

# OPUS2

Manchester Arena Inquiry

Day 132

July 13, 2021

Opus 2 - Official Court Reporters

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Tuesday, 13 July 2021

1 (9.30 am)

(Delay in proceedings)

2 (9.36 am)

MR PETER O'REILLY (continued)

Questions from MR GREANEY (continued)

MR GREANEY: Good morning, sir.

SIR JOHN SAUNDERS: Good morning.

MR GREANEY: Mr O'Reilly, as I indicated at the very end of yesterday, we're turning now to your own involvement on the night of 22 May.

Were you the duty principal officer that night?

A. I was.

Q. What did that mean?

A. Well, it meant that I was in command of all of the resources right across the county for the Fire and Rescue Service.

Q. And that night, were you at home?

A. I was.

Q. And had you turned into bed before 10.30?

A. Yes.

Q. Were you woken up by a call on your mobile at 11.08?

A. I was.

Q. And we know of course was that call was from Duty Group Manager Dean Nankivell and we'll follow these calls

1

through by reference to a document that I know you'll have seen, it's a schedule put together by North West Fire Control.

So Mr Lopez, the INQ reference is {INQ041473/36}.

There we see at 23.08:

"Group Manager Nankivell, call to CFO O'Reilly.

Duration: 1.3 minutes."

So about 1 minute and 20 seconds.

He, Mr Nankivell, as we know and you will know, had been called at 22.52 and had been given information including that NWSA Bronze was at the scene. When you spoke to him at 11.08, did he tell you that?

A. No.

Q. He had decided, following that call, to open the CSR.

Was that the right decision for him to have made?

A. Yes.

Q. He knew also, because he'd have been told in a subsequent call at 23.06, that the MTFA capability was deploying to Philips Park, along with Mr Berry and two other NILOs. Were you told that in the call at 11.08?

A. I may well have been, but I can't recall exactly.

Q. You had a number of calls with Mr Nankivell --

A. Three, I think.

Q. -- over a fairly short period of time and are you able to distinguish what you were told in each one of them?

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A. No. I think that most of the information in relation to MTFA came in a later call because I can recollect that he was able to give me quite a bit of information as well about Mick Lawlor going to police headquarters as well.

Q. But I think it would be fair to assume, would it not, that in that first call at 11.08 he will have told you that there had been an explosion at the arena and that he was setting up the CSR?

A. Absolutely, yes.

Q. Obviously, at some stage you made a decision to go to the CSR.

Did you make it following that call or at some later stage?

A. Yes, because the conversation that Dean had with me -- he asked me was I aware of an incident occurring at Manchester Arena and I said, no, I wasn't, I was in bed. And he said, "There's been an explosion", and I asked him was he setting up the CSR and he says yes that he and Paul Etches were on their way to do it and I think I said, "Okay, I'll see you there".

Q. In fact, at 23.15, did you receive a text message from North West Fire Control mobilising you to the CSR?

A. Yes.

Q. What was your reaction to that text message?

3

A. It was probably confirmation that Dean had spoken to North West Fire Control and they had then put that on the pager message for me to proceed and I think it was just a formality.

Q. You used the word I was about to use. In fact all this did was formalise a decision that you had in any event made?

A. Yes.

Q. By that stage at 23.15, did you know that something significant had occurred at the arena?

A. I knew that an event had occurred and it was likely that it was some sort of explosion, yes.

Q. Did you also know that there were multiple casualties?

A. No.

Q. In any event, you knew it was something of significance?

A. Yes.

Q. Did you realise at that stage that there would also be a police response to that incident?

A. I imagined that there would have been a police response to that incident depending on the type of incident that it was.

Q. But there was a likelihood?

A. Absolutely, yes.

Q. So did you realise at that stage that it was likely that GMP Gold would be at force headquarters?

4

1 A. No.  
 2 Q. Did you realise at that stage that it was likely that  
 3 there would be at some stage an SCG?  
 4 A. No.  
 5 Q. So with those two answers of no, you may have answered  
 6 the next question, which was: was it not better for you  
 7 to have gone at that stage to GMP Headquarters?  
 8 A. Based on the information that I had at that time, I was  
 9 quite confident that going to my own headquarters to  
 10 speak to the CSR to see what the incident actually was  
 11 was the best course of action.  
 12 Q. The whole ethos of JESIP is working together, is it not,  
 13 with other emergency services? And would it be fair to  
 14 say that a consequence of you going to the CSR was that  
 15 until you went to GMP Headquarters at shortly after  
 16 2 am, GMFRS was effectively operating in a silo?  
 17 A. Well, Mick Lawlor was there before that, and I think  
 18 really, to be honest, you have to contextualise  
 19 experience, previous experience, as well as the  
 20 information available on the night. I think if JESIP  
 21 had have been working effectively, then the agency that  
 22 had primacy would have told the other agencies that  
 23 a tactical coordinating group was being set up and where  
 24 it was being set up. That would have been part of that  
 25 message at the start of the process.

5

1 I don't think we received that message until  
 2 13 minutes before 12 o'clock at night. I think it was  
 3 luck more than anything else that John Fletcher and  
 4 Mick Lawlor were both available and they made decisions  
 5 to send Mick Lawlor to headquarters, otherwise that  
 6 decision probably wouldn't have been made until the CSR  
 7 team were in place.  
 8 I had asked early on my arrival at the CSR about had  
 9 an SCG been called and was told no, and my previous  
 10 experiences have been that in incidents, depending on  
 11 the type of incident that it is, which I didn't know at  
 12 that time, an SCG might not be called at all.  
 13 Q. So can I summarise that in this way and tell me if this  
 14 is not fair: as a fact, your decision to deploy to the  
 15 CSR did mean that for a period of time, GMFRS was  
 16 operating in a silo, but you consider that there is an  
 17 explanation for that?  
 18 A. I think that in relation to -- we were definitely  
 19 operating in a silo, definitely. I think in relation to  
 20 police headquarters, I think Mick Lawlor got there about  
 21 12 o'clock, so until that period I think definitely  
 22 we were operating in a silo, yes.  
 23 Q. Without seeking to attribute fault to one organisation  
 24 or another, that is contrary to the ethos of JESIP, do  
 25 you agree?

6

1 A. Absolutely, yes.  
 2 Q. At 23.23, you received a further call from Group Manager  
 3 Nankivell. That's the same INQ reference,  
 4 {INQ041473/46}: 23.23, duration 0.68 of a minute.  
 5 Should I take it from your earlier answer that at no  
 6 stage in these calls did Mr Nankivell tell you that  
 7 he had been told that NNAS Bronze was at the scene?  
 8 A. No.  
 9 Q. Did you know at this stage that the deployment that was  
 10 occurring was to Philips Park?  
 11 A. I don't believe so, no.  
 12 Q. What did you believe was happening so far as a Fire and  
 13 Rescue Service response was concerned at this stage?  
 14 A. I think the information that I'd received specifically  
 15 in that call was Dean had made a call to me to say that  
 16 he was restricting movements in the city centre to  
 17 life-risk incidents only.  
 18 Q. Did you agree with that?  
 19 A. Absolutely I did, yes, and it's something that we would  
 20 do as a matter of course when we've got an incident  
 21 ongoing that we're not fully understanding, and  
 22 potential risk to crews, that restricting movements to  
 23 life-risk incidents only is something, as I say, that's  
 24 pretty standard during civil disorder or other types of  
 25 incidents such as this.

7

1 Q. Were you still at home at the stage at which you took  
 2 that call from Mr Nankivell?  
 3 A. I believe so, yes.  
 4 Q. So why was it that you hadn't departed either  
 5 immediately following the 23.08 call or following the  
 6 23.15 text message?  
 7 A. Well, there's a number of assumptions that I made.  
 8 First of all, that if it was going to be a major  
 9 incident, an incident which required attendance at other  
 10 locations, I wanted to make sure I was professional  
 11 looking, so I had my uniform, I got my uniform out,  
 12 I had a shave, I got ready, and when I was ready  
 13 I started off to Fire Service Headquarters.  
 14 Q. I just want to ask you a number of other questions about  
 15 that period before you departed home. Did you have the  
 16 ability to access the North West Fire Control log at  
 17 home?  
 18 A. If I'd thought to do so, yes, I did.  
 19 Q. Did you avail yourself of that?  
 20 A. No.  
 21 Q. Did you before leaving home take any other steps to gain  
 22 your own situational awareness?  
 23 A. No, apart from the brief -- the two calls I had with  
 24 Dean, that was as far as it went then.  
 25 Q. Do you think you should have taken steps to gain

8

1 situational awareness?  
 2 A. I think my experience was that I would be given as much  
 3 information as possible by the officers who were  
 4 responding, the duty group manager in that or the APO.  
 5 I think in previous circumstances it probably would have  
 6 been the APO that would have rang me just to give me  
 7 a brief about exactly what was happening, what resources  
 8 were deployed, and where and why.  
 9 Q. In other words you expected that your subordinates would  
 10 tell you what you needed to know?  
 11 A. Yes.  
 12 Q. Just to follow the chronology, at 23.30 the CSR was  
 13 opened by the assistant principal officer, Mr Etches,  
 14 and by then you had not arrived at headquarters, had  
 15 you?  
 16 A. No.  
 17 Q. But I think probably you were on your way there at that  
 18 stage?  
 19 A. I probably — I know I sent a couple of text messages  
 20 before I left but that was before I started driving and  
 21 then I made my way to headquarters, yes.  
 22 Q. At 23.36, Dean Nankivell called you and then you called  
 23 him back. Then the two of you spoke at 23.37. So this  
 24 is page {INQ041473/53}, Mr Lopez.  
 25 This is the culmination of the two of you trying to

9

1 get hold of each other: 23.37, CFO O'Reilly call to  
 2 Mr Nankivell, duration 3.4 minutes. Again at this stage  
 3 I think you are either just about to depart home or  
 4 you're on your way to headquarters?  
 5 A. Yes, I was on my way at that time.  
 6 Q. This is a more substantial call than the earlier calls.  
 7 Do you recall what was discussed in it?  
 8 A. Yes. I think in that call, Dean was able to tell me  
 9 about the MTFA teams being mobilised to Philips Park and  
 10 that there was — Andy Berry was the duty NILO and that  
 11 I think he told me that Mick Lawlor was on his way to  
 12 Fire Service Headquarters or police headquarters, which  
 13 I thought was a good call. And I think he also told me  
 14 at that stage at the very end of that call that  
 15 John Fletcher had asked for Merseyside's MTFA team to be  
 16 stood up as well, which I also said was a good call.  
 17 Q. So at the very latest in that call at 23.37, you knew  
 18 that a significant deployment was taking place to  
 19 Philips Park?  
 20 A. Mm—hm.  
 21 Q. And Philips Park, as everyone in this room knows well  
 22 now, is not the nearest fire station to the scene, still  
 23 less is it the scene itself.  
 24 A. Yes.  
 25 Q. Did you query the deployment to Philips Park?

10

1 A. No, I didn't.  
 2 Q. And can you say why not?  
 3 A. Yes, I can, and this is a feeling of mine in that I made  
 4 an assumption that the MTFA resources were being  
 5 mustered as a precaution in case they were eventually  
 6 needed rather than they were actually needed.  
 7 Q. Can I just make sure I have understood. Did you assume  
 8 that some resources had deployed to the scene and that,  
 9 my phrase, I know you don't like it, that specialist  
 10 resources were being held back in case they were needed?  
 11 A. That's a naive assumption, but that's my assumption,  
 12 yes.  
 13 SIR JOHN SAUNDERS: Mr O'Reilly, we will call them  
 14 specialist resources if you don't mind, we understand  
 15 your reservations, but that's what we've been calling  
 16 them —  
 17 A. That's fine.  
 18 SIR JOHN SAUNDERS: — so it's easier by us. Thank you.  
 19 MR GREANEY: The North West Fire Control log records you as  
 20 present in the CSR at 23.49.36. That's {INQ041473/62},  
 21 Mr Lopez, the second entry on that page.  
 22 Do you agree that that likely represents the time or  
 23 about the time at which you arrived?  
 24 A. Yes.  
 25 Q. So 23.50. What confronted you within the CSR when you

11

1 arrived?  
 2 A. What I can remember on the night was that none of the  
 3 technology that we normally see in the command support  
 4 room was up and running at the time, including the  
 5 televisions. I think the first person I seen was  
 6 Paul Etches, who was sitting behind the desk in the  
 7 middle, and I think he was on his computer. John was  
 8 walking in with me at the same time, John Fletcher, and  
 9 I think Dean was on the far right—hand side near to  
 10 where the whiteboard would have been. But I think  
 11 he was on the — he was just finishing a telephone call  
 12 at the time. It was clear there was a lot of confusion  
 13 as to what had actually happened. We knew there was an  
 14 event that had taken place at the Manchester Arena. I'd  
 15 heard on the way in on Radio 5 Live — the extent of my  
 16 situational awareness at that time was that it was an  
 17 explosion at the arena.  
 18 Q. Yes.  
 19 A. But it was being assumed at that stage that it was  
 20 a ventilator that had exploded or some type of equipment  
 21 had exploded. That was 5 Live, that's the last thing  
 22 I heard on 5 Live as I entered. But even then, with  
 23 that situational awareness, I would have assumed we were  
 24 there, and it wasn't until I got into the command  
 25 support room that I was made aware — and I think it was

12

1 Dean who had just been told by North West Fire Control  
 2 in a conversation — that we didn't have anybody there.  
 3 I think it was Dean that told me that.  
 4 I think John was telling me that they were trying to  
 5 get a hold of the force duty officer without any  
 6 success, that Andy Berry had been trying and that he had  
 7 been trying. He told me that he was trying to use  
 8 a communications channel, which was familiar to him, to  
 9 open up emergency communications between police and  
 10 NWSA.  
 11 Q. Who said that to you?  
 12 A. John Fletcher. There's a communications channel which  
 13 I think the inquiry has heard about that he was trying  
 14 to access. Eventually, we got the televisions on and it  
 15 was very quickly after that that we seen ambulances. It  
 16 was a surreal moment because it was almost you were  
 17 questioning yourself: are these stock images or are they  
 18 live? But it said very clearly it was live and there  
 19 was a ticker tape running across the screen talking  
 20 about fatalities at the scene and people having died.  
 21 Q. Let's just pause there to make sure we can understand.  
 22 As you entered the CSR, your working assumption was that  
 23 resources had been deployed to the arena in response of  
 24 a non-specialist nature and the specialist resources  
 25 were being held back in case they were needed. That was

13

1 your working assumption?  
 2 A. My working assumption was that we would have ordinarily  
 3 had resources at the scene and I had nothing to dispel  
 4 that at that time. I believed that what we were doing  
 5 is what we would normally do — and I think we covered  
 6 this yesterday — was being proactive and making sure we  
 7 had resources in place should they actually be needed if  
 8 it was a worst-case scenario.  
 9 Q. But that's what you thought was happening.  
 10 A. Yes.  
 11 Q. But within a very short time of getting in there, you  
 12 discovered two things: (1), that you had no resources at  
 13 the scene, which was, am I right, a moment of both  
 14 surprise and shock for you?  
 15 A. Yes.  
 16 Q. And the second thing you discovered via the news on the  
 17 television was that whilst you weren't there, NWSA were  
 18 there?  
 19 A. Correct.  
 20 Q. And that meant that it was appropriate for you to be  
 21 there, didn't it?  
 22 A. Absolutely, yes.  
 23 Q. That really is where we reached at the end of yesterday,  
 24 that with a minute of arriving in the CSR you knew as  
 25 much as you needed to know to deploy resources to the

14

1 scene?  
 2 A. I did, I agree.  
 3 SIR JOHN SAUNDERS: Just before you come to that, we've  
 4 discussed with others, and you'll have seen it, the idea  
 5 that you wait for senior officers to arrive at the CSR  
 6 before the various things are set up. It seems not very  
 7 sensible.  
 8 A. I think it's ludicrous, yes.  
 9 SIR JOHN SAUNDERS: So why was that the situation? Why  
 10 hadn't something been done about it beforehand? I think  
 11 it's maybe only a quarter of an hour that we are talking  
 12 about that was wasted but a quarter of an hour is  
 13 a quarter of an hour.  
 14 A. Can I explain it in this way? Probably naive silo  
 15 working. We had — I'm sorry if I am labouring this  
 16 point, but whenever we had the control room, and I think  
 17 one of the colleagues has described it to you, it  
 18 literally was you walk through the door from the command  
 19 support room into the control room and from the control  
 20 room back into the command support room.  
 21 If we had an incident like this, as we did have many  
 22 incidents prior to losing the control room, the control  
 23 room would have had it set up at night-time. So during  
 24 the day you have officers in and around the building, so  
 25 it speaks for itself, common sense, officers would help

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1 with that. But at night-time, the controllers were  
 2 there, they were there 24/7, they knew the command  
 3 support room would get set up, obviously they will be  
 4 speaking to officers who would be saying to them, "We  
 5 want the command support room set up", so that the  
 6 officers would walk in and more or less all of the  
 7 equipment required would be up and running.  
 8 SIR JOHN SAUNDERS: Okay.  
 9 A. Whenever North West Fire Control opened and the control  
 10 room disappeared from that, there wasn't a provision put  
 11 in place that should have allowed for that, sir.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR GREANEY: So in the pre-North West Fire Control days, the  
 14 CSR would have been set up more quickly than in fact  
 15 occurred is the actual —  
 16 A. More or less, yes.  
 17 Q. So where we were was shortly after 23.50. You —  
 18 I don't mean you as an organisation, I mean you as an  
 19 individual — knew as much as you needed to know to  
 20 deploy resources to the scene and do you agree that if  
 21 a decision had been made to deploy resources to the  
 22 scene they would have been there at probably just before  
 23 midnight?  
 24 A. I would imagine — the resources were on their way at  
 25 that stage from Philips Park to Thompson Street and all

16

1 I had to do was divert them to the arena and they would  
 2 have found the rendezvous point at the arena within  
 3 minutes.  
 4 Q. And as surely you'll know there were certainly still  
 5 people there to help at that stage?  
 6 A. Absolutely yes.  
 7 Q. And I don't think you have any doubt that firefighters,  
 8 if they had been there at a relevant time or the most  
 9 relevant time would have provided substantial  
 10 assistance?  
 11 A. Absolutely, yes.  
 12 Q. In the result it was a full hour after you arrived in  
 13 the CSR that firefighters entered the station and, as  
 14 I said yesterday, in spite of command not because of it.  
 15 From your response yesterday, if I may say so, it's  
 16 obviously a matter of deep regret to you that you did  
 17 not make a decision to deploy at that stage.  
 18 A. That's something that will live with me for the rest of  
 19 my life and it has done since that night, that I had an  
 20 opportunity. I wasn't aware of anything that was  
 21 occurring in the City Room or outside of the City Room  
 22 or what the extent was then, but I knew that I had let  
 23 everybody down, especially those that needed our help  
 24 the most. And I had let them down because I hadn't  
 25 acted on instinct and diverted those resources to the

17

1 scene.  
 2 I know if those resources had been diverted to the  
 3 scene, there's nothing would have stopped those  
 4 firefighters from doing what they could to save those  
 5 people or to help those people, comfort them and treat  
 6 them with the empathy I know only firefighters can give.  
 7 Q. It wouldn't, would it, have been a matter of acting on  
 8 instinct at that stage, it would have been a matter of  
 9 acting on information, the information that ambulances  
 10 were there?  
 11 A. I think both. I think seeing the -- having the  
 12 information and instinctively sending the crews the  
 13 other way instead of the process that I was going  
 14 through at that stage was, in my own mind, and the two  
 15 options that I had when I'd seen that -- and these are  
 16 options, again, that I've battled with myself all of the  
 17 last 4 years: if we weren't going to get more  
 18 information, I was going to the scene and I was going to  
 19 take Dean Nankivell with me. If I didn't get Derek  
 20 Cartwright, that would have been the next course of  
 21 action.  
 22 Q. You'll appreciate that I need to ask you, bearing in  
 23 mind that you acknowledge there was an opportunity here  
 24 to deploy, why you didn't take that opportunity.  
 25 A. That was a failing of mine.

18

1 Q. Let's pick up the chronology --  
 2 SIR JOHN SAUNDERS: Before you do that, which resources  
 3 would you have sent there? Would you have sent  
 4 specialist resources or --  
 5 A. All of the resources that were coming from Philips Park  
 6 to Thompson Street, I just would have diverted them to  
 7 the scene.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR GREANEY: Thank you, sir.  
 10 At 23.52, you sent a text message to Mr Harris  
 11 instructing him to come to the CSR.  
 12 A. That was I think in reply to Geoff asking did I need  
 13 anything from him.  
 14 Q. It was. Why was it that you told him to come to the  
 15 CSR?  
 16 A. Twofold. One is that one of my options was that I was  
 17 going to the incident. It's not the first time I've  
 18 done that. And I wanted somebody of PO level to be  
 19 available not only to help with the CSR but also now  
 20 knowing that it was absolutely going to be an SCG call  
 21 at some stage, I wanted to make sure there was  
 22 resilience there to enable another PO to go there.  
 23 There's another issue. That is whenever  
 24 Stephen Hunt lost his life -- Geoff is very well-versed  
 25 in all of the protocols that flow from an incident such

19

1 as that, so if we have multiple fatalities, if we have  
 2 firefighter serious injuries or worse, then Geoff's very  
 3 familiar with the national protocols that are in place  
 4 to be able to enact those and has done in the past. So  
 5 there's a wealth of experience there, which was  
 6 available and available locally, and I thought it best  
 7 to make use of that.  
 8 Q. We know that the APO Mr Etches was in the room. Indeed  
 9 he was there before you. Why was he not adequate to  
 10 perform those functions?  
 11 A. I think in relation to running the command support room,  
 12 Paul was more than adequate to run those functions and  
 13 especially as John Fletcher was there with him, there  
 14 was two very, very capable and professional officers  
 15 that should have been able to run that room on their own  
 16 once we'd had every piece of information that we felt we  
 17 needed and we had communications with others to find out  
 18 what was actually being called and when.  
 19 Q. Dean Nankivell expressed a stark view about Mr Harris,  
 20 namely that in the end, he got in the way. The way he  
 21 put it to Kerslake was that he "interfered with play".  
 22 Do you agree with that assessment?  
 23 A. I don't agree with that assessment. I think that Geoff  
 24 by nature tries to be as helpful as possible.  
 25 I understand completely Dean -- if I had the same

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1 incident to go to again, the first person I would call  
2 to be by my side would be Dean Nankivell. He's probably  
3 one of the most professional, practical firefighters  
4 I have ever worked with. And I understand that he has  
5 very strong views, as do I, and Geoff is always — he's  
6 the opposite side of that. He would be very quiet,  
7 reflective and helpful. So I can't imagine Geoff  
8 getting in the way.

9 Q. I'm going to turn next to a series of calls that you had  
10 with Ben Levy and some discussions that took place  
11 within the CSR. I'm sure you know the topic to which  
12 I'm turning. Before I do so, I need to ask you about  
13 your management style. How would you describe your  
14 management style in May of 2017?

15 A. I think that Neil Helmrich described it best: very  
16 democratic at one end, inclusive — I'd hoped that I had  
17 changed the internal culture of the Fire and Rescue  
18 Service in the short time that I've been in Manchester  
19 to one of acceptance that respect is earned rather than  
20 just awarded by pips on the shoulder. That there was an  
21 equality between uniformed and support staff and there  
22 was a respect developing between all. However, I know  
23 from experience, all of my operational experience, that  
24 on an incident ground I will take information and I will  
25 take advice and I will take support, but eventually

21

1 a decision has to be made and when it comes to that  
2 decision, that decision is enacted.

3 So I agree with Neil's interpretation in that I can  
4 be extremely democratic 99% of the time but there are  
5 times when I can be at the opposite end of that spectrum  
6 and be autocratic when a decision is needed.

7 Q. Could you understand if some found you intimidating?

8 A. I think the use of the word intimidating can be  
9 misleading at times. I understand — I don't think  
10 there's anybody in Greater Manchester Fire and Rescue  
11 Service has been 360-ed more than I have. If you know  
12 what a 360 is —

13 Q. I don't.

14 SIR JOHN SAUNDERS: We'll have to make sure you have one  
15 after this inquiry. Tell him what a 360 is.

16 A. It's an assessment of your management style.

17 MR GREANEY: I'm not keen on that!

18 A. I didn't think so! Whereby your parent line manager and  
19 potentially your grandparent line manager, your peers on  
20 an equivalent level and your subordinates at a number of  
21 levels will give an assessment anonymously of a number  
22 of areas of your management style, and also people from  
23 outside of the organisation. I openly shared all of  
24 those with all of my peers, subordinates, grandparents  
25 to let them see what they say.

22

1 I know that self-reflection/self-awareness has  
2 always been a strength of mine and I always invite  
3 people to tell me when I'm doing things that are outside  
4 of what they would expect to be the norms.

5 I had open — when I first arrived in  
6 Greater Manchester Fire and Rescue Service, the culture  
7 was one of severe elitism in that an assistant chief  
8 fire officer had a PA who was a gatekeeper and you  
9 couldn't get into to have a conversation with an  
10 assistant chief fire officer unless the PA had a booking  
11 in the diary made at least a week in advance.

12 I took that out of the equation right away and  
13 I told everybody that if I'm in the office and the door  
14 is open, and I'm not on a telephone call, then anybody  
15 from any part of the organisation can come in and have  
16 a conversation. That was borne out and evidenced by  
17 a regular stream of people coming into my office to have  
18 conversations including, thankfully, Dean, Mick Lawlor,  
19 people like that, who came from the opposite side of the  
20 organisation. I use that term purposely. There was  
21 a culture of ops and fire safety. There was many of  
22 a fire officer went through their whole career with the  
23 badge of honour of saying, "I've never served in fire  
24 safety". So there was that competitive edge between  
25 both. I know that whenever we were leading on projects,

23

1 projects that I knew were for the benefit of the people  
2 of Greater Manchester, such as the community risk  
3 intervention teams and the first responder initiative,  
4 I would be very driven about trying to get them up and  
5 running because I knew the benefits that would flow out  
6 of them.

7 One of the criticisms of those 360s is that: Peter  
8 always works in fifth gear and doesn't realise that  
9 other people only have three. I also like to be very  
10 much on top of my subject matter. I'm a very strong  
11 communicator. I'm 6 foot 2, bald, and I've got a broad  
12 Belfast accent, and I know that all of that can have an  
13 impact on people who are listening. That can be  
14 overawing at times, especially if somebody has a lot of  
15 knowledge and seems to be articulating that very, very  
16 well, and I've had it fed back to me that in that  
17 respect, I can be intimidating.

18 Q. Thank you very much for that very full and clear answer.  
19 We'll bear that in mind as we look at those calls and  
20 conversations.

21 By 23.41, three NILOs were at Philips Park. And at  
22 23.53, Mr Levy telephoned you and there was contact  
23 lasting for 1.53 minutes.

24 Mr Lopez, {INQ041473/64}, please.

25 SIR JOHN SAUNDERS: How well would you know Mr Levy?

24

1 A. If I could have another chance to go at this incident,  
 2 the first person I would have beside me would be  
 3 Dean Nankivell. The second would be Mick Lawlor. And  
 4 alongside him would be Ben Levy. The difference  
 5 there is quite stark actually. Mick is probably one of  
 6 the most humble fire officers you'll ever meet, but from  
 7 the NILO cadre he is the best example of how that cadre  
 8 should work. He's absolutely professional, he goes  
 9 about his business in a way that is respectful to  
 10 everybody that he works with.  
 11 Dean is the traditional -- on my 10 years on a fire  
 12 engine, he's the type of guy that everybody looked up to  
 13 and wanted to be.  
 14 Ben was probably one of the most professional, to  
 15 use a Northern Irish word, pernickety, pedantic, but  
 16 precise officer that you could have beside you and if  
 17 you were to pick a team of three to support you to deal  
 18 with an incident like that, Ben would be the top of the  
 19 queue.  
 20 SIR JOHN SAUNDERS: So the answer is you knew him quite  
 21 well?  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Thank you.  
 24 MR GREANEY: In fact, we'll start at 23.52 which is a call  
 25 by North West Fire Control to Mr Levy. This was during

25

1 the period that they're trying to get an FCP. He is  
 2 told by Rochelle Fallon that the Ambulance Service don't  
 3 know the FCP either, but:  
 4 "They [have] just advised that a lot of their  
 5 appliances are rendezvousing at Thompson Street  
 6 Fire Station."  
 7 And Mr Levy then confirms that that is the position.  
 8 And shortly after that, immediately after that, he calls  
 9 you. But before we get to that call, should the  
 10 NILOs -- this goes back to a question that you were  
 11 going to reflect on overnight -- have gained situational  
 12 awareness before that? Assuming that is situational  
 13 awareness.  
 14 A. Yes, I think there was situational awareness amongst the  
 15 NILO group. I am absolutely convinced that if Ben Levy  
 16 had been told that there was a rendezvous point at the  
 17 cathedral, if he'd been told there was a rendezvous  
 18 point at Fishdock car park, if he'd been told there was  
 19 a rendezvous point at Boddington's car park, if he'd  
 20 been told that there's a paramedic Bronze on scene, if  
 21 he'd been told there's police on scene, he would have  
 22 taken his resources without going anywhere else, taken  
 23 all of his resources straight to the arena.  
 24 I have no doubt that Carlos Meakin would have done  
 25 the same if he'd had that information. I think it was

26

1 John Fletcher that mentioned it first, it might have  
 2 been Mr Cooper, actually, but I think the three guys  
 3 were zoned into a marauding terrorist firearms attack.  
 4 I think that that was the only picture that they had in  
 5 their minds at the time --  
 6 Q. I'm going to ask you to pause for a moment because  
 7 I have no doubt that when you talk about what you expect  
 8 the reaction of Mr Levy would have been, what you expect  
 9 the direction of Mr Meakin would have been, that you are  
 10 correct and indeed the truth of that is in what Mr Levy  
 11 did seek to do once he did gain some situational  
 12 awareness. But the point is surely all the things that  
 13 you listed they didn't know?  
 14 A. They didn't and they should have.  
 15 Q. And they should have. So isn't that the answer to my  
 16 question, that the NILOs should have gained situational  
 17 awareness before they did?  
 18 A. Yes.  
 19 Q. We were at that call at 23.53, Mr Levy to you,  
 20 1.53 minutes. Mr Levy's recollection of that call, it's  
 21 Day 122 of our proceedings, page 16 {Day122/16:1} and  
 22 following of the transcript, his recollection is that  
 23 in that call he was making clear to you that he had  
 24 decided to deploy assets to Thompson Street and from  
 25 there to the scene, and he explained that you approved

27

1 of that but told him that he should wait at  
 2 Thompson Street.  
 3 Could I ask you, do you agree, first, in that call  
 4 that Mr Levy was making clear that he was in command?  
 5 A. No. He made a phone call to me to tell me that he was  
 6 aware that ambulances were locating at Thompson Street  
 7 and he said that he was going to take the crews from  
 8 Philips Park over to Thompson Street and I said,  
 9 "Absolutely, go for it". That was my recollection of  
 10 that conversation in its entirety.  
 11 Q. Did you understand at the end of that conversation that  
 12 he had assumed the role of incident commander?  
 13 A. No.  
 14 Q. Who did you think was the incident commander?  
 15 A. We didn't have an incident commander at that stage.  
 16 Q. Secondly, do you agree that you told him to wait at  
 17 Thompson Street?  
 18 A. That's not my recollection of the call, no.  
 19 Q. Can you understand how he could have got that  
 20 understanding from anything that you said?  
 21 A. No.  
 22 Q. You will recall --  
 23 SIR JOHN SAUNDERS: Sorry, if you don't mind. What did you  
 24 think he should do: go to Thompson Street and then what?  
 25 A. He had a situational awareness, more than I had, that

28

1 the Ambulance Service were attending Thompson Street,  
 2 which wasn't a surprise to me. He said, more or less:  
 3 we are taking the resources across, can we take the  
 4 resources across and I said, "Absolutely". That was the  
 5 rendezvous with ambulance there. My hope was when he  
 6 got there, not only would the ambulance be there but the  
 7 police would be there, and I know there were others  
 8 there as well, and the police would have a rendezvous  
 9 point manager at the scene.  
 10 SIR JOHN SAUNDERS: Did you say all of that to him?  
 11 A. I think whenever he rang me to say that he was now  
 12 there, I asked him, "Are police there?", and he said no.  
 13 SIR JOHN SAUNDERS: We're coming to that call, no doubt. On  
 14 this particular call?  
 15 A. Not on that particular call, no.  
 16 SIR JOHN SAUNDERS: He was just saying, so far as you're  
 17 concerned, "I'm going to Thompson Street", you said,  
 18 "Fine"?  
 19 A. Absolutely, yes.  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 MR GREANEY: Just to fix this in the chronology, that call  
 22 we were just looking at at 23.52, whilst you were on the  
 23 phone to Mr Levy at that point, Mr Berry was speaking to  
 24 the FDO line, you'll remember we listened to that call  
 25 yesterday, and he was receiving but not acting upon the

29

1 Old Boddington's FCP and at the same time he was picking  
 2 up information from your conversation --  
 3 A. Mm--hm.  
 4 Q. -- with Mr Levy. Resources did then deploy to  
 5 Thompson Street with Mr Mottram's appliance arriving  
 6 first at 00.02.  
 7 Then {INQ041473/65}. Next, at 00.03, you telephoned  
 8 Derek Cartwright and spoke to him for nearly 3 minutes.  
 9 First of all, what had you been doing between 23.55,  
 10 when your call with Mr Levy ended, and 00.03, when you  
 11 spoke to Derek Cartwright?  
 12 A. I think I had been back into the command room again and  
 13 there was still ongoing discussions in the command room  
 14 about trying to contact the force duty officer.  
 15 I think -- it was fast time, I can't remember what other  
 16 conversations were involved, but I know I was very keen  
 17 to get in contact with Derek.  
 18 Q. The reason I put that on the screen is because we see in  
 19 the bottom entry the arrival of Mr Mottram's appliance  
 20 at the scene.  
 21 SIR JOHN SAUNDERS: Just remind us, Mr Cartwright's  
 22 position?  
 23 A. He was the chief executive of North West Ambulance  
 24 Service.  
 25 MR GREANEY: I was coming precisely to that.

30

1 A. He was the same level as myself.  
 2 Q. What was said in that 3--minute conversation?  
 3 A. Derek made me aware that he was just arriving at his own  
 4 equivalent command support room. I think in Parkway in  
 5 Manchester. And he had an understanding that it was  
 6 very, very difficult down in Manchester and he was aware  
 7 that Steve Hynes, who I also knew, who was the director  
 8 of operations for North West Ambulance Service, was at  
 9 the scene.  
 10 I didn't realise that the conversation lasted for  
 11 3 minutes and 40 seconds, I thought it was a lot shorter  
 12 than that, but if that's what the record says... It was  
 13 more of a where I was as well, I told him that I was in  
 14 our command support room, that we were struggling for  
 15 information, and it would be my intention that once  
 16 called, I would be making my way to force headquarters,  
 17 if that's where an SCG was to be called.  
 18 I think he told me that they had one of their NWS  
 19 Golds on the way to police headquarters, but that he may  
 20 decide to attend himself and might see me later on. So  
 21 that was that kind of conversation, but he did say,  
 22 "Ring Steve, he's at the scene".  
 23 Q. So am I right, the most important takeaway from that  
 24 conversation was that Steve Hynes was actually at the  
 25 scene?

