It's based on -- well, it's based on --
21 Greater Manchester Fire and Rescue Service will have
22 action cards for certain procedures, Lancashire will, as
23 will Cheshire.
24 SIR JOHN SAUNDERS: And that's historical?
25 A. When they had their own controls and procedures like

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1 I say I could be -- I may be corrected on this. When
2 North West Fire Control was put together as a concept,
3 the idea at the start -- and I believe there was a group
4 brought together -- was to develop consistent procedures
5 for incident types. I believe that became too hard to
6 do and ultimately it went down to each Fire and Rescue
7 Service had its own individual action cards which
8 I think added to confusion.
9 SIR JOHN SAUNDERS: If you were making recommendations at
10 the end of this inquiry would you be saying they need to
11 get their heads together again and at least strive to
12 reach a common series of action cards?
13 A. I think that would be very, very helpful, yes.
14 MR COOPER: Paragraph 84. One more matter on NWFC, please.
15 {INQ026734/19}. This is your part on clarification:
16 "At some point I do recall also asking NWFC if any
17 ambulances were on the scene, but NWFC were not aware of
18 any, nor that they were massing at Central Station."
19 Would you have expected Control to have that
20 information?
21 A. Yes, sir, I think they did.
22 Q. Pardon?
23 A. Yes, I think, and I think they did.
24 Q. So when you say you did not recall asking them --
25 A. Sorry, I do recall asking North West Fire Control.

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1 Q. And they said they were not aware of any?
2 A. Yes. When I made that request, I think it was possibly
3 just before I mobilised to the command support room.
4 I think it was during my call with Janine Carden. She'd
5 only just come in, I believe, and I think she asked --
6 again, this is from memory -- another control
7 operator -- I think it was more the question that
8 I asked about any ambulances, "Any update on where the
9 ambulances are?", and I got the response of, "No".
10 I also asked at that time about the status of the
11 active shooter.
12 Q. As far as you're aware, were there actually ambulances
13 on the scene at the time?
14 A. I think from looking at the chronology, it had been put
15 forward that there was five ambulances.
16 Q. Had you been told by NWFC that there were ambulances,
17 five ambulances, on the scene, would that have affected
18 your actions?
19 A. Yes, sir.
20 Q. In what way?
21 A. Well, I'd have -- obviously I wouldn't have been able to
22 mobilise, but I would have spoken to Mr Berry and
23 obviously tried to get them then down to the arena
24 itself.
25 SIR JOHN SAUNDERS: You're going to have to help me, I'm

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1 sorry. I have in the back of my mind, this is just from
 2 things this morning -- as I say, I am getting
 3 a short-term memory -- that there was mention of there
 4 being five ambulances at the scene and you assuming that
 5 they'd been there attending whatever event there had
 6 been. So they were there when the explosion happened
 7 rather than massing afterwards?
 8 A. That's what was in my log after the incident. I don't
 9 know where I've heard that from. I think to be fair,
 10 I probably tried to rationalise in my head, after saying
 11 that, some logical reasons to why we wouldn't have
 12 mobilised. I think I've come up with that it's possible
 13 that there would be five ambulances at scene. I did ask
 14 an ambulance colleague in the days after: is that
 15 standard practice that you'd have ambulances at scene at
 16 these sort of events? I think there is a guide to that,
 17 but there certainly wouldn't be five ambulances, so
 18 I started to rule that out.
 19 But it was me trying to -- on that, me trying to
 20 rationalise in my head as to that information.
 21 MR COOPER: If there were ambulances on the scene for
 22 whatever reason, would you have expected NWFC to have
 23 known that when you asked them and to have told you?
 24 A. I think the answer is that they did know but it might
 25 have been the way I termed the question.

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1 Q. Pardon?
 2 A. It might have been the way that I termed the question.
 3 Q. How did you --
 4 A. I think I said, "Is there any update on the ambulances
 5 at the moment?"
 6 Q. Right.
 7 A. And I think the response was, "No, we haven't got any
 8 update".
 9 SIR JOHN SAUNDERS: I think you explained to us that that
 10 may have been since your last call they were assuming
 11 that nothing had changed.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: But you're actually speaking to
 14 a different person, aren't you?
 15 A. Yes.
 16 MR COOPER: Let me move on. We know, and I'm not taking you
 17 over old ground, that Mr Berry was distressed, when you
 18 were talking to him to begin with. Clearly, certainly
 19 during the period that he was travelling, he was in no
 20 state to help anyone, was he?
 21 A. I wouldn't say he was in no state to help anyone. When
 22 I spoke to him, when he got to the junction -- I say
 23 distressed, but frustrated because I think he'd already
 24 come across a blocked junction earlier. And he couldn't
 25 get through to the force duty officer. What I said

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1 at the time is I would try and get hold of the FDO
 2 myself and I --
 3 SIR JOHN SAUNDERS: I'm really sorry to keep doing this.
 4 I think you've accepted it's now realised that having
 5 a person travelling in, trying to manage an incident, is
 6 not the right way to do it, so you don't do that any
 7 more?
 8 A. No, we changed the procedure straightaway.
 9 SIR JOHN SAUNDERS: It's just impossible for anyone, let
 10 alone getting stuck in traffic jams, to try and control
 11 and make all those calls and deal with all information
 12 coming in and passing it on.
 13 A. Yes, yes.
 14 MR COOPER: Paragraph 74, very briefly, just to get this
 15 bottomed out. Paragraph 74 of the statement.
 16 {INQ026734/17}.
 17 There it is. You seem to qualify a description of
 18 Mr Berry with frustrated. What you say in your
 19 statement is:
 20 "Berry seemed significantly distressed and
 21 frustrated during this call."
 22 Let's not underplay it, please, Mr Fletcher. The
 23 impact on Mr Berry of all that was happening to him,
 24 a matter for the chair to decide the detail of that, but
 25 the impact of it on Mr Berry was that he was

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1 significantly distressed and frustrated and, I suggest
 2 to you, in no condition to start being the central
 3 conduit of information.
 4 A. I accept that, yes. That's why we changed the procedure
 5 afterwards.
 6 Q. Yes, you understand, though, it may well be that's why
 7 you changed the procedure afterwards, but part and
 8 parcel of my duty on behalf of my clients is to know
 9 what happened on the night. You understand that, don't
 10 you?
 11 A. Yes.
 12 Q. All right. I want to move on to some other matters now.
 13 I want to ask you a little -- questions about the chief,
 14 Mr O'Reilly. Were you frightened of him?
 15 A. I wasn't frightened of him, no. I didn't really have
 16 much dealings with the chief.
 17 Q. Because there's a trend of evidence we may hear to say
 18 that he could be quite intimidating. What do you say
 19 about that?
 20 A. I think he's a strong character, yes.
 21 Q. There's different sorts of strong characters. Is he
 22 a bully?
 23 A. I never witnessed bullying towards myself, but he can be
 24 quite strong in how he deals with people at times, yes.
 25 Q. So you're agreeing, if not with you, he can be a bully?

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1 A. I wouldn't use those terms, sir.
 2 Q. For instance, in terms of how he deals with the men and
 3 women who are firefighters that he leads, are you aware
 4 that he can be a bully?
 5 A. I've not had any direct conversations with anybody who's
 6 said he was a bully. He may not be everybody's ideal
 7 type of person; he can be quite autocratic at times.
 8 Q. What do you mean by autocratic? Is that another word
 9 for being a bully?
 10 SIR JOHN SAUNDERS: I think that's probably an
 11 oversimplification of what's meant but anyway.
 12 Do you have any evidence yourself or any knowledge
 13 of him being a bully?
 14 A. Towards myself, sir, I have not got any evidence.
 15 SIR JOHN SAUNDERS: Have you seen him bullying anyone else,
 16 what you would describe as bullying?
 17 A. (Pause). Like I say, it's difficult. I wouldn't --
 18 bullying is a very ...
 19 SIR JOHN SAUNDERS: Emotive term?
 20 A. An emotive term, yes. I would say he can be quite
 21 strong with people and there were people who had
 22 disagreements with him.
 23 SIR JOHN SAUNDERS: So he doesn't actually like people to
 24 contradict him or have a different view?
 25 A. That is a fair point, sir, at times, yes.

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1 SIR JOHN SAUNDERS: Okay.
 2 MR COOPER: Just taking a step back from 22 May 2017, I want
 3 to take us to 8 May 2017 and an MTFA presentation
 4 in relation to MTFA.
 5 A. Yes.
 6 Q. I don't know whether you remember that. I want to ask
 7 you about the part of Mr Harris, when he attended that.
 8 So what I'm going to ask you to do now is look at
 9 {INQ026734/10} again, paragraphs 47 and 48, please.
 10 SIR JOHN SAUNDERS: This is the statement, is it?
 11 MR COOPER: Yes, sir. Forgive me, I've got a separate
 12 reference. It's the same reference.
 13 Paragraphs 47 and 48. You were given this evidence
 14 about a potential misunderstanding of MTFA and that sort
 15 of thing. Let's try and drill down on that.
 16 Go to paragraph 46, Mr Lopez, please, to again get
 17 us some perspective:
 18 "On 8 May 2017 [this is just a couple of weeks
 19 before this atrocity] a presentation was delivered to
 20 principal and assistant principal officers on national
 21 resilience and the national coordination advisory
 22 framework after Merseyside had taken over the
 23 facilitation of the NRFC from London Fire Brigade.
 24 Neil Gaskell also presented on MTFA and Mick Lawlor
 25 presented on the current threat levels following the

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1 Westminster Bridge attack and the role of the NILO.
 2 "I recall that Peter O'Reilly, former chief officer,
 3 attended, as did ACFO Harris, who were both in the
 4 command support room on the night of the incident.
 5 However, I also remember that ACFO Harris was in and out
 6 of the room, so missed key parts of the presentations."
 7 We can see in paragraph 48 the presentations that
 8 were being made, including:
 9 "Part of the MTFA capability involves enhanced
 10 medical training with input from NWAS. There are
 11 specialist bandages on MTFA vehicles to treat blast and
 12 gunshot wounds, termed Prometheus dressings. MTFA
 13 operatives have had some training on their use, which
 14 was delivered by NWAS. The SRT vehicles, which were
 15 specifically designed by GMFRS, contained a variety of
 16 emergency response equipment bespoke to MTFA which
 17 included rescue Skeds."
 18 And you describe them. Scroll, please, Mr Lopez:
 19 "They are not there for immobilisation or support.
 20 They are designed to be dragged along the ground to move
 21 a casualty quickly where required."
 22 I think that's the end of the paragraph. Just check
 23 for me please, Mr Lopez. It is? Thank you.
 24 Two things from that. It seemed from what you're
 25 saying that Mr Harris, for instance, was taking perhaps