31

1 A. That's correct, sir.  
 2 Q. That he would therefore have situational awareness, much  
 3 greater than that which you had?  
 4 A. Yes, sir.  
 5 Q. And moreover, he was someone that you knew because of  
 6 your cooperation over the project?  
 7 A. Yes, sir.  
 8 Q. Someone that you trusted?  
 9 A. Absolutely, yes.  
 10 Q. And I know this is an important point in terms of  
 11 decisions that you made, someone who was aware of the  
 12 capabilities of the Fire and Rescue Service?  
 13 A. I don't think there would have been a senior  
 14 Ambulance Service officer anywhere in the United Kingdom  
 15 that knew more about the capabilities medical-wise and  
 16 response-wise with regards to MTFA than Steve Hynes.  
 17 Q. With the knowledge that --  
 18 SIR JOHN SAUNDERS: Just one thing about that: in your  
 19 statement, you describe Mr Cartwright as saying  
 20 something to the effect of "it was a mess down there".  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: Does that mean or did you understand  
 23 that as meaning the rescue attempt was a mess or the  
 24 results of the bomb was a mess?  
 25 A. I think it was his depiction of what he believed the

32

1 aftermath of the bomb had created.  
 2 SIR JOHN SAUNDERS: Okay. The effect of the bomb?  
 3 Thank you.  
 4 MR GREANEY: The devastation?  
 5 A. Yes.  
 6 Q. Then with the knowledge that Mr Hynes was at the scene,  
 7 did you decide to call him?  
 8 A. I did, yes.  
 9 Q. We know from the records that you called him at 00.12.  
 10 And the contact lasted for 2.13 minutes. I'm at  
 11 paragraphs 69 and 70 of the witness statement, sir.  
 12 What was said in that conversation?  
 13 A. When I rang Steve, he answered, which was a surprise  
 14 that he answered so quickly. He recognised who it was  
 15 right away because obviously my name is on his phone.  
 16 He said he couldn't talk for very long. He said we  
 17 needed to get down there. I asked him to explain what  
 18 he meant by we needed to get down there, and he said,  
 19 "You need to get a resource down there now", and I asked  
 20 him what did he need and he told me. And I said to  
 21 him -- I was, again, as surprised as anybody else when  
 22 Steve told me that he just needed 12 firefighters. And  
 23 I asked him what for and he says we just need  
 24 12 firefighters to help with casualty recovery from the  
 25 scene.

33

1 I asked him, did they need to have any ballistic  
 2 protection, and he said, absolutely not, they don't.  
 3 And I asked him, did they need to be MTFA, and he says,  
 4 "Absolutely not, I just need 12 firefighters". He  
 5 said -- and as the call was finishing, he says, "And an  
 6 officer", and I said, "Okay, Steve, leave it with me,  
 7 I'll get them there as soon as I can".  
 8 Q. {INQ041473/71} on the screen, please.  
 9 Very shortly after that call ended, at 00.16,  
 10 you were called by Ben Levy and there was a contact  
 11 lasting for just under 1 minute.  
 12 A. Mm-hm.  
 13 Q. Is he correct in his recollection, Mr Levy, that in that  
 14 call you instructed him in accordance with the wishes of  
 15 Steve Hynes, as you've just explained them to be?  
 16 A. I think in the conversation I was telling Ben that I'd  
 17 just been speaking to Steve Hynes. I think Ben knew  
 18 Steve Hynes. I think. I told him that what Steve had  
 19 told me briefly on the telephone call and that he was  
 20 requesting 12 firefighters to go to the scene to assist.  
 21 I think that was the extent of the conversation.  
 22 I think Ben had said, do they not need the MTFA, and  
 23 I said, no, I asked Steve and confirmed with Steve that  
 24 they didn't need to be MTFA.  
 25 Q. Is the effect of what you were doing telling him: this

34

1 is what NWS have requested, this is what you are to do?  
 2 A. I wasn't telling him. For me, I was letting Ben know  
 3 that I'd had that conversation. It was a courtesy to  
 4 ring him and say: Ben, listen, this is what's been  
 5 requested and this is what the command room are asking  
 6 North West Fire Control to send to the scene. That was  
 7 a courtesy call to Ben because I've worked with Ben  
 8 very, very closely.  
 9 SIR JOHN SAUNDERS: You say it is a courtesy call but  
 10 actually it is the instruction to get people down there.  
 11 A. The instruction I think had already been given to the  
 12 command support room. Once I come off the telephone  
 13 call with Steve Hynes, I went down to the command  
 14 support room --  
 15 SIR JOHN SAUNDERS: Okay.  
 16 A. -- and I spoke to Dean Nankivell and said to Dean that  
 17 I'd been speaking to Steve, told Dean exactly what the  
 18 conversation was, and I think as soon as that  
 19 conversation was finished I left the command support  
 20 room and I think the first person I rang was Ben.  
 21 MR GREANEY: He rang you in fact. In that call, you weren't  
 22 inviting or encouraging Mr Levy to make a different  
 23 deployment decision, were you?  
 24 A. No.  
 25 Q. And your expectation was that he would deploy as

35

1 Mr Hynes had requested?  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: This was being autocratic, wasn't it, on  
 4 the incident? I have forgotten the total phrase.  
 5 A. Well, it was informing Ben that a decision had been  
 6 made, yes.  
 7 MR GREANEY: I think it would be reasonable to say that  
 8 Ben Levy was unhappy with that deployment decision?  
 9 A. He wasn't satisfied with it, no.  
 10 Q. Paul Etches was unhappy about it?  
 11 A. Paul didn't voice an opinion at that time.  
 12 Q. And do you agree that Dean Nankivell, the architect of  
 13 the TRU, was unhappy about it?  
 14 A. Dean was definitely concerned.  
 15 Q. What they thought ought to be happening was a greater  
 16 deployment, including the deployment of the specialist  
 17 resources?  
 18 A. That's correct.  
 19 Q. There are a number of aspects to this that, as you'll  
 20 appreciate, I want to try to unpick. The starting point  
 21 is just to understand what the role of the CSR was. So  
 22 we'll look at the Fire and Rescue Service guidance.  
 23 We've looked at it before and you will be more familiar  
 24 with it than most. {INQ004450/1}.  
 25 Could we go to {INQ004450/5}, please, paragraph 3,

36

1 I think:  
 2 "When the CSR is activated, the PO [so that's you on  
 3 this night], the assistant principal officer or the  
 4 command support room officer are not in command of the  
 5 incident. The command of an incident is sole  
 6 responsibility of the incident commander at the scene."  
 7 Is it reasonable to suggest that you did the  
 8 opposite of that?  
 9 A. I don't think that's a reasonable suggestion, no.  
 10 Q. Why not?  
 11 A. Because my responsibility, as I said from the very  
 12 outset, was the strategic oversight and deployment of  
 13 resources. There hadn't been a deployment of resources,  
 14 and as the principal officer on duty that night, all  
 15 I was doing was making sure that a deployment did take  
 16 place.  
 17 Q. Second, would it be reasonable to suggest that what you  
 18 were doing amounted to rejecting the views of  
 19 experienced members of your team in preference for the  
 20 views of someone who was not a firefighter?  
 21 A. There's two ways to look at that. The first one is that  
 22 for the first time, my understanding is that we had  
 23 contact with any of the emergency services partners on  
 24 the scene. Even though it was brief, I had probed  
 25 Steve Hynes as to the resources he wanted from us at the

1 scene, and he was very, very clear about what he needed  
 2 and what he didn't need.  
 3 I know that Steve would only ask for resources that  
 4 he needed to effect his tactical plan and I think  
 5 there's a couple of things need to be remembered there.  
 6 At this stage, through the evidence that I've heard and  
 7 seen, Steve's agency was the primary agency, they were  
 8 the agency that in my opinion would have been driving  
 9 the tactical plan for the treatment, recovery of  
 10 casualties and onward transfer to the hospital. So he  
 11 would have been the person that I would have expected to  
 12 be making the tactical and operational decisions at the  
 13 incident, but I would have expected him to be making  
 14 those decisions after a briefing with his counterpart  
 15 in the police.  
 16 I know, because of the evidence that's been  
 17 uncovered, that he had those briefings and I've heard  
 18 the evidence on the dictaphone where he asks Mark,  
 19 I think three times, "Is it safe?", and Mark says yes.  
 20 Q. You're talking about Mr Dexter's dictaphone recording?  
 21 A. Yes, the dictaphone. I've heard that so I know that --  
 22 my assumption is that Steve would have taken that into  
 23 account, he would have understood what the hazards were,  
 24 what the risks were, what the tactical plan was that he  
 25 wanted to enact, and the decision then to ask for a

1 specific resource from fire would have been based on  
 2 that and also on the knowledge what fire could have  
 3 provided.  
 4 Steve knows that there's a specialist rescue team  
 5 there and if there is a rescue to be required because  
 6 people are trapped in any way, shape or form that that  
 7 rescue team would be able to provide assistance to him  
 8 very immediately. Steve knows that if he had to deploy  
 9 resources for a marauding terrorist firearms attack,  
 10 those resources would be with him immediately and he  
 11 could deploy them along with his asset. But my belief,  
 12 knowing Steve, and the trust that I had in Steve and the  
 13 confidence that I had that he would be making a command  
 14 decision based on all of that information -- that he was  
 15 asking for the right resource from the scene with that  
 16 information and none of us, none of us, had any better  
 17 information than he did.  
 18 SIR JOHN SAUNDERS: At this stage you don't know about Plato  
 19 being declared?  
 20 A. At this stage, sir -- and I think -- no, we didn't know  
 21 Plato had been declared, but we assumed that at some  
 22 stage it had already been declared and that was a big  
 23 assumption because of all of the noise that was going  
 24 around.  
 25 SIR JOHN SAUNDERS: That's fine. So there would at least be

1 a possibility that there would be zoning?  
 2 A. There would, and I would have expected that if -- Steve  
 3 would probably, I would think, be more sensitive to  
 4 zoning than we would. If zones were in place and Steve  
 5 had been in conversation with the tactical firearms  
 6 commander, which we knew he was, Steve would have been  
 7 quite aware of where he was asking his staff to go to  
 8 and where he would be asking our staff to go to  
 9 in relation to that zoning.  
 10 SIR JOHN SAUNDERS: But you could have said to him directly,  
 11 "Would it involve working in a warm zone"?  
 12 A. I could have. But the issue for me was at the time,  
 13 Steve -- I'd got a conversation with Steve and it was  
 14 obvious that he was making command decisions as he was  
 15 speaking to me. In relation to him telling me he did  
 16 not need MTFA resources at the scene meant that there  
 17 was no zoning in place or if there was zoning in place  
 18 he didn't see that as a risk, or if there was zoning in  
 19 place he wasn't going to be sending resources into that  
 20 zone.  
 21 SIR JOHN SAUNDERS: Thank you.  
 22 MR GREANEY: I'm going to get to Plato in one moment.  
 23 I have some questions to build upon what the chairman  
 24 has asked you about. Where we were at the moment is at  
 25 00.12, you speak to Steve Hynes, at 00.16 you speak to

1 Ben Levy. At that stage, you have not had confirmation  
2 that Operation Plato has been declared?  
3 A. I haven't been told that at that stage, no.  
4 Q. That's clear from the other evidence we have heard.  
5 I was trying to unpick the decision that you were  
6 making at that stage, not having had that confirmed, not  
7 to deploy specialist resources, and there was just a  
8 third point I was going to pose for your answer.  
9 At Thompson Street by this stage were there  
10 specialist resources?  
11 A. I believe there were, yes.  
12 Q. They were the people with training and equipment to help  
13 with casualties?  
14 A. Yes.  
15 Q. But instead, you directed the deployment that would be  
16 made to a domestic house fire. Can you understand why  
17 people think that that just can't be right?  
18 A. I can understand when it's portrayed that way, that  
19 we were downplaying the incident, and it's a very  
20 emotive example, I would suggest, that we're saying this  
21 is a domestic house fire attendance and we're sending it  
22 to the Manchester Arena bomb.  
23 Q. That's a way of comparing what you did.  
24 A. It is, but it's a bit sensational, in my mind. The fact  
25 was that we had — every one of our firefighters had had

41

1 additional training by North West Ambulance Service and  
2 also they had their training validated by North West  
3 Ambulance Service. On each of our fire engines we had  
4 an aspirational target of having at least one trauma  
5 technician on board. Yes, the SRT had had additional  
6 training in relation to ballistic injuries and, yes,  
7 we were having an aspirational target of having at least  
8 one trauma technician on an SRT vehicle as well.  
9 So in relation to the response that was sent, Steve  
10 would have been quite clear in his own mind the  
11 capability he was asking for, and he knew how many of  
12 that resource he needed at that time.  
13 Q. Thank you. Let's move on in time, because it was at  
14 00.19 that you learnt of having confirmed that  
15 Operation Plato had been declared.  
16 A. It was maybe slightly after that because I know that  
17 I had, after the phone call with Ben, I think I had  
18 a couple of other phone calls. I think it was with —  
19 I tried to ring the mayor, I think, or maybe that was  
20 earlier, and I wanted to ring Gary Keary of the Fire  
21 Brigades Union.  
22 Q. I think that was at 00.26 and certainly in your  
23 statement I think the chronology is: spoken to Ben Levy,  
24 and my phrase, he's got his instructions at 00.16; then  
25 you discover at about 00.19 that Plato has been

42

1 declared; and then subsequently you attempt to make the  
2 phone calls.  
3 A. Yes.  
4 Q. But at all events, around this time and after you have  
5 spoken to Ben Levy, you discovered that Plato has been  
6 declared?  
7 A. Yes.  
8 Q. In that state of knowledge, am I right that you  
9 maintained your instruction that no specialist assets be  
10 deployed to the scene?  
11 A. I did at that time, yes.  
12 Q. Was it obvious to you on learning that Plato had been  
13 declared that zones should also have been declared as  
14 part of the response?  
15 A. It was obvious to me that if Plato in fact was enacted  
16 then there would obviously have been zones attached to  
17 that, yes.  
18 Q. And that therefore, it was likely that there would be  
19 a warm zone?  
20 A. Yes.  
21 Q. And that it might very well be the case that there would  
22 be injured people within that zone?  
23 A. At one stage, yes.  
24 Q. In those circumstances, is it fair to summarise what you  
25 were doing as holding back those who could enter that

43

1 zone and sending forward those who could not?  
2 A. I don't agree with the statement that anybody was being  
3 held back. We were sending forward a resource that had  
4 been asked for from the scene with all of the  
5 hazard/risk information that was required for that  
6 decision to be made. What we wanted — the priority for  
7 us was to have an incident commander there, and that  
8 incident commander would then have immediate situational  
9 awareness because they would be speaking to the  
10 ambulance Bronze and the fire Bronze on scene — sorry,  
11 the police Bronze.  
12 Q. But the people — and I do take your point about being  
13 held back, but the reality is that the specialist  
14 resources at that moment were not going there, were  
15 they?  
16 A. No.  
17 Q. But the non—specialist resources were going there?  
18 A. Firefighters with the relevant training were going  
19 there, yes.  
20 Q. But they didn't have the training or equipment that  
21 would, in accordance with the policy, have permitted  
22 them to enter a warm zone?  
23 A. That would be the MTFA crews that you're talking about.  
24 Q. No — yes, exactly. And the MTFA crews were at  
25 Thompson Street.

44

1 A. Mm—hm.  
 2 Q. And the people who went forward at that stage were not  
 3 the MTFA crews?  
 4 A. That's correct.  
 5 Q. So the simple point I'm inviting you to agree with  
 6 before I ask you whether you accept you made the wrong  
 7 decision is what happened in the result is that in that  
 8 initial deployment those who were being deployed were  
 9 those who were not going to be able to enter any warm  
 10 zone?  
 11 A. If the warm zone was where they were going to be  
 12 deployed into, they wouldn't have been able to do that,  
 13 no.  
 14 Q. So does that not illustrate that those who ought to have  
 15 been deployed at that stage were the MTFA crews?  
 16 A. I don't think anybody, even in the command support room,  
 17 was asking for MTFA crews to be deployed. They were  
 18 asking for SRT to be deployed, which is slightly  
 19 different in that the argument that has been proposed —  
 20 the discussion was about additional medical capabilities  
 21 rather than the MTFA capability.  
 22 Q. Sir, I don't know if you want to ask any further  
 23 questions about that, otherwise I'm going to move on.  
 24 SIR JOHN SAUNDERS: Right. Paragraph 69. There is the  
 25 reference about the NWS MTFA resource, which I didn't

45

1 quite understand.  
 2 MR GREANEY: Quite right, sir.  
 3 Before we move on, in your conversation with  
 4 Steve Hynes, you record:  
 5 "I asked him, did they need to be MTFA with  
 6 ballistic protection, and he confirmed that they did not  
 7 and that the NWS MTFA resource was still at  
 8 Manchester Central Fire Station at the direction of  
 9 GMP."  
 10 Could you explain that, please?  
 11 A. That was all that Steve had said. I'd asked Steve,  
 12 because I think somebody had told us in the command room  
 13 that NWS MTFA was on scene and I asked Steve that, and  
 14 during the telephone call he said, no, they were being  
 15 located at Thompson Street.  
 16 Q. Are you talking about HART?  
 17 A. No, I'm talking about — well, whatever their MTFA asset  
 18 is, and I think it is a HART team, part of a HART team.  
 19 Q. We know that in fact, they were there, they arrived  
 20 I think at about 23.15. So are you confident in your  
 21 recollection that he told you something which seems not  
 22 to be correct?  
 23 A. I asked him that question and that was the answer he  
 24 gave me.  
 25 SIR JOHN SAUNDERS: And also the idea it came at the

46

1 direction of GMP is not supported by the rest of the  
 2 evidence.  
 3 A. I can only — I remember that I wrote that down the next  
 4 morning and that's all I can recollect from that  
 5 conversation, that I asked Steve was his resource at the  
 6 scene and he said, no, they weren't.  
 7 SIR JOHN SAUNDERS: Thank you.  
 8 MR GREANEY: Obviously these moments are important ones  
 9 in the evidence. Are you content that we've dealt with  
 10 the matter —  
 11 SIR JOHN SAUNDERS: Yes, thank you. It was just that issue.  
 12 MR GREANEY: I want to ask you next about a call that you  
 13 have just mentioned a moment ago. It's that call at  
 14 00.26 and it's a call lasting for nearly 3 minutes and  
 15 it's a call that may take us back to the issue of risk  
 16 and approach to risk that we were discussing yesterday.  
 17 Could you remind us, who was it that you called for  
 18 3 minutes at 00.26?  
 19 A. I think it was Gary Keary.  
 20 Q. And Gary Keary is?  
 21 A. He was the brigade secretary of the Fire Brigades Union  
 22 at the time in Manchester.  
 23 Q. So brigade secretary for the FBU?  
 24 A. Yes.  
 25 Q. It might be thought odd that in the midst of responding

47

1 to these terrible events you decided to call the brigade  
 2 secretary of the FBU. Why did you do that?  
 3 A. It's something that wasn't peculiar just to this event,  
 4 it's something that I would have done and always have  
 5 done when I am dealing with a major incident. I think  
 6 it's, again, a courtesy to let the brigade secretary  
 7 know that there's a major event ongoing and that if any  
 8 decisions have been made which could result in him  
 9 receiving quite a few telephone calls from members.  
 10 Q. Obviously, we definitely don't want to get into the  
 11 rights and wrongs of this, but we know that there was at  
 12 this stage an issue between the FBU and Fire and Rescue  
 13 Services about MTFA deployments. When you called  
 14 Mr Keary, were you seeking to manage that situation to  
 15 any extent?  
 16 A. Again, I was seeking to inform him and to allow him —  
 17 Gary and I were close colleagues professionally and also  
 18 personally. It was a case of letting Gary know that we  
 19 had an event ongoing that there had been some  
 20 information about an active shooter and that we had now  
 21 sent forward firefighters to tie up with Steve Hynes and  
 22 that was really the extent of the telephone call.  
 23 Q. Does it in any sense reflect an anxiety that you were  
 24 experiencing at the time that there might have been some  
 25 fallout from a decision to deploy the MTFA capability if

48

1 it came to that?  
 2 A. I wouldn't call it anxiety, no. As I say, it was  
 3 a courtesy, and it's something that I done during the  
 4 riots, it's something I done during Paul's Hair World.  
 5 In almost every major incident that I've ever been in  
 6 charge of in any way, I would have had contact with the  
 7 Fire Brigades Union to let them know.  
 8 Q. Let's pick up the chronology. We know that the first  
 9 appliance arrived on Station Approach just seconds  
 10 before 00.37. Mr Lopez, we'll pick this up from not the  
 11 NWFC sequence of events but the sequence of events that  
 12 contains the images. This is {INQ035612/1} and we will  
 13 just look at a series of six images so we can understand  
 14 the chronology of what happens once the Fire and Rescue  
 15 Service do arrive.  
 16 {INQ035612/469}, please. It's literally just  
 17 1 second before 00.37 and we see the first fire  
 18 appliance arriving.  
 19 Then next, {INQ035612/470}, please. 00.37.28.  
 20 Mr Berry has arrived at the scene and is walking towards  
 21 the war memorial entrance.  
 22 {INQ035612/499}, please. 00.44. GMFRS personnel  
 23 are gathering outside the station.  
 24 {INQ035612/507}, please. 00.47 now. Firefighters  
 25 are moving stretchers along Station Approach.

1 {INQ035612/509}. 00.49. We can see that at this  
 2 stage, firefighters are about to enter. They will be,  
 3 I believe, the first to do so.  
 4 Then {INQ035612/521}. 00.54. The Fire and Rescue  
 5 Service are now within the station itself.  
 6 Thank you very much, Mr Lopez.  
 7 So as you have seen, and will know in any event,  
 8 firefighters did not immediately enter the station  
 9 having arrived at the scene but were outside for  
 10 a period as those who were outside were attended to and  
 11 also as Mr Berry sought to establish what the zoning  
 12 situation was. You'll remember his evidence about that.  
 13 As part of Mr Berry's efforts to establish the  
 14 situation, although in fact firefighters had already  
 15 decided to go in, at 23.53 he speaks to Mr Dexter, and  
 16 you begin to participate in that call. That's my  
 17 summary, but can you agree with that?  
 18 A. That's correct.  
 19 Q. Can we have that on the screen, please? This is the  
 20 NWFC schedule. {INQ041473/84}.  
 21 There we have it: 00.53, Mr Berry calls you, there's  
 22 a contact lasting for about 5 minutes, and it's during  
 23 the course of that that the phone is handed to Mr Dexter  
 24 so he can speak to you.  
 25 Before you spoke to Mr Dexter, what was said to you

1 by Mr Berry?  
 2 A. I think he said to me that he had -- I think this was on  
 3 the back of a request, I'm not entirely sure of the  
 4 chronology, but he had said to me that he was trying to  
 5 get information regarding where he could deploy  
 6 firefighters. I think I asked him had he met with the  
 7 other commanders and what was the risk assessment for  
 8 the area where he was working in.  
 9 Q. In your witness statement, paragraph 82, you say:  
 10 "He seemed to be seeking my permission to deploy  
 11 crews, but as he was the on-scene commander, I reminded  
 12 him that it was his responsibility to make the  
 13 operational decisions based on his risk assessment."  
 14 A. It was a real surprise to me that I was getting a phone  
 15 call at all with regards to the deployment of resources.  
 16 My expectation would have been that an officer arriving  
 17 on scene would have spoken to the other two  
 18 Bronze commanders on scene, that they would have had  
 19 a full debrief to give Andy, a full situational  
 20 awareness of what was occurring, and highlighting to him  
 21 any risks that they had attributed to hazards.  
 22 It would have been my expectation then that what  
 23 Andy would have done as a result of that, if he felt  
 24 that he needed to, that he would have done what we  
 25 always do in the Fire Service, and that is he would have

1 contacted North West Fire Control, he would have asked  
 2 for additional resources, based on the hazard and risk  
 3 that he had been identified to, and what the tactical  
 4 plan was. That would have been my expectation.  
 5 I certainly wasn't expecting a telephone call from the  
 6 incident ground like that.  
 7 Q. It's really a bit like the guidance we saw earlier.  
 8 He was the incident commander now, command decisions  
 9 were for him, but your sense was that he was seeking  
 10 approval or authority from you?  
 11 A. Yes, that's what I felt at the time, which I found very,  
 12 very strange.  
 13 Q. Do you think it might be the case that that desire for  
 14 him to seek your approval was a consequence of your  
 15 management style, even if not generally on that night?  
 16 A. I don't think so, no. On reflection, I think by that  
 17 stage Andy had had a difficult night and I think he  
 18 needed a bit of reassurance on top of what he was being  
 19 given on the incident ground. I can remember on the  
 20 telephone call, and I had misconstrued what I heard  
 21 being said, I could hear Steve Hynes in the background  
 22 and I think Steve -- what I first imagined I'd heard on  
 23 that dictaphone was Steve saying, "That's Peter, tell  
 24 him I want to talk to him", but actually when you listen  
 25 more closely to it, what it is is Steve saying, "We're

1 going to have a briefing, tell Peter we're going to have  
 2 a briefing". So he's wanting to brief Andy and I think  
 3 he's wanting to make it a joint briefing with the other  
 4 services and I think that was the first time in all of  
 5 this event that we actually had a JESIP meeting on  
 6 scene.  
 7 Q. We are going to listen to Mr Dexter's side of the  
 8 conversation in a moment, it only lasts for 4.5 minutes,  
 9 but did you want to be put in the situation of having  
 10 that conversation with Mr Dexter or was it your view  
 11 that this was something that Mr Berry ought to be  
 12 managing?  
 13 A. I thought that was something that was clearly within  
 14 Andy's bailiwick to manage, yes.  
 15 SIR JOHN SAUNDERS: Can we look at it for a moment from  
 16 Mr Berry's point of view? We've left the situation  
 17 where Mr Levy has appointed himself as being the  
 18 incident commander. I know you say you didn't know  
 19 about that, but was it right for him to do that when  
 20 there was no incident commander and nothing was  
 21 happening?  
 22 A. I think if you went purely on policy, if you're not  
 23 at the scene, then you wouldn't declare yourself as an  
 24 incident commander --  
 25 SIR JOHN SAUNDERS: That leaves no incident commander.

53

1 A. Well, not until we get somebody at the scene and then  
 2 that person who -- the first -- and we have talked about  
 3 this -- is the first -- the most senior officer  
 4 (overspeaking) becomes the incident commander --  
 5 SIR JOHN SAUNDERS: I know how it works that way, but if you  
 6 are actually just holed up at a muster point with no one  
 7 gripping the situation, why shouldn't someone say: well,  
 8 I'll be incident commander, what are we going to do  
 9 where are we going to go? How does anything happen  
 10 otherwise?  
 11 A. I think that harks back to the problem that I have  
 12 around the NILO situation and the policy. In effect  
 13 they're everything, they are the strategic, tactical,  
 14 operational -- they are the incident commander.  
 15 SIR JOHN SAUNDERS: Okay, but there were three of them.  
 16 Someone had to do it. It may be a problem with process,  
 17 I understand, but from Mr Berry's point of view actually  
 18 Mr Levy is the incident commander, he then gets told  
 19 that he should be taking the fire appliances in and  
 20 Mr Levy thinks, "I've been sacked as being incident  
 21 commander", basically. That's impression he gets.  
 22 Mr Berry goes in and when he gets there, being with  
 23 just ordinary appliances -- I caveat ordinary, but  
 24 I hope everyone understands the shorthand -- and he's  
 25 told: actually, this is a warm area, going cold, but

54

1 it's a warm area. He knows that the instructions are  
 2 that you don't send people in without ballistic  
 3 protection into a warm area, what's he meant to do?  
 4 A. Well, there's a number of aspects to that, sir. The  
 5 first thing Andy Berry -- and I think Dean Nankivell  
 6 gave it in his evidence -- the reason Andy Berry was  
 7 sent was protocol: it was three fire engines, a station  
 8 manager goes with three fire engines. That decision was  
 9 taken between the command support room and North West  
 10 Fire Control. So that's why that happened.  
 11 SIR JOHN SAUNDERS: See, I can understand how that was the  
 12 reason in the CSR, but from Mr Levy's point of view,  
 13 somewhere else, it appears entirely different.  
 14 A. Yes, and I can understand if I was in Ben Levy's shoes  
 15 I would be feeling exactly the same way as Ben felt that  
 16 night.  
 17 SIR JOHN SAUNDERS: So there's a communication issue going  
 18 on here?  
 19 A. Of course there is, and in relation to when Andy first  
 20 arrives on scene -- and we've seen the pictures, the  
 21 harrowing pictures, of non-protected non-specialist  
 22 police, non-protected non-specialist NWS operating in  
 23 an area which technically, if a Plato is still standing  
 24 up, they shouldn't be in. And therefore I believe that  
 25 within Fire Service policy, there's enough operational

55

1 discretion for our firefighters to be in there working  
 2 alongside our colleagues.  
 3 SIR JOHN SAUNDERS: Okay. But is it really that  
 4 unacceptable for Mr Berry to say, "I want some  
 5 clarification about this before I" -- you believe  
 6 there's a discretion? But you is it clear?  
 7 A. Absolutely, sir, and I think you could hear in  
 8 Steve Hynes' voice in the background Steve was wanting  
 9 to give that information. Steve was wanting a briefing  
 10 between the three so there could be a joint shared  
 11 situational awareness and understanding of risk --  
 12 SIR JOHN SAUNDERS: We're going to hear this in a minute,  
 13 I just wanted to ask these questions in order that we  
 14 look at it on this basis.  
 15 My recollection is, and it may well be corrected in  
 16 a moment, that the essence is, "It's warm getting cold".  
 17 A. This is my own personal interpretation of it. One of  
 18 the first things that Mark Dexter told me, and if he  
 19 told that to Andy Berry, in effect Mark Dexter was  
 20 saying it's no longer a Plato incident. He says, "There  
 21 is no threat of firearms discharge". At that time all  
 22 of our understanding in the Fire Service was that  
 23 a marauding terrorist firearms attack was exactly that  
 24 and I think it says it in the first two lines of the  
 25 Plato policy that it's a firearms incident.

56

1 SIR JOHN SAUNDERS: Okay. Can I just — obviously, you  
 2 don't have to see the man with the gun before you can  
 3 declare a Plato incident: if you actually fear there may  
 4 be a man with a gun it's very sensible to have a Plato  
 5 incident. And Plato — this is one of my concerns about  
 6 how people understood Plato. Plato doesn't apply to  
 7 a particular building, it applies to an area.  
 8 A. Mm—hm.  
 9 SIR JOHN SAUNDERS: Because that's where the marauding  
 10 gunman may be. So saying, "It's not really a Plato  
 11 incident here", it was still a Plato incident. The  
 12 zoning may be different in the arena because there's no  
 13 risk there, but it's the zoning, not the declaration  
 14 which counts, isn't it? Sorry, that sounds like a  
 15 statement rather than a question.  
 16 A. The thing — there's a whole — and it's a statement  
 17 that's valid. However, at the time, the risk that was  
 18 thought about was that there was some kind of firearms  
 19 assault ongoing. Mark Dexter is very clear, he couldn't  
 20 be more emphatic: there is no firearms threat.  
 21 SIR JOHN SAUNDERS: At the arena?  
 22 A. In that area where he is, yes.  
 23 SIR JOHN SAUNDERS: And warm means they're not here now, but  
 24 there's a risk they'll come back?  
 25 A. That's technically what it means, but he's also very

57

1 clear that there is no firearms threat.  
 2 SIR JOHN SAUNDERS: So he needs to know it's a cold area?  
 3 A. In my estimation what he was saying to me and what  
 4 he was telling Steve Hynes was: it's safe because  
 5 there's no firearms threat, technically that's a cold  
 6 zone.  
 7 SIR JOHN SAUNDERS: Exactly, and he's calling it "warm going  
 8 cold"?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: Sorry about that.  
 11 MR GREANEY: Not at all, sir, that was a very interesting  
 12 exchange.  
 13 Against that background, we will listen to the  
 14 recording. We'll start it before your conversation with  
 15 Mr Dexter because, as you rightly identified, there are  
 16 some interesting and important things that were said in  
 17 the lead-up.  
 18 Mr Lopez, this isn't entirely straightforward. If  
 19 it doesn't work straightaway, we will, with the  
 20 chairman's leave, take a break, but I'm hoping it will.  
 21 The recording is {INQ025479A/1}. I'm going to ask  
 22 you to play it, Mr Lopez, from 1:27:45 in to 1:32:10.  
 23 The transcript is {INQ040657/68}.  
 24 (Audio played)  
 25 I'm certain you'll have heard that before in any

58

1 event and have read the transcript.  
 2 A. Yes.  
 3 Q. You can see at the beginning of that, Mr Berry was  
 4 saying that he believed that he needed authorisation  
 5 from the chief, from you, to deploy, and the phone is  
 6 then handed over to Mr Dexter, who's able to speak to  
 7 you.  
 8 What was happening on your side of the conversation  
 9 as you recall it?  
 10 A. I was asking him questions. I said — I think what I'd  
 11 said to him was that Andy might have a bit of an  
 12 apprehension about deploying people into a warm zone  
 13 because of a firearms threat. That's when Mark came  
 14 back to me and said that there was no firearms threat,  
 15 that there hadn't been a discharge, and that was the  
 16 first time I'd heard anything like that, that there'd  
 17 never been a firearms discharge at the incident and that  
 18 there was no ongoing firearms threat.  
 19 Q. Insofar as Mr Berry needed or desired authorisation from  
 20 you, were you content to give it?  
 21 A. He didn't need any authorisation from me whatsoever.  
 22 SIR JOHN SAUNDERS: He didn't need any authorisation because  
 23 you're saying he's incident commander?  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: The last thing he knew was Mr Levy was

59

1 incident commander. I'm afraid I can't remember what  
 2 Mr Berry said about whether he believed he was incident  
 3 commander when he went to the scene.  
 4 MR GREANEY: He did believe he was incident commander.  
 5 A. I'd be very surprised, sir, if he thought any different.  
 6 Q. You had been put in the position of having this  
 7 conversation with Mr Dexter. You engaged with it, you  
 8 asked questions designed to ascertain whether the area  
 9 within the station was warm, cold or even hot. How did  
 10 this come to a conclusion?  
 11 A. It came to a conclusion that Mark was — I was satisfied  
 12 that Mark's assessment of the risk meant that we didn't  
 13 need marauding terrorist firearms attack assets there,  
 14 and he was quite clear that they were having their  
 15 assets stood at Thompson Street which was a back-up to  
 16 something that had been told to me earlier by Steve.  
 17 I would have concluded that Steve Hynes at the end of  
 18 that would have successfully been able to pull together  
 19 the two other guys to have a JESIP briefing, which  
 20 would —  
 21 Q. We see that's what he does want to do.  
 22 A. That would have been my expectation initially whenever  
 23 Andy lands on scene, that he would go and take his  
 24 briefing from others, but he would also be having the  
 25 situational awareness of his own by looking and seeing

60

1 what's going on because he was standing outside of it.  
 2 So in my interpretation of that, we as fire officers  
 3 will automatically be doing a dynamic risk assessment as  
 4 we're walking along and seeing what is happening outside  
 5 the station.  
 6 Q. So I entirely understand that your view is that as  
 7 incident commander, as the person at the scene, with  
 8 situational awareness, it was his job to make a decision  
 9 about deployment. But as you yourself have fairly  
 10 observed, Mr Berry had had a terrible night from his  
 11 journey, almost getting lost, not being able to speak to  
 12 the FDO, struggling to get situational awareness. This  
 13 had not been a good night for him, had it?  
 14 A. No.  
 15 Q. Indeed, it had been a much worse night, a terrible,  
 16 terrible night for many other people, but his job had  
 17 been difficult that night and he plainly wanted your  
 18 authorisation before sending people without ballistic  
 19 protection into what might be a warm zone?  
 20 A. Yes, he did.  
 21 Q. You had had a conversation with the ground—assigned  
 22 tactical firearms commander and essentially he had  
 23 satisfied you that there could be a deployment?  
 24 A. Absolutely, yes.  
 25 Q. Did you say that to Andy Berry?

61

1 A. I think the phone was handed back at the end and I said  
 2 something along the lines of, "Did you hear that Andy?",  
 3 and the next thing, the phone went dead. I don't know  
 4 what happened on the other end of the line. I know  
 5 I tried to contact Andy after that I think and  
 6 eventually I did get him and it was a case of Andy  
 7 telling me that he was deploying resources in the line  
 8 of sight, something along those lines. I don't think  
 9 I said it then, but I certainly then, following up on  
 10 that, sent him a text just to say well done.  
 11 Q. You did send a text saying well done. Let me come  
 12 really to the question that may be in many people's  
 13 minds and then I'll almost be finished.  
 14 At this stage, when you're having that conversation,  
 15 it's more than 2 hours and 20 minutes after the  
 16 explosion. And as you have yourself recently observed,  
 17 there were police officers from both BTP and GMP without  
 18 ballistic protection who had deployed not just into the  
 19 station but into the City Room. The same of ambulance  
 20 personnel.  
 21 A. Yes.  
 22 Q. Is it reasonable to suggest that what was occurring at  
 23 that stage represents an excessive degree of caution on  
 24 the part of the Fire and Rescue Service?  
 25 A. Yes.

62

1 Q. Let's move on, and as I've said, I've nearly finished.  
 2 Shortly after 2 am on 23 May, did you learn from  
 3 Mr Lawlor, who was at GMP Headquarters, that an SCG was  
 4 to take place?  
 5 A. I think I heard before that, around about half 1,  
 6 I think I'd been told to go to an SCG which was going to  
 7 take place at 2.30, I think.  
 8 Q. That's a fair observation. So in the result, you  
 9 departed the CSR shortly after 2 in order to get there  
 10 in time for that. But in the result, the SCG happened  
 11 not at 2.30 but at 4.15 in the morning?  
 12 A. Yes.  
 13 Q. Do you agree that that, at that stage, was of no value  
 14 to the emergency response and of no assistance to those  
 15 who had been injured earlier that night?  
 16 A. It was an absolutely useless exercise.  
 17 Q. Finally, so far as my —  
 18 SIR JOHN SAUNDERS: Stop for a moment. You say that. We  
 19 know that part of the use of the Silver room is planning  
 20 for the future and what's going to happen in the future  
 21 to try and get business as usual set up. Didn't that  
 22 happen?  
 23 A. Can I explain something, sir? For me, there's a number  
 24 of phases within the strategic command of an incident  
 25 like that. There's obviously the emergency response

63

1 phase, which is key. Absolutely key. No SCG occurred  
 2 during the emergency response phase. None. In my mind,  
 3 we were now into the recovery phase and I think, very  
 4 quick time after that, you know, yes, there was a need  
 5 for the police to have an SCG of their own in relation  
 6 to the follow-up regarding potential other perpetrators,  
 7 locations, the likes of that, largely the primary focus  
 8 of police and we assisted in that.  
 9 So yes, there was an element of worth for the  
 10 recovery phase or the follow-up, as you said, but in  
 11 regards to helping those that needed us most, getting  
 12 the most effective resource there at the appropriate  
 13 time and making sure that every one of the partners that  
 14 was responding that night had all of the information at  
 15 their disposal, it was absolutely useless.  
 16 SIR JOHN SAUNDERS: I well understand what you're saying  
 17 about that, but isn't there a case for saying that, as  
 18 I understand it, these SCGs are really quite formal  
 19 occasions, that when you're actually dealing with an  
 20 emergency response, and these things are by necessity  
 21 set up quite late into the emergency response, what you  
 22 actually want is people there who can just talk to each  
 23 other in the room rather than sitting around and having  
 24 a formal minuted meeting?  
 25 A. I think you're right and I think for me, what should

64

1 have happened was at the very, very outset, a tactical  
 2 coordinating group should have been called immediately  
 3 and it should have been identified, the location for  
 4 that tactical coordinating group to take place. It  
 5 doesn't always happen at force headquarters. So it  
 6 could happen --

7 SIR JOHN SAUNDERS: But assuming it was going to be at force  
 8 headquarters.

9 A. If it was at force headquarters then North West Fire  
 10 Control should have been told very clearly: this is  
 11 a major incident, a tactical coordinating group is going  
 12 to be called, it's at force headquarters, can you get  
 13 somebody there as quickly as possible?

14 SIR JOHN SAUNDERS: Would you have gone then?

15 A. At the tactical coordinating group stage, probably not.  
 16 My experience, my operational experience, I want to walk  
 17 into that room -- because this is me personally --  
 18 I want to walk into that room with every piece of  
 19 knowledge that I can get about where the Fire and Rescue  
 20 Service is and what it's doing, maybe across the county  
 21 at that time before I go in to sit with the NILO who  
 22 will then tell me what they have learned from that room  
 23 and ordinarily, sir, that would happen within an hour.

24 SIR JOHN SAUNDERS: So would Mr Lawlor have been your  
 25 representative at that or would you have sent somebody

65

1 else?

2 A. At the tactical coordinating group?

3 SIR JOHN SAUNDERS: Yes.

4 A. Yes, because it is a liaison role, it is not a command  
 5 role as such, so they will go in, they will not make  
 6 command decisions, they can pick up on risk and they can  
 7 advise not to attend, of course they can. But they  
 8 don't make command decisions in that room: they pick up  
 9 information and pass that information on.

10 SIR JOHN SAUNDERS: So Mr Lawlor who was there would be  
 11 appropriate for that? All I want to know is if he's  
 12 appropriate for it.

13 A. Not only is he appropriate, he's probably the best  
 14 in the Fire and Rescue Service for it because he set it  
 15 up.

16 SIR JOHN SAUNDERS: Okay, thank you.

17 MR GREANEY: So finally, and really out of a desire to be  
 18 fair both to GMCA and you, I'm going to draw your  
 19 attention to paragraph 106 of your witness statement.  
 20 I will read that out and simply invite you to agree that  
 21 it still represents your views.

22 This was really your attempt, I think, to summarise  
 23 how you feel having reflected on the events of that  
 24 night. You say:  
 25 "I don't think there has been a day that has passed

66

1 since the bomb that any of us has not thought about it.  
 2 I know that if firefighters had been allowed to go that  
 3 night, they would have made a difference. We could and  
 4 should have had firefighters at the arena within  
 5 4 minutes of notification of the incident. They would  
 6 have worked with care and compassion to help those  
 7 injured alongside NWAS and GMP. They would have run  
 8 into that arena. They would have done everything they  
 9 could to have saved as many people as they could. They  
 10 would have used all their training to do that. They  
 11 would have tried their best to make sure whoever was in  
 12 difficulty was helped. I know I speak on behalf of  
 13 every firefighter within GMFRS when I say that we are  
 14 all devastated that we did not contribute to the  
 15 emergency response as we would have been expected to."

16 Does that still reflect your view --

17 SIR JOHN SAUNDERS: I think it is "as we would have expected  
 18 to". It actually changes the meaning slightly.

19 A. Absolutely, yes.

20 MR GREANEY: Sir, those are my questions. Thank you,  
 21 Mr O'Reilly, for answering them.

22 SIR JOHN SAUNDERS: We'll have a quarter of an hour break.

23 MR GREANEY: Could I indicate the order in which I will call  
 24 upon the CPs?

25 SIR JOHN SAUNDERS: Yes.

67

1 MR GREANEY: When we return, I'll ask Mr Smith to ask his  
 2 questions on behalf of North West Fire Control, then  
 3 Ms Roberts to ask any questions that she has, followed  
 4 by Mr Horwell on behalf of Greater Manchester Police,  
 5 then Mr Cooper on behalf of the families.

6 Sir, can I pause for one moment to indicate that  
 7 I've spoken overnight to Mr Cooper. It was fully his  
 8 intention that he should be present in the room today in  
 9 order to pose his questions, but there have been  
 10 significant travel difficulties between London and  
 11 Manchester overnight and it has not been possible for  
 12 him to attend.

13 SIR JOHN SAUNDERS: Thank you. I am sure we'll all manage  
 14 perfectly well over the video link.

15 MR GREANEY: I believe we will. Finally, I will ask  
 16 Mr Warnock to ask his questions on behalf of the  
 17 combined authority.

18 SIR JOHN SAUNDERS: Thank you.  
 19 (11.15 am)

20 (A short break)

21 (11.35 am)

22 MR GREANEY: Sir, Ms Roberts has been good enough to tell me  
 23 that she has just one very short matter she wishes to  
 24 clarify and in those circumstances it makes sense for  
 25 her to go before Mr Smith.

68

1 Questions from MS ROBERTS  
 2 MS ROBERTS: Thank you very much, Mr Greaney. Can you see  
 3 and hear me?  
 4 MR GREANEY: We can.  
 5 MS ROBERTS: Sir, it's really for your benefit, and it's  
 6 picking up if, I may, please, on the questions you were  
 7 asking about paragraph 69 of Mr O'Reilly's statement,  
 8 dealing with the call that was made between Mr O'Reilly  
 9 and Mr Steve Hynes, then operational commander at scene.  
 10 It's a call at 00.12. Sir, you asked questions about  
 11 the MTFA resource. That would be HART. The point made  
 12 within that paragraph being, of course, that  
 13 Mr O'Reilly's recollection of the call is that Mr Hynes  
 14 told him that the MTFA resource, that would be HART, was  
 15 at the RVP.  
 16 Just to remind you, sir, and others, there are two  
 17 HART teams within the north-west. I shan't say where  
 18 they are based. One of those HART teams was of course  
 19 at scene, arriving, as Mr Greaney quite properly said,  
 20 about 23.15. The other team, which is based elsewhere,  
 21 was deployed first of all to the RVP.  
 22 And the ambulance history for your benefit, sir, it  
 23 doesn't need to go on the screen, is {INQ040368/9}. At  
 24 page 9 of the ambulance history, those other members of  
 25 the other HART team are seen arriving at RVP

69

1 Manchester Central, so that would be Thompson Street,  
 2 and not arriving at scene until 00.19.  
 3 So at the point at which the phone call was made  
 4 between Mr Hynes and Mr O'Reilly, there were in fact  
 5 HART members from the other team deployed elsewhere in  
 6 the north-west at the RVP, but there were of course,  
 7 you're quite right, sir, HART members at scene as well.  
 8 So that, I hope, gives you, sir, and others a little  
 9 bit of context. That's all I wish to add at this stage,  
 10 I hope by way of clarification.  
 11 SIR JOHN SAUNDERS: Ms Roberts, that does help. Do you  
 12 happen to know, otherwise I can know later, how long the  
 13 second HART team were actually kept at Thompson Street  
 14 before being deployed?  
 15 MS ROBERTS: I can give you some timings, sir, yes. They  
 16 were at Thompson Street at 23.43, 23.46, 23.54, 00.09  
 17 and all of them made it to the scene for 00.19.  
 18 SIR JOHN SAUNDERS: Thank you very helpful. Thank you very  
 19 much.  
 20 MS ROBERTS: Thank you, sir.  
 21 MR GREANEY: Thank you, Ms Roberts. I will now call upon  
 22 Mr Smith to ask his questions on behalf of North West  
 23 Fire Control.  
 24 Questions from MR SMITH  
 25 MR SMITH: Mr O'Reilly, paragraph 109 of your statement

70

1 lists three categories of failure in the mobilising  
 2 response. It's page 28.  
 3 As I understand it, you have included yourself  
 4 within the third of these individual failings within  
 5 GMFRS; is that correct?  
 6 A. That's correct, sir, yes.  
 7 Q. One of the matters you were asked about by Mr Greaney  
 8 was why you didn't deploy crews to the scene upon seeing  
 9 the presence of ambulance on your arrival at the command  
 10 support room. Your answer to Mr Greaney was that it was  
 11 a failing of yours. Do you remember?  
 12 A. Yes, sir.  
 13 Q. The question, however, is: why didn't you deploy crews  
 14 immediately to the scene? You've acknowledged it was  
 15 a failure. The question is: why didn't you do it?  
 16 A. I can't explain that, sir. It was an absolute failure  
 17 of mine not to recognise that the best solution at that  
 18 stage was to divert crews from Philips Park to the scene  
 19 immediately.  
 20 Q. With all your operational experience, Mr O'Reilly, and  
 21 let's just think about it for a moment, surely you must  
 22 have considered more than once since the event why you  
 23 didn't deploy crews at that time. I'm going to suggest  
 24 there must be a reason.  
 25 A. If there's an identifiable reason, I haven't been able

71

1 to find it, sir, and that's the truth. There was a lot  
 2 of confusion within the command room and going through  
 3 my head at the time. As I said to Mr Greaney, it's not  
 4 the first time I would have done it. At the forefront  
 5 of my mind, I was going to the incident if I couldn't  
 6 get a hold of the chief executive of the  
 7 Ambulance Service. That was probably the wrong things  
 8 to think at that time and I know now -- and I wish and  
 9 I really do wish that I had sent the resources from  
 10 Philips Park direct to the scene.  
 11 Q. Well, nobody would dispute that, Mr O'Reilly, nobody.  
 12 I'm just anxious to explore as briefly as possible your  
 13 state of mind upon seeing the presence of ambulance at  
 14 that scene and knowing that appliances were at  
 15 Philips Park. I'm anxious to explore that with you, if  
 16 I can, and to find from you some explanation.  
 17 A. My state of mind on seeing ambulances at the scene was  
 18 absolute shock and bewilderment. That is probably the  
 19 best way I can describe that. I was looking at three of  
 20 the most experienced officers the organisation had and  
 21 they seemed to be bereft of any information with regards  
 22 to what was actually happening at the scene.  
 23 My instinct, which I admit was wrong, was to try and  
 24 get information about what was happening at the scene,  
 25 and that was in spite of seeing very clear evidence that

72

1 other agencies were already there.  
 2 Q. That's the point I want to come to next, please.  
 3 Clearly, one of the factors involved in your  
 4 decision—making at that time would be, wouldn't it, the  
 5 absence of information about the circumstances on the  
 6 ground? Do you agree?  
 7 A. I agree, yes, sir.  
 8 Q. Does that not apply to the control room?  
 9 A. I think, sir — I know we're conflating two issues here.  
 10 At that stage — and in fact I would argue in the first  
 11 10 minutes of North West Fire Control receiving a call,  
 12 they had an abundantly more... Sorry, the information  
 13 they had was much greater at that time than anybody had  
 14 at the command room whenever we seen ambulances going to  
 15 the scene.  
 16 Q. But is the principle the same, that you need information  
 17 in order to make a decision about what to deploy and  
 18 where and when?  
 19 A. The model that we work on is predicated on receiving  
 20 information about hazards, risks, the resources we have  
 21 at our disposal, and what we're going to do with them  
 22 when they get there. So yes, we do need information,  
 23 and the sad thing for me was that I now know that that  
 24 information was actually readily available.  
 25 Q. Have you any explanation to offer for the fact that

73

1 crews did not arrive at the arena until just before  
 2 20 minutes to 1 o'clock in the morning, in other words,  
 3 00.38, you having been present in the command support  
 4 room from about 10 to? Have you any explanation for why  
 5 those crews were not deployed earlier?  
 6 A. I think, sir, the obvious answer to that is that North  
 7 West Fire Control didn't send the predetermined  
 8 attendance when they should have.  
 9 Q. You keep returning to that theme, don't you?  
 10 SIR JOHN SAUNDERS: Sorry, Mr Smith, I don't want you to be  
 11 at cross—purposes. You've already said that you should  
 12 have sent ambulances — sorry, should have sent fire  
 13 appliances as soon as you saw ambulances at the scene,  
 14 and you can't explain it. So it follows, as night  
 15 follows day, that your answer to the question from  
 16 Mr Smith, which may be the same as we've just had, is,  
 17 "No, I can't explain it", because you can't explain —  
 18 A. Sorry, I was unclear as to the question, sir.  
 19 SIR JOHN SAUNDERS: I don't know if I've made it more  
 20 unclear.  
 21 MR SMITH: Far from it, sir, you never do.  
 22 SIR JOHN SAUNDERS: That is certainly untrue, but thank you.  
 23 MR SMITH: I would like to move on then, please, to a number  
 24 of other issues which touch upon the control room. Your  
 25 position is this, isn't it, Mr O'Reilly, that it was

74

1 obvious and should have been obvious to anyone connected  
 2 with the Fire and Rescue Service that crews should have  
 3 been mobilised as quickly as possible to either the RVP  
 4 or to the incident scene? Is that your position?  
 5 A. Yes, sir.  
 6 SIR JOHN SAUNDERS: To the RVP or the incident scene or  
 7 simply the RVP is what I think you told me before.  
 8 A. No, the clarification is quite right, sir. My position,  
 9 sir, is that because we had additional qualitative  
 10 information, which was the location of a rendezvous  
 11 point, and that rendezvous point had been provided to us  
 12 by the agency who had primacy, which was the police,  
 13 then the Fire and Rescue Service assets should have been  
 14 sent directly to the rendezvous point.  
 15 MR SMITH: And they should have been mobilised as a matter  
 16 of urgency?  
 17 A. Yes, sir.  
 18 Q. I'm not going to spend any more time on this, but I hope  
 19 to be able to ask you one more question then. If  
 20 that is your view, how does it come about that you are  
 21 unable to explain to the inquiry your state of mind and  
 22 reasons for not mobilising having watched the television  
 23 at the command support room?  
 24 A. Again, the explanation — the only explanation I can  
 25 provide is that at that time, and seeing those

75

1 ambulances and seeing the lack of information within  
 2 that room, I instinctively went to try and find where  
 3 I could get information from, and that caused a delay  
 4 which I will regret for the rest of my life.  
 5 Q. You see the point I'm making?  
 6 A. I see the point, yes.  
 7 Q. You recognise, don't you, the importance which you've  
 8 said of mobilising as a matter of urgency to the RVP,  
 9 let's just say that?  
 10 A. Sorry, did you ask a question?  
 11 Q. But nonetheless, is this correct, you're unable to  
 12 explain your decision—making in failing to order  
 13 mobilisation on seeing the presence of ambulance crews  
 14 at the scene?  
 15 A. If I had sent — and I agree that I should have, even  
 16 based on that scant amount of information, when  
 17 ambulance crews were obviously at the scene, without any  
 18 other background information I should have still have  
 19 done that. But my point in relation to the information  
 20 that North West Fire Control had at its disposal at the  
 21 earlier stage of the incident was much more than any of  
 22 the rest of us had and should have been acted on at that  
 23 time, in my opinion.  
 24 Q. I'm going to come now to the information that you did or  
 25 did not have. You had been aware, hadn't you, of the

76

1 incident since 23.08 when you received the first call  
 2 from the duty group manager, Mr Dean Nankivell?  
 3 A. Yes.  
 4 Q. You have informed the inquiry through your statement at  
 5 paragraph 59, page 16, that you took it for granted, is  
 6 this correct, that Greater Manchester Fire and Rescue  
 7 Service would have had a PDA along with an incident  
 8 commander already at the arena at the point at which you  
 9 received information concerning the incident?  
 10 A. Yes, that was my assumption.  
 11 Q. Does that remain your position?  
 12 A. Yes.  
 13 Q. I think you've indicated that you considered that to be  
 14 the position because you'd not been told otherwise.  
 15 A. It was a position, yes, I hadn't been told otherwise and  
 16 that would have been my experience to that point.  
 17 Q. The whole point of Mr Nankivell's call, wasn't it, was  
 18 to inform you of the fact that there'd been an exploded  
 19 bomb at Manchester Arena?  
 20 A. He categorised it as an explosion to my memory.  
 21 Q. Are you sure?  
 22 A. I'm as sure as I can be, yes.  
 23 Q. Would you look at page 21 of the sequence of  
 24 communications, please {INQ041473/21}?  
 25 Can we just have a look together at North West Fire

77

1 Control's call to Mr Nankivell and just see what  
 2 information was being passed at that time. Pick it up  
 3 at the bottom of {INQ041473/21} and go into  
 4 {INQ041473/22}, please, Mr Lopez:  
 5 "A bomb had gone off. There's 30 casualties so  
 6 far."  
 7 You probably followed the evidence as to the way in  
 8 which information about the rendezvous point was cut  
 9 off. But then you will already be familiar, is this  
 10 correct, with the rest of that paragraph that follows?  
 11 A. (Pause). Yes.  
 12 Q. That's the information that was given to Mr Nankivell at  
 13 that time. Does it surprise you that a man of  
 14 Mr Nankivell's experience, which you've testified to,  
 15 told you only that there had been an explosion and made  
 16 no reference to a bomb? Does that surprise you?  
 17 A. It doesn't, really, because if the bomb has exploded,  
 18 it's an explosion, and Dean — that was the way he  
 19 categorised it to me at that time.  
 20 Q. Mr O'Reilly, think about it, please. Could there have  
 21 been a more substantial or significant incident facing  
 22 Greater Manchester Fire and Rescue Service at that time  
 23 than this one?  
 24 A. No.  
 25 Q. The first thing I suggest you'd want to have is an

78

1 awareness of what was taking place on the ground; isn't  
 2 that right?  
 3 A. That's correct, yes.  
 4 Q. You were still at home, weren't you?  
 5 A. I was.  
 6 Q. You have now become aware that by this time,  
 7 Mr Nankivell had spoken to North West Fire Control at  
 8 22.52, as we've just seen, was aware there was  
 9 a paramedic Bronze commander on scene, and that four  
 10 pumps had been mobilised to Philips Park. It's all  
 11 there. That he had spoken to Area Manager Etches at  
 12 22.57, to Station Manager Berry at 23.01 and 23.02. And  
 13 to North West Fire Control again at 23.06. You've  
 14 become aware of all that, haven't you, since the  
 15 incident, since the attack?  
 16 You've said in your statement, haven't you,  
 17 Mr O'Reilly, that Mr Nankivell didn't appear to have any  
 18 other information?  
 19 A. That was the information that he gave me at the time and  
 20 there was no additional information on top of that  
 21 in the initial call.  
 22 Q. Well, do you agree it's extraordinary, if that is the  
 23 case, that this limited amount of information was  
 24 provided to you at that time, at 23.08, in the context  
 25 of the information that he had been provided with at the

79

1 very least by North West Fire Control? It's  
 2 extraordinary, isn't it?  
 3 A. It's unusual, yes.  
 4 Q. Do you feel you've been let down?  
 5 A. No, I don't feel I've been let down because I think what  
 6 Dean was doing was doing the rounds to — and actually,  
 7 you know, well, Dean was letting me know that an  
 8 incident had occurred and that he was heading into the  
 9 command support room, and that was as much, I think,  
 10 in the first call that we talked about. I was glad of  
 11 that and I said that I would see him there first. At  
 12 that stage, I had no additional information, but I can't  
 13 say I felt let down about that.  
 14 Q. You should have been supplied with it, shouldn't you?  
 15 A. If he had that information then I would have expected to  
 16 have got it, yes.  
 17 Q. But if he didn't have the information to offer, what  
 18 enquiries did you make of him?  
 19 A. Well, I was doing what I would normally do in relation  
 20 to responding to something along those lines of that  
 21 magnitude and that was getting ready to go, knowing  
 22 rightly that in the next 10 minutes — because you know,  
 23 the way I had taken it from Dean and the way I'd  
 24 received the information in that first call was that it  
 25 was something that had happened quite recently and

80

1 therefore you wouldn't ordinarily expect to have  
 2 additional information other than that if we were still  
 3 responding.  
 4 Q. You have agreed with me, haven't you, you would want as  
 5 much information as possible in order to inform your  
 6 response?  
 7 A. I think in relation to every operational incident, the  
 8 first responding officers want every piece of available  
 9 information that can be passed to them, yes.  
 10 Q. So put simply, why didn't you ask him if he didn't tell  
 11 you any more than this?  
 12 A. As I say, you know, in my -- I am... Even though I am  
 13 the chief, in relation to the food chain, I would expect  
 14 that the most relevant information goes to the initial  
 15 incident commander who's attending, and subsequent to  
 16 that then that information is sent to the officers who  
 17 are attending in support. I would expect that the  
 18 command support room would then be given a full relay of  
 19 information and then when I got there, that would be  
 20 a full brief that I would get, which I would then take  
 21 on elsewhere.  
 22 Q. Before leaving home, you sent text messages, didn't you,  
 23 to the mayor's office at 23.20 and a message to the  
 24 chief constable? Didn't you think it would have been  
 25 appropriate or helpful at the very least to ask

81

1 Mr Nankivell, "What information can you give me about  
 2 this incident so that I'm as well-informed as I can be  
 3 before I leave", with the prospect of an SCG looming?  
 4 Why didn't you say that to Mr Nankivell?  
 5 A. If you look at -- I received another very quick call  
 6 from Dean, I think it was just before I'd left, where he  
 7 told me that he had restricted movements, which  
 8 I supported. But then when I was in the car and I had  
 9 a chance to ring him back, that was the opportunity then  
 10 to get more information about what we were doing and  
 11 why. At that stage, again, a total failing of mine, but  
 12 I made an assumption that we had resources at scene and  
 13 the information that Dean was giving me at that time was  
 14 supplementary information about support arrangements  
 15 we were putting in place in case of an escalation.  
 16 Q. My question was: why at 23.08 did you not ask him for  
 17 the necessary information to inform you? I'm not asking  
 18 you about what steps were taken later. I'm asking you  
 19 about the call at 23.08.  
 20 A. My interpretation of that call at 23.08, Dean was giving  
 21 me the information that he felt I needed to know at that  
 22 time. My response to him was: was a command support  
 23 room being established? He said yes, and I said, "I'll  
 24 see you on the way in there". It's quite a relevant  
 25 question that I should have asked for a full detailed

82

1 relay of information that he had received from North  
 2 West Fire Control and I failed to do that.  
 3 Q. So it is a relevant question, isn't it?  
 4 A. Yes.  
 5 Q. And it is another failure by you, isn't it?  
 6 A. It is a failure for me to ask for any other information  
 7 that Dean had at that time if he could have given it to  
 8 me.  
 9 Q. In terms of your assumption that fire crews would have  
 10 been mobilised to the scene of the attack, you didn't  
 11 know at that time, did you, what action plan, if any,  
 12 had been followed by North West Fire Control, did you?  
 13 A. No, and I wouldn't have been familiar with the detail of  
 14 all of those action plans anyway. I was told that we  
 15 had an explosion and I made the assumption that in  
 16 response to an explosion, regardless of action cards,  
 17 that we would have had an attendance going to that  
 18 incident.  
 19 Q. And are you familiar with them all now?  
 20 A. No.  
 21 Q. How does that come about?  
 22 A. I've seen one or two of the action cards, but I'm since  
 23 retired from Greater Manchester Fire and Rescue Service  
 24 since 6 February 2018. I have seen the differences  
 25 between, I think, three action cards, which are the

83

1 explosions action card, the MTFA action card and the  
 2 unexploded bomb action card.  
 3 Q. Well, with the knowledge you have now, do you agree that  
 4 for all you knew, there might have been a reason for not  
 5 sending fire crews to the scene?  
 6 A. What I know now, sir, is that what you're asking me  
 7 about?  
 8 Q. Yes.  
 9 A. What I know now from the evidence, and forgive me if  
 10 I've misunderstood this question again.  
 11 Q. Shall I clarify it?  
 12 A. Yes, please.  
 13 SIR JOHN SAUNDERS: I just wonder whether you are actually  
 14 asking -- aren't you asking: at the time --  
 15 MR SMITH: I'm coming to that next, with respect.  
 16 SIR JOHN SAUNDERS: So you are being asked now, having  
 17 looked at all the material, do you consider that there  
 18 would have been a good reason for not sending people to  
 19 the scene?  
 20 MR SMITH: There might have been.  
 21 A. Having viewed the evidence that's been made available  
 22 from North West Fire Control, I think a predetermined  
 23 attendance should have been sent.  
 24 Q. What if the "Operation Plato -- standby" action plan had  
 25 been implemented by North West Fire Control? This is

84

1 why I asked the question the way I did. Your knowledge  
 2 now would tell you, wouldn't it, that the first step  
 3 under that action plan would have required North West  
 4 Fire Control to contact the duty NILO?  
 5 A. Sir, in those first 10 minutes there was no information  
 6 in North West Fire Control that would have indicated  
 7 that it would be reasonable to use the Plato action  
 8 plan.  
 9 Q. Yes, but what I'm trying to get to is that your  
 10 knowledge of the action cards now tells you, doesn't it,  
 11 that if that action card had been applied, if it had,  
 12 the duty NILO would have been required to be consulted?  
 13 That's the first question, please.  
 14 A. If North West Fire Control had received information  
 15 which indicated that Plato was the appropriate action  
 16 card to use, then yes, they should have rang the duty  
 17 NILO.  
 18 Q. And that would have required a firearms incident,  
 19 wouldn't it?  
 20 A. Plato is the police response to a firearms incident,  
 21 yes.  
 22 Q. As far as the explosion plan is concerned, you're aware  
 23 now that that required North West Fire Control to deploy  
 24 crews to the incident scene; is that correct?  
 25 A. Yes.

85

1 Q. That it was contemplated that that action plan would  
 2 involve a situation in which a bomb had exploded; do you  
 3 understand that to be the case now?  
 4 A. Yes.  
 5 Q. And that as far as the "Bomb — general" action plan is  
 6 concerned, that was contemplated to be an appropriate  
 7 action plan for a situation in which a bomb was  
 8 unexploded?  
 9 A. That's my understanding, sir, yes.  
 10 Q. Are you aware that the explosion action plan contained  
 11 no provisions for deploying to an RVP?  
 12 A. Yes, I do. That's correct, yes.  
 13 Q. The "Bomb — general" action plan contained a provision  
 14 for deploying to an RVP and that makes sense, doesn't  
 15 it?  
 16 A. It does, yes.  
 17 Q. Because if the bomb is unexploded, there needs to be  
 18 a safe muster point, doesn't there?  
 19 A. Yes, and that would be the proactive actions that you  
 20 would expect to deal with something that has yet not  
 21 exploded.  
 22 Q. Have you any view about whether these three action cards  
 23 to which I've just made reference, now that you know  
 24 their content, was capable of leading to a degree of  
 25 uncertainty or confusion in relation to the required

86

1 mobilising response in circumstances such as these?  
 2 Have you any view now about that?  
 3 A. In circumstances such as these, I think that the bomb  
 4 action card could definitely have been clearer to  
 5 describe that it was something that had not yet exploded  
 6 and be very clear about that. My previous experience —  
 7 we were very clear about that, you know, so there was  
 8 a code word attached to a bomb and there was a prefix  
 9 then added to that, that it was a suspect or it was  
 10 a detonated. So I can understand how that would have  
 11 caused some element of confusion if they had adopted  
 12 that action card.  
 13 SIR JOHN SAUNDERS: Can I ask you? Here we have a request  
 14 by the police to send to an RVP. You say the explosion  
 15 card was the appropriate card?  
 16 A. I think that was Mr Smith's words. I thought that  
 17 definitely on reflection, on my statement when I seen  
 18 the explosion action card afterwards, that would have  
 19 been — if they'd adopted an action card, that would  
 20 have been the most appropriate one to adopt.  
 21 SIR JOHN SAUNDERS: If they didn't adopt an action card,  
 22 they would have had to ask for someone, they would have  
 23 had to have gone to a NILO for advice, wouldn't they?  
 24 A. Again, I think this is —  
 25 SIR JOHN SAUNDERS: I know you wish it was like the old

87

1 situation, but it's not like the old situation; this is  
 2 the way NWFC operates.  
 3 A. Yes. I still maintain, sir, that the information that  
 4 they had at that time very clearly indicated that there  
 5 was a request coming from two agencies who were sending  
 6 resources to the scene.  
 7 SIR JOHN SAUNDERS: Okay. The explosion card does not  
 8 provide for sending to an RVP, so what do you do if  
 9 you have a request from the police to send to an RVP?  
 10 You think the explosion card is the appropriate card,  
 11 but that only provides for people to go to the scene.  
 12 A. Sir, I think in relation to that, I would never have  
 13 assumed, and I still don't assume, that an action card  
 14 is something that — if it's not on it, that you don't  
 15 operate with discretion.  
 16 SIR JOHN SAUNDERS: So you think if they'd chosen the  
 17 explosion card, they should simply have said, "Send to  
 18 RVP rather than the scene"?  
 19 A. I think actually the common sense issue in relation to  
 20 that would be: there's been an explosion, police have  
 21 given us somewhere that they feel is safe for us to go  
 22 to initially, we don't know the extent of structural  
 23 damage or anything else, so we'll send that response to  
 24 an RVP.  
 25 SIR JOHN SAUNDERS: Right. Thank you.

88

1 MR SMITH: Does that involve an element of assessment by the  
2 control room as to match the circumstances the control  
3 room is facing with the available action card, and if  
4 there is, for example, an absence of requirement to send  
5 to an RVP in an action card, do you consider that they  
6 could assess the situation and make a decision based on  
7 their experience and understanding?  
8 A. I honestly feel that if they felt that they didn't have  
9 enough information to send to that RVP, they should have  
10 interrogated the sources from which they were receiving  
11 that information. So they should have went back to the  
12 police control room, who were giving them that  
13 information, and asked them about the relevance of the  
14 RVP and if it was safe so that they could have made  
15 a better informed decision if they felt that they hadn't  
16 got enough information.  
17 Q. Implied within that, may I ask, is it your position that  
18 the control room should have been examining the  
19 circumstances and seeking information and reaching their  
20 own decision on which action card they were to apply?  
21 A. No, sir. What I meant was that at the time they had  
22 received very clear information from police, and if they  
23 were in any way anxious about the amount of information  
24 or lack of, then they should have contacted police.  
25 I think action cards, especially the bomb action card,

89

1 has confused it.  
2 SIR JOHN SAUNDERS: I think we can probably rule the bomb  
3 action card out of it a bit.  
4 MR SMITH: We can, yes.  
5 SIR JOHN SAUNDERS: Let's forget about the bomb action card  
6 because no one is saying they used it.  
7 A. It's a funny one, sir. I was conditioned, as others  
8 were, that the bomb action card had been used.  
9 SIR JOHN SAUNDERS: Absolutely. You'll have to de-condition  
10 yourself and look at it from a different way.  
11 A. Honestly, again I come back to it, I don't think -- and  
12 I know the controllers have said they didn't use any  
13 action card, which was a surprise to me. But I still,  
14 if we go back to action cards, maintain that there was  
15 enough information there to select the explosion action  
16 card and reference it.  
17 SIR JOHN SAUNDERS: Let's tie down to where the differences  
18 are between the two of you are. What you're saying is:  
19 if they were worried about the safety of officers going  
20 to an RVP, then the correct thing to do was to get more  
21 information from the control room. What NWFC says is:  
22 actually, what we do is we speak to the expert and we  
23 speak to the NILO who we know will have access to better  
24 information because they can go to the FDO. So why is  
25 yours right and, if it is Mr Smith's case, and I hope

90

1 I'm not misleading, his case not right? Why is it not  
2 just as good to go to the NILO who they know can get the  
3 best information?  
4 A. I think my instinctive reply to that, sir --  
5 SIR JOHN SAUNDERS: You can give a considered one if you  
6 like.  
7 A. I can consider it as well, but it flies in the face of  
8 JESIP. For me, the primary issue there in relation to  
9 an incident like this is that the three control rooms  
10 have a joint understanding of the incident that they  
11 face, the hazards that are presented and the risks  
12 thereof, and they agree between the three of them where  
13 a rendezvous point will be established.  
14 SIR JOHN SAUNDERS: Okay.  
15 A. And that's very clear.  
16 SIR JOHN SAUNDERS: Stop there. So there we have the  
17 difference.  
18 MR SMITH: This proceeds on the basis, therefore, that the  
19 control room for the Fire Service is part of that  
20 understanding; is that right?  
21 A. That's correct, yes.  
22 Q. Doesn't that hand to the control room a requirement to  
23 pursue other lines of investigation or enquiry before  
24 speaking to any member of the Fire and Rescue Service?  
25 A. I think that's their responsibilities under JESIP, yes.

91

1 Q. Why is the duty NILO ruled out at this stage of the  
2 enquiry? I just ask a little bit more connected with  
3 that question, if I may, to explain why I ask it. Do  
4 you recall that the telephone call made by  
5 Michelle Gregson to the duty NILO contained the words,  
6 and you have made reference to this, "Obviously we're  
7 not mobilising at the moment. Would you speak to the  
8 police and we'll hang fire"? And at that moment GMP was  
9 on the line, both control rooms were connected.  
10 So this was a request to the duty NILO to contact  
11 the force duty officer, wasn't it?  
12 A. It was, yes, sir.  
13 Q. Wasn't that the source of information that the Fire  
14 Service needed to determine whether resources should be  
15 sent to the RVP rather than entrusting this decision to  
16 the control room?  
17 A. Honestly, that's the control room's job. The control  
18 room's job is to speak to the partner agencies, gather  
19 as much information as they can, and then make  
20 a decision as to deploy or not. I think if they were  
21 going to say, "Let's hold back", they have to have  
22 a justifiable reason to hold back. We had people there  
23 who were needing us immediately and our partner agencies  
24 obviously had enough information at their disposal in  
25 their control rooms to mobilise their resources directly

92

1 to the incident.

2 So I find that I'm at a loss as to why we would feel  
3 that it would be better if we speak to somebody who's  
4 obviously at home with maybe no information whatsoever  
5 about the incident, and at that stage it was an  
6 explosion we were dealing with, and at that stage North  
7 West Fire Control had a whole raft of information which  
8 allowed them to make a decision to send a predetermined  
9 attendance to the rendezvous point.

10 SIR JOHN SAUNDERS: Just let me ask you this, and I think we  
11 may need to move on, Mr Smith.

12 MR SMITH: We are going to.

13 SIR JOHN SAUNDERS: It's really not going to make a great  
14 deal of difference in time whether you go back to the  
15 control room and say, "Give me further information", or  
16 maybe they have to try and find it out, then speak to  
17 the NILO, who is after all the expert, and once the  
18 information comes in, it'll mean more to him. He can  
19 speak to the FDO, they get all sorts of information,  
20 NILOs, which perhaps the rest of the world don't get.  
21 So why is that such a bad alternative compared with what  
22 you're saying? Why does it take that much longer?