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1 an in-and-out attitude to that important briefing, and
 2 as you put it at the end of your paragraph 47, missed
 3 key parts of the presentations.
 4 A. Yes, from what I recall, sir, he had to take a number of
 5 phone calls during the presentations.
 6 SIR JOHN SAUNDERS: It looks like it might have irritated
 7 you a bit at the time for you to make a mental note of
 8 it.
 9 A. It possibly did, yes.
 10 MR COOPER: Because it was an important presentation for
 11 people to understand, wasn't it, how MTFAs worked and
 12 the trauma and technical capabilities of firefighters
 13 who may need to be deployed?
 14 A. Yes.
 15 Q. There we see at that briefing, 2 weeks before the
 16 atrocity, is Mr O'Reilly, don't we?
 17 A. The chief was there, yes.
 18 Q. Yes. This is the man we hear from your evidence that
 19 got it wrong on the night about capabilities in terms of
 20 trauma technicians; correct?
 21 A. From the discussion that we had at the time of the --
 22 mentioning trauma technicians, that was what I thought
 23 I had heard. Whether he might have said trauma
 24 trained --
 25 Q. (Overspeaking) let's not all fall over each other on

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1 trauma training and trauma technicians, he got it wrong,
 2 didn't he, in terms of the capabilities of firefighters ?
 3 A. Yes, my understanding is there's one trauma technician
 4 on each fire appliance. They weren't all trauma
 5 technicians.
 6 Q. Had he taken a little more care and attention to listen
 7 to your paragraph 48 he wouldn't have made that mistake,
 8 would he?
 9 A. The specifics of that presentation were about the MTFA
 10 capability, sir, rather than the whole trauma capability
 11 of the Fire Service.
 12 SIR JOHN SAUNDERS: Mr Cooper, I understand, and that if
 13 it is right, he didn't know about the training for
 14 trauma of firefighters and the difference between that
 15 and that which the specialist has. That is something
 16 clearly you'd expect the chief fire officer to know.
 17 You can correct me if I'm wrong about this, but the
 18 context of this appears to be he speaks on the phone to
 19 Mr Hynes. By that time, am I right in thinking that
 20 everyone was down in the casualty station, ready to be
 21 got rid of -- sorry, that's an unfortunate phrase --
 22 taken to hospital. And what actually was required of
 23 firefighters at that time was to come and help take them
 24 out of that area to ambulances and put them on the
 25 ambulance trolleys?

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1 MR COOPER: That's as I understand it (overspeaking)
 2 Mr Hynes --
 3 SIR JOHN SAUNDERS: Although one might expect him to know
 4 that about the trauma training, I'm not sure that at the
 5 particular time he is talking to Mr Hynes it was
 6 a relevant factor. We can obviously explore that with
 7 Mr O'Reilly and I may be wrong about summarising the
 8 evidence that way.
 9 MR COOPER: It may well be and in fact it is perhaps
 10 a matter then I'll take up with Mr O'Reilly in his
 11 evidence.
 12 Can I take you, please, to another document,
 13 Mr Fletcher, {INQ000277/1}. This is what's called
 14 a conversation with you and others. I think it's
 15 Kerslake--connected but I'm not sure. It's certainly
 16 a discussion you had.
 17 SIR JOHN SAUNDERS: It's certainly Kerslake.
 18 MR COOPER: It is, I can see it now. On 17 November 2017.
 19 Can we go to {INQ000277/2}, please.
 20 Just the third paragraph down effectively:
 21 "At the internal debrief, some of the information
 22 that the chief gave, I said, 'That's not right'; he said
 23 it was. I explained why I'd challenged. John Fletcher
 24 leaned over and said he'd told the chief. He challenged
 25 Janine there alone from NWFC. I said this is debrief,

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1 not court. Kate Green was chairing. Chief said he
 2 didn't know fire resources were there. He did."
 3 Were you there during that discussion, Mr Fletcher,
 4 at all --
 5 A. I don't recognise that document, to be honest.
 6 Q. -- as it seems from the names at the top of the
 7 document? But your name is mentioned here:
 8 "John Fletcher leaned over and said he'd told the
 9 chief [in terms of the resources that were there]."
 10 SIR JOHN SAUNDERS: As I understand it, this is Mr Nankivell
 11 telling Lord Kerslake's inquiry what he remembers of
 12 this incident. He's describing what happened and your
 13 part in it as he remembered it.
 14 A. I think on that, I think it was the... From what
 15 I remember of the debrief, the chief said -- I think
 16 more the Merseyside capability, that he said that Dean
 17 had put them on standby. Dean said, "No, I didn't do
 18 that", and then I think I leaned to the chief and said,
 19 "That was me". But like I say, I can't be totally 100%
 20 committed on that. I do think that was the -- that was
 21 the thing during the debrief where we had a little bit
 22 of a -- there was an anomaly with what was being said --
 23 MR COOPER: I see.
 24 A. -- if that makes sense.
 25 Q. So when the chief said he didn't know fire resources

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1 were there, he did?
 2 As far as you're concerned, you'd simply leant over
 3 to the chief and informed him of the situation?
 4 A. Like I said, that was about the Merseyside resources,
 5 sir --
 6 Q. It's about Merseyside.
 7 A. -- if that makes sense. But the paragraph doesn't make
 8 sense to me, to be honest.
 9 Q. All right. Then let me move on from it. I wanted to
 10 clarify that in any event.
 11 Let me move back to your statement, {INQ026734/19}.
 12 I just want to clarify a few disparate matters there.
 13 Paragraph 85, please. We go back again to: "As I got to
 14 GMFRS HQ... fire officer was also arriving ... told him
 15 of MTFA capability was on standby... asked if he was
 16 going to GMP HQ because I knew there would be strategic
 17 coordinating group... The chief said he was not going
 18 yet because last time he was at GMP HQ it was chaos and
 19 he felt that he was better off in the CSR."
 20 This may be something for Mr O'Reilly, but did he
 21 explain to you what he meant by GMP HQ being "in chaos"?
 22 A. No, he didn't, sir. That is just a phrase. I think he
 23 felt he'd get better information from the CSR than he
 24 would have done at the force command module.
 25 Q. Incidentally, could you have declared a major incident

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1 if you'd felt it appropriate?
 2 A. No, because I wasn't really — I wasn't in the command
 3 chain, I was a tactical adviser. Although I did send
 4 the message to Control, I did it on behalf of the chief
 5 on the night.
 6 Q. Because you were aware at the time, weren't you, or
 7 certainly as things developed, of, very sadly, the
 8 multiple fatalities that had occurred at the arena?
 9 A. Yes. I've got to say it should have been declared
 10 a major incident much, much sooner. One of the issues
 11 we've had in the past is sometimes it's based on
 12 resource deployments and sadly we hadn't deployed
 13 anything at that time.
 14 Q. Let me pick you up on that because I've heard you say
 15 that on a number of occasions, and of course an atrocity
 16 like this doesn't come round that often, but surely it's
 17 not an excuse for emergency services, in this case the
 18 Fire Service, to say, "We weren't prepared"? You should
 19 have been, shouldn't you?
 20 A. Sorry, prepared for?
 21 Q. Prepared for an atrocity, an event like this. This is
 22 just the sort of thing that you should have been —
 23 I say you, not just you obviously, but you should have
 24 been prepared for?
 25 A. To be perfectly honest, I thought we were prepared,

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1 I thought the facilities, the training, I thought that
 2 the procedures were robust. I accept that through the
 3 forensic investigation and analysis of them, there's
 4 been gaps identified. But I thought we was in a really,
 5 really strong position to deal with this type of
 6 atrocity. And it completely destroys me, the fact that
 7 we failed.
 8 Q. Who then could have declared the major incident? Let me
 9 just be clear. Who was it that could have declared it
 10 far sooner and far quicker?
 11 A. I suppose any of the NILOs going, the duty group manager
 12 or the APO could have declared it.
 13 Q. And all of these people would have known pretty quickly
 14 about the multiple fatalities that were occurring at the
 15 arena, wouldn't they?
 16 A. They should have done, yes.
 17 Q. And it is highly regrettable, isn't it, that not one of
 18 them, in your view, declared it?
 19 A. Yes, and again, maybe, from my perspective I could have
 20 advised them to declare it.
 21 SIR JOHN SAUNDERS: Tell me the difference in practice if it
 22 had been declared.
 23 A. The major incident — well, the protocol that would go
 24 in place with it is the command support room. So
 25 I think most of the stuff will be there, the command

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1 support room, the force command module, we would send
 2 somebody up there. It's looking at the whole incident
 3 and the wider impact, so strategic impacts on the
 4 community, the county, as well as just the — I say
 5 "just" — the resource attendance at the incident. So
 6 it's taking into account everything: dealing with the
 7 media and things like that.
 8 SIR JOHN SAUNDERS: It clearly should be declared, I'm not
 9 suggesting not. I just wondering what the difference in
 10 practice was.
 11 A. It should have been declared, sir, and I think it's fair
 12 comment that most of the wider aspects that would have
 13 come in as a result of it being declared were being put
 14 in place, albeit, as I say, it probably could have been
 15 quicker.
 16 MR COOPER: What would have been the consequences of the
 17 declaration of a major incident, the practical
 18 consequences? I hear you say, well, some of these
 19 things were happening already, maybe in a drip feed sort
 20 of way. But in terms of declaring a major incident,
 21 would this have quickened up and speeded up the
 22 response?
 23 A. I think it would have quickened up the multi-agency
 24 communication and coordination of the incident, yes.
 25 Q. And quickened it up significantly?

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1 A. Yes. And as I say, the key word there is the
 2 coordination of the multi-agency response.
 3 Q. One of the things that tragically went wrong is a lack
 4 of coordination, wasn't it?
 5 A. Yes, sir.
 6 Q. When you said in your paragraph 92 that:
 7 "Seeing the ambulances being deployed was a game
 8 changer."
 9 I know what the term means obviously, but what do
 10 you mean in the context of 22 May? What do you mean, it
 11 was a game changer?
 12 A. That's the first time that visually or by information
 13 that I was aware of the ambulances responding en masse
 14 down to the scene. We were under a total
 15 misapprehension from our perspective. I know that there
 16 was information elsewhere that the ambulances were
 17 at the rendezvous point, but to see everything going in
 18 like that, it was... It was... Well, I've used the
 19 word game changer, I don't know how else I could
 20 describe it. It was a seminal moment during the night
 21 for us to see what we were witnessing.
 22 Q. Would it be fair to say as, and no one has ever
 23 suggested otherwise, brave and courageous rank and file
 24 firefighters, that was the moment when they felt
 25 completely let down by leadership?

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1 A. I think we all felt let down by how we'd all responded
2 to that incident, yes.

3 Q. All right. I would like to take you, please, to
4 paragraph 107 of your statement. It deals with
5 Mr Dexter and it's just this:
6 "In fact, a subsequent conversation I had with
7 Superintendent Dexter shed some further light on GMP's
8 thoughts around the incident response at the scene.
9 I know Mark well through our previous joint working.
10 I have a tremendous amount of respect for him he said he
11 could not understand the furore around the Fire
12 Service's response to the incident. I explained it was
13 the operational crews who were getting very angry at the
14 delayed response. However, he stated that in his
15 opinion the Fire Service were not required as he had
16 sufficient police and ambulance resources at scene. In
17 fact, he went on to state that he did not even notice
18 that we were not there, which may explain the lack of
19 communication from the scene. Certainly, it would
20 explain why other emergency responders had not requested
21 our presence sooner."