23 A. Actually, it's a bad alternative because of what  
24 happened on the night —

25 SIR JOHN SAUNDERS: Because they couldn't get through to the

93

1 FDO?

2 A. Because, yes, he couldn't get through to the FDO.

3 SIR JOHN SAUNDERS: So if he had been able to get through to  
4 the FDO immediately and got all the information from the  
5 FDO and said, "Yes, absolutely safe to go to the RVP",  
6 then he says fine to the control room and that happens,  
7 so you'd be happy then?

8 A. No, I wouldn't, sir. This is still in relation to the  
9 (inaudible: distorted) outset here. I'm not being  
10 dogmatic here, I'm being practical in the sense that  
11 at the time, before they rang the NILO, North West Fire  
12 Control had every piece of information that they needed  
13 to deploy to the rendezvous point.

14 SIR JOHN SAUNDERS: Weren't they entitled to say, really,  
15 "I think we need to check this RVP out, it's pretty  
16 close"?

17 A. Again I'll go back to my previous —

18 SIR JOHN SAUNDERS: Because then you check with the control  
19 room —

20 A. Then you ask the police, who told you about the  
21 rendezvous point: is there any legitimate reason why we  
22 shouldn't be sending our resources to your nominated  
23 rendezvous point?

24 SIR JOHN SAUNDERS: So it was reasonable for them to make  
25 further enquiries but not reasonable to do it in the way

94

1 they did.

2 A. I think, and I quoted this to Mr Greaney yesterday, it  
3 was reasonable for them to mobilise the resources to the  
4 rendezvous point and then make a telephone call to the  
5 NILO to tell them exactly what was happening and if they  
6 could find any additional information  
7 then (overspeaking) —

8 SIR JOHN SAUNDERS: My question was slightly different: you  
9 accept it was reasonable if they were concerned about  
10 the rendezvous point being safe to at least ask the  
11 control room?

12 A. Yes.

13 SIR JOHN SAUNDERS: Okay.

14 A. That wouldn't have been my primary focus, sir.

15 SIR JOHN SAUNDERS: I understand that.

16 MR SMITH: Have you considered why in these circumstances  
17 Mr Berry didn't say to North West Fire Control at 22.40,  
18 "Deploy to the incident", or, "Deploy to the RVP, just  
19 get on with it"?

20 A. I can't understand that, sir, no.

21 Q. Well, is there anything you can point to in Mr Berry's  
22 training that would have told him otherwise that he  
23 should have adopted some different action?

24 A. Honestly, I haven't done the NILO training, sir, so  
25 I don't know. The only thing that I can point to is

95

1 what I pointed to yesterday, that element of corporate  
2 autonomy that NILOs have. I don't know what was in  
3 Andy's head whenever he'd received that information from  
4 North West Fire Control.

5 SIR JOHN SAUNDERS: Let's forget about the NILO training.  
6 In your view, his response should have been what your  
7 response is and they should have said to NWFC, "Deploy  
8 to the RVP"?

9 A. I think that's consistent with every officer that's been  
10 on this stand, sir.

11 MR SMITH: I would suggest that's not right, Mr O'Reilly.  
12 Evidence has been given to the inquiry that Mr Berry's  
13 response was reasonable.

14 SIR JOHN SAUNDERS: I think it's varied. We need to  
15 annotate all the evidence.

16 MR SMITH: We will need to analyse all that carefully, sir.

17 But there's some evidence before the inquiry from  
18 senior Fire and Rescue Service officers that Mr Berry's  
19 response was reasonable. If you don't know what  
20 training NILOs undergo, how are you in a position to  
21 deny that proposition?

22 A. Again, sir, I think we're conflating two issues here.  
23 My point is before that conversation took place and  
24 I can't understand why, in the conversation with  
25 Andy Berry, that Andy didn't challenge back and ask,

96

1 "Why are we not sending to an RVP?"  
 2 Q. Well, moving on from there, if we may, which we must,  
 3 I want to ask you about another aspect of your response,  
 4 which Mr Greaney has touched upon, and I would like to  
 5 take you, please, to {INQ004279/1}, which is how the  
 6 incident log for incident 9074 would have appeared to  
 7 you if you had viewed it on screen before leaving home.  
 8 Do you agree that that is how it would have appeared?  
 9 A. Yes, sir.  
 10 Q. If we scroll down, please, Mr Lopez, through  
 11 {INQ004279/2} into {INQ004279/3}, where we can pick up  
 12 references to the paramedic Bronze commander at scene  
 13 and the arrival of police officers at scene, and go to  
 14 {INQ004279/4}, where we'll pick up, in the early part of  
 15 the page, 23.08.  
 16 This is the time of the call from Mr Nankivell to  
 17 you.  
 18 A. Mm—hm.  
 19 Q. It's clear, isn't it, Mr O'Reilly, that if you had  
 20 looked on your system at incident log 9074 immediately  
 21 after the end of that call with Mr Nankivell, you would  
 22 have been able to follow all of the information that had  
 23 been provided and entered on to the log by North West  
 24 Fire Control up until that point, wouldn't you?  
 25 A. I would have, sir, yes.

97

1 Q. You'll forgive me for putting it this way, please, but  
 2 if you had time to send text messages, why didn't  
 3 you have time to look at the log, or did you?  
 4 A. I would say, sir, that I probably would have had time to  
 5 look at the log if I had chosen to.  
 6 Q. So why didn't you choose to?  
 7 A. It's not something that would have entered my head to do  
 8 as I would have expected that any information that would  
 9 have been on that log would have been passed to the  
 10 relevant officers for attendance.  
 11 Q. You've reached a point at 23.08 at which Mr Nankivell is  
 12 unable to supply you with very much information, haven't  
 13 you?  
 14 A. The information that I was supplied with is what I would  
 15 have expected at the outset of an incident, sir:  
 16 something very scant, not enough information, but that  
 17 information would be coming from officers on the ground.  
 18 Q. In the context of a situation in which you considered  
 19 you might be moving to an SCG in due course. So do  
 20 I take it you don't accept that that was a failure for  
 21 which you were responsible?  
 22 A. I accept that it can be viewed as a failure for not  
 23 looking at the log and not asking for more information  
 24 at that time. I understood that it was the dynamic  
 25 phase and that Dean was keen to get on with other stuff

98

1 and he was informing me that that was happening.  
 2 Q. You appreciate, don't you, that Station Manager Berry  
 3 arrived at Victoria Station with three appliances  
 4 an hour and a half after you were first notified?  
 5 A. Correct, sir, yes.  
 6 Q. What responsibility do you personally accept for that  
 7 state of affairs, given your experience and involvement?  
 8 A. I accept fully, sir, that from the point that I realised  
 9 that we weren't there and the point that I realised  
 10 others were, that I should have been more positive in  
 11 ensuring that resources were sent to the scene, and  
 12 that's something that I will always live with.  
 13 Q. Finally, before leaving failures, do you accept that you  
 14 personally took command of this incident from the  
 15 command support room?  
 16 A. I don't accept that, sir, no.  
 17 Q. Instead of leaving command in the capable hands of Group  
 18 Manager Ben Levy, you took over the decision-making,  
 19 didn't you?  
 20 SIR JOHN SAUNDERS: I think that goes on the presumption  
 21 that you actually knew he was incident commander. Did  
 22 you know Ben Levy was incident commander?  
 23 A. No, sir.  
 24 SIR JOHN SAUNDERS: I think we needed to stop at the stage  
 25 there.

99

1 MR SMITH: You're quite right, thank you.  
 2 But if you didn't know who the incident commander  
 3 was, what did you do about it to establish an incident  
 4 command?  
 5 A. I did what I know the Fire and Rescue Service always  
 6 does and that was to get resources deployed to the  
 7 scene.  
 8 SIR JOHN SAUNDERS: I have to say that seems a gap to me.  
 9 For whatever reason you haven't got resources at the  
 10 scene and you just can't get an incident commander to  
 11 get a grip until they've got some at the scene. It  
 12 could go on forever.  
 13 A. Well, the way the Fire Service, sir — and I think  
 14 I gave a very detailed explanation yesterday, and  
 15 I don't want to repeat all of that, but we do not  
 16 ordinarily remotely manage situations.  
 17 SIR JOHN SAUNDERS: I understand that because you normally  
 18 go to the scene. But if it is foreseeable that there  
 19 will be an incident where you won't go to the scene,  
 20 doesn't it seem that some provision should be made for  
 21 having an incident manager?  
 22 A. And I think that is — yes, there is, and there is  
 23 provision for that. For example, if it's not  
 24 a spontaneous event, if it's a pre-planned, based on  
 25 information, then people and resources will correlate at

100

1 a place, co-locate with others and someone with be  
 2 identified as an incident commander, and we do that all  
 3 the time. On this occasion because it was an actual  
 4 incident, it was spontaneous, we would have expected  
 5 that getting eyes and ears on the scene is the ground  
 6 truth. Situational awareness, hazard appreciation, all  
 7 of that is necessary from eyes and ears on the ground.  
 8 SIR JOHN SAUNDERS: But if I'm doing recommendations, would  
 9 it be a good idea if one recommendation was that at  
 10 least the Fire Service should think about is making sure  
 11 that an incident commander is appointed even if they're  
 12 not at the scene, so when you have a delay in getting to  
 13 the scene for whatever reason?  
 14 A. Well, that is catered for in quite a lot of the policy,  
 15 sir. I don't know whether you've been exposed to that.  
 16 SIR JOHN SAUNDERS: Why didn't it happen on this night then?  
 17 What policy didn't apply?  
 18 A. Well, actually, when you're — well, because we didn't  
 19 mobilise to the incident, nobody was mobilised as an  
 20 incident commander, so there wasn't an officer  
 21 pinpointed for that. If there's an ongoing incident,  
 22 for example, and we are mobilised to a staging area,  
 23 a marshalling area, a rendezvous point, then somebody  
 24 will be nominated as an incident commander to attend  
 25 with the crews on a holding basis that they would then

101

1 be forward deployed on.  
 2 SIR JOHN SAUNDERS: I am so sorry to take over, but until  
 3 the order is made to deploy there will be no incident  
 4 commander? The order, not immediate, when you deploy,  
 5 you will be deploying with — you're the senior officer  
 6 going with the deployment?  
 7 A. And there's a provision made for that, if we're  
 8 deploying three appliances and they were being told to  
 9 go to stand by, then a station commander would be sent  
 10 along with them and he'd then be seen as the incident  
 11 commander who would deploy along with those resources  
 12 even though they are not at the incident.  
 13 SIR JOHN SAUNDERS: And there's no gap as far as you're  
 14 concerned?  
 15 A. I think because — and this has always been, and I think  
 16 I said this yesterday, there's always been  
 17 a complication between the command structures of the  
 18 three emergency services whereby one will say the  
 19 incident commander would be 2 miles away from it or  
 20 further and another will say that, no, we have to have  
 21 an incident commander on scene because that's how we  
 22 risk assess the safety to our firefighters when we are  
 23 committing them.  
 24 SIR JOHN SAUNDERS: Okay, thank you.  
 25 MR SMITH: So who had command of Fire Service resources once

102

1 you had arrived at the command support room?  
 2 A. The chief fire officer or the principal officer on duty  
 3 always retains the responsibility for the deployment of  
 4 resources across the county and further afield.  
 5 Q. And before we leave this, do you agree that you opposed  
 6 every attempt that Group Manager Ben Levy made to deploy  
 7 the SRT to the scene? Do you agree with that?  
 8 A. Opposed I think is a strong word. What we were required  
 9 to do was to get a response to the scene. Should I have  
 10 included some of the recommendations made by Dean and  
 11 Ben? The conversation with Dean was quite open. The  
 12 conversation with Ben was more — Ben wasn't in receipt  
 13 of the same information that Dean was. Should I have  
 14 included an element of the specialist response team  
 15 in the deployment we made to the arena that night?  
 16 I think that would have been a better decision. To say  
 17 that I opposed Ben I think would be factually incorrect.  
 18 But to say a better decision in that resource that  
 19 responded — even if it was only to recognise the  
 20 professional opinion of others in the room — then maybe  
 21 I should have done that and it would have been a better  
 22 decision as a result.  
 23 Q. As far as the tenor of your conversations with Mr Levy  
 24 is concerned, have you listened to and heard the  
 25 evidence that he was warned that if he wasn't careful,

103

1 he'd get the sack?  
 2 A. Not by me he wasn't, sir.  
 3 Q. No, not by you, but he was warned in his conversations  
 4 with you that if he wasn't careful, somebody warned him  
 5 he would get the sack.  
 6 A. I think even in Ben's evidence, he described that as  
 7 something that he didn't actually think was a reality.  
 8 I think the understanding that Ben and I had — Ben was  
 9 regularly in my office and regularly telling me where  
 10 I was wrong. So Ben and I had a good professional  
 11 understanding about how to communicate with each other.  
 12 I was under no illusions that Ben wanted to take a full  
 13 MTFA team down to the scene and I was trying my best to  
 14 communicate to Ben that what we'd received on  
 15 information was that the full MTFA wasn't required. But  
 16 I do acknowledge that the representations that Dean  
 17 made, I should have acknowledged them better and  
 18 I should have included, even if it was just to give that  
 19 reassurance to individuals about their experience,  
 20 I should have made a decision to include an element of  
 21 the specialist response team in that response to the  
 22 arena.  
 23 Q. Before we leave this, further to what you have just  
 24 said, could I be clear: are you saying that there was  
 25 a balanced and careful professional discussion between

104

1 you and Mr Levy which wouldn't have given rise to any  
 2 perception that he was overstepping the mark in relation  
 3 to his challenge to your position?  
 4 A. My perception was that he hadn't overstepped any mark.  
 5 Q. I would like to take you now to a very different matter,  
 6 please: the debrief at The Hive on 12 July 2017.  
 7 Sir, have I dealt with everything that you wanted to  
 8 raise?  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR SMITH: Thank you.  
 11 Could Mr Lopez put on the screen, please,  
 12 {INQ030902/3}.  
 13 You agree, don't you, you were present at this  
 14 debrief?  
 15 A. I was, yes.  
 16 Q. Did you follow the discussions?  
 17 A. Yes, sir.  
 18 Q. I would like to take you, please, to a reference to  
 19 Janine and the words begin, probably approaching halfway  
 20 down the page:  
 21 "Our training is: tell the NILO, think NILO. Think  
 22 NILO, because we don't know what we're sending crews  
 23 into."  
 24 Did you hear her say that?  
 25 A. I think I do remember that, yes, sir.

105

1 Q. Did you agree with it?  
 2 A. I don't agree with it, sir, no.  
 3 Q. Why didn't you say so at the time?  
 4 A. I think you've heard that it was a very challenging  
 5 debrief and others were wanting to talk at the time.  
 6 And to be honest, a debrief should be a very open  
 7 discussion where people say things that they feel  
 8 comfortable saying rather than being challenged. And  
 9 then it gets pulled back into some sort of document  
 10 which allows us to draw conclusions and make  
 11 recommendations. I don't think that that was actually  
 12 that type of debrief.  
 13 Q. Mr O'Reilly, this was your opportunity, wasn't it,  
 14 surely, in the presence of those firefighters to inform  
 15 them that what North West Fire Control was saying  
 16 through its operations manager at this meeting was  
 17 something you disagreed with? It was your opportunity,  
 18 wasn't it?  
 19 A. It was an opportunity.  
 20 Q. Why didn't you take it?  
 21 A. I think it was well-known by that stage that my views  
 22 were.  
 23 Q. Well, if that's the case, why conceal them at that  
 24 point?  
 25 A. I don't think I needed to conceal them, sir. I think

106

1 everybody was aware of the fact that I believed that  
 2 a predetermined attendance — in fact that was my view  
 3 from the early hours of 23 May, that a predetermined  
 4 should have been sent and I think North West Fire  
 5 Control and everyone within North West Fire Control was  
 6 aware of that.  
 7 Q. Did you pick up the telephone at any time between this  
 8 incident and 12 July and speak to the head of North West  
 9 Fire Control and tell her your views?  
 10 A. No, I didn't.  
 11 Q. Wouldn't that have been a sensible thing to do?  
 12 A. It would have been, sir, but — and there is a but to  
 13 that. I was very, very surprised when I was sitting and  
 14 reflecting on the morning of 23 May, having written my  
 15 first contemporaneous note about what had occurred the  
 16 night before and realising what a disaster it had been  
 17 for the people there who were hurt at the scene, to  
 18 receive an email from the manager of North West Fire  
 19 Control saying that they had followed every policy to  
 20 the letter.  
 21 I found that a strange thing to do within hours of  
 22 that incident having occurred, without anyone being able  
 23 to reflect on what had occurred the night before, to  
 24 tell all of the north-west chiefs that, in her opinion,  
 25 North West Fire Control made no mistakes and had done

107

1 everything right.  
 2 Q. And this was your opportunity to correct it, wasn't it,  
 3 by picking up the phone and speaking to her and having  
 4 a proper, professional discussion about where in your  
 5 opinion North West Fire Control had gone wrong? Do you  
 6 agree?  
 7 A. It was an opportunity, yes, sir.  
 8 Q. Why didn't you take it?  
 9 A. I don't think I was in a fit state of mind to have that  
 10 conversation at that time, sir.  
 11 Q. Before we leave this page, could you just move on  
 12 a little, please, Mr Lopez, further down until we find  
 13 a reference to Nick:  
 14 "Just wondering why the PDA wasn't sent on the  
 15 explosion?"  
 16 And the operations manager answered:  
 17 "We would never send you out straightaway. We will  
 18 go to the NILO."  
 19 Have you got that?  
 20 A. No, sir.  
 21 SIR JOHN SAUNDERS: Just over halfway down.  
 22 A. I've got it, yes.  
 23 (Pause)  
 24 MR SMITH: This is the very point you're making, have made  
 25 in your statement and in your evidence to the inquiry,

108

1 isn't it, that that's simply not how you considered it  
 2 should have worked?  
 3 A. That's correct, sir.  
 4 Q. So why didn't you challenge that at the time?  
 5 A. Again, I'll say I don't think it was a forum to start  
 6 getting involved in a conversation that obviously wasn't  
 7 going to be able to be had fully and open. There was  
 8 a lot of emotion in the room and I certainly didn't want  
 9 to increase the temperature and the emotion in the room  
 10 at the time.  
 11 Q. That's the reason, is it?  
 12 A. That is the reason, yes.  
 13 Q. I would like to move next to your meeting with the Mayor  
 14 of Manchester, please, on 24 May 2017. It's  
 15 paragraph 93 of your statement, page 24.  
 16 I would like to make it clear, and it's important  
 17 that I should, Mr O'Reilly, that at the time when you  
 18 had your meeting with the Mayor of Manchester, you  
 19 believed that the information at the time of the 22.40  
 20 call to the duty NILO by then included information that  
 21 there was an active shooter at the scene. Is that  
 22 right?  
 23 A. At the time I had the conversation with the mayor, I was  
 24 aware of the inclusion of a reference to an  
 25 active shooter at some point in the early conversations

109

1 with Andy Berry.  
 2 Q. You've appreciated since that in the 22.40 call, that  
 3 information had not yet come in --  
 4 A. Absolutely.  
 5 Q. -- to the control room?  
 6 A. Yes.  
 7 Q. So I just wanted to emphasise that point because it's  
 8 very important to have a proper understanding of your  
 9 views. You did say, didn't you, to the Mayor of  
 10 Manchester, running down 93, 94, first of all,  
 11 paragraph 93:  
 12 "We discussed that if this information had been  
 13 accurate and we had deployed directly to the scene,  
 14 there was a risk that firefighters could have been shot  
 15 or involved in a secondary explosive attack."  
 16 A. Yes.  
 17 Q. Is that what you said to the mayor?  
 18 A. Yes, sir.  
 19 Q. Was that your thinking at the time?  
 20 A. I was giving the mayor a full brief of the incident as  
 21 it occurred to my knowledge at the time, yes, sir.  
 22 Q. Do you appreciate now that a secondary device was one of  
 23 the risks that the control room team leaders considered  
 24 on the strength of the information that had come into  
 25 the control room by 22.40?

110

1 A. I haven't seen evidence to that effect, sir.  
 2 Q. Have you followed the evidence of Michelle Gregson in  
 3 this inquiry?  
 4 A. I've followed some of it, yes, sir.  
 5 Q. That their training told them that in a situation such  
 6 as this, there was a risk of a secondary device? Have  
 7 you followed that evidence?  
 8 A. Yes, sir.  
 9 Q. If that was one of the risks that the control room team  
 10 leaders had in mind, do you still maintain that they  
 11 should have sent unprotected crews direct to the scene,  
 12 rather than consult the duty NILO?  
 13 A. Yes, sir.  
 14 Q. You do. It goes on at paragraph 94:  
 15 "I told the mayor that as a firefighter, it would  
 16 kill me if I found out that we could have saved more  
 17 people by getting there quicker, but I also know that  
 18 the FBU and the HSE..."  
 19 That's the Health and Safety Executive, isn't it?  
 20 A. It is.  
 21 Q. "... would have had me in the dock if firefighters had  
 22 been sent directly to the scene and been killed by  
 23 a terrorist."  
 24 A. Again, that was something that I said to the mayor, but  
 25 that was as a matter of fact. I knew that that sort of

111

1 thing could occur.  
 2 Q. If that proposition holds good for the chief fire  
 3 officer, doesn't it hold good for the control room?  
 4 A. I don't think, sir, that in any way was I trying to  
 5 explain to the mayor that I would hold back crews  
 6 because of that. I think it was -- basically he had  
 7 said to me as well about it might be viewed as a right  
 8 or wrong decision depending, and he had mentioned as  
 9 well about firefighters being sent down to the Twin  
 10 Towers on 9/11 needlessly, and we were having that kind  
 11 of discussion.  
 12 The acknowledgement -- Paul Metcalf lost his life  
 13 trying to save a life and Greater Manchester Fire and  
 14 Rescue Service were prosecuted for that. And also  
 15 firefighters in Warwickshire were prosecuted because of  
 16 the loss of firefighters at Atherstone on Stour.  
 17 So that was what the discussion was around. It was  
 18 around the reality, but I lived with that reality every  
 19 day as a chief fire officer. The risks that we take, we  
 20 take deliberately because we know there's a risk versus  
 21 a benefit in that risk taking. All I was doing was  
 22 having a conversation with the mayor, which I have  
 23 articulated in my statement, and that was the basis of  
 24 it.  
 25 Q. What were you trying to convey to the mayor when you

112

1 said the HSE would have had you in the dock in those  
2 circumstances?  
3 A. What I was trying to convey was that if it had been  
4 a marauding terrorist firearms attack and firefighters  
5 had been blindly sent into that, then that would have  
6 been an inappropriate assessment of risk and that,  
7 rightly so then, officers and the chief fire officer in  
8 particular could have been subject to a prosecution.  
9 Q. Doesn't that hold good for the control room? Why  
10 shouldn't it?  
11 A. Of course, if the control room does not have enough  
12 information and decides on the basis of the same type of  
13 scenario, for example, if they are told very clearly,  
14 "This is a marauding terrorist firearms attack which is  
15 occurring in the centre of Manchester", and they then  
16 just continue to deploy crews into it, then I would say  
17 that would hold for North West Fire Control as well.  
18 Q. That would?  
19 A. It would, yes.  
20 Q. How should that then have influenced their actions on  
21 the night had that been their state of mind?  
22 A. First, I think they would have had to have been told  
23 that that was the actuality of it, that there was  
24 a marauding terrorist firearms attack, and if they were  
25 under any kind of illusion as to that being the case, my

113

1 expectation would have been that they would have  
2 interrogated the source to find out if it was  
3 appropriate or not appropriate to respond. And if they  
4 still weren't getting satisfaction from that, they would  
5 be taking that information along with the information  
6 that they would glean through the NILO, but that is  
7 specific to a Plato-type incident.  
8 SIR JOHN SAUNDERS: Mr Smith, I think we may be going back  
9 to the same --  
10 MR SMITH: We're not, sir.  
11 SIR JOHN SAUNDERS: It's a subtly different point, is it?  
12 MR SMITH: It is a subtly different point, and I'm leaving  
13 it anyway. Thank you very much.  
14 SIR JOHN SAUNDERS: Can I just ask something? The secondary  
15 device. So would the potential of a secondary device  
16 prevent deployment to the scene? I know if the gunman  
17 is going to be there then that may well have that  
18 effect, and certainly if you know there was, but we've  
19 had throughout this a potential for a secondary device  
20 until, finally, the explosive dogs were got in there  
21 very late in the -- late-ish in the whole day. I can't  
22 remember what the time was when they arrived. So no one  
23 could be certain there weren't secondary explosive  
24 devices until then. So how should the Fire Brigade  
25 react to that possibility?

114

1 A. That's my opinion and my experience because I have  
2 extensive experience in this area. That is down to  
3 training of crews. So if the police are saying, we are  
4 aware there will be secondary devices in the area,  
5 that's a different matter altogether. But every time  
6 we have any suspected terrorist-related explosion,  
7 we are always aware of the risk of secondary and  
8 tertiary devices and we are aware to the extent -- and  
9 I hope I'm not saying anything sensitive here -- but we  
10 are aware --  
11 SIR JOHN SAUNDERS: Please make sure you don't.  
12 A. Okay. We are aware of the tactics that could be  
13 employed in relation to that.  
14 SIR JOHN SAUNDERS: And are all firefighters trained in some  
15 way as to that?  
16 A. I don't believe that all firefighters in  
17 Greater Manchester would be trained to that standard.  
18 SIR JOHN SAUNDERS: Would the specialists have been trained?  
19 A. They may well have been, yes.  
20 SIR JOHN SAUNDERS: So that is actually a reason, another  
21 reason, for getting the specialists in there, wasn't it?  
22 Because no one was saying there weren't secondary  
23 devices there.  
24 A. My opinion is, and it has never moved one iota, in the  
25 initial stages of that incident our specialist rescue

115

1 teams should have been part of the make-up of the first  
2 deployment on scene.  
3 SIR JOHN SAUNDERS: I think just going down the line, we  
4 certainly know that when -- I think when you had the  
5 conversation with Chief Inspector Dexter, he was  
6 actually saying to you: actually, there is a risk of  
7 secondary devices, it's decreasing but there's still  
8 that risk. Okay.  
9 A. It's up to us to take that risk. There were people  
10 needing our help. Other emergency services are in there  
11 and we are going on the basis of their risk assessment.  
12 We can't stand outside and say we're not going to do  
13 it --  
14 SIR JOHN SAUNDERS: No. And there are steps, are there,  
15 that firefighters can take to reduce that risk by the  
16 way they go into premises? I don't want you to tell me  
17 because that may be sensitive.  
18 A. Absolutely and it's all about resource deployment, sir,  
19 and training.  
20 SIR JOHN SAUNDERS: Thank you.  
21 MR SMITH: Before we leave the answer you've just given to  
22 the chairman, if it's your view that specialist  
23 resources should have been available and deployed in the  
24 initial stages of the incident, is that correct?  
25 A. Yes, sir, I would have expected that once the PDA had

116

1 arrived, they would have called on specialist resources  
 2 immediately.  
 3 Q. Who would have had to make that decision?  
 4 A. The incident commander on scene.  
 5 Q. Who would have made the decision as to whether they  
 6 should be deployed?  
 7 A. There shouldn't be any objection to an incident  
 8 commander's request.  
 9 Q. Who should have made the decision?  
 10 A. The incident commander made the decision.  
 11 Q. What about the duty NILO?  
 12 A. The duty NILO wouldn't be involved in that because the  
 13 incident commander would be requesting those resources  
 14 directly from North West Fire Control, as is the policy.  
 15 SIR JOHN SAUNDERS: And the duty NILO would then be in the  
 16 proper position as an adviser?  
 17 A. Probably if they were locating at the incident.  
 18 MR SMITH: Can I see if we can clarify this because it  
 19 shouldn't be left just in the air. If Mr Lopez could  
 20 put up, please, {INQ040652/1}.  
 21 This is the GMFRS guidance information headed  
 22 "Mobilisation of special response vehicle SRV."  
 23 Have you seen this document before?  
 24 A. No, sir.  
 25 Q. You'll see, and I don't want therefore to rush you about

117

1 this because if you haven't seen it before it's  
 2 important that we follow it. The guidance  
 3 information -- and this was current at the time --  
 4 issued to North West Fire Control was that:  
 5 "Any request for the attendance of this vehicle  
 6 should only be in response from a call from the police  
 7 via the duty NILO. If the SRV is to be mobilised by  
 8 NWFC to location nominated by the duty NILO..."  
 9 And then there follows a list of requirements.  
 10 Doesn't that require the involvement of the duty NILO  
 11 before the deployment of the SRT --  
 12 SIR JOHN SAUNDERS: Of the?  
 13 MR SMITH: That's the vehicle, sir.  
 14 SIR JOHN SAUNDERS: Okay, of course, sorry.  
 15 MR SMITH: The SRT is the team.  
 16 SIR JOHN SAUNDERS: Yes.  
 17 A. Can you just clarify for the chair and for my  
 18 understanding as well, the SRV is actually the MTFA  
 19 response vehicle, isn't it?  
 20 MR SMITH: Yes, that's my understanding, yes.  
 21 So in those circumstances, doesn't that require the  
 22 involvement of the duty NILO?  
 23 A. Yes, because that relates to an MTFA event.  
 24 Q. That it?  
 25 A. Relates to an MTFA event.

118

1 Q. That was Mr Nankivell's understanding, wasn't it?  
 2 A. I don't know if that was his evidence.  
 3 Q. Because he told you, according to your account, at  
 4 23.23, that the MTFA had been deployed.  
 5 A. I think according to my account, sir, there was three  
 6 phone calls and it was in the latest of the phone calls  
 7 that Dean confirmed to me all of the MTFA resources  
 8 being deployed, so the earlier one was just for him to  
 9 tell me that he was restricting to life --risk incidents  
 10 only in the centre of Manchester.  
 11 Q. Did you know that at an early stage the deployment of  
 12 the MTFA had been flagged up on the incident log?  
 13 A. No, sir.  
 14 Q. But it comes to this, doesn't it, that in order to  
 15 deploy the MTFA capability, the duty NILO has to be  
 16 involved and authorise that step? Did you know that?  
 17 A. Yes, I did know that and I would expect that, yes, for  
 18 an MTFA event.  
 19 Q. So before we leave this finally, this aspect, for the  
 20 chairman's assistance, what is your approach to this  
 21 situation? The team leaders at North West Fire Control,  
 22 in the light of their training that they've received,  
 23 particularly from Mr Gaskell, consider that this is  
 24 a terrorist incident with the capacity for secondary  
 25 devices and they don't know what they're sending the

119

1 crews into. If the view is that this is the early  
 2 stages of an unfolding terrorist attack, is it your  
 3 position that nonetheless, without consulting the duty  
 4 NILO, they should send unprotected crews to the RVP?  
 5 That's your position, isn't it?  
 6 A. That is, sir, yes.  
 7 Q. Have you had any involvement with the training provided  
 8 to North West Fire Control by Mr Gaskell?  
 9 A. No, sir.  
 10 Q. Had you seen the PowerPoint presentation that he had  
 11 presented to them?  
 12 A. No, sir.  
 13 Q. Were you aware that he had recommended and advised North  
 14 West Fire Control that they should consult the duty NILO  
 15 in circumstances such as these?  
 16 A. I wasn't aware that he had --  
 17 SIR JOHN SAUNDERS: Does the evidence go that far? We'll  
 18 obviously have to check it.  
 19 MR SMITH: We will check but my recollection is the evidence  
 20 of Michelle Gregson or Janine Carden is that was the  
 21 training they had received.  
 22 SIR JOHN SAUNDERS: I know they were given training about  
 23 MTFAs and what they were. What I was less certain about  
 24 is whether the training included instructions to them as  
 25 to how they should respond.

120

1 MR SMITH: I think we're looking at Janine Carden's evidence  
 2 in that regard and I'm just speaking on my feet at the  
 3 moment.  
 4 SIR JOHN SAUNDERS: No, no, absolutely.  
 5 MR SMITH: But you had no involvement with that training,  
 6 did you, Mr O'Reilly?  
 7 A. No, sir.  
 8 Q. Do you know whether North West Fire Control had ever  
 9 been instructed in how they should respond to  
 10 a situation like this? In other words, regardless of  
 11 your perception of what's likely to unfold in terms of  
 12 explosions, you send the crews straight to the scene?  
 13 A. Had I any experience of that training?  
 14 Q. Yes.  
 15 A. No, sir.  
 16 Q. Or awareness of it?  
 17 A. Of that training, no, sir.  
 18 Q. Have you listened and followed the evidence of Group  
 19 Manager Gaskell?  
 20 A. Most of it, I think, sir.  
 21 Q. Group Manager John Fletcher?  
 22 A. Yes, sir.  
 23 Q. Station Manager Lawlor?  
 24 A. Yes, sir.  
 25 Q. Group Manager Levy?

121

1 A. Yes, sir.  
 2 Q. Group Manager Dean Nankivell?  
 3 A. Yes, sir.  
 4 Q. Area Manager Paul Etches?  
 5 A. Yes, sir.  
 6 Q. Do you disagree with their view that it was reasonable  
 7 for North West Fire Control, on the basis of the  
 8 information that they had coming into the control room,  
 9 to take the action that they did? Do you disagree with  
 10 their views?  
 11 A. I listened to most of their evidence and most of those  
 12 officers agreed that on the basis of the information  
 13 that North West Fire Control had at its disposal in  
 14 those early minutes, they should have provided  
 15 a response to — the PDA to the rendezvous point.  
 16 I know my own opinion would be if they'd had information  
 17 which came in slightly later than that, if that had come  
 18 in earlier, then there would have been a reason why they  
 19 would have interrogated the police further and, if they  
 20 were getting no satisfaction in relation to that, then  
 21 absolutely it would have been reasonable then to say,  
 22 "We've tried with the police, we're getting nothing out  
 23 of them, can you try with the force duty officer?"  
 24 Q. A final topic, please: the control room, generally.  
 25 You have always been of the view, haven't you, that

122

1 there should have been a specific control room for  
 2 Greater Manchester Fire and Rescue Service?  
 3 A. I have been, yes, sir.  
 4 Q. Are you able to point, because it's important the  
 5 chairman should know the answer to this, to any step  
 6 taken that night under the old system that would have  
 7 represented a different step or action to that taken by  
 8 North West Fire Control? It's a slightly complicated  
 9 issue, isn't it, because of the action cards? But  
 10 that's my question.  
 11 A. If I understand your question correctly, sir, and  
 12 forgive me if I'm wrong again, I would have expected an  
 13 immediate deployment to the rendezvous point.  
 14 Q. Are you prepared to accept that under the old system,  
 15 the control room would still have spoken to a senior  
 16 Fire and Rescue Service officer before making any  
 17 decision as to mobilisation?  
 18 A. In the old control room, sir, we had senior Fire and  
 19 Rescue Service officers in charge of that room who were  
 20 able to make risk-based decisions and I would have  
 21 expected them to have deployed to the scene and I think  
 22 every serving officer at that time from a response point  
 23 of view would have expected that also.  
 24 Q. Would that have happened at 10.30 at night?  
 25 A. It would have happened on the information that was

123

1 received, I think, by Mr Ellis.  
 2 SIR JOHN SAUNDERS: I think the question is: would you have  
 3 actually had senior officers there at 10.30 at night who  
 4 could make that risk assessment? Is that correct?  
 5 MR SMITH: That's correct.  
 6 A. What I was referring to was in that control room, sir,  
 7 the senior officers who were in charge of it were the  
 8 control room officers, who had a wealth of operational  
 9 experience.  
 10 SIR JOHN SAUNDERS: Okay, thank you.  
 11 MR SMITH: Before we finally leave this topic, I need to  
 12 take up with you paragraph 118 of your statement,  
 13 please, at page 31.  
 14 SIR JOHN SAUNDERS: Right. Personally, I was going to  
 15 ignore this entirely.  
 16 MR SMITH: May I say something, sir? Mr Greaney ignored it  
 17 entirely as well. I had in mind that Mr Cooper may wish  
 18 to visit it, in which case I wanted to deal with it  
 19 pre-emptively.  
 20 SIR JOHN SAUNDERS: Right. If Mr Cooper — I think we'll  
 21 find out over lunch whether he is going to deal with it.  
 22 If he's not then I propose to ignore it because I am  
 23 well aware there may be all sorts of explanations.  
 24 I have a very serious and complicated issue to  
 25 determine.

124

1 MR SMITH: You have.  
 2 SIR JOHN SAUNDERS: I'd prefer not to have too many  
 3 subsidiary matters to determine. So for my part,  
 4 if we leave it, we'll check up and you will have the  
 5 opportunity to deal with it pre—emptively if you wish  
 6 to.  
 7 MR SMITH: Thank you, sir. That's all I have to ask.  
 8 SIR JOHN SAUNDERS: Thank you very much.  
 9 We'll break for lunch. An hour. Thank you.  
 10 (1.00 pm)  
 11 (The lunch adjournment)  
 12 (2.00 pm)  
 13 (Delay in proceedings)  
 14 (2.10 pm)  
 15 MR GREANEY: Sir, I apologise to you and to the core  
 16 participants for the slightly late start. The reason,  
 17 as you know, but they don't, is because it was necessary  
 18 for your team to have a meeting this lunchtime.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR GREANEY: I'm going to explain in the presence of  
 21 Mr O'Reilly what the position is about paragraph 118.  
 22 He has it open in front of him.  
 23 I have been in touch with Mr Cooper, who has most  
 24 helpfully explained that he had no intention of asking  
 25 about the specific incident which is referred to from

125

1 line 2 down in that paragraph. He does propose to ask  
 2 Mr O'Reilly whether there is any respect in which he  
 3 wishes to develop the first sentence of paragraph 118  
 4 but he has no interest in receiving information about  
 5 the specific incident in answer to that question.  
 6 SIR JOHN SAUNDERS: Okay. I hope you understand the reason  
 7 for that and don't feel in any way gagged. It's simply  
 8 that I don't wish to be discussing other incidents as  
 9 well which are unrelated to this.  
 10 MR GREANEY: I believe that means that Mr Smith doesn't need  
 11 to ask about that incident, but there is one issue that  
 12 he wanted to assist you with, sir, before we turn to  
 13 Mr Cooper.  
 14 MR SMITH: Sir, can I revisit the issue of Janine Carden's  
 15 evidence, please.  
 16 SIR JOHN SAUNDERS: Yes, absolutely.  
 17 MR SMITH: It's Day 125, 30 June, at page 3 {Day125/3:1}.  
 18 I don't know whether it would assist you if I read from  
 19 the transcript. Interestingly, these were questions  
 20 that you asked, sir.  
 21 SIR JOHN SAUNDERS: And I've forgotten the answers.  
 22 MR SMITH: Well, I had forgotten that you had asked the  
 23 questions, but Ms Gilmour has located the extract.  
 24 Would it assist?  
 25 SIR JOHN SAUNDERS: Would you like to just summarise it?

126

1 MR SMITH: Well, it provides the necessary support for the  
 2 proposition that I put to the witness, if I could just  
 3 say this, because it's quite a long passage, but at the  
 4 beginning you asked the question:  
 5 "Question: But what are you told to do or were you  
 6 told to do if you reached the situation which happened  
 7 here when you think it may be an MTFFA but no one's  
 8 actually told you it's an MTFFA, so when you have  
 9 suspicions but you don't know? Were you trained as to  
 10 what you were to do in that situation?"  
 11 She went on to say:  
 12 "Answer: Tell a NILO, go to the NILO."  
 13 And you asked for clarification:  
 14 "Question: You were trained to do that?"  
 15 She said:  
 16 "Answer: Yes, and that was even back when I was in  
 17 Cheshire when NILOs were first introduced."  
 18 I'll cut through some of this and just deal with  
 19 this if I may:  
 20 "Answer: So after the NILO role was introduced and  
 21 we had training and that was the same when we were at  
 22 North West Fire Control, Mick Lawlor came and did NILO  
 23 training for staff. It was always: think NILO, think  
 24 NILO, think NILO."  
 25 And then you asked the question:

127

1 "Question: I just want to limit myself, so as far  
 2 as you're concerned what Michelle Gregson did — she  
 3 says, 'I suspected there may be an MTFFA.'"  
 4 The witness said yes. You went on to quote from her  
 5 evidence:  
 6 "Question: 'Therefore I rang the NILO and I didn't  
 7 follow any of the action cards', as I understand her  
 8 evidence at the end. She was following [you say, this  
 9 was your question, sir] exactly the training that she'd  
 10 been given?"  
 11 She said:  
 12 "Answer: Yes, training and experience, yes, of  
 13 understanding that type of thing."  
 14 You then said:  
 15 "Question: Can you leave out experience for  
 16 a moment? We can come back to that. But you're saying  
 17 when you were given training about MTFFA, you were being  
 18 told specifically by the trainers, and this is dealing  
 19 with NWFC training, you were being told by them: if you  
 20 suspect an MTFFA, don't do anything, speak to the NILO?"  
 21 "Answer: Yes, that training came from MTFFA training  
 22 and also NILO training that was provided by Mick Lawlor  
 23 of what the NILO role consisted of."  
 24 SIR JOHN SAUNDERS: Right, thank you very much for that.  
 25 People will understand, of course, that sometimes when

128

1 I say things that sound like statements they were meant  
 2 to be questions, as I've remarked to other people.  
 3 MR SMITH: We all do that from time to time.  
 4 SIR JOHN SAUNDERS: Thank you for that.  
 5 MR GREANEY: Sir, you may have been aware of activity whilst  
 6 Mr Smith was reading that out. I've been provided with  
 7 a copy of an email that I consider I ought to ask  
 8 Mr O'Reilly about, but obviously he ought to be given an  
 9 opportunity to read it before I do so. I'm going to  
 10 invite you to rise just for -- I don't think it will  
 11 take any more than 5 minutes for that to happen.  
 12 SIR JOHN SAUNDERS: Do we want to do that now or can we do  
 13 that at a suitable stage in his evidence, if we're going  
 14 to have a break some time in the afternoon, or at the  
 15 end of his evidence?  
 16 MR GREANEY: All I had in mind was whether this was  
 17 something that Mr Cooper, having heard it, might want to  
 18 ask about. But we can probably accommodate that in a  
 19 different way, sir.  
 20 SIR JOHN SAUNDERS: Can we do that? I'm sure we can.  
 21 MR GREANEY: Yes, certainly. Can I indicate that Mr Horwell  
 22 has indicated that he has no questions on behalf of  
 23 Greater Manchester Police, but as we know, Mr Cooper has  
 24 questions on behalf of the bereaved families and he has  
 25 joined us.

129

1 Questions from MR COOPER  
 2 MR COOPER: I do, sir. As far as this email is concerned,  
 3 I'm not sure what it is, if it's something I've not seen  
 4 perhaps before I begin my questioning of Mr O'Reilly,  
 5 I can just be told what this email is.  
 6 SIR JOHN SAUNDERS: You won't have seen it yet. We'll make  
 7 sure you get to see it. For the moment I would quite  
 8 like to carry on with your questions so far. I have  
 9 seen the email. It's nothing that's going to require  
 10 a great deal of getting a grip on, if I can use that  
 11 phrase. So I am sure that if we do it at the mid stage  
 12 new will be able to deal with that.  
 13 MR COOPER: Of course, sir. Shall I wait for Mr O'Reilly to  
 14 see the email now or do you want to stop?  
 15 SIR JOHN SAUNDERS: No, he's going to see it later too.  
 16 We're putting it aside for the moment.  
 17 MR COOPER: Mr Lopez, could you please play INQ015859/1  
 18 (sic), just the first 53 seconds, please?  
 19 {INQ015879/1}. Hopefully we gave Mr Lopez advance  
 20 information of this about 3 hours ago.  
 21 (Video played)  
 22 Thank you, Mr Lopez.  
 23 Mr O'Reilly, you'll recognise that as a short  
 24 segment of your interview with Granada Television;  
 25 is that right?

130

1 A. That's correct, sir, yes.  
 2 Q. Do you stand by what we've just played?  
 3 A. Yes, sir.  
 4 Q. So it was a massive failure for which you take  
 5 responsibility?  
 6 A. Yes, sir.  
 7 Q. Let's look please at your paragraph 6 of your statement  
 8 {INQ026732/2}. You say:  
 9 "My role at the time of the Manchester Arena attack  
 10 was as chief fire officer for GMFRS. That role meant  
 11 that I was the strategic leader for the organisation and  
 12 in charge of day-to-day operational command. CFO is  
 13 a wide-ranging role and one which takes ultimate  
 14 responsibility for the performance and management of the  
 15 organisation."  
 16 So again, you take ultimate responsibility for the  
 17 performance and management of GMFRS on 22 May 2017;  
 18 is that correct, please?  
 19 A. Yes.  
 20 Q. Throughout your evidence, and the documents I've seen,  
 21 it's a question I've been specifically asked to put to  
 22 you on behalf of the bereaved families, there's one  
 23 thing that's missing and I want to give you the  
 24 opportunity now of tendering it, and that's your apology  
 25 to the bereaved. Do you want to apologise to them?

131

1 A. I want to apologise personally for all of my failings  
 2 and all of the failings of the organisation on 22 May.  
 3 I am so sorry and I'll regret my failings for the rest  
 4 of my life.  
 5 Q. I'm very grateful for that, but more to the point I'm  
 6 sure the families are because they specifically asked me  
 7 to give you that opportunity and you have courteously  
 8 accepted that opportunity, for which I'm sure that will  
 9 be well taken by the families.  
 10 Let me ask you a little, please, about Steve Hynes  
 11 and the training he received. For that I want to take  
 12 you to paragraph 17 of your statement. You say this:  
 13 "Upon my promotion to CFO, my successor as director  
 14 of prevention and protection, ACFO Geoff Harris,  
 15 supported my work in developing and maintaining  
 16 a cardiac arrest response that NWAS through  
 17 implementation of a national trial. In September 2017,  
 18 following 2 years of responding to hundreds of cardiac  
 19 arrest incidents, the firefighters and fire appliances  
 20 of GMFRS stopped responding to assist NWAS and those  
 21 suffering potentially fatal cardiac arrests."  
 22 Dealing with the first part, please, Mr O'Reilly, of  
 23 that part of your statement, when you refer to that  
 24 training, is that the training that you are referring to  
 25 in relation to Mr Hynes?

132

1 A. Yes, sir, the cardiac arrest response training was built  
2 on, on top of the community risk intervention team  
3 training, and it enhanced the awareness and skills of  
4 all firefighters.

5 Q. So that's the training you're relying on, is it, to give  
6 you support that Mr Hynes had particular abilities when  
7 you were speaking to him on the night of the 22nd?

8 A. Yes, that aspect of training, the standard of first aid  
9 training that firefighters received and also the  
10 enhanced training that I know, and I think witnesses  
11 gave evidence to, that they received from the trauma  
12 technicians on their watch.

13 Q. Indeed, but I'm just focusing on what was giving you  
14 particular confidence that Mr Hynes was fully able to  
15 give you advice on the night. Is it that training that  
16 you refer to in paragraph 17?

17 A. It's the training in paragraph 17 but also additionally  
18 the training to trauma technicians, which North West  
19 Ambulance Service also provided validation for through  
20 their medical director.

21 Q. But the particular training that you're referring to,  
22 and I'm pressing for a reason, the particular training  
23 that you're referring to is that training referred to in  
24 paragraph 17?

25 A. That's part of the training referred to in paragraph 17,

133

1 yes.

2 SIR JOHN SAUNDERS: Okay, I think the question is: did  
3 Mr Hynes have knowledge of or participate in training  
4 for trauma technicians as well as to the cardiac  
5 arrests?

6 A. Sir, if that's the question, he had knowledge of every  
7 aspect of training that his organisation provided to the  
8 firefighters in ours.

9 SIR JOHN SAUNDERS: Thank you.

10 MR COOPER: I want to ask you a little about that cardiac  
11 arrest training with NWS. Was this something that you  
12 pioneered yourself in many respects?

13 A. Certainly in Greater Manchester, yes.

14 Q. Was there some criticism of this particular training  
15 from firefighters, for instance?

16 A. In what respect, sir?

17 Q. Well, I'm asking you. Was there any criticism in any  
18 way?

19 A. Directly to myself, I'm not aware, sir, of what you're  
20 referring to. The only thing that I can think of, sir,  
21 is that some firefighters felt that we were going too  
22 quickly at a new project.

23 Q. Did those firefighters, for instance, and a significant  
24 number of them, I suggest to you, suggest that the  
25 training was going too quick, too fast?

134

1 A. I heard that being said, yes.

2 Q. And that many of them felt, despite it, they felt  
3 untrained?

4 A. That was never told to me, no.

5 Q. Was this, for instance, a complaint ever made by people  
6 who indulged in this training from NWS?

7 A. Sorry, sir, you broke up, I didn't hear the question.

8 Q. Were there any individuals in NWS or were you aware in  
9 any way that those who received this training from NWS  
10 felt the same concerns about it?

11 A. I think there was a few that felt in our organisation.  
12 I wasn't aware of any concerns from North West Ambulance  
13 Service.

14 Q. For instance, on a specific issue, was the IT paging  
15 system appropriate?

16 A. That was a different issue altogether. The  
17 communications system was poor in relation to the  
18 set-up. We would have liked to have had a multi-agency  
19 information transfer system and we talked to North West  
20 Ambulance Service about that. The pager — the system  
21 they wanted implemented as part of the project was based  
22 on the system that we had used with community risk  
23 intervention teams and that was their desired request  
24 for us to mobilise with.

25 Q. Were these discussions taking place before 22 May

135

1 in relation to the IT paging system?

2 A. These discussions took place back in 2015 is my  
3 understanding, 2014/2015. And arrangements had been put  
4 in place since that, my understanding is — I'm sorry,  
5 my memory on all of this isn't perfect, but I do believe  
6 that we came up with a solution, which was a better  
7 solution than the pager system eventually.

8 Q. And in short, how was that pager system supposed to  
9 assist, for instance, in atrocities such as occurred on  
10 22 May 2017?

11 A. I'm not — my recall is awful on this. I don't know  
12 whether the pagers were still in use during that event,  
13 to be honest.

14 Q. Would they have assisted in communication between  
15 emergency services?

16 A. My recollection is that the pager would respond if it  
17 was within a 3-mile radius, and I could be wrong on  
18 this, so please forgive me, but I think if you were  
19 within a 3-mile radius of the event, you would be  
20 notified by that pager system with a pre-alert to  
21 respond to the potential incident.

22 Q. Do you know, for instance, whether that pager system is  
23 available to the FDO?

24 A. The police's force duty officer?

25 Q. Yes.

136

1 A. No, sir, I wouldn't have that information.  
 2 Q. Would it have been of help if such a pager system, which  
 3 was clearly in existence at the time, was up and working  
 4 on 22 May to enable all services to at least be aware of  
 5 communications that were necessary?  
 6 A. I think the pager system was one that was adopted by  
 7 NWAS for their first responders. I think it would be  
 8 a matter for them to outline the technology and how they  
 9 would feel that may have assisted in some way.  
 10 SIR JOHN SAUNDERS: Mr Cooper, I just want to ask something  
 11 about recall, if you don't mind, whilst this is in my  
 12 mind. We heard from NWFC that they had a recall to duty  
 13 system whereby they could call operatives in if they had  
 14 something like this incident to come and do it, but it  
 15 was an entirely voluntary system. As I understand it,  
 16 one person responded. Do you have a system for recall  
 17 to duty among firefighters?  
 18 A. We do have a recall to duty system, but again, it's  
 19 voluntary, and it's my understanding that it hasn't  
 20 changed.  
 21 SIR JOHN SAUNDERS: So why are these systems voluntary?  
 22 You're an emergency service. I don't mean to be — this  
 23 is probably a naive question and please forgive me if  
 24 it is, but why can it not be a condition of employment  
 25 that if there is an emergency where people are actually

137

1 required to be there, they can be and would expect to go  
 2 into duty?  
 3 A. It's a very interesting question, sir, and it relates to  
 4 the topic that you weren't wanting to get involved in,  
 5 which is —  
 6 SIR JOHN SAUNDERS: Well, I won't then. But it's something  
 7 that I will think about as to whether something could be  
 8 at least tried to be organised. Thank you.  
 9 Mr Cooper, I'm sorry, that was a completely  
 10 different topic, but it came into my mind because of  
 11 your question.  
 12 MR COOPER: Not at all. If my question in any way  
 13 stimulated that, then I'll take the credit.  
 14 Can I go back to you, please, Mr O'Reilly, and go on  
 15 to another slightly akin issue, the issue of training,  
 16 and ask Mr Lopez to put on the screen {INQ007988/1},  
 17 please.  
 18 We see there that this is a document to you and it's  
 19 effectively from someone who was clearly in the same  
 20 field of work. I won't deal with paragraph 1, but he  
 21 goes on:  
 22 "Whilst G21 was not deployed in the city centre last  
 23 night, one of my colleagues was."  
 24 And he goes on to describe that issue as well. Then  
 25 if you look further down, again towards the bottom, and

138

1 this is where I want to take you now:  
 2 "On my first night shift [of] this tour I spent some  
 3 time in front of [my] computer clicking tick boxes,  
 4 answering multi-choice questions..."  
 5 It's gone very blurred now, I can't see it.  
 6 SIR JOHN SAUNDERS: On JESIP?  
 7 MR COOPER: That's better:  
 8 "... answering... questions on JESIP, which were  
 9 mostly irrelevant for my role. We do that kind of LMS  
 10 on a regular basis. That's what passes for training  
 11 nowadays. Far, far too often. I hardly retain any of  
 12 it, it's impossible. There's too much with too much  
 13 detail that is mostly irrelevant."  
 14 I understand that the individual is deleted for some  
 15 reason from that, but I'm going to ask you about the  
 16 sentiments expressed as far as training is concerned.  
 17 That was a document sent to you, concerned about the  
 18 level of training about JESIP. How did you respond to  
 19 that?  
 20 A. How did I respond to it at the time, sir?  
 21 Q. Yes. It was sent to you. How did you respond?  
 22 A. I don't recall whether I responded or not, sir.  
 23 Q. Well, that was quite an important observation being made  
 24 by that individual, wasn't it, because we've read a lot  
 25 about JESIP training and there's someone raising the

139

1 issue, an issue that this inquiry has concerned itself  
 2 with before now, about click-box training and the  
 3 inadequacy of it. Regardless of whether you can  
 4 remember responding to that particular email, that's  
 5 a serious concern being expressed in it, isn't it?  
 6 A. It is indeed, yes, sir.  
 7 Q. And do you agree with it? Do you agree with that  
 8 concern?  
 9 A. I agree with the sentiment, sir. I don't have specifics  
 10 in relation to what the individual is referring to. But  
 11 I would also be of an opinion that I would much prefer  
 12 hands-on practical training as opposed to online  
 13 versions.  
 14 Q. In terms of something as important as JESIP, would you  
 15 agree that perhaps click-box training, as referred to  
 16 there, and I'm not speaking about that particular  
 17 individual's concerns now, I'm asking you about  
 18 a general question about the level of training on  
 19 something as important as JESIP, would you accept if  
 20 that was the level of training for JESIP, that would be  
 21 entirely inadequate?  
 22 A. Sir, without actually seeing the training, I'm not  
 23 trying to be evasive, I'm not a fan of online tick-box  
 24 training in any sense, but I don't know the level that  
 25 was being offered and the information contained within

140

1 it. But again, I'll go back to my previous answer:  
 2 I would much prefer, especially training from  
 3 a multi-agency perspective, that we do that as best  
 4 we can in a practical sense.  
 5 Q. Would it be right perhaps to take from this that on  
 6 something as important as JESIP, and there may be  
 7 a handful of other, probably only a handful, of other  
 8 more important issues to train people on in this sphere,  
 9 would it be right to say that JESIP just simply should  
 10 not be click-box?  
 11 A. I would agree with you, sir, yes.  
 12 Q. Can I take you to paragraph 48, please, a different  
 13 topic now, of your statement. Again, Mr Lopez,  
 14 {INQ026732/13}.  
 15 As you'll see, this is an issue that has arisen on  
 16 a number of occasions during the course of this inquiry.  
 17 Let's just read into it. You indicate in your paragraph  
 18 you're dealing with MTFA training and then -- over the  
 19 page, Mr Lopez {INQ026732/14} -- we read down there,  
 20 you're dealing with foreseeable incidents. And then in  
 21 the last two lines of that paragraph you say:  
 22 "I had attended Parliament and confirmed to groups  
 23 of MPs that when a Paris-style attack happens in  
 24 Manchester, that GMFRS will be ready and that it would  
 25 be responding on the front line with GMP."

1 I'm not going to make the cheap point that that's  
 2 not what happened. The question I want to ask you is:  
 3 you were focusing, were you not, there, as many other  
 4 people were, to be fair to you, on a Paris-style attack,  
 5 weren't you?  
 6 A. I was, yes.  
 7 Q. And what happened is that people were caught out,  
 8 emergency services and others were caught out by  
 9 a lone-wolf attack, would you accept that?  
 10 A. Yes, sir, I would.  
 11 Q. And do you agree that perhaps there was excessive focus  
 12 by all concerned, right-minded people, but excessive  
 13 focus by all concerned on a Paris-style attack and the  
 14 eye was taken off the ball in relation to a lone-wolf  
 15 attack?  
 16 A. I think largely that's a security services concern, sir,  
 17 but I agree with you: I think that there was more  
 18 emphasis being given to a multi-pronged attack.  
 19 Q. And did that perhaps wrong-foot those like yourselves  
 20 and colleagues in the service and the other three blue  
 21 light services as to how to deal with the atrocity that  
 22 was developing on 22 May 2017?  
 23 A. Forgive me, Mr Cooper, I'm not sure -- I didn't get the  
 24 first line of your question.  
 25 Q. Did that, that focus on -- we have used the expression

1 before -- tunnel vision, that focus on a Paris-style  
 2 attack perhaps wrong-foot the Fire Service as well as  
 3 other emergency services when dealing with the lone-wolf  
 4 attack which was developing on the 22nd?  
 5 A. I believe that there was an adoption of the response for  
 6 a marauding terrorist firearms attack which was  
 7 implemented but not fully communicated. I believe there  
 8 was other information which was provided but never  
 9 retracted, and I believe that -- I have to agree with  
 10 you in certain respects -- that led to, whether you call  
 11 it a moth to the flame or tunnel vision-type approach to  
 12 that incident that night, yes.  
 13 SIR JOHN SAUNDERS: I'm very concerned -- sorry, Mr Cooper,  
 14 I'm just going to take that up.  
 15 I understand and it certainly can be said that one  
 16 of the reasons for the fact the Fire Service were not  
 17 there quicker was a perceived risk of there being gunmen  
 18 there or some other attack and it being an ambush. And  
 19 had that perceived fear not been there, no doubt they  
 20 would all have been there immediately. But equally one  
 21 just can't change these things by the fashion, as it  
 22 were, so if you've got an explosion, are you not bound  
 23 to at least have in your mind that there may be another  
 24 attack following up?  
 25 A. I think we... Having lived in those circumstances, sir,

1 operationally ...  
 2 SIR JOHN SAUNDERS: You have more experience than the rest  
 3 of us.  
 4 A. I definitely have. And in relation to that, we always  
 5 live with the risk that something else could occur, but  
 6 we have to trust our emergency services partners, and  
 7 I keep going back to that: JESIP is based on the trust  
 8 that we have to be able to rely on each other to pass  
 9 the information when it's most relevant. And the  
 10 failure on that night, for me, goes back to the fact  
 11 that if it was assumed that it was a marauding terrorist  
 12 firearms attack, then that information should have been  
 13 transferred to the other partners and then the whole of  
 14 the JESIP process should have been followed. The fact  
 15 that it wasn't followed in any respect in some cases led  
 16 to utter confusion, in my opinion.  
 17 SIR JOHN SAUNDERS: Right.  
 18 MR COOPER: Just returning, just to top and tail the  
 19 question I was asking you a moment ago, because there  
 20 had been perhaps excessive focus on a Paris-style attack  
 21 by all concerned, did this perhaps put emergency  
 22 services and those responding at a disadvantage, on the  
 23 back foot, as it were, as this was a lone-wolf attack?  
 24 A. I think, sir, if I'm going to be honest, utterly honest,  
 25 and this is my own experience, I have never forgotten

1 about — and I keep up to date with a lot of what  
 2 I would call my local news, and I don't ever take my eye  
 3 off the ball that something can happen from a — you  
 4 call it either a lone-wolf perspective or I would call  
 5 it a traditional attack perspective. I hope I'm not  
 6 couching my words too vaguely and people understand what  
 7 I'm saying.  
 8 I would say that local terrorism still had risk  
 9 attached to that and I certainly — and I don't believe  
 10 the Fire and Rescue Service had ever taken its eye off  
 11 that ball either.  
 12 Q. You've pre-empted my subsidiary question. It may well  
 13 be that you — I see your experience in your  
 14 statement — would be aware obviously of various  
 15 permutations of terrorist attacks. But would you agree  
 16 that others, particularly those developing processes and  
 17 policies in the Fire Service, might have themselves  
 18 taken their eye off the ball and developed those  
 19 processes and policies thinking more of Paris than of  
 20 the lone wolf, traditional attack, which you will?  
 21 A. Sir, I really do support your view that there was a very  
 22 focused view on similar events to Mumbai, Paris, those  
 23 sorts of events occurring, and I think everybody thought  
 24 that it wasn't if, it was when at that time, and  
 25 I remember that being said quite a lot. But I also know

1 that we've got a number of our professional NILOs who  
 2 were attending regular meetings, where they would have  
 3 been given high-grade intelligence and security  
 4 information in relation to a breadth of terrorist  
 5 threats, which would include the traditional.  
 6 Q. Well, we're going to — and we understand why — rely on  
 7 others to ask questions of the security services as to  
 8 exactly what people were being told at the time and  
 9 I know that will be at the forefront of their minds as  
 10 to exactly whether an eye had been taken off the ball  
 11 about traditional terrorist attacks. So I can't develop  
 12 that further because others will have to do it.  
 13 But what I'm going to ask you is this, and I'm not  
 14 asking you to divulge anything sensitive, far from it,  
 15 as I always say that's the last thing I want to do on  
 16 behalf of those I represent, but — and pause and feel  
 17 free to say, "I can't answer that question", and I'll  
 18 move on. To reassure those listening, is an attitude  
 19 now being taken which isn't just Paris and  
 20 Mumbai-centric but now accepts that a terrorist attack  
 21 should be prepared for, in policy and procedure, taking  
 22 into account very seriously the real, real possibility  
 23 of a lone-wolf attack?  
 24 A. Sir, yes, I believe I think you're dead right. I think  
 25 that everybody realised that there's a breadth of

1 response that's required for a breadth of threats, and  
 2 certainly that ... You know, I thought that we'd learned  
 3 a lot from 7/7 when we had a number of attackers using  
 4 a similar type response, and also in Barcelona, I think  
 5 it happened as well, Madrid.

6 I would have liked to have thought that we still had  
 7 a focus on that type of attack at the time, but after  
 8 22 May, I know certainly there was a revisiting and an  
 9 emphasis on the traditional, which I think is saddening  
 10 that we weren't focused on everything that we should  
 11 have been focused on collectively.

12 SIR JOHN SAUNDERS: Mr Cooper, before you go on, let me just  
 13 reassure you that for myself at the moment, I see no  
 14 reason why the person who comes from the security  
 15 service to give open evidence should not certainly be  
 16 asked whether generally the security services had taken  
 17 their eye off that ball. So please don't overemphasise  
 18 what needs to be said in private and what needs to be  
 19 said in public.

20 MR COOPER: I was trying to be mysterious in any way, I was  
 21 genuinely being careful.

22 SIR JOHN SAUNDERS: That's perfectly all right, but I just  
 23 wanted to reassure people of that.

24 MR COOPER: Thank you, sir, that's appreciated.  
 25 As indeed I might say Mr O'Reilly is your

1 reassurance for those listening that perhaps people who  
 2 are here to protect us, from whatever discipline, are  
 3 taking a wider view perhaps of the threat we face than  
 4 they might have been taking on the 22nd.

5 Let me move if I may, then, please on to the issues  
 6 and the developments of that tragic night of 22 May.  
 7 I have to put to you a number of matters which obviously  
 8 I would like to give you an opportunity of responding  
 9 to.

10 One of the issues, and it was raised by  
 11 Mr Nankivell, for instance, and I can take you to the  
 12 reference if needs be, is the amount of time it took you  
 13 to get to the control centre, as it were. I don't know  
 14 whether you remember that evidence that he gave, that he  
 15 got there quicker and he was effectively living some  
 16 distance away compared to where you were, and he raised  
 17 a metaphorical eyebrow as to how long it took you to get  
 18 to the scene. I can take you to it if needs be, but you  
 19 may remember that criticism. Simple question: why did  
 20 it take you so long to get there?

21 A. I don't know whether you heard my evidence, I think it  
 22 was this morning, but being the figurehead of the  
 23 organisation, I in my experience have known that if  
 24 I had just jumped out of bed, jumped into my working rig  
 25 and went straight to work, I probably would have had to

1 have returned home or got my uniform, shaved, washed  
 2 somewhere else, so I did that before I left .  
 3 It 's funny, when you go back to your training, I can  
 4 remember being taught about Gold command by those who  
 5 had responded to Buncefield, you might remember, in the  
 6 south of England.  
 7 Q. I was actually so close to it , my windows rattled, so  
 8 I do remember.  
 9 A. I can remember having input from the fire and police  
 10 commanders who were the strategic commanders at the  
 11 time. They gave us two really high quality pieces of  
 12 information about when something large happens: be  
 13 careful that you still rely on subsidiarity as a key  
 14 principle of emergency response and that you rely and  
 15 you trust the officers who are the first responders to  
 16 go to the scene.  
 17 I can remember very, very clearly that the  
 18 chief constable, who had talked to us about Buncefield,  
 19 says that he realised it is going to be at least  
 20 45 minutes to 1 hour before he'd be in a position to  
 21 receive enough information that he went and had  
 22 a shower, a shave, got his uniform ready, got dressed  
 23 and, he said by the time he got to where he had to be  
 24 he was in full receipt of all the information that he  
 25 needed at that time because the people who reported to

149

1 him had had the time to do that.  
 2 I can remember — that still resonates with me  
 3 today. I can remember the second point. Ron Dobson  
 4 talked to us well about 7/7. Ron Dobson was the chief  
 5 fire officer of London Fire Brigade or the commissioner  
 6 of London Fire Brigade and he said that in 7/7,  
 7 communications broke down and I think that's probably  
 8 not a surprise. He said that he fell back on the  
 9 relationships that he had developed with his fellow  
 10 strategic partners.  
 11 So in both those respects, I did take my time going  
 12 to Fire Service headquarters to go to the command room.  
 13 That was deliberate. Also when I got there I relied on  
 14 that second piece of advice received from Ron Dobson:  
 15 contact your equivalent level in another organisation if  
 16 you're blind and I did.  
 17 SIR JOHN SAUNDERS: I find there to be slight contradictions  
 18 that on the one hand you agreed with me that the idea of  
 19 not getting someone else to set up the CSR and get  
 20 a technician in to do that and rely on senior officers  
 21 arriving to take quarter of an hour after they'd got  
 22 there to do it, it seemed to be obvious you should save  
 23 time by doing otherwise, but on the other hand you think  
 24 it 's actually worth having a shave before you go in.  
 25 A. There's a number of issues to that, sir . I tend to have

150

1 a — I don't want to present myself in an unprofessional  
 2 way. And it was a tradition that I had that if I was  
 3 going to be going to any type of coordinating group or  
 4 if I was going to have to present outside of the  
 5 organisation, that I wanted to look professional.  
 6 I relied again on the professionalism of our  
 7 organisation to respond to the incident and I don't want  
 8 to be a policy person here, but our policy in relation  
 9 to Greater Manchester Fire and Rescue Service was that  
 10 I would be expected to be in attendance within  
 11 60 minutes.  
 12 SIR JOHN SAUNDERS: Okay. Mr Cooper, thank you.  
 13 MR COOPER: Thank you.  
 14 Well, during this time, maybe not when you're  
 15 shaving and washing and changing, but during the time  
 16 that you're in transition, you're receiving information,  
 17 are you?  
 18 A. The information that I was receiving, sir, was telephone  
 19 calls from Dean Nankivell, the follow-up call from  
 20 Dean Nankivell, and I also had the radio on in the  
 21 house, listening to Radio 5 Live.  
 22 Q. When did you first become aware there were problems  
 23 contacting the force duty officer?  
 24 A. The first time that I was told of any problems  
 25 contacting the force duty officer was when I walked into

151

1 the command suite.  
 2 Q. Were you aware of any communication difficulties before  
 3 you walked into the command suite?  
 4 A. No, I wasn't, sir .  
 5 Q. When you heard of those difficulties, did you think:  
 6 well, I may have contacts because of my links and  
 7 associations with senior people in different services,  
 8 I 'll go down my own route, use my own address book,  
 9 something like that? Did you think of doing that?  
 10 A. I did, sir, but it was unfortunately — it was after I'd  
 11 seen ambulances arriving on the scene.  
 12 Q. For instance, let 's look, please, if we can, at  
 13 {INQ019111/1}?  
 14 SIR JOHN SAUNDERS: While we are looking at that,  
 15 Dean Nankivell's attitude about the FDO, and I'm not  
 16 disputing what he says or that he meant it, is: well,  
 17 I never had any reason to contact the FDO, I would not  
 18 have realised he was that important. So what was — did  
 19 you realise the importance of being in contact with the  
 20 FDO or you were in Mr Nankivell's camp about that?  
 21 A. You have heard my evidence today, sir. I 'm very firmly  
 22 in the camp that Dean was.  
 23 MR COOPER: {INQ019111/1}, please. Let's just get some  
 24 perspective on here, take it maybe from six lines down:  
 25 "A forward control point for onward deployment if

152

1 required ... Dean also stated that he had asked the FRS  
2 to stand up their MTFA team just in case we had any  
3 number of events. Dean said that the NWFC had received  
4 a number of AFAs and that he had directed appliances  
5 only be deployed where there's a life risk. I thanked  
6 Dean for the update and asked and the GMFRS command  
7 support room been stood up. Dean told me he was on the  
8 way to set it up. I told Dean that I would be making my  
9 way to support him and provide a PO for an SCG to be  
10 established. I then texted Kevin Lee and the  
11 chief constable, Ian Hopkins, to tell them what I was  
12 doing."