22 My first question: there had been a number of live
23 exercises, at least hadn't there, indicating the
24 critical role that the Fire Service played in these
25 situations?

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1 A. There'd been a number of exercises, yes.

2 Q. And we've heard evidence that on a number of occasions
3 Greater Manchester Police didn't or may not be perceived
4 at times to have taken them as seriously as they should.

5 A. I wouldn't say as serious as they should, but I think --
6 as I said when I was giving testimony last time, there
7 was more of a focus on their role than the multi-agency
8 response.

9 Q. We've heard, for instance, was it in Winchester, where
10 Greater Manchester Police were packing up before just as
11 you were -- not you personally, I keep saying that --
12 just as you were arriving?

13 A. Yes, sir.

14 Q. Is that paragraph 117 perhaps a consequence of, say,
15 that rather relaxed attitude Greater Manchester Police
16 seemed to have to some of these exercises?

17 A. I think on that, some of it is -- there is a lack of
18 understanding of what the capability was.

19 SIR JOHN SAUNDERS: You tried to put that right after
20 Winchester Accord by having the meetings of commanders
21 to explain just what each service to provide to the
22 other?

23 A. Like I say, I thought we'd addressed it.

24 SIR JOHN SAUNDERS: Perhaps Mr Dexter wasn't one those who
25 went?

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1 A. I don't know if Mr Dexter was there. I have known
2 Mr Dexter for quite some time --

3 SIR JOHN SAUNDERS: Okay. There are two alternatives: on
4 the one hand, he may just not have realised the enormous
5 contribution the Fire Service could make in that
6 situation or, secondly, he was being nice to you.

7 A. I think in fairness to Mr Dexter, I spoke to him after
8 the incident, I think it's the time he got there.
9 I listened to his testimony. He did actually say in his
10 recording, "Fire's not here", which was a bit of news to
11 me. But I think what he said is: at that time, there
12 were so many ambulances there in his assessment, he
13 probably didn't feel the need that we needed to be
14 there, hence I'm thinking that's why we weren't
15 requested earlier than we had been --

16 SIR JOHN SAUNDERS: He was clearly wrong because at the time
17 they did provide a help in the end when they did get
18 there.

19 A. Yes, sir.

20 MR COOPER: Last reference to your statement, please.
21 Paragraph 112:
22 "Following the incident it was recognised that GMFRS
23 and multi-agency partners had never begun previous MTFA
24 training exercises from the point of mobilisation. On
25 every pre-incident training exercise all of the agencies

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1 were already located at the scene. As a result, we have
2 since carried out an exercise starting from the point of
3 call receipt and mobilisation called
4 Exercise Powerhouse, which took place in November 2017."

5 It is, would you agree, asking you as a man of your
6 experience and your job, quite startling that prior to
7 Manchester Arena, that this had never happened before,
8 that there'd never been a training exercise from the
9 point of mobilisation?

10 A. Yes, I couldn't disagree.

11 Q. And had there been one, it could well have taught people
12 important lessons that they may have put into operation
13 on the night of the 22nd?

14 A. There certainly has been logistical issues. I think one
15 of the things that it would have highlighted was the
16 time of response, if it was just specialist response
17 going, but also the communication side of it.

18 Q. And Powerhouse took place in November 2017s dealing with
19 from the point of mobilisation. Have there been
20 exercises since Powerhouse?

21 A. I think there have been mobilisation -- I've since left
22 the service so I wouldn't know.

23 Q. All right.

24 Last question: I'm going to ask you please to look
25 at {INQ022395/1}. It's a presentation Mr Lawlor gave

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1 and it's {INQ022395/25}. Those are the bullet points
 2 that he put together as discussion points, I emphasise.
 3 You mentioned Kerslake and you mentioned in your
 4 evidence Kerslake being like a cheese with holes in it
 5 in terms of what it commented about, about events.
 6 Looking at those --
 7 SIR JOHN SAUNDERS: It's a particular type of theory of how
 8 accidents happen --
 9 MR COOPER: Sir, yes.
 10 SIR JOHN SAUNDERS: -- apparently --
 11 A. Yes.
 12 SIR JOHN SAUNDERS: -- the Swiss cheese one.
 13 MR COOPER: I didn't know that.
 14 SIR JOHN SAUNDERS: Anything I can do to help!
 15 MR COOPER: My question is simply this: looking at those
 16 bullet points, if Kerslake -- and indeed Kerslake did
 17 find them as found -- as far as Greater Manchester Fire
 18 and Rescue Service is concerned, would you say, sadly,
 19 that's a fair assessment?
 20 A. Yes, I mean, just looking at again the point about the
 21 PO contributed to the delay in the response. Again,
 22 being fair to all sides, maybe he didn't send the
 23 response that I would have actioned myself with the MTFA
 24 but, in fairness to him, he was the one who at that
 25 point got the wheels moving towards the arena. So

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1 I think there's a little bit of clarity that's required
 2 on that and I think everything else there is a fair
 3 (overspeaking).
 4 Q. Everything else is fair? It's certainly not flawed or
 5 anything like that?
 6 A. No, I wouldn't say it's flawed, sir, no.
 7 MR COOPER: I have no further questions. I think I'm
 8 absolutely bang on time.
 9 SIR JOHN SAUNDERS: Give yourself a pat on the back,
 10 Mr Cooper. Thank you.
 11 MS CARTWRIGHT: Finally, could I ask Mr Warnock QC to ask
 12 his questions on behalf of GMCA.
 13 SIR JOHN SAUNDERS: Mr Warnock.
 14 Questions from MR WARNOCK
 15 MR WARNOCK: Mr Fletcher, since it has been mentioned on
 16 several occasions, it's not in your evidence proposal,
 17 but I'm going to ask us to have a look at the major
 18 incident plan which we'll see that you in fact -- your
 19 name appears as the author on it.
 20 Mr Lopez, it's {INQ004544/1} --
 21 SIR JOHN SAUNDERS: Are you happy to answer questions about
 22 it?
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: We'll make sure you have a proper
 25 opportunity to look at things, so do say if you want to

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1 look at it.
 2 A. Yes, sir.
 3 MR WARNOCK: I think if we scroll down, Mr Lopez, to I think
 4 {INQ004544/4}, we'll see there that this was version 4,
 5 dated 28 July 2016:
 6 "Author: Group Manager John Fletcher."
 7 A. Yes, sir.
 8 Q. I think you'll agree this would have been the version of
 9 the plan in force at the time of the arena attack?
 10 A. Yes.
 11 Q. If we go down, please, to {INQ004544/9}, Mr Lopez. We
 12 see there in relation to the questions which have arisen
 13 about declaration of a major incident:
 14 "Any IC..."
 15 That's incident commander, is that right?
 16 A. Yes.
 17 Q. "Any IC, regardless of rank or role, can declare a major
 18 incident from the incident ground."
 19 Does that partly explain, do you think, why a major
 20 incident wasn't called by the Fire Service on the night
 21 until later on because nobody was at the incident
 22 ground?
 23 A. That could impact on it, but again I think at other
 24 points in the document it says if there's clearly
 25 a significant incident going on, then it could possibly

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1 be declared elsewhere, possibly the duty GM in
 2 consultation with control. The reason we put "any IC"
 3 in there when we put this document together was again
 4 previously it was always a minimum of a station manager
 5 that could declare it --
 6 Q. I see.
 7 A. -- and we took that out. It could be a crew manager on
 8 an incident.
 9 Q. Just to be clear, it could be called by anyone, they
 10 didn't have to be at the incident ground? I think
 11 that's what you're saying?
 12 A. Yes, sir.
 13 Q. Then if you could go down, please, Mr Lopez, to page 11.
 14 We've got the strategic considerations {INQ004544/11}.
 15 At paragraph 27:
 16 "The level at which to consider the emergency in its
 17 wider context to determine longer-term wider impacts and
 18 risks; define and communicate the overarching strategy
 19 for the emergency response; establish the framework,
 20 policies and parameters for lower level tiers; monitor
 21 the risks, impacts and progress towards defined
 22 objectives."
 23 And then at paragraph 28:
 24 "For a major incident which only affects GMFRS,
 25 strategic direction is ordinarily provided by a PO or

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1 APO.”
 2 But then at 29:
 3 “Where a multi–agency major incident has been
 4 declared, a strategic coordinating group will be
 5 established at Greater Manchester Police HQ.”
 6 Paragraph 30:
 7 “In the early stages of a major incident, it is
 8 likely that the initial meeting of the SCG will be via
 9 teleconference.”
 10 And then 31:
 11 “When an SCG is established, it is usual for the
 12 duty PO to attend. However, there may be times when
 13 this is delegated to an APO.”
 14 One thing it doesn’t expressly say there, do you
 15 agree, is in fact it envisaged a mobilisation of the PO
 16 or APO direct to force headquarters before the SCG was
 17 called?
 18 A. No, it doesn’t direct the mobilisation but that is the
 19 method of operation. When it’s a multi–agency major
 20 incident, you — you know, we would normally expect an
 21 officer, probably PO level, to be at the multi–agency
 22 command and then they can attend the strategic
 23 coordinating group meeting when it’s been called.
 24 Q. So not in the policy but your expectation would be
 25 that —

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1 A. Yes.
 2 Q. — they would attend GMP HQ before the SCG was called?
 3 A. Yes, to get a full briefing.
 4 Q. Thank you very much, Mr Lopez. You can take that down.
 5 In relation to the MTFA capability, you’ve described
 6 how you asked for Merseyside to put their MTFA
 7 capability on standby.
 8 A. Yes.
 9 Q. And you’ve described also how, when there was a debate
 10 about whether the SRT, Greater Manchester’s MTFA
 11 capability, should attend the arena, one of the concerns
 12 the chief had was keeping the MTFA capability available
 13 in case there were any further incidents.
 14 A. Correct, yes.
 15 Q. The MTFA capability in Manchester at that time was in
 16 Central Manchester; is that right?
 17 A. We’ve moved it forward during the incident, yes.
 18 Q. Yes. Had it been necessary to bring in MTFA capability
 19 from Merseyside, can you give us an approximate idea as
 20 to how long it would have taken that capability to get
 21 into Central Manchester?
 22 A. I think on blue lights — I think I discussed this last
 23 time — probably about 25 minutes. The main time is to
 24 get them assembled. I was in contact with their NILO
 25 direct, so we could set them forward whenever we deemed

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1 fit. But I would say probably about 25 minutes,
 2 20/25 minutes on blue lights at least.
 3 Q. Thank you —
 4 SIR JOHN SAUNDERS: Just before you leave that issue, this
 5 heated dispute, and it’s clear it was a heated dispute
 6 that went on between Mr O’Reilly and others of you who
 7 were there, about whether to bring the SRT forward,
 8 I expect we will hear from Mr O’Reilly that he acted in
 9 the way he did because of the conversation he had with
 10 Mr Hynes and what Mr Hynes specifically asked for. Did
 11 he convey this to the other people in the room at the
 12 time?
 13 A. I think the phrase — and I can’t remember whether it
 14 was the first time or the second time — was, “This is
 15 what they’ve asked for, this is what we’re going to send
 16 them”, and he made his decision and he stuck to it.
 17 SIR JOHN SAUNDERS: Okay. But didn’t particularly go into
 18 detail about why that was wanted or...
 19 A. I don’t recall him going into the specific detail, sir.
 20 He just said — I think the first time they’ve asked for
 21 12 firefighters, so that’s what we’re sending. But he
 22 would have had, I would say, more information following
 23 the call than we did.
 24 SIR JOHN SAUNDERS: Okay, thank you.
 25 MR WARNOCK: Just to be clear then, and if you disagree do