13 First question: when did you text Kevin Lee and  
14 Mr Hopkins and tell them what you were doing?  
15 A. 11.20 was the first one, I think, and 11.21 was the  
16 second one.  
17 Q. And remind me who Kevin Lee is? He's the director  
18 at the mayor's office, isn't he?  
19 A. That's correct.  
20 Q. When you for instance contacted them at around about  
21 11.20 or so, did you text them or did you telephone  
22 them?  
23 A. I texted them at -- sorry, the two -- they were both  
24 text messages at 20 past and 21 past.  
25 Q. And did you think, for instance, particularly as far as

153

1 Ian Hopkins was concerned, the chief constable, to ring  
2 him and to speak with him and have some communication  
3 and liaison between the two people, you and him, at the  
4 relative tops of their jobs?  
5 A. I didn't think of ringing him and that's a mistake, sir.  
6 Q. Because had you rung, for instance, because you managed  
7 to text him, had you rung Mr Hopkins, the  
8 chief constable, you could have got some critical  
9 information from him, I presume, couldn't you?  
10 A. I don't know, sir, what information he had at that  
11 stage.  
12 Q. Let's presume as chief constable he was hopefully pretty  
13 well-informed by 11.20/11.30. Do you agree?  
14 A. You would like to think so, sir.  
15 Q. Well, it would have been quite useful for you at least  
16 to try to contact him and speak to him, wouldn't it?  
17 A. Well, I did contact him and he did reply to me.  
18 Q. But when you're texting him, why not call him and say:  
19 what do you know, let's have our own mini-JESIP here?  
20 A. It's a really good point, sir, and it's well pointed  
21 out. I think, as I said earlier on today, I was of that  
22 view that things were still developing and that our  
23 officers needed the time collectively across the  
24 services to get a joint understanding of the situation  
25 and the risks that they faced. I was basically telling

154

1 the chief constable what I was doing at that point and  
2 not asking for any further information or advice because  
3 at that stage I didn't feel that I needed to do that.  
4 Q. To be fair to you then, did the chief constable, whilst  
5 you were telling him what you were doing, tell you what  
6 he was doing?  
7 A. No, I don't think so. He just said, "Okay, see you  
8 there".  
9 SIR JOHN SAUNDERS: Mr Cooper, this is something that will  
10 relate to the information of which you were being asked.  
11 If you want me to have a break now so you can see it  
12 in the course of your questioning, then we could do  
13 that.  
14 MR COOPER: Thank you, sir, I'll take that guidance if  
15 I can, please, yes.  
16 MR GREANEY: I was going to say, given the answer that has  
17 just been given by Mr O'Reilly, he's plainly not going  
18 to be taken by surprise in relation to this.  
19 SIR JOHN SAUNDERS: No, I agree. We'll have a 10-minute  
20 break. As much time as you need, within reason.  
21 MR GREANEY: Of course, sir, thank you very much indeed.  
22 (2.55 pm)  
23 (A short break)  
24 (3.05 pm)  
25

155

1 Further questions from MR GREANEY  
2 MR GREANEY: Sir, thank you very much for the break. With  
3 the agreement of Mr Cooper, before he resumes his  
4 questioning, I'm going to deal with the email issue.  
5 Can I say, Mr O'Reilly has read the email and seen an  
6 accompanying document.  
7 As I indicated at the start of this afternoon's  
8 session, an email had been received. So that I have not  
9 created a situation of mystery, can I indicate that this  
10 was an email that was received from a member of  
11 Lord Kerslake's team. In the email, that person  
12 recalled that he had been shown a text message by  
13 Mr O'Reilly and he had a particular recollection of what  
14 the content of that message was, that it isn't in the  
15 result necessary for me to go into save to say that if  
16 he had been correct in his recollection, it would have  
17 been potentially an important text message.  
18 But in fact, he wasn't correct. We have located the  
19 text message itself. It was indeed the one that  
20 Mr Cooper was just asking about, and the one that  
21 Mr O'Reilly had answered upon. We'll put it on the  
22 screen: {INQ019098/1}.  
23 Mr O'Reilly, I will turn just to ask you a couple of  
24 questions about this. As you recalled, at 23.21 on  
25 22 May, you sent a text message to Ian, that would be

156

1 Ian Hopkins, the chief constable of Greater Manchester  
 2 Police at that stage; is that correct?  
 3 A. That's correct, sir, yes.  
 4 Q. And you said:  
 5 "Ian, heading into our command room at FSHQ. Keep  
 6 in touch, Pete."  
 7 FSHQ standing for?  
 8 A. Fire Service Headquarters.  
 9 Q. So you were indicating that you were going to do what  
 10 in the result we know you did?  
 11 A. Sir.  
 12 Q. And then you go to the CSR. And he replied, and this  
 13 may be the only part of this that requires a little  
 14 explanation if you can provide it, although he will give  
 15 evidence in due course. The chief constable replied:  
 16 "Okay, see you there."  
 17 Did you understand from that that he intended to go  
 18 to Fire Service headquarters or something else?  
 19 A. At that time, sir, I was getting ready to go out and  
 20 I got the reply and it says, "Okay, see you there", and  
 21 I didn't really think about it that much and probably  
 22 Ian can give a better explanation of what he thought.  
 23 MR GREANEY: Shall we park that until he gives his evidence  
 24 then?  
 25 Mr Cooper I am very grateful for that opportunity.

157

1 Sir, I hope that I have cleared up why there was  
 2 activity —  
 3 SIR JOHN SAUNDERS: There are no other texts which could  
 4 be —  
 5 MR GREANEY: There are no others.  
 6 SIR JOHN SAUNDERS: That you're aware of?  
 7 MR GREANEY: This is the exchange that the person  
 8 I mentioned, Mr Deeming —  
 9 SIR JOHN SAUNDERS: Dr Deeming.  
 10 MR GREANEY: Dr Deeming, I am sorry, I have made the same  
 11 mistake.  
 12 This is the message he was recalling although, and  
 13 one doesn't blame him for this, he's talking about  
 14 events some time ago and his recollection was not  
 15 accurate.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR GREANEY: Thank you, Mr Cooper.  
 18 Questions from MR COOPER (continued)  
 19 MR COOPER: I'm grateful, thank you, sir.  
 20 Mr O'Reilly, I don't need to follow up on any of  
 21 that. I've asked you the questions that I sought to ask  
 22 you and you have answered them. Let me move on to  
 23 something else.  
 24 You mentioned, in fact you volunteered, this morning  
 25 something about this 360 assessment of management style.

158

1 In the questions that I have to ask you in the next  
 2 sector of my questioning, it really does necessitate me  
 3 asking you a little more about that. You indicated, you  
 4 volunteered to us this morning, that peers and  
 5 subordinates would give assessments anonymously about  
 6 your management style and you shared all of them and  
 7 I think you added self-awareness is a strength of yours;  
 8 is that right?  
 9 A. I'm always focused on that area of self-awareness to try  
 10 and make sure that obviously I'm as professional as  
 11 possible but also as courteous and inclusive as  
 12 possible.  
 13 Q. Yes. Were you aware for a contrary position that others  
 14 had grave misgivings about your management and  
 15 leadership style?  
 16 A. No, sir, I wasn't.  
 17 Q. Do you know someone called Warren Pickstone?  
 18 A. I know Warren Pickstone, yes.  
 19 Q. He's an area manager, isn't he?  
 20 A. He's retired but I think before I did, yes.  
 21 Q. Do you know for instance what his views might have been  
 22 of you?  
 23 A. He has never voiced his views personally to me, no, sir.  
 24 Q. These are questions I'm asking of you, I emphasise that,  
 25 I'm not taking a position on it yet, but these are just

159

1 questions I'm asking of you. Are you aware that he sent  
 2 an email to the leadership team, criticising your —  
 3 SIR JOHN SAUNDERS: Stop, Mr Cooper, I'm sorry. Mr Warnock  
 4 wants to say something.  
 5 MR WARNOCK: I do object. There seems to be some sort of  
 6 ambush in the witness box. There's nothing on the  
 7 evidence proposal about any of this. I have not  
 8 received anything about it in advance. I'm sure the  
 9 witness hasn't. It's not an issue within the inquiry's  
 10 terms of reference. I simply don't know where it's  
 11 going. But I respectfully submit this is something  
 12 that, if it is to be developed, ought to be developed  
 13 properly.  
 14 SIR JOHN SAUNDERS: Mr Cooper, is it right that the witness  
 15 hasn't seen this as part of the evidence proposals?  
 16 MR COOPER: Absolutely, sir. I'm just simply trying to at  
 17 this stage ascertain whether the witness has any  
 18 knowledge of this. That was only as far as I was going  
 19 to go today. Simply if he has any knowledge of it.  
 20 SIR JOHN SAUNDERS: No, no, we certainly have heard  
 21 suggestions in the past of your leadership style. So  
 22 rather than personalising it, would you mind just asking  
 23 in general terms?  
 24 MR COOPER: Of course I will.  
 25 SIR JOHN SAUNDERS: We've heard it in evidence already.

160

1 Thank you.

2 MR COOPER: Well then, let me for the time being,

3 Mr O'Reilly, just speak in general terms to you in these

4 questions. Are you aware of anyone, for instance,

5 communicating with the so-called leadership team

6 criticisms of your style of management and leadership?

7 A. No, sir, I'm not.

8 Q. You retired, as you've told us, on 6 February 2018;

9 correct?

10 A. That's correct, sir, yes.

11 Q. Were you, a simple question I ask you, were you not put

12 on gardening leave before you retired?

13 A. No, sir, I wasn't.

14 Q. Did you or did you not have any communication with

15 anyone from the mayor's office about your style of

16 leadership?

17 A. No, sir, I didn't.

18 Q. I'll leave it there, sir, for the time being.

19 SIR JOHN SAUNDERS: Thank you very much. Thank you,

20 Mr Cooper.

21 MR COOPER: But what you do know, don't you, Mr O'Reilly,

22 is that there were certain descriptions given during the

23 course of this inquiry about your style, expressions

24 such as "intimidating", "follow-up orientated", "not

25 approachable", "oppressive", "bombastic"? Do you agree

161

1 with any of those descriptions of your management and

2 leadership style or have they all perhaps got it wrong?

3 A. Well, I think I know I'd seen you ask those questions,

4 Mr Cooper, and quite a few times they were misquotes or

5 quotes by others --

6 SIR JOHN SAUNDERS: The bombastic was a misquote, so let's

7 forget about that. But you were described as being

8 capable of being intimidating, and that came from people

9 like Mr Nankivell, who you're an admirer of and he's an

10 old-style firefighter, would that be fair, in the best

11 traditions perhaps you could say?

12 A. He's a very professional firefighter, sir, yes.

13 SIR JOHN SAUNDERS: Okay. So did that come as a surprise to

14 you, that he said that?

15 A. It didn't come as a surprise to me that Dean said that

16 he was not intimidated by me ever.

17 SIR JOHN SAUNDERS: But he said that other people might be

18 as I recall.

19 A. He did say that, sir, but the only one person that has

20 ever told me that sometimes I can come across as

21 intimidating was Geoff Harris.

22 SIR JOHN SAUNDERS: Okay. So do you think Mr Harris is

23 right about that?

24 A. No, I think he is right about that and I think I gave an

25 explanation of that this morning to you.

162

1 SIR JOHN SAUNDERS: Okay. You're tall, you've got an Irish

2 accent, you're bald. I think these were the facts, some

3 of the factors that you were saying made you -- could

4 make you intimidating?

5 A. I think I also said to you I like to be on top of the

6 information that I have. I'm very communicative in my

7 style. When we have the time for open and inclusive

8 meetings, then we have open and inclusive meetings and

9 I like to talk to and listen to people a lot. I know

10 and I understand when I do talk and do public speaking,

11 some people feel that they don't have the same knowledge

12 and that was what Geoff had fed back to me, that

13 sometimes that can be intimidating for people.

14 SIR JOHN SAUNDERS: Okay.

15 MR COOPER: We're going to come on, Mr O'Reilly, to how

16 people with maybe superior knowledge behave: you had

17 four of them around you and you ignored them. We'll

18 come back to that.

19 SIR JOHN SAUNDERS: The quality of the reproduction of your

20 voice is not fantastic, Mr Cooper, so could you just

21 repeat that again?

22 MR COOPER: Yes, of course. I will come back to how people

23 with superior knowledge are dealt with by you, that is

24 Mr Nankivell, Mr Fletcher, Mr Levy, Mr Etches in

25 a moment. But I want to deal with you at the moment.

163

1 Are you really saying that people have come to

2 court, come to this inquiry, and said, a very serious

3 thing about you, that you are intimidating -- and be in

4 no doubt you accept that's a serious thing to say about

5 a leader or a manager, isn't it, that they are

6 intimidating? Do you accept that?

7 A. It depends on -- I think intimidating is a strong word,

8 yes, but (overspeaking) that's being offered. I feel

9 intimidated now, but that's because of the setting,

10 because I know there's superior knowledge in the room to

11 me. But that's something I would have expected.

12 Q. I am not suggesting --

13 SIR JOHN SAUNDERS: (Overspeaking), Mr Cooper?

14 MR COOPER: I'm sorry, sir?

15 SIR JOHN SAUNDERS: You're being intimidating and you're not

16 even bald!

17 MR COOPER: Or indeed I'm only from Wolverhampton, so that

18 doesn't make sense to me!

19 Going back to you, Mr O'Reilly, are you really

20 saying that because you're -- and these are your words,

21 not mine, let me emphasise that, because this appears on

22 real time -- that because you're tall, bald and Irish,

23 that's intimidating?

24 A. That's part of what I explained, sir, yes.

25 Q. Can I say, with the greatest of respect to you,

164

1 Mr O'Reilly, that's nonsense, isn't it? Senior fire  
 2 officers are not going to come to an inquiry like this,  
 3 dealing with the deaths of 22 people, and simply assert  
 4 that you are intimidating simply because you are bald,  
 5 tall and Irish. Think about it —  
 6 SIR JOHN SAUNDERS: In fairness, Mr Cooper, there was  
 7 another aspect to why he said he was intimidating and  
 8 I didn't deliberately leave it out to make you feel  
 9 stupid or anything like that, I actually genuinely  
 10 couldn't recall it at the time. You say sometimes,  
 11 perhaps, you appear rather too knowledgeable for your  
 12 own good, maybe?  
 13 A. Sometimes, yes, sir.  
 14 SIR JOHN SAUNDERS: Okay.  
 15 MR COOPER: Shall we add egotistic to that then?  
 16 A. I don't believe that I'm egotistic in any sense of the  
 17 word, sir, no.  
 18 Q. Arrogant?  
 19 A. No, sir.  
 20 Q. Someone who perhaps thinks they have a higher degree of  
 21 knowledge over and above others?  
 22 A. Absolutely not. Absolutely not.  
 23 Q. You see, I understand indeed you're presenting — as one  
 24 always does, no criticism of you — sitting there in the  
 25 witness box, presenting your best face forward, but

165

1 I will not shirk from putting the question to you. When  
 2 you're dealing perhaps with subordinates you're not  
 3 quite the man you appear now, are you?  
 4 A. Sir, I would fundamentally disagree with that. I would  
 5 say that if that was true, there would be evidence of  
 6 that.  
 7 Q. Yes. And again, I do press you on this: senior,  
 8 experienced firefighters have come to this inquiry, very  
 9 onerous, serious and grave inquiry, and felt that they  
 10 should say that you were intimidating. Can I suggest to  
 11 you, they would not be saying that simply because you  
 12 were tall, bald, Irish and had a degree of knowledge.  
 13 There's something more in it, isn't there? Let's get  
 14 there. Being tall, bald, Irish and reasonably  
 15 well-informed.  
 16 SIR JOHN SAUNDERS: We've had enough of that now, thank you,  
 17 Mr Cooper.  
 18 What do you say?  
 19 A. I disagree with everything Mr Cooper says.  
 20 SIR JOHN SAUNDERS: Well, not everything, but on this  
 21 particular topic anyway?  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 24 MR COOPER: Not at all, I'll move on.  
 25 To a degree I'll move on because I want to go on to

166

1 the Steve Hynes conversation that you had. The  
 2 conversation that you had with Mr Hynes, I think you  
 3 told us, lasted 2 minutes; is that right?  
 4 A. That's what the records show, sir.  
 5 Q. Yes, 2 minutes. And this conversation, we've got no  
 6 record of, have we?  
 7 A. You have his record and my record, sir.  
 8 Q. Well, is there any transcript of this conversation?  
 9 A. I don't believe it was recorded anywhere, sir.  
 10 Q. No, that's what I mean by no record. The reason there's  
 11 no record of what you said, independent record, between  
 12 you and Mr Hynes of what was said is that it was on your  
 13 mobile phone, wasn't it?  
 14 A. It was, sir, that's correct.  
 15 Q. Why did you ring him on your mobile phone?  
 16 A. Because I felt that was the best chance I had of  
 17 connecting with him.  
 18 Q. Did you try any other formal method which could be  
 19 recorded and evidenced?  
 20 A. No, sir, I didn't.  
 21 Q. So what we have here, for better or for worse, what the  
 22 inquiry has here to grapple with is a very important  
 23 decision being taken without any independent record of  
 24 what was said other than what you and Mr Hynes say?  
 25 A. No, sir, I would challenge that in that within a minute

167

1 or two, Steve Hynes made a formal request through his  
 2 North West Ambulance Service control room to North West  
 3 Fire Control to say almost exactly what was agreed  
 4 in that telephone call.  
 5 Q. I'm sure there is that, but we don't hear the tone of  
 6 your voice, do we?  
 7 A. I am sorry, could you explain to me...  
 8 Q. Well, do you really want me to go back over it again?  
 9 I will. We don't hear the tone of your voice when  
 10 you're speaking to Mr Hynes, do we?  
 11 A. Obviously not, sir, because it's in writing —  
 12 Q. No, no — well, it's not even in writing, is it?  
 13 SIR JOHN SAUNDERS: Sorry, you're now at cross-purposes.  
 14 I think Mr O'Reilly is talking about the request being  
 15 made to North West Fire Control —  
 16 MR COOPER: I'm talking about this telephone call because,  
 17 Mr O'Reilly, you will understand that a number of  
 18 witnesses have to a degree, and hopefully in an  
 19 unintimidating style, been asked about why use mobile  
 20 phones when other procedures could be used to record and  
 21 evidence the conversations. So what's sauce for them is  
 22 sauce for you. You used your mobile phone, therefore we  
 23 don't have a transcript of that call, we can't even hear  
 24 your voice, can we?  
 25 A. That's correct.

168

1 Q. And this is in the context of a line of questioning I've  
2 had about you being intimidating and I agree with the  
3 other witnesses, for what it's worth, in putting it to  
4 you that you are intimidating, so we don't know whether  
5 you were being intimidating in that call, do we?  
6 A. No.  
7 Q. No. So again, during this 2-minute call that you're  
8 having with Mr Hynes, you used the word — you probed  
9 him? All right? So during this 2-minute probing —  
10 SIR JOHN SAUNDERS: Did you hear that?  
11 A. I think I heard it, yes. I probed.  
12 MR COOPER: You probed him, yes. Tell us about this  
13 2-minute probing. How did you probe him?  
14 A. I think it's in the statement.  
15 SIR JOHN SAUNDERS: Just tell us again. As far as you're  
16 concerned, how did the conversation in general terms go  
17 with Mr Hynes?  
18 A. It started with Steve saying to me, "Hello Peter, how  
19 are you? I haven't really got a lot of time to talk."  
20 That's what started it. He said to me, "You need to get  
21 down here", and I said, "Okay, Steve, what is it you  
22 need?" And he told me it was 12 firefighters he needed.  
23 I then asked him, "Are you sure you don't need MTFA?  
24 They don't need ballistic protection? You don't need  
25 any specialism?" He said, "No, I just need 12

169

1 firefighters and an officer".  
2 SIR JOHN SAUNDERS: Okay, thank you.  
3 MR COOPER: When that conversation, that probing, took  
4 place, you were aware nonetheless by now, weren't you,  
5 of a bomb having exploded; correct?  
6 A. I was aware that an explosion had occurred, yes.  
7 Q. And no doubt hopefully some little more information  
8 about the circumstances of what was developing at the  
9 arena, correct?  
10 A. At that point, just from what I'd got from Steve and  
11 what I had seen on the television and some information,  
12 I think, in the command suite — I don't know whether it  
13 was from Dean or from John — about an assumption of an  
14 active shooter earlier in the incident. I'm not sure  
15 who it was that informed me of that, but that was  
16 certainly part of my concerns when speaking with  
17 Steve Hynes as to whether they needed to be MTFA or not.  
18 Q. Despite what Steve Hynes may or may not have said to you  
19 as to his requirements, you're an independent,  
20 of course, emergency service, aren't you?  
21 A. Of course we are an independent emergency service, but  
22 in that type of scenario you're trying to be as joined  
23 up as one as you possibly can.  
24 Q. Yes. Here is a conversation, and can I suggest the  
25 probing probably lasted less than 2 minutes given all

170

1 the introductions, but a short probing that takes place  
2 over 2 minutes, unrecorded, unevidenced, during this  
3 short telephone conversation that you've had, did you  
4 not say to yourself, "Wait a minute, we're not just  
5 a takeaway service for NWAS, they ring up and say what  
6 they want and we make a delivery, we're something more  
7 than that, we're a Fire Service? We know what's going  
8 on there to a degree, a bomb has exploded, and  
9 regardless of what you say, Mr Hynes, with all your  
10 cardiac arrest training, I'm sending down this  
11 equipment." What was it that Mr Hynes managed to say to  
12 you in 90 seconds that turned you into an NWAS takeaway  
13 service?  
14 A. I think the fact that I had at least 3.5, probably 4,  
15 years' experience of Steve Hynes' professional approach  
16 to everything that he did. I believe that Steve Hynes  
17 was certainly the most knowledgeable and most  
18 professional paramedic that I knew and I had a lot of  
19 trust in his experience as well as in him personally.  
20 Q. And yet there you are, during this conversation, which  
21 must have lasted less than 2 minutes, given the  
22 introductions, you're ignoring and dismissing the views  
23 of Mr Levy, Mr Nankivell, Mr Etches and Mr Fletcher and  
24 simply taking a call from NWAS, "We want this, please",  
25 and you saying, "Yeah, we'll deliver it". What was it

171

1 that was said by Mr Hynes that made you ignore Levy,  
2 Nankivell, Etches and Fletcher?  
3 A. Sorry, sir, can you repeat that, please?  
4 SIR JOHN SAUNDERS: What was said to you by Mr Hynes that  
5 led you to do what he wanted rather than listening to  
6 the advice of the four senior officers who were in the  
7 room?  
8 A. It was the fact that he was communicating to me from the  
9 scene itself. So he was there, I know Steve would have  
10 been in conversation with the tactical firearms  
11 commander. He had a shared understanding of that risk  
12 of that scene and a situational awareness of that scene.  
13 He was there, he was a professional officer, and he was  
14 trying his best to deliver a tactical plan and he needed  
15 our help to do that. I don't think I needed a lot more  
16 than that, to be honest, to trust Steve's judgement  
17 about what we needed at the scene.  
18 MR COOPER: He was a bit like Mr Berry, wasn't he,  
19 a tactical adviser, whose views should be taken? That  
20 sort of person; yes?  
21 A. Actually, sir, he was the director of operations for  
22 North West Ambulance Service.  
23 SIR JOHN SAUNDERS: He was on-scene commander too at the  
24 time. He was on-scene commander for NWAS at the scene.  
25 MR COOPER: Is it usual, taking up the chair's question, for

172

1 GMFRS to take the direction from an NNAS Bronze?  
 2 A. It's usual for us to take a professional opinion of our  
 3 colleagues, yes.  
 4 Q. Is it usual in a situation like this, in the critical  
 5 situation that you were having this unrecorded  
 6 conversation, is it usual for GMFRS to completely  
 7 subserviate themselves to an NNAS Bronze?  
 8 A. I think it's the responsibility of us when we're asked  
 9 for assistance to try and provide that assistance as  
 10 best we can.  
 11 Q. Is it not the responsibility also of GMFRS to take their  
 12 own independent professional initiative and, in these  
 13 circumstances, err on the side of caution that despite  
 14 the fact that Mr Hynes was asking for a domestic fire  
 15 deployment, you would take the decision, "No, Mr Hynes,  
 16 in these circumstances we're sending this"? Was that  
 17 not the proper and robust approach that  
 18 Greater Manchester would have expected of you?  
 19 A. Sir, in my understanding and from my experience, what  
 20 I was dealing with at that point in time was the lead  
 21 agency. That was the lead agency who were responding to  
 22 try and treat as best they could the people who needed  
 23 their help the most. At that point in time, they are  
 24 the people best placed from a professional perspective  
 25 to ask for the assistance that they feel that they need.

173

1 I'm certainly not in a position to challenge Steve with  
 2 regards to what medical expertise or what other  
 3 expertise he needs to be able to carry out his tactical  
 4 plan.  
 5 SIR JOHN SAUNDERS: I think the differences of opinion  
 6 between the witnesses led by Mr Nankivell on one side  
 7 and by Mr O'Reilly on his evidence seem to me to be  
 8 pretty clear cut now, on which I need to make  
 9 a decision. If there was some particular thing you  
 10 wanted to take up on the last answer, then of course  
 11 I won't stop you.  
 12 MR COOPER: Simply this, then, sir.  
 13 You gave in your evidence to us, Mr O'Reilly, this  
 14 morning that Ben Levy, your words, knew Steve Hynes,  
 15 knew him well, and knew his capabilities. That's your  
 16 evidence this morning. Ben Levy knew Steve Hynes, knew  
 17 him well and knew his capabilities. That's your  
 18 evidence and you stand by that, I presume?  
 19 A. To the best of my belief, Ben knew Steve and Steve knew  
 20 Ben. That's my belief.  
 21 Q. That's not what you said. You said:  
 22 "Ben Levy knew Steve Hynes. He knew him well and  
 23 knew his capabilities."  
 24 You said that only a few hours ago. You stand by  
 25 that, I presume?

174

1 A. That was my belief, sir.  
 2 Q. Yes. And yet Ben Levy, despite knowing Steve Hynes  
 3 well, and despite critically knowing of his  
 4 capabilities, still disagreed with you; correct?  
 5 A. Ben definitely disagreed at the time in that he felt  
 6 that we should be deploying the specialist rescue team  
 7 to the scene. I explained to Ben that I had been  
 8 talking to Steve and Steve had been quite clear to me  
 9 what he needed at the scene. I know, and if I'd been  
 10 in the same situation as Ben, under the emotional  
 11 pressure that Ben was under at the time as well,  
 12 I probably would have felt the same. The fact was that  
 13 I had had a direct request for assistance from the  
 14 incident ground and I responded to that request.  
 15 Similarly, if we were at a fire incident and I wanted  
 16 a HART team to respond, that's exactly what I would ask  
 17 for because I know of the capabilities that they could  
 18 provide to assist us at the incident.  
 19 Q. I'll ask the question again. Kindly answer it: Ben Levy  
 20 knew Mr Hynes well and knew of his capabilities and  
 21 Ben Levy still disagreed with what Mr Hynes was saying;  
 22 is that right?  
 23 A. I believe so, yes.  
 24 Q. You believe so. Then I won't take it any further.  
 25 Thank you. I'll move on.

175

1 I just want to touch upon, if I can, the information  
 2 you had. It's a matter that Mr Smith was dealing with  
 3 a little earlier on about information you had and  
 4 whether you were giving that information out to people  
 5 and the accuracy of it.  
 6 You spoke to the Prime Minister, didn't you?  
 7 A. That was the next day, I believe.  
 8 Q. Yes, absolutely. Let me just try and understand what  
 9 information you had then, and exactly how much of that  
 10 you passed on to Mrs May.  
 11 A. (Overspeaking).  
 12 Q. I'm going to help you. This conversation you had with  
 13 the Prime Minister occurred the following — was it the  
 14 following day or was it 30 May in fact? 30 May. Would  
 15 that be right (overspeaking) given notice of, so it will  
 16 be no surprise.  
 17 A. On 30 May, I don't believe I was in the country.  
 18 SIR JOHN SAUNDERS: I think it was the next day is what I've  
 19 read in the statement, Mr Cooper. You may have other  
 20 information that I don't have, I have no idea.  
 21 MR COOPER: Not at all, sir, it's an INQ; I will take you to  
 22 it in a moment so as to get me clarification.  
 23 When you spoke to the Prime Minister what was your  
 24 state of mind about what had happened? What information  
 25 had you got, broadly, when you spoke to the

176

1 Prime Minister?  
 2 A. I think I had the information, sir, that obviously we  
 3 had been delayed for quite some time. I knew what  
 4 appliances had eventually attended and I knew the work  
 5 that we were carrying on with from that point.  
 6 Q. Did you know by then that there were at least  
 7 communication problems on the night?  
 8 A. Absolutely, yes.  
 9 Q. Effectively, you broadly knew — obviously you know more  
 10 now because of this inquiry, Kerslake and other matters,  
 11 but you broadly knew when you spoke to the  
 12 Prime Minister what you know now?  
 13 A. I had a good idea, sir, yes.  
 14 Q. Can we look then, please, at {INQ019049/1}.  
 15 This is to Peter Holland. Who is Peter Holland?  
 16 A. He was the chief fire and rescue adviser to the  
 17 Department for Communities and Local Government at the  
 18 time.  
 19 Q. Thank you. This is from you, isn't it?  
 20 "Many thanks, Pete."  
 21 Is this from you?  
 22 A. No, sir, it's not.  
 23 Q. Right. Do you know who this is from then?  
 24 A. That's from Peter Holland to me, I think.  
 25 SIR JOHN SAUNDERS: You'll see near the bottom, or just

177

1 below halfway down, it refers to:  
 2 "CFO O'Reilly was fire Gold commander at SCG."  
 3 So unless Mr O'Reilly talks about himself in the  
 4 third person, that would suggest perhaps he's not the  
 5 author of this document. Was this part of the evidence  
 6 proposal? Have you seen this as part of the evidence  
 7 proposal?  
 8 MR COOPER: It certainly was isolated by us as part of the  
 9 evidence proposal.  
 10 SIR JOHN SAUNDERS: I'm not suggesting it wasn't.  
 11 Anyway, are you the author of it?  
 12 A. No, sir.  
 13 MR COOPER: Did you receive it or see it in any way?  
 14 A. I received it from Peter Holland, yes.  
 15 Q. Let's go back to it again then, please:  
 16 "... some specific info as the PM plans to write to  
 17 all three blue light services post-bombing... conscious  
 18 of the criticism flying around, so I want to help as you  
 19 know. Will the following work okay for you?  
 20 "'GMC FRS MTF A teams were sent to an RVP... and  
 21 stood by to support. Around 20 GMC FRS personnel  
 22 assisted N W A S with casualty. CFO O'Reilly was fire  
 23 Gold commander at the SCG.'  
 24 "In addition, Pete, is there anything else you want  
 25 me to brief her on? Many thanks, Pete."

178

1 So this is definitely not from you?  
 2 A. That is definitely not from me.  
 3 Q. Going back to it again, Mr Lopez, please. Do you agree  
 4 in any event, for the time being, looking at that, the  
 5 Prime Minister is being told very little about what  
 6 happened 5 days later or more?  
 7 A. I would agree, yes, sir.  
 8 Q. And in fact, whoever is responsible for that suggestion  
 9 is effectively misleading the Prime Minister?  
 10 A. Um...  
 11 SIR JOHN SAUNDERS: It's a bit selective in the information  
 12 it supplies?  
 13 A. Peter Holland sent that to me. It is definitely not all  
 14 of the information. We certainly didn't know any of the  
 15 information about why the FDO hadn't enacted Plato  
 16 widely. There's loads of stuff that we didn't know in  
 17 those immediate days afterwards, which we  
 18 subsequently —  
 19 MR COOPER: I understand that, Mr O'Reilly, which is why  
 20 I carefully asked the question before I presented this  
 21 INQ: did you broadly know what you're telling us about  
 22 when the Prime Minister was spoken to? You said yes.  
 23 I'm not suggesting the detail that's come out at this  
 24 inquiry would have been known, but broadly, as I think  
 25 the chair said, this is a little selective, isn't it, in

179

1 what the Prime Minister is being told?  
 2 A. It is selective, yes, sir.  
 3 Q. And it's misleading as far as Mrs May was concerned,  
 4 isn't it?  
 5 A. I... I don't know how you can say it's misleading.  
 6 It is selective.  
 7 Q. (Overspeaking) look at it? (Overspeaking) shall we go  
 8 through it line by line? (Overspeaking) Are you saying  
 9 that you —  
 10 SIR JOHN SAUNDERS: Hang on, Mr Cooper, I am really sorry,  
 11 you've managed to talk across each other. It's not your  
 12 fault it; is just because of the video link. Just let  
 13 Mr O'Reilly answer, please.  
 14 A. In relation to some of the text, obviously there's  
 15 misspellings, grammar, other stuff —  
 16 SIR JOHN SAUNDERS: We're not worried about that.  
 17 A. (Overspeaking) but the likes of — GMFRS MTF A teams were  
 18 sent to a rendezvous point at Philips Park and they  
 19 stood by there and then moved to Thompson Street.  
 20 Around 20 firefighters, which is five fire appliances,  
 21 did attend the scene. And I did eventually attend the  
 22 Gold command at police service headquarters when it was  
 23 called.  
 24 MR COOPER: All right. Yes, of course. But it's selective,  
 25 isn't it? It's missing out all the bad bits, isn't it?

180

1 A. I think there was quite a lot of bad bits that I was  
 2 unaware of yet. Certainly — and I didn't think it was  
 3 my place to include in that bits that I was making heavy  
 4 assumptions on at that time.  
 5 Q. Well, did you attend — you didn't attend the debrief,  
 6 did you, shortly after, where the firefighters commented  
 7 that they were so ashamed to be firefighters as a result  
 8 of what happened? You weren't aware of that at the  
 9 time?  
 10 A. I think that was occurring at the same time I was in the  
 11 SCG, when it was eventually called, and I was aware that  
 12 there was going to be a meeting because I was told,  
 13 I think by Geoff Harris and maybe Dean Nankivell, that  
 14 they were going down to Manchester Central to have  
 15 a conversation with firefighters when they returned.  
 16 Q. The level of feeling was such that one firefighter said  
 17 in one document I have seen:  
 18 "The AA currently call themselves the fourth  
 19 emergency service. They could break into the top three  
 20 after this."  
 21 That was the level of feeling :  
 22 "The AA currently call themselves the fourth  
 23 emergency service. They could break into the top three  
 24 after this."  
 25 That's the level of observation that was being made.

181

1 That was — certainly you were aware of that, weren't  
 2 you, by the time the Prime Minister was being spoken to?  
 3 SIR JOHN SAUNDERS: You were aware of firefighters' views,  
 4 I think you shared them.  
 5 A. I think the Prime Minister came to police headquarters  
 6 on the morning after the bomb, which I think was the  
 7 23rd, at around about 11 o'clock and I think she was  
 8 accompanied by Amber Rudd. That was on the Tuesday.  
 9 I certainly was becoming more and more aware as the day  
 10 went on of firefighters' concerns to the point that  
 11 I contacted Matt Wrack from the Fire Brigades Union who  
 12 I knew was on the way to Manchester, and we agreed to  
 13 meet in the afternoon.  
 14 SIR JOHN SAUNDERS: According to your statement, it's taking  
 15 place on the 23rd, you had been going home and then you  
 16 went back in because of — to meet the Prime Minister.  
 17 A. Yes. I think it was around about 11 o'clock or 11.30.  
 18 SIR JOHN SAUNDERS: Okay.  
 19 MR COOPER: It's a serious suggestion I'm making to you: my  
 20 question is that the Prime Minister was effectively  
 21 misled as to the seriousness of the failings ; would you  
 22 agree?  
 23 A. Sir, I think whenever we went to meet with the  
 24 Prime Minister, I think all of the emergency services  
 25 were aware that there were significant failings on the

182

1 night before.  
 2 SIR JOHN SAUNDERS: (Overspeaking) the Prime Minister?  
 3 A. I don't believe it was, sir, no.  
 4 MR COOPER: Why not?  
 5 A. I think there was a lot of sensitivity around it at the  
 6 time and we weren't absolutely sure of why. We are more  
 7 sure now, of course.  
 8 Q. It may well be you might not have been sure at the time,  
 9 but that's not a reason to not tell the Prime Minister  
 10 what your concerns are, is it?  
 11 A. I don't think that was the appropriate time to voice  
 12 concerns within the room. I think there was sensitivity  
 13 around — a lot of people had suffered badly and a lot  
 14 of people had lost loved ones. We were all very  
 15 conscious the next day of that. It was devastating for  
 16 those families, it was devastating for firefighters, it  
 17 was devastating to the emergency services. We knew  
 18 something had went badly wrong. I don't think that that  
 19 would have been the advice from anyone that we should be  
 20 telling the Prime Minister that there and then because  
 21 none of us were actually aware of the facts.  
 22 Q. Let me put this question on behalf of the families then  
 23 as you say that. You have just said you all knew things  
 24 had gone badly wrong. On behalf of the families, I put  
 25 to you that you should have told the Prime Minister

183

1 straightaway that, and that you do a disservice to the  
 2 families by not doing so. What do you say about that?  
 3 Before you start invoking the names of the families  
 4 (overspeaking).  
 5 SIR JOHN SAUNDERS: Hang on, he is about to answer and  
 6 you're talking across each other again. Sorry,  
 7 Mr Cooper.  
 8 MR COOPER: Not at all.  
 9 SIR JOHN SAUNDERS: Right, Mr O'Reilly.  
 10 A. I agree that there should have been a combined position  
 11 to give the Prime Minister what we knew that day.  
 12 I think I would have been a lone voice if that had been  
 13 the case. I know that in conversations that I had  
 14 in the days afterwards, I felt that there should have  
 15 been an opportunity for at least myself and the  
 16 chief constable to have explained that there were  
 17 failings. I certainly was willing to take my  
 18 responsibility in that, but in my conversation with the  
 19 mayor it was obvious that there were differences of  
 20 opinion in relation to how that should be played out.  
 21 MR COOPER: Let's leave the mayor out of this for the time  
 22 being. We may bring him back in in a minute. You have  
 23 given fine words and fine inclinations during the course  
 24 of your evidence, but I'm dealing with your actions,  
 25 Mr O'Reilly, not your words here today, I'm dealing with

184

1 your actions. You could have been the lone voice,  
 2 couldn't you? You're a tall, as you call it, in  
 3 inverted commas, a tall, bald Irishman who is very  
 4 knowledgeable. Could you not have been that tall, bald  
 5 Irishman who's very knowledgeable with the  
 6 Prime Minister?  
 7 A. I could have done, sir, yes.  
 8 Q. Why not?  
 9 A. I didn't believe it was the right time.  
 10 Q. Are you holding things back now because you don't  
 11 believe it's the right thing?  
 12 A. Absolutely not, sir. I think ... I have waited to be  
 13 able to tell everything that I know at the right time  
 14 in the right place (overspeaking). What you're getting  
 15 from me is an honest account of my reflections and my  
 16 memory of the events that occurred on the night, the  
 17 morning after and in the days that followed. I haven't  
 18 changed any of the detail in that time and I honestly  
 19 regret and I am sorry for the mistakes that I made that  
 20 contributed to the delay and really I have to wait, like  
 21 everyone else, to see what the impact of that delay was.  
 22 Q. Let's go back — without being diverted let's go back to  
 23 how frank and keen you are to make an honest assessment.  
 24 You're so frank and so keen, you withhold information  
 25 from the Prime Minister; is that right?

185

1 A. That's not right, sir.  
 2 Q. Well, you've just admitted to it. You had information,  
 3 you wish you'd spoken out to the Prime Minister and you  
 4 didn't. That's holding back from her, isn't it?  
 5 A. Actually, sir, I had concerns which — I think at  
 6 roughly 4 am in the morning I asked Assistant Chief Fire  
 7 Officer Keelan to come to force headquarters. The  
 8 specific reason I asked him to come to force  
 9 headquarters was because I wanted to find out exactly  
 10 why there was such a poor response by the Fire and  
 11 Rescue Service. Dave Keelan suggested that  
 12 Damian O'Rourke, our area manager, take on that  
 13 investigation immediately and we set about immediately  
 14 trying to gather some sort of facts as to why the  
 15 firefighters of Greater Manchester weren't there to help  
 16 the people of Greater Manchester when they needed them  
 17 most.  
 18 SIR JOHN SAUNDERS: Okay. Some of the context about the  
 19 Prime Minister's visit. Clearly, her primary reason  
 20 presumably for coming to Manchester was because of the  
 21 losses of the families, the suffering caused to people  
 22 and the general shock which was in Manchester as  
 23 a whole. The purpose of meeting with the rescue  
 24 services was what, as far as you could tell?  
 25 A. Obviously I was called back to attend that. It was the

186

1 SCG, I think, meeting with the Prime Minister to give  
 2 her a flavour of the initial information from the events  
 3 the night before. That was as far as it went, sir, and  
 4 it didn't really get much further than that.  
 5 SIR JOHN SAUNDERS: How long did it last?  
 6 A. Very brief. I'd say 10/15 minutes at the very most.  
 7 SIR JOHN SAUNDERS: I think what's being suggested to you,  
 8 I think with all of you, that there was really — you  
 9 were not going to tell her any more than you could  
 10 absolutely get away with telling her.  
 11 A. I think that's one view. I think —  
 12 SIR JOHN SAUNDERS: I'm asking if it's right.  
 13 A. No, I think most of us weren't in full receipt of any  
 14 facts at that time about why things had fallen down. We  
 15 had had the rumours the night before about the force  
 16 duty officer, we weren't fully aware — we hadn't gone  
 17 into all of the information that we could glean from our  
 18 logs, North West Fire Control, the Vector logs, the  
 19 different logs that were there, and we really did need  
 20 someone who wasn't so close to the events of night  
 21 before to start looking at that.  
 22 Not only that, Mr Cooper, I don't know whether  
 23 you're aware of the meeting I had with Matt Wrack at  
 24 Thompsons Solicitors along with Les Skarratts and  
 25 Gary Keary of the FBU. I told them that we had serious

187

1 failings that needed investigated and I invited them to  
 2 join with me immediately to begin a joint investigation  
 3 with the FBU.  
 4 MR COOPER: I was going to ask you about that.  
 5 SIR JOHN SAUNDERS: That meeting was after your meeting with  
 6 the Prime Minister; is that right?  
 7 A. It was, yes.  
 8 MR COOPER: I was going to ask you about that. That appears  
 9 in paragraph 92 but we'll come back to that  
 10 investigation and what happened to it in a moment. Let  
 11 me just top and tail this. I'm not asking you questions  
 12 indicating that you should have told the Prime Minister  
 13 why these things happened; I'm asking you why you and  
 14 your colleagues didn't tell the Prime Minister that they  
 15 had happened. That could have been said within 3 or  
 16 4 minutes in the 15 minutes you're speaking to her. Do  
 17 you understand that?  
 18 A. I do, sir, but can I complicate things even further?  
 19 I can't remember where I'd heard it from, but there was  
 20 a feeling, a saying, and that was repeated to me by  
 21 a number of significant people afterwards, that it  
 22 wasn't a significant failing, fire were not required,  
 23 and therefore there was no reason for them to be there.  
 24 SIR JOHN SAUNDERS: In your statement you attributed that to  
 25 the mayor. I'm not keen to get into all of these,

188

1 particularly what's said by people. I'm happy for you  
 2 in general terms, but I really don't want to involve  
 3 many more people in this inquiry to give their account  
 4 of what was said immediately afterwards.

5 MR COOPER: I'm only asking you these questions,  
 6 Mr O'Reilly, particularly about how frank you were with  
 7 the Prime Minister, to suggest that you're capable of  
 8 holding things back then. Are you capable of holding  
 9 things back now?

10 A. I refute that. I refute that entirely. I didn't  
 11 consciously or deliberately hold back any information  
 12 from the Prime Minister. If I had been asked, would  
 13 I have given an honest answer? I probably would have.  
 14 Am I holding anything back now? Absolutely not.

15 Q. Sir, I think you've got the flavour of what I am asking  
 16 and I won't --

17 SIR JOHN SAUNDERS: I think, if I may say so, Mr Cooper, the  
 18 flavour is for me, not that information as information  
 19 has been held back or decisions, it's the reasons for it  
 20 and maybe the inability and failure to listen to other  
 21 people, that is really what we've been looking at.

22 MR COOPER: Thank you, sir.  
 23 Can I take you, please, Mr O'Reilly, to  
 24 paragraph 101 of your statement just for some  
 25 explanation.

189

1 Let's put it on the screen. It's the same reference  
 2 which is {INQ026732/26}:  
 3 "At 10.12 on 25 May, I received a text from  
 4 Peter Holland, chief fire and rescue adviser, asking me  
 5 to contact him urgently. I rang him and he told me that  
 6 senior Home Office civil servants were very jumpy about  
 7 Plato policy and they wanted an update urgently."  
 8 What's that mean:  
 9 "Home Office civil servants were very jumpy about  
 10 Plato policy on 25 May?"

11 A. I think that information had got to them that there had  
 12 been a breakdown in the approach to JESIP and Plato and  
 13 that he, as the chief fire and rescue adviser, was  
 14 following up on that.

15 Q. I see. I presume discussions took place thereafter  
 16 about Plato policy? I'm not asking for the details, but  
 17 I presume there was an ongoing communication of that?

18 A. I think the rest of the paragraph alludes to that, yes.

19 Q. Thank you. Paragraph, please, 102:  
 20 "I rang Roy Wilsher, as requested by Peter Holland.  
 21 Roy told me that he had received a telephone call  
 22 directly from the JESIP police lead who had told Roy  
 23 that, 'We don't need a public fallout between police and  
 24 fire over information sharing, do we?'"  
 25 Do you know what that meant?

190

1 A. Again, I think that the police lead and Roy were aware,  
 2 how they were aware I don't know, that there had been  
 3 a serious breakdown in the application of JESIP on the  
 4 night in question.

5 Q. All right. Reading on then from paragraph 102, just  
 6 another paragraph, please:  
 7 "Roy said that he told me that he'd spoken to  
 8 Matt Wrack of the FBU and had emphasised that this could  
 9 bring down the British Fire Service."  
 10 What could bring down the British Fire Service?

11 A. I believe that that was the failure of  
 12 Greater Manchester Fire and Rescue Service to be able to  
 13 respond effectively on the night.

14 Q. I want to just deal with, if I can, please, and just to  
 15 highlight them, the criticisms, the debrief criticisms  
 16 and otherwise that you've made since this event. I'll  
 17 reference them and hopefully deal with it in short  
 18 order.  
 19 Mr Lopez, please, {INQ004273/5}.  
 20 This is your document, Mr O'Reilly. There we see  
 21 the usual format:  
 22 "What aspects of Operation Newtown did not go well?"  
 23 Again, I am not going to take you through each and  
 24 every one. Is there any one of those that you  
 25 particularly want to highlight that may assist this

191

1 inquiry or do you simply stand by what you have recorded  
 2 there for us to consider?

3 A. I stand by those, sir.

4 Q. Thank you. {INQ004273/9}, please, Mr Lopez:  
 5 "What key recommendations for future similar  
 6 events?"  
 7 Again you list there a catalogue of, no doubt,  
 8 helpful suggestions. Is there anything in there that  
 9 you wish to develop that you haven't already developed  
 10 or again do you stand by those as matters which the  
 11 chair should consider?

12 A. I think that those matters should be considered, yes,  
 13 sir.

14 Q. Thank you. Can I take, on the same subject of your  
 15 observations as to improvements which may assist this  
 16 inquiry, Kerslake, please --

17 SIR JOHN SAUNDERS: I'm going to interrupt for a minute  
 18 while we're on this theme.  
 19 I wonder why you are saying that the on-duty  
 20 principal officer needs to be immediately alerted. At  
 21 the moment the procedure appears to be: go to the people  
 22 who will actually get to the scene and then it goes up  
 23 the chain rather than most things coming down chains.  
 24 Isn't that the right way to do it, though, from the  
 25 ground up rather than having the principal officer told

192

1 straightaway?  
 2 A. I think, sir, with the likes of the pager system and  
 3 having had experience in a different Fire and Rescue  
 4 Service, it's quite easy to inform a principal officer  
 5 when something of a magnitude of this has happened.  
 6 It's just for information.  
 7 SIR JOHN SAUNDERS: Did you have a pager?  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: Okay. Thank you, Mr Cooper.  
 10 MR COOPER: Not at all, sir, thank you.  
 11 Kerslake, please. That is, Mr Lopez, {INQ023497/3}.  
 12 SIR JOHN SAUNDERS: Just tell me if you don't agree with any  
 13 of the notes, will you, if we go through them? We may  
 14 have a transcript, I simply don't know.  
 15 MR COOPER: Can I help to bring this forward? There's  
 16 a reference in there from you that:  
 17 " ... had the NILO used his discretion and moved  
 18 forward, he would have been a hero."  
 19 That's somewhere on there. It's hard to read from  
 20 here. Do you remember saying that?  
 21 A. I don't, sir, no.  
 22 Q. Right, okay. Then we're going to have to see whether  
 23 I can find that. As I say, that's {INQ023497/3}.  
 24 Can I go to the bottom, please, of that document,  
 25 Mr Lopez? Part of it is obscured by the screen. That's

193

1 just about it. I'm going to look at mine on my screen  
 2 because this is blurred. Bear with me. Do you see the  
 3 NB?  
 4 A. Yes.  
 5 Q. "I didn't follow this point up, but I can't help  
 6 thinking that had the NILO used his discretion and moved  
 7 forward, he would have been a hero."  
 8 Do you say that?  
 9 A. No, sir.  
 10 Q. Right. Do you know who said that?  
 11 A. No, sir.  
 12 Q. Can we go to the first page {INQ023497/1}, please,  
 13 Mr Lopez?  
 14 SIR JOHN SAUNDERS: It could have been a note made by the  
 15 interviewer, can't it?  
 16 MR COOPER: It looks a rather specific comment to make.  
 17 It's not a general thing, if I may suggest to you, and  
 18 again that's blurred, so I will assume that document is  
 19 saying it's a document from your interview or  
 20 discussion. Can I suggest to you, you did say that  
 21 because that's a very specific recording.  
 22 SIR JOHN SAUNDERS: You can only say what you remember.  
 23 MR COOPER: Did you say that?  
 24 A. I have to say, you know, this -- and I know that others  
 25 have said the same thing. The first time I ever seen

194

1 this document was in preparation for coming to this  
 2 inquiry. At no stage was it presented to me to  
 3 authenticate anything that was said or asked for  
 4 amendment to it in any way, shape or form, and each one  
 5 of those NB comments that are within that document,  
 6 I would attribute to the people who were doing the  
 7 interview, Mr Cooper.  
 8 SIR JOHN SAUNDERS: We simply don't know, but we could  
 9 possibly --  
 10 MR GREANEY: I don't believe we have a transcript of this.  
 11 SIR JOHN SAUNDERS: We will try and make enquiries as to  
 12 whether the NB means it's said by the interviewer.  
 13 MR COOPER: I will move on. It may not take the inquiry  
 14 very far forward, I can see, but it was just something  
 15 I wanted to clarify.  
 16 Can I, again, take you to the document, because  
 17 I want to try and speed the process up. Do you remember  
 18 saying that deploying the NILO from Wigan was not right?  
 19 A. I think I have said that, sir, yes.  
 20 Q. Again, for reference, for anyone that wants to reference  
 21 it, {INQ023497/4} again. Why did you say deploying  
 22 a NILO from Wigan was not right?  
 23 A. I think it was -- and again, it goes back to previous  
 24 experience that I have. It's obviously 22 miles away  
 25 and I just don't think that our policy was right to have

195

1 a responding officer being that far away.  
 2 SIR JOHN SAUNDERS: So why was the policy in existence?  
 3 A. I think we had a policy in existence whereby station  
 4 managers would be required to respond in a time frame  
 5 and it was certainly very tight. I haven't got it in  
 6 front of me, and I don't know whether the inquiry has,  
 7 but it might have been in the region of 20 minutes.  
 8 I think it was reasonably foreseeable that as an  
 9 incident commander it would be very difficult to travel  
 10 22 miles in 20 minutes.  
 11 SIR JOHN SAUNDERS: But if it was an MTFA, if it had been  
 12 declared an MTFA in the early stages, that's actually  
 13 the procedure which would have been followed?  
 14 A. Yes (overspeaking).  
 15 SIR JOHN SAUNDERS: So in that sort of worst case example of  
 16 an MTFA, it's actually going to take the person more  
 17 than the minimum time you require for any other fire?  
 18 A. I agree, sir. I do think the policy was deeply flawed.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR COOPER: I want to take you to a reference which we have  
 21 looked at before and we may just need some clarification  
 22 on this as you whether it was you that spoke. It's  
 23 {INQ030902/21}, please.  
 24 Again, do you see the name "Pete" in the middle of  
 25 that page?

196

1 A. Yes.  
 2 Q. You are, take it from me, attending that meeting. This  
 3 was a point we wanted clarified some weeks ago. I've  
 4 been waiting to ask you about it. Neil, just  
 5 beforehand:  
 6 "We are expected to make a decision but I want you  
 7 to tell me to get stuck in if it results in something  
 8 else. Grenfell has just shown that we have to go  
 9 against policy sometimes."  
 10 Then it's got Pete:  
 11 "There is no one at this end of the table who  
 12 disagrees."  
 13 Was that you saying:  
 14 "There's no one at this end of the table who  
 15 disagrees?"  
 16 A. That's correct, yes, I did say that.  
 17 Q. So when Neil Helmrich, I presume, or whoever the Neil  
 18 was, says:  
 19 "Grenfell has just shown that we have to go against  
 20 policy sometimes."  
 21 And you say:  
 22 "There's no one at this end of the table who  
 23 disagrees."  
 24 Are you saying, and perhaps you could develop that  
 25 for the chair, are you saying that sometimes you have to

197

1 go against policy?  
 2 A. I think sometimes we have to account for policy and act  
 3 outside of it when we believe that we can certainly save  
 4 lives, when it's likely that we'd be able to save  
 5 property, and I do believe that the operational  
 6 discretion that was live at the time I said that  
 7 afforded that opportunity for incident commanders to  
 8 operate outside policy for a short period of time to  
 9 achieve that objective.  
 10 Q. Was a critical problem here, would you agree, that  
 11 people did not correctly exercise on the night that  
 12 operational discretion to override policy?  
 13 A. I think there are examples of that, yes, sir.  
 14 MR COOPER: Thank you, sir. I have no further questions.  
 15 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 16 MR GREANEY: Thank you, Mr Cooper.  
 17 Sir, there are a small number of questions that  
 18 I will have to ask Mr O'Reilly before I suggest  
 19 Mr Warnock asks his questions. First of all, can I deal  
 20 with two things that I hope you will consider it's  
 21 appropriate to deal with.  
 22 First of all, there has been reference, both today  
 23 and yesterday, to Stephen Hunt, a firefighter who died  
 24 tackling a blaze in Northern Quarter of this city, and  
 25 in fact, sir, he died 8 years ago today and

198

1 firefighters, his family and friends, have been  
 2 commemorating his life at Philips Park, in fact, as  
 3 I understand it.  
 4 Sir, I hope you feel it's appropriate that we should  
 5 recognise the loss of his life on the anniversary of his  
 6 death.  
 7 Secondly, I know that Mr Atkinson has something that  
 8 he wishes to say.  
 9 A. Thank you, sir.  
 10 SIR JOHN SAUNDERS: No, had we known before, we would have  
 11 mentioned it before.  
 12 MR ATKINSON: Thank you, sir.  
 13 Mr O'Reilly, on behalf of those families that  
 14 I represent, they perhaps would not have wanted anyone  
 15 to be put on the spot and asked for an apology, but they  
 16 are profoundly grateful to you for the sincerity of the  
 17 apology that you offered them and for the frankness of  
 18 the evidence that you have given them.  
 19 Thank you, sir.  
 20 SIR JOHN SAUNDERS: Thank you very much.  
 21 MR GREANEY: Mr O'Reilly, are you content to answer some  
 22 further questions or would you like a short break?  
 23 SIR JOHN SAUNDERS: I think we'll have a short break. We'll  
 24 have 5 minutes. Thank you very much.  
 25 (4.07 pm)

199

1 (A short break)  
 2 (4.14 pm)  
 3 Further questions from MR GREANEY (continued)  
 4 MR GREANEY: Mr O'Reilly, I'm not going to be very long.  
 5 Let me tell you the topic I am going to ask you about.  
 6 It's a return to the conversation you had with Mr Hynes,  
 7 the Bronze commander on the night for N.W.A.S. Obviously,  
 8 you have been pressed entirely properly on that by me  
 9 and most recently Mr Cooper. Out of fairness to you,  
 10 what needs to happen is you should be reminded of what  
 11 Mr Hynes said about the conversation from his point of  
 12 view and then there's just one aspect of it that I want  
 13 to ask you for your help about.  
 14 Mr Lopez has this already. It's Day 113 of our oral  
 15 evidence hearings and page 113 {Day113/113:19}.  
 16 Do you see the answer that was given by Mr Hynes at  
 17 the bottom? The question isn't terribly important:  
 18 "So the intention was to arrange a JESIP huddle. So  
 19 I was asking Peter [talking about you] just to, 'Just  
 20 bear with me, Peter, what is it you want?' And then  
 21 Peter really was asking for a situational report in  
 22 terms of, you know, what's going on, and his words were  
 23 something to the effect of, 'What M.T.F.A resources do you  
 24 require, Steve?'"  
 25 And in broad terms at least, does that accord with

200

1 your recollection of the conversation?  
 2 A. In broad terms, yes.  
 3 Q. It carries on, there are about three pages of this that  
 4 we need to look at:  
 5 "Question: First of all, were you aware in that  
 6 call of how it was that Mr O'Reilly knew that you had  
 7 information that you could give about the situation?  
 8 How did he know that you were there?"  
 9 "Answer: As I said, I think -- I think  
 10 Derek Cartwright -- I assume Derek Cartwright would have  
 11 informed him at the point that I seen his name come up  
 12 on my phone and consequently through this process, the  
 13 inquest process, that assumption was correct, that Derek  
 14 had informed him that I was on scene."  
 15 And although it appears I didn't know that at the  
 16 time, in fact that is correct, isn't it, you had been  
 17 told by Derek Cartwright that he was there?  
 18 A. Correct.  
 19 Q. "Question: That's helpful to know, thank you. In short,  
 20 Mr O'Reilly was asking you required in terms of what,  
 21 their marauding terrorist firearms capability?"  
 22 He replied:  
 23 "Answer: Yes, that's correct."  
 24 "Question: Had anything been said to you by this  
 25 stage about the potential that there was underway

201

1 an MTFA?  
 2 "Answer: The only time I had come across that  
 3 firearms were mentioned was through the social media,  
 4 so -- and that was speculative. But in terms of the  
 5 handover I had received from Dan [that's Dan Smith who  
 6 had earlier been NWAS Bronze], the phone calls that  
 7 I had made, whether that would be to Derek or Sean on  
 8 the way in, nobody had alluded to any types of firearms  
 9 that I can recall taking place."  
 10 Sir John asked:  
 11 "Had it been alluded to that it had been a terrorist  
 12 attack?"  
 13 "Answer: I don't think anybody actually articulated  
 14 it in that manner. I -- you know, through the knowledge  
 15 I had at that time, I would have -- I had assumed it was  
 16 some form of terrorism--related -- you know, based on the  
 17 explosion, based on the environment it was in."  
 18 And we then returned to the conversation you were  
 19 having with Mr Hynes and he was asked:  
 20 "Question: When Mr O'Reilly asked you what you  
 21 required, how did you respond?"  
 22 "Answer: I was probably quite short with Peter  
 23 because I said, 'It's not MTFA, Peter. We just require  
 24 your firefighters down here', words to that effect.  
 25 I was quite clear with him from the outset in terms of

202

1 it was not an MTFA incident."  
 2 Again, at least in broad terms, does that accord  
 3 with your recollection?  
 4 A. Yes, sir.  
 5 Q. "Question: And it sounds as if you were also seeking to  
 6 communicate to him the sense of 'Where are you?'"  
 7 "Answer: Yes, I was surprised to say the least that  
 8 they weren't already there and it wasn't a conversation  
 9 I wanted to elongate with Peter as regards what type of  
 10 resources and how many. But I felt if I asked for  
 11 something, a number of his resources, which as I recall,  
 12 12 firefighters --"  
 13 Again, does that accord with your recollection?  
 14 A. Yes.  
 15 Q. "Question: In your statement [I reminded him] you refer  
 16 to 12 trauma-trained firefighters and a commander?"  
 17 That's what I want to come back to in a moment.  
 18 He replied:  
 19 "Answer: Yes, and that was seeking the support  
 20 of -- we were dealing with casualties at that point and  
 21 the Fire Service are a great asset in terms of  
 22 supporting us, you know, in that casualty clearing."  
 23 And he went on to give a little bit more information  
 24 about that.  
 25 So in general terms, does it seem as if the two of

203

1 you are in agreement about what was discussed?  
 2 A. Yes, sir.  
 3 Q. What I want to ask you about, and it was in fact  
 4 something I meant to ask about earlier, is that the  
 5 recollection of Mr Hynes was that what he had requested  
 6 were 12 trauma-trained firefighters and a commander.  
 7 A. In the verbal conversation what I had with Steve,  
 8 I recollect that he asked for 12 firefighters and  
 9 a commander, and it was probably 10 or 15 minutes later  
 10 that Dean showed me inside -- from the log that they'd  
 11 requested through the control rooms, "12 firefighters,  
 12 if possible trauma trained", I think it was, or, "If  
 13 possible trauma techs".  
 14 Q. We'll try and track that down, but certainly at some  
 15 stage you became aware that it was thought desirable  
 16 that those who attended should be trauma trained?  
 17 A. There should be an element of trauma training there,  
 18 yes.  
 19 Q. You'll remember, I am certain, the evidence that we  
 20 heard from, I think it was -- I can't remember actually,  
 21 it was one of those who was in the CSR, perhaps more  
 22 than one, remembered that there had been a discussion  
 23 about trauma trained.  
 24 A. Dean and I -- I can remember Dean showed me the comment  
 25 and I think the comment I made to him was: even

204

1 if we wanted to, we wouldn't be able to get 12 trauma  
 2 technicians on the one fire engine. I think it was  
 3 something as flippant as that at the time.  
 4 Q. This is what I want to be clear about in case it 's of  
 5 any significance. What certainly I've understood  
 6 is that GMFRS has a number of firefighters trained as  
 7 trauma technicians across watches and stations to  
 8 provide enhanced first aid; is that correct?  
 9 A. That's correct.  
 10 Q. Not all firefighters are trauma technicians?  
 11 A. That's correct, sir.  
 12 Q. And are all firefighters trauma trained?  
 13 A. I think, sir, I would go to the evidence that you heard  
 14 from the firefighters themselves. I think that they  
 15 were quite clear that they were as well trained in those  
 16 areas than they'd ever been. I think one of the crews  
 17 described themselves as a Formula 1 pit crew when it  
 18 came to dealing with cardiac arrests, but they also  
 19 received regular training from the trauma technicians  
 20 that they had on their watch on the station, so they had  
 21 an element of trauma training, yes.  
 22 Q. And I think it was Mr Nankivell who recalled you, during  
 23 the course of -- it sounds as if it was a fairly tense  
 24 discussion within the CSR -- referring to all  
 25 firefighters as being trauma trained. First, did you

205

1 make that comment?  
 2 A. I probably did say that all firefighters were trauma  
 3 trained.  
 4 Q. And was that comment accurate?  
 5 A. I believe so, yes, sir, because as I say, they'd all  
 6 taken enhanced training with regards to responding to  
 7 cardiac arrests, which also would have had other  
 8 complications on top of that. But also, they were  
 9 receiving regular training -- and I think the  
 10 firefighters themselves told you that, that they were  
 11 receiving regular training from their own trauma  
 12 technicians.  
 13 SIR JOHN SAUNDERS: If you're talking about blast injuries,  
 14 undoubtedly your specially trained SRT people would be  
 15 better at that, wouldn't they, or had more specific  
 16 training on that?  
 17 A. I agree with you, sir, if it came to ballistic injuries,  
 18 definitely. I undertook the one-day course at a GMP  
 19 location, where it was highlighted that they would bring  
 20 in to an incident -- where people had suffered ballistic  
 21 injuries, they would have equipment to be able to deal  
 22 with that, and especially if some of them themselves had  
 23 suffered, they would have that equipment. I understand  
 24 completely that on the specialist rescue vehicles they  
 25 had more equipment than we had on fire engines, but the

206

1 fire engines had equipment as well.  
 2 MR GREANEY: So you will appreciate that there is an issue  
 3 about whether it was appropriate for you simply to  
 4 respond to what Mr Hynes requested or whether you ought  
 5 to have been making your own and a different judgement  
 6 about what to do, and that will be for the chairman to  
 7 resolve if he thinks it is of importance.  
 8 But now that we've looked at what Mr Hynes had to  
 9 say about it and we've gone to the issue about trauma  
 10 training, is it your view that you did or did not supply  
 11 what Mr Hynes had asked of you?  
 12 A. I think that's my view, and every time I've heard Steve  
 13 talk, that's his view also.  
 14 MR GREANEY: Thank you very much indeed for answering those  
 15 further questions of mine. I'm now going to invite  
 16 Mr Warnock to ask his questions.  
 17 Questions from MR WARNOCK  
 18 MR WARNOCK: Thank you.  
 19 On that point, Mr O'Reilly, could I just kindly ask  
 20 Mr Lopez to put up Mr Steve Hynes' witness statement,  
 21 which is {INQ025660/1}. If we could go to  
 22 {INQ025660/7}, please.  
 23 You will see, Mr O'Reilly, that at paragraph 27,  
 24 Mr Hynes set out his recollection of that call, the call  
 25 he had with you, when he made his witness statement. He

207

1 referred to your long-standing professional  
 2 relationship, and about four or five lines down he says  
 3 he recalled:  
 4 "Officer O'Reilly asking me what I required in terms  
 5 of marauding terrorist firearms capability, to which  
 6 I advised him that I was unable to speak to him for very  
 7 long as a JESIP huddle was imminent, but that MTFA  
 8 capability was not required. I requested from  
 9 Officer O'Reilly the attendance at scene of 12 trauma  
 10 trained firefighters and a commander to assist with the  
 11 care and management of P3 patients."  
 12 Can I just ask, would you have understood what he  
 13 meant by "P3 patients"?  
 14 A. I understand what he means by "P3 patients", yes, sir.  
 15 Q. And what is that?  
 16 A. That it was patients who were mobile and that he needed  
 17 assistance with to be able to take them to ambulances to  
 18 go for treatment.  
 19 Q. Did you have that understanding about P3 patients on  
 20 22 May?  
 21 A. Absolutely, yes.  
 22 Q. Sir, just for your reference, Ms Roberts very helpfully  
 23 provided information earlier as to where HART were  
 24 at the time of this call. In fact, there's an even more  
 25 precise time that Mr Schanck and his colleague left,

208

1 according to the ambulance schedule, left the  
 2 Thompson Street rendezvous point at 00.13.48, I think it  
 3 was, but there is a precise time on that as to when they  
 4 actually left .  
 5 SIR JOHN SAUNDERS: Thank you.  
 6 MR WARNOCK: Thank you very much, Mr Lopez, you can take  
 7 that down.  
 8 Just one further matter, Mr O'Reilly: on 23 May when  
 9 the Prime Minister came to Manchester and you had  
 10 a meeting with her at 11.00 in the morning. The night  
 11 before, 22 innocent people had been murdered in  
 12 Manchester. Can you help the inquiry with what the  
 13 focus of discussion was with the Prime Minister during  
 14 that meeting that you recall lasted about 10 to  
 15 15 minutes?  
 16 A. The focus in my memory, my recall, was that it was  
 17 really an understanding, mainly given by the police, of  
 18 the situation that had occurred the night before and  
 19 a quick round—the—room briefing about resources that had  
 20 been deployed during the incident up to that point.  
 21 Q. Was there still an ongoing deployment of resources at  
 22 that point?  
 23 A. Absolutely. We were assisting police colleagues with  
 24 a lot of ongoing work regarding the events at the arena  
 25 and also in relation to follow—up police actions that

209

1 they were taking, and that lasted for quite some time.  
 2 Q. Did it seem to you that it was an occasion for an  
 3 inquisition as to shortcomings in the emergency response  
 4 the evening before?  
 5 A. I thought — and I think I got that across — it would  
 6 have been highly inappropriate for me to start a public  
 7 spat at that time with others. I think that I was very  
 8 conscious that there was so much grief in Manchester at  
 9 that time that a public spat between public officials  
 10 was the last thing that people wanted to hear. It would  
 11 have sounded very selfish.  
 12 MR WARNOCK: Thank you, sir. I have no further questions  
 13 for Mr O'Reilly.  
 14 SIR JOHN SAUNDERS: Thank you.  
 15 MR GREANEY: Sir, nor do I.  
 16 SIR JOHN SAUNDERS: Thank you very much, Mr O'Reilly.  
 17 You've obviously thought about what happened on that  
 18 night extremely deeply and no doubt you'll continue to  
 19 do that, but thank you very much for the assistance  
 20 you have given me.  
 21 MR GREANEY: Sir, could I just indicate that I had hoped  
 22 that there would be a meaningful period of time  
 23 available at the end of Mr O'Reilly's evidence to start  
 24 to call Mr Keelan, who will give corporate evidence on  
 25 behalf of the Fire and Rescue Service. I haven't met

210

1 him yet, so if I were to do that now, we would not be  
 2 starting him until 4.45, and there seems little point  
 3 when we must do Mr Parry tomorrow morning.  
 4 So the plan tomorrow will be Mr Parry and then we  
 5 will follow Mr Parry with Mr Keelan.  
 6 SIR JOHN SAUNDERS: Thank you.  
 7 (4.30 pm)  
 8 (The inquiry adjourned until 9.30 am  
 9 on Wednesday, 14 July 2021)

211

1 I N D E X  
 2  
 3 MR PETER O'REILLY (continued) .....1  
 4 Questions from MR GREANEY (continued) .....1  
 5 Questions from MS ROBERTS .....69  
 6 Questions from MR SMITH .....70  
 7 Questions from MR COOPER .....130  
 8 Further questions from MR GREANEY .....156  
 9 Questions from MR COOPER (continued) .....158  
 10 Further questions from MR GREANEY .....200  
 11 (continued)  
 12 Questions from MR WARNOCK .....207

212

213



185:22 187:7 196:1 205:25  
**belief (1)** 24:12  
**belief (4)** 39:11 174:19,20  
 175:1  
**believe (32)** 7:11,12 8:3  
 41:11 50:3 55:24 56:5 60:4  
 68:15 115:16 126:10 136:5  
 143:5,7,9 145:9 146:24  
 165:16 167:9 171:16  
 175:23,24 176:7,17 183:3  
 185:9,11 191:11 195:10  
 198:3,5 206:5  
**believed (6)** 14:4 32:25 59:4  
 60:2 107:1 109:19  
**below (1)** 178:1  
**ben (46)** 21:10 25:4,14,18  
 26:15 34:10,16,17,22  
 35:2,4,7,7,20 36:5,8 41:1  
 42:17,23 43:5 55:14,15  
 49:18,22  
 103:6,11,12,12,17  
 104:8,8,10,12,14  
 174:14,16,19,20,22  
 175:2,5,7,10,11,19,21  
**benefit (4)** 24:1 69:5,22  
 112:21  
**benefits (1)** 24:5  
**bens (1)** 104:6  
**bereaved (3)** 129:24  
 131:22,25  
**berest (1)** 72:21  
**berry (25)** 2:19 10:10 13:6  
 29:23 49:20 50:11,21 51:1  
 53:11 54:22 55:5,6 56:4,19  
 59:3,19 60:2 61:10,25  
 79:12 95:17 96:25 99:2  
 110:1 172:18  
**berries (6)** 50:13 53:16 54:17  
 95:21 96:12,18  
**beside (2)** 25:2,16  
**best (19)** 5:11 20:6 21:15  
 25:7 66:13 67:11 71:17  
 72:19 91:3 104:13 141:3  
 162:10 165:25 167:16  
 172:14 173:10,22,24  
 174:19  
**better (14)** 5:6 39:16 89:15  
 90:23 93:3 103:16,18,21  
 104:17 136:6 139:7 157:22  
 167:21 206:15  
**between (23)** 13:9 21:21,22  
 23:24 30:9 48:12 55:9  
 56:10 68:10 69:8 70:4  
 83:25 90:18 91:12 102:17  
 104:25 107:7 136:14 154:3  
 167:11 174:6 190:23 210:9  
**bewilderment (1)** 72:18  
**big (1)** 39:22  
**bit (11)** 3:3 4:12 52:7,18  
 59:11 70:9 90:3 92:2  
 172:18 179:11 203:23  
**bits (3)** 180:25 181:1,3  
**blame (1)** 158:13  
**blast (1)** 206:13  
**blaze (1)** 198:24  
**blind (1)** 150:16  
**blindly (1)** 113:5  
**blue (2)** 142:20 178:17  
**blurred (3)** 139:5 194:2,18  
**board (1)** 42:5  
**boddingtons (2)** 26:19 30:1  
**bomb (24)** 32:24 33:1,2  
 41:22 67:1 77:19  
 78:5,16,17 84:2  
 86:2,5,7,13,17 87:3,8  
 89:25 90:2,5,8 170:5 171:8  
 182:6  
**bombastic (2)** 161:25 162:6  
**book (1)** 152:8  
**booking (1)** 23:10  
**borne (1)** 23:16  
**both (10)** 6:4 14:13 18:11  
 23:25 62:17 66:18 92:9  
 150:11 153:23 198:22  
**bottom (6)** 30:19 78:3  
 138:25 177:25 193:24

200:17  
**bound (1)** 143:22  
**box (2)** 160:6 165:25  
**boxes (1)** 139:3  
**breadth (3)** 146:4,25 147:1  
**break (14)** 58:20 67:22 68:20  
 125:9 129:14 155:11,20,23  
 156:2 181:19,23 199:22,23  
 200:1  
**breakdown (2)** 190:12 191:3  
**brief (8)** 8:23 9:7 37:24 53:2  
 81:20 110:20 178:25 187:6  
**briefing (8)** 38:14 53:1,2,3  
 56:9 60:19,24 209:19  
**briefings (1)** 38:17  
**briefly (2)** 34:19 72:12  
**brigade (7)** 47:21,23 48:1,6  
 114:24 150:5,6  
**brigades (4)** 42:21 47:21  
 49:7 182:11  
**bring (5)** 184:22 191:9,10  
 193:15 206:19  
**british (2)** 191:9,10  
**broad (4)** 24:11 200:25  
 201:2 203:2  
**broadly (5)** 176:25 177:9,11  
 179:21,24  
**broke (2)** 135:7 150:7  
**bronze (13)** 2:11 7:7 26:20  
 44:10,10,11 51:18 79:9  
 97:12 173:1,7 200:7 202:6  
**btp (1)** 62:17  
**build (1)** 40:23  
**building (2)** 15:24 57:7  
**built (1)** 133:1  
**bulnfield (2)** 149:5,18  
**business (2)** 25:9 63:21