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1 say, but was he keen to get resources to the scene as
 2 quickly as he could?
 3 A. Yes, I’d say so, yes.
 4 Q. Sir, I’m not — it’s not something for the witness, but
 5 an answer to a question you asked earlier. You asked
 6 about what efforts had been made to ascertain the FCP
 7 prior to Mr Fletcher’s conversation at 00.04. There are
 8 at least two.
 9 At 23.50, Mr Berry had his what I hope I can put
 10 neutrally as a rather unsatisfactory conversation with
 11 Mr Myerscough, where he’d been asking for an FCP.
 12 SIR JOHN SAUNDERS: Yes.
 13 MR WARNOCK: And then at 23 —
 14 SIR JOHN SAUNDERS: He said Mr Myerscough didn’t appear to
 15 know what an FCP was.
 16 MR WARNOCK: Yes. Just prior to that, at 23.46, Mr Levy had
 17 asked Rochelle Fallon at North West Fire Control to try
 18 and ascertain an FCP from GMP, but she and North West
 19 Fire Control had no success in relation to that either.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR WARNOCK: Just one final question, Mr Fletcher. You were
 22 off duty that night, indeed you were in bed when you
 23 heard about the attack at the arena.
 24 A. Yes, sir.
 25 Q. Why did you get involved?

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1 A. I think because of my knowledge, obviously my
2 involvement in the multi-agency side, I felt a sense of
3 duty to try and help, really. I've always responded to
4 recall to duty requests previously. I felt I could make
5 a contribution on the night and that's what I tried to
6 do.

7 MR WARNOCK: Thank you.

8 SIR JOHN SAUNDERS: Thank you.

9 Mr Greaney, when Mr Horwell was asking questions of
10 Assistant Chief Constable Hankinson yesterday, he raised
11 an issue at which I think I expressed surprise at the
12 time, which related to what happened on Operation
13 Winchester Accord --

14 MR GREANEY: You did.

15 SIR JOHN SAUNDERS: -- and problems with it. This is
16 a witness who I know has some knowledge of it, so I've
17 invited you, as it was raised with ACC Hankinson, to ask
18 some questions which relate to that, because clearly
19 it is now a matter which may be an issue.

20 Questions from MR GREANEY

21 MR GREANEY: Indeed, sir. As you have made plain, the
22 reason I'm dealing with this rather than Ms Cartwright
23 is because it arose during the evidence of a witness
24 I questioned yesterday, ACC Hankinson.

25 Mr Fletcher, you'll have got a flavour of what I'm

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1 wanting to explore with you, but let me set it out in a
2 little more detail.

3 When you first gave evidence to the inquiry, as long
4 ago now as 22 February, do you recall that you explained
5 to the chairman that, together with Station Manager
6 Lawlor, you had led the Fire and Rescue element of the
7 planning for Exercise Winchester Accord?

8 A. I hadn't led the planning: it was Mr Lawlor and
9 Mr Gaskell who was directly involved in the planning for
10 the exercise.

11 Q. So I hope that I haven't misunderstood this completely.
12 Did you play a part in observing Exercise
13 Winchester Accord?

14 A. I did, sir. I was in the management suite of the
15 Trafford Centre.

16 Q. So I have therefore understood that. And as a result,
17 were you there to provide guidance to delegates on the
18 GMFRS MTFA capability?

19 A. Yes, sir.

20 Q. To put it in what I hope are neutral terms, on the day
21 of the exercise, you were surprised, as were your
22 colleagues, at the length of time it was taking to
23 deploy both the Fire and Rescue Service and
24 Ambulance Service personnel?

25 A. Yes, sir.

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1 Q. And as we know, it took something in the order of 1 hour
2 and 30 minutes.

3 A. Yes, sir.

4 Q. Yesterday, as the chairman has indicated already, the
5 possibility -- and I underline the word possibility --
6 that it may have taken a prolonged period for military
7 and firearms officers to neutralise a threat was the
8 explanation for that delay. So I want to emphasise,
9 that was raised as a possibility and in a spirit of
10 discovery as opposed to putting that as a firm
11 proposition. Have you followed me so far?

12 A. Yes, sir.

13 Q. What the chairman would like, I know, is your
14 contribution, given your role in the exercise, and what
15 I'll also do is take the opportunity to view with you
16 a few documents and to see whether you agree with their
17 content, all in this context of Exercise
18 Winchester Accord.

19 First, was it ever suggested to you or in your
20 presence at the time or in the immediate aftermath that
21 the delay in the deployment of ambulance and Fire and
22 Rescue Service personnel was attributable to a period
23 taken to neutralise a threat?

24 A. No. My understanding was the call from the force duty
25 officer was the delay in bringing the Fire and Rescue

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1 and ambulance forward.

2 Q. Thank you for that answer. I'm keen to take it in
3 stages so we capture your evidence as accurately as
4 possible.

5 The answer to my question, "Was it ever suggested
6 at the time or in the aftermath that the delay was
7 attributable to the time taken to neutralise a threat",
8 the simple answer to that question is no?

9 A. I don't recall anything being put to me in those terms,
10 no.

11 Q. Your understanding for the reason for the delay was,
12 I think twofold, given evidence you have given
13 previously. First of all and perhaps principally, the
14 failure of the GMP FDO to call the other emergency
15 services forward?

16 A. Yes, sir.

17 Q. And you also mentioned a second reason when you last
18 gave evidence, namely that an inspector, as you
19 understood it, on the inner cordon, had refused to allow
20 Fire and Rescue Service and Ambulance Service personnel
21 into the inner cordon because he did not understand
22 their capabilities?

23 A. That's what was fed back to me, yes.

24 Q. That was your understanding of the reasons for the
25 delay?

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1 A. Yes, sir .
 2 Q. Mr Lawlor, when he gave evidence, explained that in his
 3 view the only reason there was a breakthrough in this
 4 regard during Winchester Accord was because the Fire and
 5 Rescue Service had contacted the police exercise
 6 director . Are you able to confirm or refute that or
 7 have you no knowledge?
 8 A. No, I believe that was the case. The exercise
 9 directors — I think in the planning for the exercise ,
 10 the rendezvous point was identified and because there
 11 was the delay, I think they mobilised to the rendezvous
 12 point.
 13 SIR JOHN SAUNDERS: That's what I understood: they just went
 14 forward themselves (overspeaking) the FDO.
 15 A. — (overspeaking) coordination team, yes.
 16 SIR JOHN SAUNDERS: Because they worried otherwise the
 17 exercise would be lost, basically ?
 18 A. Yes, sir .
 19 SIR JOHN SAUNDERS: The second part of it.
 20 MR GREANEY: I'm next going to ask you about the witness
 21 statement of a colleague of yours, Neil Gaskell. It's
 22 his statement of 29 June 2020.
 23 Mr Lopez, the reference is {INQ033910/16},
 24 paragraph 64.
 25 This is Mr Gaskell's take on the situation . You've

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1 explained to us the role that he had in the planning.
 2 Do you know, was he also present on the day?
 3 A. I believe he was, yes.
 4 Q. And he explained:
 5 "Notwithstanding these issues, once all commanders
 6 were co-located at the FCP and the TFC was also present
 7 there, the exercise actually went very well. Commanders
 8 from GMP, GMFRS and NWS HART communicated well to
 9 formulate multi-agency deployment plans. GMFRS worked
 10 well with NWS to treat casualties, with fire
 11 concentrating on the extrication of casualties."
 12 Something a number of witnesses have emphasised
 13 is that in a situation such as Winchester Accord, or
 14 22 May, that was something of real value that the Fire
 15 and Rescue Service could bring?
 16 A. Yes, sir .
 17 Q. It carries on and this is really the point I wanted to
 18 see if you could agree or disagree with:
 19 "In fact, so much time had elapsed since the start
 20 of the exercise that once we moved forward from the RVP
 21 to treat and extricate casualties, there were police
 22 firearms officers coming the other way in relaxed dress
 23 who had been given the end ex. In other words, they had
 24 been told that the exercise was over. This was a missed
 25 opportunity to observe the multi-agency response by fire

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1 and ambulance. It was also inappropriate as we are
 2 trained in the JOPs to..."
 3 And then there's an irrelevant and sensitive
 4 section .
 5 So do you recall that contrary to it being the
 6 position that you couldn't go in because firearms
 7 officers and military were still trying to neutralise
 8 the threat, that in fact by the time you got there, the
 9 firearms officers had been told that the exercise was
 10 over?
 11 A. I don't recall the thing about the end ex, if I'm being
 12 perfectly honest, sir . I mentioned in my testimony
 13 other exercises that had been done — like I say, I'd
 14 probably have to speak to Mr Gaskell on that one, but
 15 there was issues. There was a significant delay and
 16 I think once the firearms had neutralised the threat,
 17 whether end ex had been called, they were withdrawing
 18 from the scene.
 19 Q. But I suppose it would be reasonable to say that if
 20 that's Mr Gaskell's recollection, you don't yourself
 21 have any reason to disagree with it?
 22 A. No, sir . Mr Gaskell was on the scene, so he would have
 23 more of a tactical overview of that than myself.
 24 Q. And then finally, I'm going to draw your attention to
 25 a document that we have seen before, albeit not during

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1 the course of your evidence. Perhaps nobody's fault,
 2 but it's only just become relevant. I'm going to read
 3 a few lines out to you and see whether it represents
 4 your feelings and your view about what went wrong on
 5 Exercise Winchester Accord.
 6 So what I'm going to be showing you is the debrief
 7 or one of the debriefs carried out by the North West
 8 Ambulance service, {INQ013669/1}.
 9 Could you enlarge, please, the top half of that
 10 page?
 11 "Negatives."
 12 This is, as I have indicated, is the view of NWS:
 13 "Huge delay in tri-service meeting, out of line with
 14 JESIP."
 15 Do you agree or disagree?
 16 A. Agree, sir .
 17 Q. "Lack of direct police on-site liaison with
 18 ambulance/Fire and Rescue Service."
 19 Do you agree or disagree?
 20 A. Agree.
 21 Q. "Huge delay in deployment of ambulance/Fire and Rescue
 22 Service to triage and treat (triage teams deployed at
 23 02.20, 2 hours and 20 minutes after attack). We should
 24 have been able to deploy ambulance/Fire and Rescue
 25 Service into warm zone on outside of building within

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1 30 minutes of attack and therefore would have rescued
 2 a number of casualties early. This delay would
 3 unequivocally have resulted in unnecessary loss of
 4 life."

5 A. Agree, sir.

6 Q. Before I asked my question, you agree with that as
 7 a proposition?

8 A. Yes.

9 Q. What was being said was in a -- if things went wrong, as
 10 they did on exercise Winchester Accord, in the real
 11 world then the prospect was an unnecessary loss of life?

12 A. Yes, sir.

13 Q. I think the upshot of Mr Fletcher's helpful evidence
 14 is that your surprise yesterday was well-founded.
 15 I have informed Mr Horwell that I proposed to deal with
 16 this issue in general terms and that I would give him an
 17 opportunity, with your agreement, sir, to pose any
 18 questions that he wished. So I will call upon
 19 Mr Horwell, if he wishes to ask questions, to do so at
 20 this stage.

21 Further questions from MR HORWELL

22 MR HORWELL: Sir, I will happily continue the spirit of
 23 discovery.

24 Mr Fletcher, you were in the management suite of the
 25 Trafford Centre?

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1 A. Yes, sir, I was.

2 Q. Who were you with?

3 A. From the Fire Service perspective, I think I was the
 4 only member from Greater Manchester Fire and Rescue
 5 Service there, sir.

6 Q. And who else was in the management suite of the
 7 Trafford Centre? I'm sorry, I'm finding it very
 8 difficult to understand what was happening in the
 9 management suite, Mr Fletcher, so that's why I'm asking
 10 you these questions.

11 A. Sorry, sir, these were invited delegates. I think there
 12 was -- again, I am trying to recall from a number of
 13 years ago, there were VIPs that were escorted on site
 14 during the exercise so they got an on-scene visual
 15 representation of what was going on. I think there was
 16 other personnel from agencies -- as I say, it was just
 17 across the piece -- who were in the management suite and
 18 they were able to observe the proceedings on CCTV.
 19 I was asked to go there just to provide any information
 20 on what the Fire Service MTFA capability was if any
 21 questions arose. I think there was a couple of
 22 presentations given during the -- leading up to the
 23 exercise commencing.

24 Q. Was any part of the exercise being performed in the
 25 management suite or was it simply a group of individuals

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1 observing whatever they could?

2 A. It was just observation, sir. There was no practical
 3 element to the exercise from the management suite, no.

4 Q. So you weren't with the FDO?

5 A. Oh no, sir. The FDO was -- I was in the
 6 Trafford Centre. The FDO was at force headquarters,
 7 I believe.

8 Q. Exactly. And you weren't with the GATFC?

9 A. No, sir.

10 Q. All of this arose out of a question that was asked of
 11 the Gold commander for this exercise yesterday as to
 12 when the involvement of the military and the firearms
 13 officers came to an end. Do you know when that was,
 14 Mr Fletcher?

15 A. No, sir, I can't recall that.

16 Q. Did you know, either before the exercise or during the
 17 exercise, that the primary purpose of it was for the
 18 military to re-licence themselves?

19 A. Yes, sir, I did.

20 Q. You did?

21 A. Yes.

22 Q. And that the military aspect, there working with the
 23 firearms officers, was a principal part of this
 24 exercise, was it not?

25 A. Yes, sir, it was.

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1 Q. In answer to a question, you said that it was a failure
 2 of the FDO to call the emergency services forward.

3 A. Did I? Did I say that in the answers to the questions
 4 just now?

5 SIR JOHN SAUNDERS: Yes.

6 MR HORWELL: Yes.

7 A. That was what was fed back to me of the delay in the
 8 emergency services responding to the incident.

9 Q. Who fed that back to you, Mr Fletcher?

10 A. That was fed back to me -- I think it was from members
 11 of the exercise coordination team, so certainly,
 12 I believe, Mr Lawlor fed that back to me the next day.
 13 I started finding bits out the next day after the
 14 exercise, and I also discussed with one of the JESIP
 15 observers who was a fire officer from Merseyside who
 16 I knew.

17 Q. So this is nothing that you saw or heard that night
 18 during the exercise?

19 A. Not in the management suite, sir, no.

20 MR HORWELL: Thank you, Mr Fletcher. That's all I ask.

21 SIR JOHN SAUNDERS: Could you come back, Mr Horwell, just
 22 for a moment?

23 MR HORWELL: Yes, of course.

24 SIR JOHN SAUNDERS: I'm very happy to do voyages of
 25 discovery, but sometimes they can be short circuited and

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1 I have no doubt that GMP presumably know perfectly well
 2 whether there was actually delay which was caused by
 3 them not being brought forward or by the fact that they
 4 were still searching the area to find out if there were
 5 any people who needed to be found before calling people
 6 forward.
 7 Of course, if GMP don't know the answer to that then
 8 let's go on with the voyage of discovery, but if some
 9 enquiries could be made to see if they do know, that
 10 would save me going too far down that line.
 11 MR HORWELL: Sir, we have done our best from all of the
 12 many -- I was going to say hundreds of pages, it's
 13 probably thousands of pages of documents that relate to
 14 this topic -- and we haven't found the answer to that
 15 question. I have no doubt that we can carry out further
 16 enquiries and if there is an answer, of course we will
 17 bring it to you. But it struck me yesterday, when
 18 asking Ms Hankinson questions, that no one has actually
 19 given a time as to when the military and firearms aspect
 20 of Winchester Accord came to an end and in what
 21 circumstances. And I thought as the Gold commander, it
 22 was a good place to start. But sir, in the spirit of
 23 not discovery now but cooperation, we will do everything
 24 we can to find the answers.
 25 SIR JOHN SAUNDERS: Thank you very much. I'd be grateful.

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1 Thank you, Mr Horwell.
 2 MR GREANEY: Sir, subject to any further questions that
 3 you have, that concludes the evidence of Mr Fletcher.
 4 SIR JOHN SAUNDERS: I'm very grateful. I'm grateful for
 5 your candour. It obviously helps me get to the bottom
 6 of things if people are candid in what they're saying.
 7 So I'm very grateful.
 8 A. Thank you, sir.
 9 SIR JOHN SAUNDERS: How long?
 10 MR GREANEY: Could we have 15 minutes? Then we'll make
 11 a start on the evidence of Mr Nankivell.
 12 (3.16 pm)
 13 (A short break)
 14 (3.35 pm)
 15 MR GREANEY: Sir, thank you very much. I'm sorry we were
 16 slightly longer than 15 minutes. That was my fault.
 17 The witness in the witness box is Mr Nankivell,
 18 about whom we've heard so much, and I'll ask that he be
 19 sworn, please.
 20 MR DEAN NANKIVELL (affirmed)
 21 Questions from MR GREANEY
 22 MR GREANEY: Would you begin, please, by telling us your
 23 full name?
 24 A. Dean John Nankivell.
 25 Q. Mr Nankivell, on the night of the arena attack, were you

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1 the GMFRS duty group manager?
 2 A. I was.
 3 Q. In that capacity, did you deploy to the GMFRS command
 4 support room?
 5 A. I did.
 6 Q. Arriving there at a time that we can ascertain from the
 7 MODAS records to be 11.41 pm?
 8 A. Yes, I would say so, yes.
 9 Q. Mr Nankivell, just so you know where we're going, I want
 10 over the course of today, and inevitably a good portion
 11 of tomorrow morning, to explore with you two broad
 12 issues: first of all, what you knew by the time you
 13 arrived at the command support room, or CSR, and what
 14 you communicated on to others; and second, what happened
 15 within the CSR once you were there and, in particular,
 16 the decision--making in relation to deployment to the
 17 scene. Does that make sense?
 18 A. Yes, sir.
 19 Q. Let's begin, before we get to those two issues, with
 20 your background. Did you join GMFRS in September 1991?
 21 A. I did.
 22 Q. And did you retire from the service on 31 January 2019
 23 after what must have been more than 27 years of service?
 24 A. I did, sir.
 25 Q. By that stage, the stage of your retirement, had you

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1 risen to the rank of group manager?
 2 A. I had, yes.
 3 Q. Much earlier in your career, indeed at an early stage
 4 within it, did you develop an interest in search and
 5 rescue?
 6 A. I would say a big interest in search and rescue, sir.
 7 Q. Did you become at that early stage what was then known
 8 as an urban search and rescue technician?
 9 A. I did.
 10 Q. Were you in due course selected for the international
 11 search and rescue team?
 12 A. I was, yes.
 13 Q. Known as the ISSR?
 14 A. UK ISSR, sir.
 15 Q. And indeed later did you become the ISSR commander for
 16 GMFRS?
 17 A. For GMFRS, yes, and also I became part of the management
 18 team for UK -- UK ISSR.
 19 Q. Did that work take you all over the world?
 20 A. It did, sir.
 21 Q. Both responding to actual incidents and delivering
 22 training?
 23 A. It did, sir.
 24 Q. And in terms of incidents, just give one example, were
 25 you involved in responding to an earthquake in Haiti in

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1 2010?
 2 A. I was, yes.
 3 Q. I appreciate there were other things that you were
 4 involved in during the course of your career, but
 5 you will appreciate why I'm interested just to establish
 6 your experience in this particular area.
 7 In the early 2010s, were you given responsibility
 8 for the design and implementation of a specialist rescue
 9 team within GMFRS?
 10 A. Yes, sir.
 11 Q. In due course did that team become known as the
 12 technical response unit or TRU?
 13 A. It did, yes.
 14 Q. In other words, you were there right at the beginning,
 15 in terms of the TRU, and involved in its design and
 16 implementation?
 17 A. From its inception until present day, yes.
 18 Q. Did you also take on the implementation or at least some
 19 responsibility in relation to the implementation of the
 20 GMFRS MTFAs response?
 21 A. I did, yes.
 22 Q. In due course did that lead to the creation of the SRT?
 23 A. It did, yes.
 24 Q. In terms of your role in the implementation of what
 25 became the SRT, did your role involve, among other

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1 things, no doubt arranging training?
 2 A. It did, yes.
 3 MR GREANEY: Sir, so you know, I'm at the first witness
 4 statement of Mr Nankivell, it's dated 13 November 2019,
 5 {INQ026736/5}, paragraphs 23 and 24.
 6 Did the training that you arranged for members of
 7 the TRU, who were to become also members of SRT, involve
 8 joint training with Greater Manchester Police?
 9 A. It did, sir, yes.
 10 Q. Did it involve firearms demonstrations and
 11 familiarisation?
 12 A. It did, yes.
 13 Q. Casualty recovery and general matters to understand the
 14 procedures and terminology of GMP in the event of
 15 an MTFAs-style attack?
 16 A. Indeed, sir.
 17 Q. Did the training that you arranged also involve routine
 18 paramedic training with the NWAS HART?
 19 A. It did, yes.
 20 Q. And during that training with NWAS HART, were there
 21 members of the TRU given training in casualty
 22 extrication?
 23 A. Yes, sir.
 24 Q. And casualty treatment?
 25 A. Yes, sir.

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1 Q. Did that include specific training on specialist medical
 2 equipment, like the use of haemostatic dressings?
 3 A. It did, yes.
 4 Q. And the application of tourniquets?
 5 A. Yes, sir.
 6 Q. Many witnesses have agreed, I'm sure you would as well,
 7 that it's that kind of training and that kind of
 8 expertise which means that the specialist response teams
 9 of GMFRS had real value to offer at the arena on the
 10 night of the attack?
 11 A. Absolutely, sir, yes.
 12 Q. So let's just take a moment to see where we are and see
 13 whether you agree with this: on 22 May 2017, do you
 14 agree that you were particularly well placed to judge
 15 what value the specialist resources of the Fire and
 16 Rescue Service could bring to the emergency response to
 17 the attack?
 18 A. Yes, I would definitely, yes.
 19 Q. I think it would be fair to say that that is one of the
 20 things that makes what was to happen in the CSR
 21 disappointing, if not galling, for you?
 22 A. I agree.
 23 Q. As you will appreciate, we're going to get to that in
 24 due course. I know that you know, as we discussed this,
 25 that I'm going to ask you to give an entirely

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1 unvarnished account of what happened in that room over
 2 that period of time.
 3 A. Yes, sir.
 4 Q. In terms of your more general experience, you have
 5 responded in your career to many major incidents;
 6 is that fair?
 7 A. Yes, sir.
 8 Q. So, for example, you coordinated the response to the
 9 flood in Cumbria in 2015?
 10 A. I did.
 11 Q. And the response to the Boxing Day floods in
 12 Greater Manchester that same year but later on?
 13 A. Yes, sir.
 14 Q. Is it the position that on both of those occasions, you
 15 worked together with a firefighter that we know, because
 16 he's given evidence, Ben Levy?
 17 A. I have a very good working relationship with Ben Levy,
 18 sir.
 19 Q. Not only did you know him well but you knew through
 20 working closely with him that he was someone that was to
 21 be trusted?
 22 A. Absolutely, sir.
 23 Q. And to say that you rated him highly wouldn't even begin
 24 to scratch the surface of your view, would it?
 25 A. I'd agree with you, yes, sir.

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1 Q. Again, we are jumping ahead, but it's helpful just to
 2 set some of the lines of your evidence. I believe your
 3 position is as incident commander on the night of the
 4 attack, he should have been the decision maker
 5 in relation to the deployment of resources to the scene?
 6 A. As the incident commander, sir.
 7 Q. Yes. And in the result, that role or responsibility was
 8 removed from him by what happened in the CSR, do you
 9 agree?
 10 A. If he was under the role of incident commander at that
 11 point, I agree, sir.
 12 Q. And again, we will get to that in due course, although
 13 I'm sure it will now be tomorrow.
 14 Let's just finish off your background, and this will
 15 take us to 22 May. At the time of the arena attack, was
 16 your day-to-day role in what you describe as core hours
 17 as head of resilience?
 18 A. It was, yes.
 19 Q. But as a group manager were you also on rota call, on
 20 a 24-hour rota, as the nominated duty group manager?
 21 A. I was for that day, yes.
 22 Q. I will come to the day, but that wasn't the first time
 23 that you had been in that position, was it?
 24 A. No, it was on a rota basis, so each — depending on
 25 availability of group managers, it would be generally

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1 rotated on skill sets. On that night, if I recall,
 2 Ben Levy was — we were short of — there wasn't enough
 3 NILOs, so he was on rota as a NILO and I was the duty
 4 group manager. But he could have been the duty group
 5 manager had there been enough skill sets on the rota.
 6 Q. Were you then or had you ever been yourself a NILO?
 7 A. No, sir, not at all.
 8 Q. As you have told us already, on 22 May, you were the
 9 duty GM, as I believe it's known, and in that position
 10 were you on call for a 24-hour period?
 11 A. I was, yes.
 12 Q. Did that mean that you would yourself respond to or be
 13 expected to respond to incidents?
 14 A. Generally never. I mean, it could come about if they
 15 were really short and if the APO felt happy, he could
 16 then send me to an incident if I was really required,
 17 but generally in all the years I have done it, I've
 18 never responded to an incident when I was DGM, I always
 19 went to the command support room.
 20 Q. I will come on to the CSR in a moment, but is the reason
 21 why you wouldn't generally respond to an incident and
 22 become operational because instead your role was to
 23 provide advice?
 24 A. Absolutely, sir — support, sir, not advice, support.
 25 Q. Support. So would that be support to incident

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1 commanders?
 2 A. Incident commanders —
 3 Q. To whom would you provide support whilst you were
 4 working as DGM?
 5 A. Support would be for — to take the weight from the
 6 incident commander, should he need specialist resources.
 7 If I may give you an example, sir, if we take the huge
 8 fires we had on Saddleworth Moor, we needed resources
 9 from the army specialist equipment that we didn't have
 10 in Manchester so that came from Kent and Gloucester and
 11 places. So the command support room would take on that
 12 role, trying to facilitate that.
 13 The other role was to support North West Fire
 14 Control because from their inception they didn't have
 15 the crewing, if you like, that they were used to or
 16 possibly needed — Manchester is a huge city, so if
 17 there were other incidents going on in the Manchester
 18 area, it was help to support North West Fire Control in
 19 looking for recall to duty, bringing in other qualified
 20 officers, and searching out resources for North West
 21 Fire Control.
 22 Q. So let me make sure I've understood this: in terms of
 23 the incident commander, he's dealing with the particular
 24 incident, he is there on the scene, as was to be
 25 expected, and your role as the duty GM would be to be

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1 told by him or to see for yourself, he needs some
 2 additional support, it's your job to ensure that he or
 3 she receives it?
 4 A. Absolutely, sir.
 5 Q. And in terms of North West Fire Control, again to make
 6 sure I've understood it, there might be occasions upon
 7 which they were stretched and so, rather than one of
 8 their operators making calls to identify other resources
 9 able to come in from being off duty, you would be given
 10 that responsibility?
 11 A. Absolutely, yes, sir.
 12 Q. Those are the kind of things you would do?
 13 A. There was a myriad of other things, but that would be
 14 the gist of it.
 15 Q. One of the other things I believe would be within your
 16 area of responsibility would be to make the decision
 17 whether or not to open a command support room.
 18 A. Yes, sir. Sometimes if the incident — if it reached
 19 a certain criteria, six pumps or something — we didn't
 20 always open the command support room because it may be
 21 something like a water relay, which is just a matter of
 22 pumps lined up along a line providing water to the
 23 incident ground, so it didn't need a bigger coordination
 24 from the command support room but so it was really — it
 25 was generally my decision to make it open the command

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1 support room.
 2 Q. In terms of the criteria that would drive the opening of
 3 a command support room, I think you mentioned if you had
 4 six or more appliances at an incident —
 5 A. Yes.
 6 Q. — unless they were doing no more than providing water.
 7 But would a CSR also be opened for something that was
 8 unusual and/or complex, such as floods?
 9 A. Absolutely, yes.
 10 Q. And obviously as we know in the situation that we are
 11 concerned with, if there has been an explosion as
 12 a result of a bomb?
 13 A. Absolutely, sir.
 14 Q. That was your role on the night of the 22nd. So let's
 15 turn to that night. At just after 22.50 that night,
 16 were you at home and watching television?
 17 A. I was, sir.
 18 Q. At that stage, were you aware or unaware that something
 19 had occurred at the Manchester Arena?
 20 A. Completely unaware, sir.
 21 Q. At 22.52, did you receive a call from Joanne Haslam of
 22 North West Fire Control?
 23 A. Yes, sir, I did.
 24 Q. Mr Nankivell, what we are going to do is to listen to
 25 that call because it's an important one. And we'll have

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1 the transcript on the screen as well. We will not be
 2 listening to every single call that you were involved
 3 in, many of them we'll summarise by reference to
 4 a schedule that's been prepared by North West Fire
 5 Control. But where important, we will listen to them.
 6 Mr Lopez, the audio is {INQ004364/1}. The
 7 transcript is {INQ001224/1}.
 8 (Audio played)
 9 SIR JOHN SAUNDERS: I'm sure everyone noticed that the
 10 sensitive location of the TRU was included in that,
 11 although it may not be very secret.
 12 MR GREANEY: That is operationally sensitive and I'm sure
 13 that will be handled. Thank you.
 14 So you were told, during the course of that call,
 15 a number of things. I'm not going to identify each of
 16 them, but just what I'm going to suggest were the
 17 critical ones. You were told that a bomb had exploded
 18 and given the location at which that had occurred?
 19 A. Yes, sir.
 20 Q. You were told that there were many casualties?
 21 A. Yes, sir.
 22 Q. And fatalities?
 23 A. Yes, sir.
 24 Q. There was what I recognise to have been a passing
 25 reference to "rendezvous car park". You may not have

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1 even spotted that.
 2 A. No, I got the rendezvous point, but yes.
 3 Q. That perhaps is an answer to one of the questions that
 4 might have been posed. There is a passing reference to
 5 rendezvous car park but I think you're making the point
 6 that you didn't register that at the time and didn't
 7 even really register it whilst listening to the call
 8 then?
 9 A. No.
 10 Q. You were told in answer to a question —
 11 SIR JOHN SAUNDERS: It's not on the transcript, is it?
 12 MR GREANEY: It is on the transcript, sir.
 13 SIR JOHN SAUNDERS: Oh, is it?
 14 MR GREANEY: It simply says "rendezvous car park". It
 15 doesn't refer to cathedral. Let's just have that on the
 16 screen.
 17 SIR JOHN SAUNDERS: Sorry.
 18 MR GREANEY: It does just pass in a moment, out of fairness
 19 to the witness, and certainly I'm not going to be
 20 suggesting that he would necessarily have registered
 21 from that that there was a rendezvous at a particular
 22 car park. You've got it there. It's the middle of that
 23 page, 22.52.44:
 24 "And the original call from the police said the
 25 merchandise stand. It was... there's 30 casualties so

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1 far ... the rendezvous car park."
 2 And then it moves on to you asking a question about
 3 the major incident; do you see that?
 4 A. Yes, I do.
 5 Q. Is it appearing on the screen in front of you?
 6 A. It is, yes, sir.
 7 Q. You asked a question about, as we can see — that can go
 8 from the screen, Mr Lopez — about whether a major
 9 incident had been called and you were told not so far as
 10 North West Fire Control knew. You were told Andy Berry
 11 had directed four pumps to Philips Park and was on his
 12 way there himself. And you were told that a job, in
 13 other words a log, had been created for that location.
 14 So I'm going to come back to that much later, but logs
 15 were created for a number of purposes: one log was
 16 created to ensure people went to Philips Park, but we'll
 17 get to that in due course. You look like that's
 18 a surprise to you.
 19 A. I think I'm with you on that one.
 20 Q. Don't worry about that too much now.
 21 You raised the question of whether the command
 22 support room should be set up and I'll ask you about
 23 that in just one moment. And you directed that the TRU,
 24 in their MTFA kit, should deploy to Philips Park?
 25 A. Yes, sir.

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1 Q. Finally so far as my summary is concerned, again I'm
2 going to turn to this, you were told that the NWAS
3 Bronze was at the scene; were you not?
4 A. On the transcript, yes, sir, I was.
5 Q. "Also another little message has gone on, there's
6 a paramedic Bronze commander at the scene."
7 So there are two remaining issues about that call
8 that I would like your assistance with. First, you were
9 the duty group manager?
10 A. Yes, sir.
11 Q. You were, it would not be an overstatement to say, an
12 expert in the TRU?
13 A. Very knowledgeable, yes, sir.
14 Q. And from what you've said, it rather sounded as if you
15 were asking NWFC whether a CSR should be set up.
16 A. I know full well actually without any question or any
17 doubt, without even me asking that question, I would
18 have opened up the CSR. I was thinking out loud.
19 I know full well I'm going to open that command support
20 room, there's no two ways about it. So I can only
21 rationalise that I was thinking out loud, really.
22 SIR JOHN SAUNDERS: And it would be outside of their ambit,
23 wouldn't it, NWFC, to ask for that?
24 A. Absolutely, yes, sir.
25 MR GREANEY: So you'll understand why it was important you

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1 should be asked that question and give the answer. But
2 the answer you have given and that you have given
3 consistently is that you always knew, given your
4 experience, that a CSR would need to be set up?
5 A. Yes, sir, definitely.
6 Q. This was, as you've just put it, you thinking out loud?
7 A. Yes.
8 Q. And you did take steps promptly to set up a CSR?
9 A. Yes, I did.
10 Q. The second issue is that you were told that the
11 paramedic Bronze commander was at the scene. Do you
12 agree that that information revealed that an emergency
13 service partner was at the scene of the bombing?
14 A. On reflection, yes, sir.
15 Q. Do you agree too that that was important information?
16 A. Um... I agree it was important information, yes, sir.
17 Q. There is no trap in these questions and I don't want you
18 to think that I am being overcritical, but it's
19 important to understand what you knew and what you did
20 with it. Plainly this was important information that
21 NWAS, one of your emergency service partners, had
22 a commander actually at the scene?
23 A. Yes. Commander — the Bronze commander, it could have
24 been a paramedic, it might not have been an officer, but
25 yes, there was definitely a presence by NWAS at the

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1 scene, yes.
2 Q. That's an accurate way of putting it: there was
3 a presence at the scene. Do you agree that this was an
4 indication that the Fire and Rescue Service should also
5 be at the scene?
6 A. I would have to agree with you, yes, sir.
7 SIR JOHN SAUNDERS: If you feel like you want to take time
8 to answer the question, please feel entirely free to do
9 that. All right?
10 A. Thank you, sir.
11 SIR JOHN SAUNDERS: Not at all.
12 MR GREANEY: I'm sorry if I'm pressing too quickly through
13 this.
14 SIR JOHN SAUNDERS: Not at all. It was just when you were
15 saying there are no traps, that may have been just an
16 encouragement to answer the question without really
17 thinking about it. I'm sure it wasn't what you wanted
18 to do.
19 MR GREANEY: It certainly wasn't my purpose, nor would it
20 ever be.
21 The question in light of those frank responses
22 you've given is: what did you do with that information?
23 A. The paramedic information, sir?
24 Q. Yes. What did you do with the information that NWAS had
25 a presence at the scene, bearing in mind that this was

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1 an indication that the Fire and Rescue Service should
2 also be there?
3 A. I... I actually honestly failed to do anything with it
4 because I failed to acknowledge it. I think I was
5 already thinking about my next actions and I did not
6 pick up on that information.
7 Q. Are you okay?
8 A. I'm fine, sir, yes, absolutely.
9 Q. Obviously, we all appreciate that it's easy for us,
10 lawyers, years later to pick over all of this and find
11 out things that could have been done differently, but
12 I think what you are candidly recognising is that this
13 was important information that you should have done
14 something with?
15 A. I should have recorded it or kept some kind of mental
16 note, but it just bypassed me, if I'm honest, sir.
17 Q. And the fact that you didn't, I think you would have to
18 accept was an error on your part?
19 A. I would say so.
20 SIR JOHN SAUNDERS: Presumably you didn't actually have
21 a piece of paper and a pencil or anything to write stuff
22 down?
23 A. No — normally, if I'd been in bed, I would have had
24 a notepad by the bed, believe it or not, but because
25 I was sat up watching TV, I didn't have a notepad to

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1 hand and I could have made notes.
 2 SIR JOHN SAUNDERS: And you would have done, had you had
 3 a notebook to hand, would you? Is that why you keep one
 4 by the bed?
 5 A. Absolutely, I would have taken notes but I think on that
 6 particular point I was focused on other things that were
 7 said in that message.
 8 SIR JOHN SAUNDERS: The number of casualties and the people
 9 who had died?
 10 A. Exactly, yes, sir.
 11 MR GREANEY: In any event, I think it would probably be fair
 12 to qualify your concession on this basis, that you knew
 13 that the duty NILO was engaged in the events by that
 14 stage? You were told about Mr Berry.
 15 A. Mr Berry responding, yes, sir.
 16 Q. Would it have been your expectation that you would have
 17 been the only person provided with this information or
 18 that, for example, the duty NILO would also have been
 19 provided with this information?
 20 A. If the duty NILO's been informed before me, I would
 21 expect him to have that information before me, yes, or
 22 as well as me.
 23 Q. At the time that you received that call, you were at
 24 home, were you not?
 25 A. I was, yes, sir.

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1 Q. Whilst at home did you have any way of accessing the log
 2 or logs of North West Fire Control?
 3 A. I did, via iNet. I could have accessed them, yes.
 4 Q. What I would like to do at this stage is just see
 5 what was available on one of the logs to be seen at that
 6 stage. Mr de la Poer took, I think, Michelle Gregson
 7 through these logs very carefully and together with her,
 8 explained what is quite a confusing situation.
 9 But the log that I would like to look at with you at
 10 this stage, and I'll refer to it as the Ellis log, it's
 11 log 1, it's 9074, and it's the log that David Ellis
 12 created or started at any rate at 22.38 in response to
 13 a call from GMP.
 14 So Mr Lopez, could we have it on the screen, please?
 15 It will be page 3 once you have found the reference.
 16 {INQ008376/3}.
 17 SIR JOHN SAUNDERS: While we are getting that up, would you
 18 be aware of the fact that North West Fire Control would
 19 open different logs for different stages? We actually
 20 have three logs on this occasion covering the same
 21 incident.
 22 A. No, sir, not at all. Again perhaps I should have known,
 23 but I just presumed there was one log and everything was
 24 dumped on one log if you like.
 25 SIR JOHN SAUNDERS: It's certainly something that NWFC

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1 should have shared with you or GMFRS should have known?
 2 A. Yes, I should have been made aware of it or I should
 3 have known myself but I didn't.
 4 MR GREANEY: There were in fact, and we will get to this
 5 tomorrow, because it is relevant to what happened in the
 6 CSR, there were at least four logs (overspeaking)
 7 related to this incident, but there were three that were
 8 important. There was the Ellis log, which is started --
 9 SIR JOHN SAUNDERS: There's the NWS log.
 10 MR GREANEY: There's what I'll be calling the Philips Park
 11 log, started at 22.48. Then there's a subsequent log,
 12 which I'll call the CSR log, which was designed to
 13 deploy people to that location. As I said, the
 14 situation isn't entirely straightforward, even to
 15 someone who heard the clarity of evidence that was
 16 given. But we'll look at just one of them at this
 17 stage.
 18 This is a type of document that no doubt you were in
 19 May 2017 familiar with?
 20 A. Yes, sir.
 21 Q. The bottom entry on that page, 22.39.53, so you can see
 22 that it is timed 13 minutes before you received the call
 23 from Joanne Haslam. The relevant part in fact is just
 24 over the page, {INQ008376/4}.
 25 You can see:

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1 "Merchandise stand. 30 casualties reported so far.
 2 RVP car park area outside the cathedral."
 3 Can you see that?
 4 A. I can, yes, sir.
 5 Q. So that was information that was available by 22.56 when
 6 your call with Joanne Haslam finished. Then if we go
 7 further down that page, there's an entry at 22.43.03;
 8 do you see that?
 9 A. Yes, sir.
 10 Q. "Police have not got numbers of casualties. Several
 11 officers allocated and making way."
 12 So had you read that, would you have realised that
 13 GMP were deploying to the scene?
 14 A. Having read that, I would have definitely have assumed,
 15 having read that, that the police were making their way
 16 to the scene, yes.
 17 Q. Then over the page, {INQ008376/5}, towards the top, it's
 18 the second entry down, 22.44.26:
 19 "[Ambulance] have five vehicles en route. [Police]
 20 have advised officer landing on scene."
 21 So again, would you agree that had you read that,
 22 you would have realised that the Ambulance Service were
 23 deploying in numbers to the scene and that the police,
 24 GMP, had an officer landing on the scene?
 25 A. Yes, sir.

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1 Q. So it would have been apparent from that that both of
2 your emergency service partners were deploying to the
3 scene?
4 A. Indeed.
5 Q. Then there's just one final one that I'll look at with
6 you and all of these are occurring before Joanne Haslam
7 has even spoken to you. 22.46.17:
8 "[Police] have advised more officer arriving on
9 scene."
10 A. Yes, sir.
11 Q. So you can see, can you not, that North West Fire
12 Control was aware by the time Joanne Haslam spoke to you
13 that your emergency service partners were deploying in
14 numbers to the scene?
15 A. Yes, it would appear that they had a significant amount
16 of information at that point, yes.
17 Q. Obviously, an important issue for the chairman to
18 consider is why all of that was not communicated to you
19 and indeed whether it should have been. But another
20 question is, you were at home and able to access this
21 log. Having come off the telephone with Joanne Haslam
22 at 22.56, did you do so?
23 A. I did not, sir, no.
24 Q. Why not?
25 A. I had previously logged on to iNet viewer for various

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1 things to make a decision whether I was going to the
2 command support room. On this incident I had enough
3 information, I was definitely going to open the command
4 support room up, so that information would have been
5 available once I landed in the command support room
6 anyway. More information would come to light. So
7 I would generally only open or review the iNet if I was
8 under any uncertainty whether I was going to sort of sit
9 and wait at home for a bit more information or whether
10 I was going to deploy to the command support room.
11 Sometimes I would delay response to the command support
12 room because it was unclear whether the incident was
13 going to be protracted, whether it was going to grow or
14 not.
15 In this incident, I was definitely going to the
16 command support room so I didn't consult iNet viewer.
17 Q. So you knew as much as you needed to know to take the
18 important decision that was your decision?
19 A. Yes.
20 Q. And I think you said that the other information
21 available on the log, that was something to be
22 considered once the CSR had been established?
23 A. For me and I had two messages — I had passed message if
24 there had been any updates or anything like that.
25 I would have expected to have been told that. If that

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1 was already known by North West Fire Control, I would
2 have expected to have been informed of that kind of
3 information without me having to go and — by firing up
4 my laptop and logging on, it takes time, it burns time
5 up, but I knew where I was ultimately going to go. So
6 I would have thought that I would have been informed of
7 that on my initial contact.
8 Q. So just a number of stages to this that I would like to
9 further consider with you. So what you're explaining
10 is that information that your emergency service partners
11 were deploying in numbers to the scene was important
12 information?
13 A. I would agree, sir.
14 Q. And it was information that you would have expected to
15 have been told about in that 22.52 call, bearing in mind
16 it was known by NWFC at that stage?
17 A. Yes, sir.
18 Q. "What if" questions are always difficult and I do
19 appreciate that, but you have now seen that at an early
20 stage there was a designated RVP, namely cathedral car
21 park and Mr Berry did know that. If you had known that
22 there was a designated RVP, what would you have
23 considered should occur?
24 A. If I'd had a designated RVP — if an RVP is given it's
25 generally deemed as a safe place to go or a convenient

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1 place to go to bring resources. Normally, if you're
2 going to bring a large number of resources together you
3 don't want them descending at the scene all in one go,
4 so an RVP is somewhere deemed as an appropriate place to
5 go. I would have expected us to respond to the RVP if
6 I was making that decision.
7 Q. The second and connected issue: you had been told at
8 22.52, or in that call starting at that time, that
9 resources were deploying to Philips Park.
10 A. Indeed, sir.
11 Q. The duty NILO was going there. If you had known at
12 22.52 that your emergency service partners were
13 deploying not to an RVP away from the scene but to the
14 scene and in numbers, would you have questioned the
15 GMFRS deployment to Philips Park?
16 A. I would have definitely asked the question, sir, if I'd
17 known that.
18 SIR JOHN SAUNDERS: Just without all that, did you query in
19 your mind Philips Park?
20 A. I did query it. I can think of lots of places to go,
21 but I was stationed at Philips Park for a number of
22 years and it wouldn't have — it just wouldn't have
23 entered ... There was a set distance that we had in the
24 event of a bomb. We had a set distance for that and
25 Philips Park was well outside of that distance, so it

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1 would not have occurred to me to deploy to Philips Park
 2 at all .

3 SIR JOHN SAUNDERS: So as group manager, what are your
 4 responsibilities , if any, to ensure that in those early
 5 stages, which are so important, the Fire Service
 6 response is getting off on the right foot?

7 A. To start collating information, really, sir. I am not
 8 a decision maker, unfortunately, on that particular
 9 night. I was a support. I had already stepped out of
 10 the boundaries or crossed the boundaries of making
 11 decisions by asking Control to send the MTF A TRU to
 12 OS . Because of my -- how -- I felt I had the right
 13 knowledge to do that and to make that decision, but on
 14 that night I was not a decision maker, which perhaps
 15 I should have enforced that, I could have crossed that
 16 line a bit more, but that was -- my whole training was
 17 not to interfere with whatever plan was put in place.

18 SIR JOHN SAUNDERS: Thank you.

19 MR GREANEY: So your view was: we've got a duty NILO, he's
 20 been informed, he's making the decisions, my job is to
 21 get the CSR set up and provide the support that he and
 22 others need?

23 A. Exactly, sir .

24 Q. The call that we listened to ended at 22.56. We know
 25 that you did depart home at some stage after you had

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1 involved yourself in that call . How long after the call
 2 ended did you leave home?

3 A. I couldn't give you an exact time. I know I phoned the
 4 APO, Paul Etches and I know that I phoned the chief, and
 5 at that point I deployed from home, from my home to
 6 headquarters. So I would say 15 minutes, sir, tops.

7 Q. We know that you arrived at the CSR at 11.41. Does that
 8 confirm you in your view that you probably left around
 9 about 11.10, something like that?

10 A. I would say, it's about a half-hour run at that time of
 11 night at those speeds, yes.

12 Q. It's therefore the position that a good deal of time
 13 before you left home, BTP declared a major incident.
 14 They did that at 22.39 and thereafter, a short time
 15 later, a high quality METHANE message was passed between
 16 BTP. Are you aware of that now?

17 A. Only I know that a METHANE message has been sent. I've
 18 only found that out a long time after the event, sir .

19 Q. Furthermore, N WAS had declared a major incident at 22.46
 20 and an advanced paramedic passed, if not a classic
 21 METHANE message, certainly some information to his
 22 Control. As I say, all of that happened before you left
 23 home. At any stage before you left home, indeed at any
 24 stage that night, were you aware of those declarations
 25 and those METHANE messages?

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1 A. No, sir, I wasn't. I did ask the question and I don't
 2 know if it ever became apparent but I was certainly not
 3 informed of it until very, very late into the event.

4 Q. If you had been aware at an early stage, early in terms
 5 of your involvement, of the declaration by your partners
 6 of a major incident and of the METHANE messages, would
 7 it have made any difference to what you did?

8 A. Absolutely. A METHANE message is a key -- generally on
 9 the fire ground we give an informative message, and
 10 METHANE is an inflated informative message, it gives you
 11 everything: it gives you what's responding, where it's
 12 responding to, what's actually going on, what's
 13 required. It's a key piece of information, the METHANE
 14 message.

15 Q. If you don't feel you can answer this question, you must
 16 tell me, but you will appreciate I know, I know you
 17 appreciate, that one of the issues, an important issue
 18 the inquiry is investigating, is why the Fire and Rescue
 19 Service did not attend the arena during the most
 20 relevant period of the response. You understand that
 21 that's an important issue for the chairman, do you not?

22 A. I do, yes.

23 Q. Now you look back, if that METHANE message had been --
 24 if those declarations and those messages had been known
 25 about within GMFRS, do you believe it would have made

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1 any difference on that critical question?

2 A. For me, sir, yes, and I would hope that if North West
 3 Fire Control had been made aware of a METHANE message,
 4 it would have made a difference to them, I think, as
 5 well. But it definitely would have made a difference to
 6 the way I thought and make -- and the information flow
 7 that would have come out of that.

8 SIR JOHN SAUNDERS: I'm sorry, suppose you got the METHANE
 9 message, you're not a decision maker. Who do you pass
 10 it on to?

11 A. Well, I would have checked with Control first to make
 12 sure they got it. They probably would have been the
 13 ones who told me about it. I would have certainly
 14 contacted the APO, certainly contacted the chief.

15 SIR JOHN SAUNDERS: Are they decision makers?

16 A. Um... I think we're all decision makers, sir, but
 17 obviously the chief is the chief, he's the principal
 18 officer that night. It might not have been him, but yes
 19 he is a decision maker. I would have probably have rang
 20 Ben Levy, I would have got hold of one of the NILOs.
 21 I didn't like ringing Andy Berry because it was like an
 22 unwritten rule not to ring -- and I saw Andy Berry as
 23 the incident commander at this point because he was the
 24 decision maker.

25 MR GREANEY: Yes.

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1 A. It was an unwritten rule not to ring that person because
 2 they were already busy enough without people ringing up.
 3 I would ring the command support officer or somebody
 4 else. I would definitely have digested that information
 5 and disseminated it somewhere, I would have got hold of
 6 somebody and seen what actions would be taken in
 7 accordance with that and, depending what was in the
 8 METHANE message, I may have stepped up to the line again
 9 with Control with regards to resources because we would
 10 have known in that METHANE -- sorry, sir.
 11 SIR JOHN SAUNDERS: Sorry, I interrupted you and I apologise
 12 for doing that. It just seems slightly curious: the
 13 METHANE message, vital information, particularly for the
 14 decision maker. Principal decision maker at the moment
 15 is Andy Berry?
 16 A. I would say he was at this stage, yes.
 17 SIR JOHN SAUNDERS: You don't tell him?
 18 A. Not that I don't tell him. I would normally not go to
 19 the incident commander because they normally have got --
 20 we have a command structure that spreads that -- spans
 21 of control out. So for me to ring Andy, I probably
 22 would have done in this instance because he would have
 23 been mobile to the incident, so he wouldn't have -- he
 24 wouldn't have been on the incident ground and he
 25 wouldn't have had 10 people pecking his head and all the

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1 rest of it.
 2 SIR JOHN SAUNDERS: So you have to make sure he gets the
 3 information. So who do you make sure -- do you get
 4 Control --
 5 A. Everything should go through Control and I emphasised
 6 that with a few officers that night that everything must
 7 go through Control.
 8 SIR JOHN SAUNDERS: And it's perfectly apparent things
 9 actually didn't all go through Control, did they?
 10 A. Absolutely not.
 11 SIR JOHN SAUNDERS: And some officers just didn't do that?
 12 A. No.
 13 SIR JOHN SAUNDERS: It does seem odd, yes. Thank you.
 14 MR GREANEY: I don't want to put words in your mouth --
 15 SIR JOHN SAUNDERS: He's now going to do that!
 16 MR GREANEY: -- does it come to this, that your not just
 17 hope but expectation is that if you had been aware of
 18 those declarations and those METHANE messages, it would
 19 have resulted in an early deployment of Fire and Rescue
 20 Service resources to the scene?
 21 A. I think it would have done, yes, sir. That would have
 22 given us a clear -- and everybody knowing there was
 23 a clear rendezvous point because it would have been
 24 in that message.
 25 Q. So what I'm going to turn to deal with next is the

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1 journey made by Mr Nankivell to the CSR. It's going to
 2 take some time. What I propose, although I'm happy to
 3 go on until whatever time you would like, sir, is that
 4 I spend a minute or two setting the scene and that we
 5 then deal with the journey tomorrow morning.
 6 SIR JOHN SAUNDERS: Absolutely. Take your own course.
 7 MR GREANEY: In terms of setting the scene, before you
 8 embarked upon your journey and once you were on your
 9 journey to the CSR, you were involved in a large number
 10 of telephone calls, were you not?
 11 A. I was, yes.
 12 Q. Subsequently, you made an attempt to recall to whom you
 13 had spoken?
 14 A. Yes, sir.
 15 Q. The order in which you had spoken to them?
 16 A. Yes, sir.
 17 Q. And the content of the conversations that you had?
 18 A. Indeed.
 19 Q. But everyone will understand, I am certain, that in the
 20 stress of the situation that you were in, you have not
 21 in your witness statement got the order of every
 22 conversation correct. Does that surprise you?
 23 A. Not at all, sir, no. This is where I empathise with
 24 Andy Berry. I know that incident commanders and
 25 responders, when you're driving at relatively high speed

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1 to get to a point, you've got to get there safely and
 2 get there in one piece, so that's your primary role. So
 3 it's difficult to take on lots of other information and
 4 do other things, if you like.
 5 Q. And obviously you're not able to make notes in the sense
 6 of writing notes?
 7 A. No, sir.
 8 Q. And should we understand that you didn't, as some in
 9 some emergency services did, have a dictaphone into
 10 which you could record any discussions that you had?
 11 A. Not at all, sir.
 12 MR GREANEY: What we'll do tomorrow is rather than taking
 13 you through these conversations in the order in which
 14 they are dealt with in your witness statement, we're
 15 going to use a schedule that I have drawn to your
 16 attention. Nothing within it will take you by surprise.
 17 It is a schedule that has been put together by North
 18 West Fire Control. It combines a number of sources and
 19 sets out in chronological order all of the conversations
 20 that you and your colleagues were involved in both
 21 between yourselves and with North West Fire Control. So
 22 that is what you have to look forward to tomorrow.
 23 A. Excellent.
 24 SIR JOHN SAUNDERS: But do come, please, tomorrow morning.
 25 A. I was playing cricket, but it's cancelled so I'll be

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1 there now.
 2 MR GREANEY: Sir, that would be a convenient moment, unless
 3 you would like to press on.
 4 SIR JOHN SAUNDERS: Thank you very much. 9.30 tomorrow.
 5 (4.27 pm)

6 (The inquiry adjourned until 9.30 am
 7 on Wednesday, 7 July 2021)

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