C

**capabilities (9)** 32:12,15  
 45:20 174:15,17,23  
 175:4,17,20  
**capability (8)** 2:18 42:11  
 45:21 48:25 119:15 201:21  
 208:5,8  
**capable (6)** 20:14 86:24  
 99:17 162:8 189:7,8  
**capacity (1)** 119:24  
**car (3)** 26:18,19 82:8  
**card (26)** 84:1,1,2 85:11,16  
 87:4,12,15,15,18,19,21  
 88:7,10,10,13,17  
 89:3,5,20,25  
 90:3,5,8,13,16  
**carden (1)** 120:20  
**cardens (2)** 121:1 126:14  
**cardiac (9)** 132:16,18,21  
 133:1 134:4,10 171:10  
 205:18 206:7  
**cards (9)** 83:16,22,25 85:10  
 86:22 89:25 90:14 123:9  
 128:7  
**care (2)** 67:6 208:11  
**career (1)** 23:22  
**careful (5)** 103:25 104:4,25  
 147:21 149:13  
**carefully (2)** 96:16 179:20  
**carlos (1)** 26:24  
**carries (1)** 201:3  
**carry (2)** 130:8 174:3  
**carrying (1)** 177:5  
**cartwright (7)** 18:20 30:8,11  
 32:19 201:10,10,17  
**cartwrights (1)** 30:21  
**cases (1)** 144:15  
**casualties (5)** 4:13 38:10  
 41:13 78:5 203:20  
**casualty (3)** 33:24 178:22  
 203:22  
**catalogue (1)** 192:7  
**categories (1)** 71:1  
**categorised (2)** 77:20 78:19  
**catered (1)** 101:14  
**cathedral (1)** 26:17  
**caught (2)** 142:7,8  
**caused (3)** 76:3 87:11 186:21  
**caution (2)** 62:23 173:13  
 28:3,5,18  
 29:13,14,15,21,24 30:10  
 33:7 34:5,9,14,19  
 35:7,9,13,21 42:17 46:14  
 47:12,13,14,15 48:1,22  
 49:2 50:16 51:15 52:5,20  
 67:23 69:8,10,13 70:3,21  
 73:11 77:1,17 78:1 79:21  
 80:10,24 82:5,19,20 92:4  
 95:4 97:16,21 109:20  
 110:2 118:6 137:13 143:10  
 145:2,4,4 151:19 154:18  
 168:4,16,23 169:5,7  
 171:24 181:18,22 185:2  
 190:21 201:6 207:24,24  
 208:24 210:24  
**called (19)** 2:10 6:9,12  
 9:22,22 20:18 31:16,17  
 33:9 34:10 47:17 48:13  
 65:2,12 117:1 159:17  
 180:23 181:11 186:25  
**calling (2)** 11:15 58:7  
**calls (16)** 1:25 2:22 7:6 8:23  
 10:6 21:9 24:19 26:8 42:18  
 43:2 48:9 50:21 119:6,6  
 151:19 202:6  
**came (16)** 3:2 23:19 46:25  
 49:1 59:13 60:11 122:17  
 127:22 128:21 136:6  
 138:10 162:8 182:5 205:18  
 206:17 209:9  
**camp (2)** 152:20,22  
**cant (24)** 2:21 21:17 30:15  
 41:17 60:1 71:16  
 74:14,17,17 80:12 95:20  
 96:24 100:10 114:21  
 116:12 139:5 143:21  
 146:11,17 168:23 188:19  
 194:5,15 204:20

**capabilities (9)** 32:12,15  
 45:20 174:15,17,23  
 175:4,17,20  
**capability (8)** 2:18 42:11  
 45:21 48:25 119:15 201:21  
 208:5,8  
**capable (6)** 20:14 86:24  
 99:17 162:8 189:7,8  
**capacity (1)** 119:24  
**car (3)** 26:18,19 82:8  
**card (26)** 84:1,1,2 85:11,16  
 87:4,12,15,15,18,19,21  
 88:7,10,10,13,17  
 89:3,5,20,25  
 90:3,5,8,13,16  
**carden (1)** 120:20  
**cardens (2)** 121:1 126:14  
**cardiac (9)** 132:16,18,21  
 133:1 134:4,10 171:10  
 205:18 206:7  
**cards (9)** 83:16,22,25 85:10  
 86:22 89:25 90:14 123:9  
 128:7  
**care (2)** 67:6 208:11  
**career (1)** 23:22  
**careful (5)** 103:25 104:4,25  
 147:21 149:13  
**carefully (2)** 96:16 179:20  
**carlos (1)** 26:24  
**carries (1)** 201:3  
**carry (2)** 130:8 174:3  
**carrying (1)** 177:5  
**cartwright (7)** 18:20 30:8,11  
 32:19 201:10,10,17  
**cartwrights (1)** 30:21  
**cases (1)** 144:15  
**casualties (5)** 4:13 38:10  
 41:13 78:5 203:20  
**casualty (3)** 33:24 178:22  
 203:22  
**catalogue (1)** 192:7  
**categories (1)** 71:1  
**categorised (2)** 77:20 78:19  
**catered (1)** 101:14  
**cathedral (1)** 26:17  
**caught (2)** 142:7,8  
**caused (3)** 76:3 87:11 186:21  
**caution (2)** 62:23 173:13  
 28:3,5,18  
 29:13,14,15,21,24 30:10  
 33:7 34:5,9,14,19  
 35:7,9,13,21 42:17 46:14  
 47:12,13,14,15 48:1,22  
 49:2 50:16 51:15 52:5,20  
 67:23 69:8,10,13 70:3,21  
 73:11 77:1,17 78:1 79:21  
 80:10,24 82:5,19,20 92:4  
 95:4 97:16,21 109:20  
 110:2 118:6 137:13 143:10  
 145:2,4,4 151:19 154:18  
 168:4,16,23 169:5,7  
 171:24 181:18,22 185:2  
 190:21 201:6 207:24,24  
 208:24 210:24  
**called (19)** 2:10 6:9,12  
 9:22,22 20:18 31:16,17  
 33:9 34:10 47:17 48:13  
 65:2,12 117:1 159:17  
 180:23 181:11 186:25  
**calling (2)** 11:15 58:7  
**calls (16)** 1:25 2:22 7:6 8:23  
 10:6 21:9 24:19 26:8 42:18  
 43:2 48:9 50:21 119:6,6  
 151:19 202:6  
**came (16)** 3:2 23:19 46:25  
 49:1 59:13 60:11 122:17  
 127:22 128:21 136:6  
 138:10 162:8 182:5 205:18  
 206:17 209:9  
**camp (2)** 152:20,22  
**cant (24)** 2:21 21:17 30:15  
 41:17 60:1 71:16  
 74:14,17,17 80:12 95:20  
 96:24 100:10 114:21  
 116:12 139:5 143:21  
 146:11,17 168:23 188:19  
 194:5,15 204:20

153:11 154:1,8,12 155:1,4  
 157:1,15 177:16 184:16  
 186:6 190:4,13  
**chiefs (1)** 107:24  
**chose (1)** 98:6  
**chosen (2)** 88:16 98:5  
**chronology (7)** 9:12 19:1  
 29:21 42:23 49:8,14 51:4  
**circumstances (16)** 9:5 43:24  
 68:24 73:5 87:1,3 89:2,9  
 95:16 113:2 118:21 120:15  
 143:25 170:8 173:13,16  
**city (6)** 7:16 17:21,21 62:19  
 138:22 198:24  
**civil (3)** 7:24 190:6,9  
**clarification (6)** 56:5 70:10  
 75:8 127:13 176:22 196:21  
**clarified (1)** 197:3  
**clarify (5)** 68:24 84:11  
 117:18 118:17 195:15  
**clear (24)** 12:12 24:18 27:23  
 28:4 38:1 41:4 42:10 56:6  
 57:19 58:1 60:14 72:25  
 87:6,7 89:22 91:15 97:19  
 104:24 109:16 174:8 175:8  
 202:25 205:4,15  
**cleared (1)** 158:1  
**clearer (1)** 87:4  
**clearing (1)** 203:22  
**clearly (10)** 13:18 53:13  
 65:10 73:3 88:4 113:13  
 137:3 138:19 149:17  
 186:19  
**clickbox (3)** 140:2,15 141:10  
**clicking (1)** 139:3  
**close (4)** 48:17 94:16 149:7  
 187:20  
**closely (2)** 35:8 52:25  
**close (1)** 87:8  
**cold (6)** 54:25 56:16 58:2,5,8  
 60:9  
**colleague (1)** 208:25  
**colleagues (8)** 15:17 48:17  
 56:2 138:23 142:20 173:3  
 188:14 209:23  
**collectively (2)** 147:11  
 154:23  
**colocate (1)** 101:1  
**combined (2)** 68:17 184:10  
**come (35)** 15:3 19:11,14  
 23:15 35:12 57:24 60:10  
 62:11 73:2 75:20 76:24  
 83:21 90:11 110:3,24  
 122:17 128:16 137:14  
 162:13,15,20 163:15,18,22  
 164:1,2 165:2 166:8  
 179:23 186:7,8 188:9  
 201:11 202:2 203:17  
**comes (4)** 22:1 93:18 119:14  
 147:14  
**comfort (1)** 18:5  
**comfortable (1)** 106:8  
**coming (11)** 19:5 23:17  
 29:13 30:25 84:15 88:5  
 98:17 122:8 186:20 192:23  
 195:1  
**command (55)** 1:15 12:3,24  
 15:18,20 16:2,5 17:14  
 20:11 28:4 30:12,13  
 31:4,14 35:5,12,13,19  
 37:4,4,5 39:13 40:14 45:16  
 46:12 52:8 55:9 63:24  
 66:4,6,8 71:9 72:2 73:14  
 74:3 75:23 80:9 81:18  
 82:22 99:14,15,17 100:4  
 102:17,25 103:1 131:12  
 149:4 150:12 152:1,3  
 153:6 157:5 170:12 180:22  
**commander (56)** 28:12,14,15  
 37:6 40:6 44:7,8 51:11  
 120:18,19 125:4  
 54:4,8,14,18,21 59:23  
 60:1,3,4 61:7,22 69:9 77:8  
 79:9 81:15 97:12 99:21,22  
 100:2,10 101:2,11,20,24  
 102:4,9,11,19,21

117:4,10,13 172:11,23,24  
 178:2,23 196:9 200:7  
 203:16 204:6,9 208:10  
**commanders (6)** 51:7,18  
 117:8 149:10,10 198:7  
**commas (1)** 185:3  
**commemorating (1)** 199:2  
**comment (5)** 194:16  
 204:24,25 206:1,4  
**commented (1)** 181:6  
**comments (1)** 195:5  
**commissioner (1)** 150:5  
**committing (1)** 102:23  
**common (2)** 15:25 88:19  
**communicate (3)** 104:11,14  
 203:6  
**communicated (1)** 143:7  
**communicating (2)** 161:5  
 172:8  
**communication (7)** 55:17  
 136:14 152:2 154:2 161:14  
 177:7 190:17  
**communications (8)**  
 13:8,9,12 20:17 77:24  
 135:17 137:5 150:7  
**communicative (1)** 163:6  
**communicator (1)** 24:11  
**communities (1)** 177:17  
**community (3)** 24:2 133:2  
 135:22  
**compared (2)** 93:21 148:16  
**comparing (1)** 41:23  
**compassion (1)** 67:6  
**competitive (1)** 23:24  
**complaint (1)** 135:5  
**completely (4)** 20:25 138:9  
 173:6 206:24  
**complicate (1)** 188:18  
**complicated (2)** 123:8  
 124:24  
**complication (1)** 102:17  
**complications (1)** 206:8  
**computer (2)** 12:7 139:3  
**conceal (2)** 106:23,25  
**concern (3)** 140:5,8 142:16  
**concerned (20)** 7:13 29:17  
 36:14 85:22 86:6 95:9  
 102:14 103:24 128:2 130:2  
 139:16,17 140:1 142:12,13  
 143:13 144:21 154:1  
 169:16 180:3  
**concerning (1)** 77:9  
**concerns (9)** 57:5 135:10,12  
 140:17 170:16 182:10  
 183:10,12 186:5  
**concluded (1)** 60:17  
**conclusion (2)** 60:10,11  
**conclusions (1)** 106:10  
**condition (1)** 137:24  
**conditioned (1)** 90:7  
**confidence (2)** 39:13 133:14  
**confident (2)** 5:9 46:20  
**confirmation (2)** 4:1 41:1  
**confirmed (6)** 34:23 41:6  
 42:14 46:6 119:7 141:22  
**confirms (1)** 26:7  
**conflating (2)** 73:9 96:22  
**confronted (1)** 11:25  
**confused (1)** 90:1  
**confusion (5)** 12:12 72:2  
 86:25 87:11 144:16  
**connected (3)** 75:1 92:2,9  
**connecting (1)** 167:17  
**conscious (3)** 178:17 183:15  
 210:8  
**consciously (1)** 189:11  
**consequence (2)** 5:14 52:14  
**consequently (1)** 201:12  
**consider (9)** 6:16 84:17 89:5  
 91:7 119:23 129:7  
 192:2,11 198:20  
**considered (8)** 71:22 77:13  
 91:5 95:16 98:18 109:1  
 110:23 192:12  
**consisted (1)** 128:23  
**consistent (1)** 96:9

168:16 169:12 170:3  
 172:18,25 174:12  
 176:19,21 178:8,13 179:19  
 180:10,24 182:19 183:4  
 184:7,8,21 187:22 188:4,8  
 189:5,17,22 193:9,10,15  
 194:16,23 195:7,13 196:20  
 198:14,15,16 200:9  
 212:7,9  
**cooperation (1)** 32:6  
**coordinating (7)** 5:23  
 65:2,4,11,15 66:2 151:3  
**copy (1)** 129:7  
**core (1)** 125:15  
**corporate (2)** 96:1 210:24  
**correct (46)** 14:19 27:10  
 32:1 34:13 36:18 45:4  
 46:22 50:18 71:5,6 76:11  
 77:6 78:10 79:3 85:24  
 86:12 90:20 91:21 99:5  
 106:22 109:3 116:24  
 124:4,5 131:1,18 153:19  
 156:16,18 157:2,3  
 161:9,10 167:14 168:25  
 170:5,9 175:4 197:16  
 201:13,16,18,23  
 205:8,9,11  
**corrected (1)** 56:15  
**correctly (2)** 123:11 198:11  
**correlate (1)** 100:25  
**couching (1)** 145:6  
**couldnt (9)** 23:9 33:16 57:19  
 72:5 93:25 94:2 154:9  
 165:10 185:2  
**counterpart (1)** 38:14  
**country (1)** 176:17  
**counts (1)** 57:14  
**county (3)** 1:16 65:20 103:4  
**couple (4)** 9:19 38:5 42:18  
 156:23  
**course (30)** 1:24 5:11 7:20  
 18:20 50:23 55:19 66:7  
 69:12,18 70:6 98:19  
 113:11 118:14 128:25  
 130:13 141:16 155:12,21  
 157:15 160:24 161:23  
 163:22 170:20,21 174:10  
 180:24 183:7 184:23  
 205:23 206:18  
**courteous (1)** 159:11  
**courteously (1)** 132:7  
**courtesy (5)** 35:3,7,9 48:6  
 49:3  
**covered (1)** 14:5  
**cps (1)** 67:24  
**created (2)** 33:1 156:9  
**credit (1)** 138:13

cut (3) 78:8 127:18 174:8

**D**

d (1) 212:1  
 damage (1) 88:23  
 damian (1) 186:12  
 dan (2) 202:5,5  
 date (1) 145:1  
 dave (1) 186:11  
 day (14) 15:24 27:21 66:25  
 74:15 112:19 114:21  
 126:17 176:7,14,18 182:9  
 183:15 184:11 200:14  
 day11311319 (1) 200:15  
 day122161 (1) 27:21  
 day12531 (1) 126:17  
 days (5) 16:13 179:6,17  
 184:14 185:17  
 daytoday (1) 131:12  
 dead (2) 62:3 146:24  
 deal (18) 25:17 86:20 93:14  
 124:18,21 125:5 127:18  
 130:10,12 138:20 142:21  
 156:4 163:25 191:14,17  
 198:19,21 206:21  
 dealing (17) 48:5 64:19 69:8  
 93:6 128:18 132:22  
 141:18,20 143:3 165:3  
 166:2 173:20 176:2  
 184:24,25 203:20 205:18  
 deat (3) 47:9 105:7 163:23  
 dean (54) 1:25 3:15 4:1 7:15  
 8:24 9:22 10:18 12:9 13:1,3  
 18:19 20:19,25 21:2 23:18  
 25:3,11 35:16,16,17  
 36:12,14 55:5 77:2 78:18  
 80:6,7,23 82:6,13,20 83:7  
 98:25 103:10,11,13 104:16  
 119:7 122:2 151:19,20  
 152:15,22 153:1,3,6,7,8  
 162:15 170:13 181:13  
 204:10,24,24  
 death (1) 199:6  
 deaths (1) 165:3  
 debrief (8) 51:19 105:6,14  
 106:5,6,12 181:5 191:15  
 decide (2) 31:20 33:7  
 decided (4) 2:14 27:24 48:1  
 50:15  
 decides (1) 113:12  
 decision (43) 2:15 3:11 4:6  
 6:6,14 16:21 17:17  
 22:1,2,6 35:23 36:5,8  
 38:25 39:14 41:5 44:6 45:7  
 48:25 55:8 61:8 73:17  
 89:6,15,20 92:15,20 93:8  
 103:16,18,22 104:20 112:8  
 117:3,5,9,10 123:17  
 167:23 173:15 174:9 197:6  
 decisionmaking (3) 73:4  
 76:12 99:18  
 decisions (12) 6:4 32:11  
 38:12,14 40:14 48:8 51:13  
 52:8 66:6,8 123:20 189:19  
 declaration (1) 57:13  
 declare (2) 53:23 57:3  
 declared (10) 39:19,21,22  
 41:2 42:15 43:1,6,13,13  
 196:12  
 decondition (1) 90:9  
 decreasing (1) 116:7  
 deeming (3) 158:8,9,10  
 deep (1) 17:16  
 deeply (2) 196:18 210:18  
 definitely (13) 6:18,19,21  
 36:14 48:10 87:4,17 144:4  
 175:5 179:1,2,13 206:18  
 degree (7) 62:23 86:24  
 165:20 166:12,25 168:18  
 171:8  
 delay (6) 1:3 76:3 101:12  
 125:13 185:20,21  
 delayed (1) 177:3  
 deleted (1) 139:14  
 deliberate (1) 150:13

deliberately (3) 112:20 165:8  
 189:11  
 deliver (2) 171:25 172:14  
 delivery (1) 171:6  
 democratic (2) 21:16 22:4  
 deny (1) 96:21  
 depart (1) 10:3  
 departed (3) 8:4,15 63:9  
 department (1) 177:17  
 depending (3) 4:20 6:10  
 112:8  
 depends (1) 164:7  
 depiction (1) 32:25  
 deploy (32) 6:14 14:25  
 16:20,21 17:17 18:24  
 27:24 30:4 35:25 39:8,11  
 41:7 48:25 51:5,10 59:5  
 71:8,13,23 73:17 85:23  
 92:20 94:13 95:18,18 96:7  
 102:3,4,11 103:6 113:16  
 119:15  
 deployed (25) 9:8 11:8 13:23  
 43:10 45:8,12,15,17,18  
 62:18 69:21 70:5,14 74:5  
 100:6 102:1 110:13 116:23  
 117:6 119:4,8 123:21  
 138:22 153:5 209:20  
 deploying (10) 2:19 59:12  
 62:7 86:11,14 102:5,8  
 175:6 195:18,21  
 deployment (27) 7:9  
 10:18,25 35:23 36:8,16,16  
 37:12,13,15 41:15 45:8  
 51:15 61:9,23 102:6  
 103:3,15 114:16 116:2,18  
 118:11 119:11 123:13  
 152:25 173:15 209:21  
 deployments (1) 48:13  
 derek (10) 18:19 30:8,11,17  
 31:3 201:10,10,13,17  
 202:7  
 describe (5) 21:13 32:19  
 72:19 87:5 138:24  
 described (5) 15:17 21:15  
 104:6 162:7 205:17  
 descriptions (2) 161:22  
 162:1  
 designed (1) 60:8  
 desirable (1) 204:15  
 desire (2) 52:13 66:17  
 desired (2) 59:19 135:23  
 desk (1) 12:6  
 despite (5) 135:2 170:18  
 173:13 175:2,3  
 detail (4) 83:13 139:13  
 179:23 185:18  
 detailed (2) 82:25 100:14  
 details (1) 190:16  
 determine (3) 92:14 124:25  
 125:3  
 detonated (1) 87:10  
 devastated (1) 67:14  
 devastating (3) 183:15,16,17  
 devastation (1) 33:4  
 develop (4) 126:3 146:11  
 192:9 197:24  
 developed (5) 145:18 150:9  
 160:12,12 192:9  
 developing (7) 21:22 132:15  
 142:22 143:4 145:16  
 154:22 170:8  
 developments (1) 148:6  
 device (5) 110:22 111:6  
 114:15,15,19  
 devices (6) 114:24  
 115:4,8,23 116:7 119:25  
 dexter (11) 50:15,23,25  
 53:10 56:18,19 57:19  
 58:15 59:6 60:7 116:5  
 dexters (2) 38:20 53:7  
 diary (1) 23:11  
 dictaphone (4) 38:18,20,21  
 52:23  
 didnt (78) 6:11 11:1 13:2  
 14:21 18:19,24 22:18  
 27:13,14 28:15 31:10

34:24 36:11 38:2 39:20  
 40:18 44:20 45:25 53:18  
 59:21,22 60:12 63:21  
 71:8,13,15,23 74:7 79:17  
 80:17 81:10,10,22,24 82:4  
 83:10 87:21 89:8 90:12  
 95:17 96:25 98:2,6 99:19  
 100:2 101:16,17,18 104:7  
 106:3,20 107:10 108:8  
 109:4,8 110:9 128:6 135:7  
 142:23 154:5 155:3 157:21  
 161:17 162:15 165:8  
 167:20 176:6 179:14,16  
 181:2,5 185:9 186:4 187:4  
 188:14 189:10 194:5  
 201:15  
 died (3) 13:20 198:23,25  
 difference (4) 25:4 67:3  
 91:17 93:14  
 differences (4) 83:24 90:17  
 174:5 184:19  
 different (21) 35:22 45:19  
 55:13 57:12 60:5 90:10  
 95:8,23 105:5 114:11,12  
 115:5 123:7 129:19 135:16  
 138:10 141:12 152:7  
 187:19 193:3 207:5  
 difficult (4) 31:6 52:17 61:17  
 196:9  
 difficulties (3) 68:10 152:2,5  
 difficulty (1) 67:12  
 direct (3) 72:10 111:11  
 175:13  
 directed (2) 41:15 153:4  
 direction (4) 27:9 46:8 47:1  
 173:1  
 directly (8) 40:10 75:14  
 92:25 110:13 111:22  
 117:14 134:19 190:22  
 director (5) 31:7 132:13  
 133:20 153:17 172:21  
 disadvantage (1) 144:22  
 disagree (4) 122:6,9  
 166:4,19  
 disagreed (4) 106:17  
 175:4,5,21  
 disagrees (3) 197:12,15,23  
 disappeared (1) 16:10  
 disaster (1) 107:16  
 discharge (3) 56:21 59:15,17  
 discipline (1) 148:2  
 discover (1) 42:25  
 discovered (3) 14:12,16 43:5  
 discretion (7) 56:1,6 88:15  
 193:17 194:6 198:6,12  
 discussed (4) 10:7 15:4  
 110:12 204:1  
 discussing (2) 47:16 126:8  
 discussion (10) 45:20 104:25  
 106:7 108:4 112:11,17  
 194:20 204:22 205:24  
 209:13  
 discussions (6) 21:10 30:13  
 105:16 135:25 136:2  
 190:15  
 dismissing (1) 171:22  
 disorder (1) 7:24  
 dispel (1) 14:3  
 disposal (5) 64:15 73:21  
 76:20 92:24 122:13  
 dispute (1) 72:11  
 disputing (1) 152:16  
 disservice (1) 184:1  
 distance (1) 148:16  
 distinguish (1) 2:25  
 distorted (1) 94:9  
 divert (2) 17:1 71:18  
 diverted (4) 17:25 18:2 19:6  
 185:22  
 divulge (1) 146:14  
 dobson (3) 150:3,4,14  
 dock (2) 111:21 113:1  
 document (15) 2:1 106:9  
 117:23 138:18 139:17  
 156:6 178:5 181:17 191:20  
 193:24 194:18,19

195:1,5,16  
 documents (1) 131:20  
 does (27) 32:22 45:14 48:23  
 54:9 60:21 67:16 70:11  
 73:8 75:20 77:11 78:13,16  
 83:21 86:16 88:7 89:1  
 93:22 100:6 113:11 120:17  
 126:1 159:2 165:24 200:25  
 203:2,13,25  
 doesnt (19) 24:8 57:6 58:19  
 65:5 69:23 78:17 85:10  
 86:14,18 91:22 100:20  
 112:3 113:9 118:10,21  
 119:14 126:10 158:13  
 164:18  
 dogmatic (1) 94:10  
 dogs (1) 114:20  
 doing (25) 14:4 18:4 23:3  
 30:9 34:25 37:15 18 43:25  
 61:3 65:20 80:6,6,19 82:10  
 101:8 112:21 150:23 152:9  
 153:12,14 155:1,5,6 184:2  
 195:6  
 domestic (3) 41:16,21  
 173:14  
 done (20) 15:10 17:19 19:18  
 20:4 26:24 48:4,5 49:3,4  
 51:23,24 62:10,11 67:8  
 72:4 76:19 95:24 103:21  
 107:25 185:7  
 dont (114) 6:1 7:11 11:9,14  
 16:18 17:7 20:23 22:9,13  
 26:2 28:23 32:13 34:2 37:9  
 39:18 44:2 45:16,22 48:10  
 52:16 55:2 57:2 62:3,8  
 66:8,25 74:9,10,19 76:7  
 80:5 88:13,14,22 90:11  
 93:20 95:25 96:2,19 98:20  
 99:2,16 100:15 101:15  
 105:13,22 106:2,11,25  
 108:9 109:5 112:4  
 115:11,16 116:16 117:25  
 119:2,25 125:17  
 126:7,8,18 127:9 128:20  
 129:10 136:11 137:11,22  
 139:22 140:9,24 145:2,9  
 147:17 148:13,21 151:1,7  
 154:10 155:7 158:20  
 160:10 161:21 163:11  
 165:16 167:9 168:5,9,23  
 169:4,23,24,24 170:12  
 172:15 176:17,20 180:5  
 183:3,11,18 185:10 187:22  
 189:2 190:23 191:2  
 193:12,14,21 195:8,10,25  
 196:6 202:13  
 door (2) 15:18 23:13  
 doubt (9) 17:7 26:24 27:7  
 29:13 143:19 164:4 170:7  
 192:7 210:18  
 down (41) 17:23,24 31:6  
 32:20 33:17,18,19  
 35:10,13 47:3 80:4,5,13  
 90:17 97:10 104:13 105:20  
 108:12,21 110:10 112:9  
 115:2 116:3 126:1 138:25  
 141:19 150:7 152:8,24  
 169:21 171:10 178:1  
 181:14 187:14 191:9,10  
 192:23 202:24 204:14  
 208:2 209:7  
 downplaying (1) 41:19  
 dr (2) 158:9,10  
 draw (2) 66:18 106:10  
 dressed (1) 149:22  
 driven (1) 24:4  
 driving (2) 9:20 38:8  
 due (2) 98:19 157:15  
 duration (3) 2:7 7:4 10:2  
 during (21) 7:24 15:23 25:25  
 46:14 49:3,4 50:22 64:2  
 136:12 141:16 151:14,15  
 161:22 169:7,9 171:2,20  
 184:23 205:22 209:13,20  
 duty (37) 1:12,24 9:4 10:10  
 13:5 30:14 37:14 77:2

85:4,12,16 92:1,5,10,11  
 103:2 109:20 111:12  
 117:11,12,15  
 118:7,8,10,22 119:15  
 120:3,14 122:23 136:24  
 137:12,17,18 138:2  
 151:23,25 187:16  
 dynamic (2) 61:3 98:24

**E**

e (1) 212:1  
 earlier (16) 7:5 10:6 42:20  
 52:7 60:16 63:15 74:5  
 76:21 119:8 122:18 154:21  
 170:14 176:3 202:6 204:4  
 208:23  
 e (1) 212:1  
 earlier (16) 7:5 10:6 42:20  
 52:7 60:16 63:15 74:5  
 76:21 119:8 122:18 154:21  
 170:14 176:3 202:6 204:4  
 208:23  
 doing (25) 14:4 18:4 23:3  
 30:9 34:25 37:15 18 43:25  
 61:3 65:20 80:6,6,19 82:10  
 101:8 112:21 150:23 152:9  
 153:12,14 155:1,5,6 184:2  
 195:6  
 domestic (3) 41:16,21  
 173:14  
 done (20) 15:10 17:19 19:18  
 20:4 26:24 48:4,5 49:3,4  
 51:23,24 62:10,11 67:8  
 72:4 76:19 95:24 103:21  
 107:25 185:7  
 dont (114) 6:1 7:11 11:9,14  
 16:18 17:7 20:23 22:9,13  
 26:2 28:23 32:13 34:2 37:9  
 39:18 44:2 45:16,22 48:10  
 52:16 55:2 57:2 62:3,8  
 66:8,25 74:9,10,19 76:7  
 80:5 88:13,14,22 90:11  
 93:20 95:25 96:2,19 98:20  
 99:2,16 100:15 101:15  
 105:13,22 106:2,11,25  
 108:9 109:5 112:4  
 115:11,16 116:16 117:25  
 119:2,25 125:17  
 126:7,8,18 127:9 128:20  
 129:10 136:11 137:11,22  
 139:22 140:9,24 145:2,9  
 147:17 148:13,21 151:1,7  
 154:10 155:7 158:20  
 160:10 161:21 163:11  
 165:16 167:9 168:5,9,23  
 169:4,23,24,24 170:12  
 172:15 176:17,20 180:5  
 183:3,11,18 185:10 187:22  
 189:2 190:23 191:2  
 193:12,14,21 195:8,10,25  
 196:6 202:13  
 door (2) 15:18 23:13  
 doubt (9) 17:7 26:24 27:7  
 29:13 143:19 164:4 170:7  
 192:7 210:18  
 down (41) 17:23,24 31:6  
 32:20 33:17,18,19  
 35:10,13 47:3 80:4,5,13  
 90:17 97:10 104:13 105:20  
 108:12,21 110:10 112:9  
 115:2 116:3 126:1 138:25  
 141:19 150:7 152:8,24  
 169:21 171:10 178:1  
 181:14 187:14 191:9,10  
 192:23 202:24 204:14  
 208:2 209:7  
 downplaying (1) 41:19  
 dr (2) 158:9,10  
 draw (2) 66:18 106:10  
 dressed (1) 149:22  
 driven (1) 24:4  
 driving (2) 9:20 38:8  
 due (2) 98:19 157:15  
 duration (3) 2:7 7:4 10:2  
 during (21) 7:24 15:23 25:25  
 46:14 49:3,4 50:22 64:2  
 136:12 141:16 151:14,15  
 161:22 169:7,9 171:2,20  
 184:23 205:22 209:13,20  
 duty (37) 1:12,24 9:4 10:10  
 13:5 30:14 37:14 77:2

enhanced (4) 133:3,10 205:8  
 206:6  
 enough (10) 55:25 68:22  
 89:9,16 90:15 92:24 98:16  
 113:11 140:21 166:16  
 enquiries (3) 80:18 94:25  
 195:11  
 enquiry (2) 91:23 92:2  
 ensuring (1) 99:11  
 enter (5) 43:25 44:22 45:9  
 50:2,8  
 entered (5) 12:22 13:22  
 17:13 97:23 98:7  
 entirely (10) 51:3 55:13  
 58:18 61:6 124:15,17  
 137:15 140:21 189:10  
 200:8  
 entirety (1) 28:10  
 entitled (1) 94:14  
 entrance (1) 49:21  
 entrusting (1) 92:15  
 entry (2) 11:21 30:19  
 environment (1) 202:17  
 equality (1) 21:21  
 equally (1) 143:20  
 equation (1) 23:12  
 equipment (9) 12:20 16:7  
 41:12 44:20 171:11  
 206:21,23,25 207:1  
 equivalent (3) 22:20 31:4  
 150:15  
 err (1) 173:13  
 escalation (1) 82:15  
 especially (6) 17:23 20:13  
 24:14 89:25 141:2 206:22  
 essence (1) 56:16  
 essentially (1) 61:22  
 establish (3) 50:11,13 100:3  
 established (3) 82:23 91:13  
 153:10  
 estimation (1) 58:3  
 etches (10) 3:20 9:13 12:6  
 20:8 36:10 79:11 122:4  
 163:24 171:23 172:2  
 ethos (2) 5:12 6:24  
 evasive (1) 140:23  
 even (19) 12:22 37:24 45:16  
 52:15 60:9 76:15 81:12  
 101:11 102:12 103:19  
 104:6,18 127:16 164:16  
 168:12,23 188:18 204:25  
 208:24  
 evening (1) 210:4  
 event (19) 4:6,11,15 12:14  
 48:3,7,19 50:7 53:5 59:1  
 71:22 100:24 118:23,25  
 119:18 136:12,19 179:4  
 191:16  
 events (14) 43:4 48:1  
 49:11,11 66:23 145:22,23  
 153:3 158:14 185:16  
 187:2,20 192:6 209:24  
 eventually (8) 11:5 13:14  
 21:25 62:6 136:7 177:4  
 180:21 181:11  
 ever (11) 21:4 25:6 49:5  
 121:8 135:5 145:2,10  
 162:16,20 194:25 205:16  
 every (18) 20:16 41:25 49:5  
 64:13 65:18 67:13 81:7,8  
 94:12 96:9 103:6 107:19  
 112:18 115:5 123:22 134:6  
 191:24 207:12  
 enact (2) 20:4 38:25  
 enacted (3) 22:2 43:15  
 179:15  
 encouraging (1) 35:22  
 end (17) 1:9 10:14 14:23  
 20:20 21:16 22:5 28:11  
 60:17 62:1,4 97:21 128:8  
 129:15 197:11,14,22  
 210:23  
 ended (2) 30:10 34:9  
 engaged (1) 60:7  
 engine (2) 25:12 205:2  
 engines (5) 42:3 55:7,8  
 206:25 207:1  
 england (1) 149:6

120:17,19 121:1,18 122:11  
 126:15 128:5,8 129:13,15  
 131:20 133:11 147:15  
 148:14,21 152:21  
 157:15,23 160:7,15,25  
 166:5 168:21  
 174:7,13,16,18 178:5,6,9  
 184:24 199:18 200:15  
 204:19 205:13 210:23,24  
 evidenced (2) 2:31,16 167:19  
 exactly (15) 2:26 3:7 35:17  
 44:24 55:15 56:23 58:7  
 95:5 128:9 146:8,10 168:3  
 175:16 176:9 186:9  
 examining (1) 89:18  
 example (7) 25:7 41:20 89:4  
 100:23 101:22 113:13  
 196:15  
 examples (1) 198:13  
 excessive (4) 62:23  
 142:11,12 144:20  
 exchange (2) 58:12 158:7  
 executive (3) 30:23 72:6  
 111:19  
 exercise (2) 63:16 198:11  
 existence (3) 137:3 196:2,3  
 expect (9) 23:4 27:7,8  
 81:1,1

extraordinary (2) 79:22 80:2  
extremely (2) 22:4 210:18  
eye (6) 142:14 145:2,10,18  
146:10 147:17  
eyebrow (1) 148:17  
eyes (2) 101:5,7

**F**

face (4) 91:7,11 148:3  
165:25  
faced (1) 154:25  
facing (2) 78:21 89:3  
factors (2) 73:3 163:3  
factually (1) 103:17  
failed (1) 83:2  
failing (5) 18:25 71:11 76:12  
82:11 188:22  
failings (8) 71:4 132:1,2,3  
182:21,25 184:17 188:1  
failure (1) 71:1,15,16  
83:5,6 98:20,22 131:4  
144:10 189:20 191:11  
failures (1) 99:13  
fair (9) 3:6 5:13 6:14 43:24  
63:8 66:18 142:4 155:4  
162:10  
fairly (3) 2:24 61:9 205:23  
fairness (2) 165:6 200:9  
fallen (1) 187:14  
fallon (1) 26:2  
fallout (2) 48:25 190:23  
familiar (6) 13:8 20:3 36:23  
78:9 83:13,19  
families (12) 68:5 129:24  
131:22 132:6,9  
183:16,22,24 184:2,3  
186:21 199:13  
family (1) 199:1  
fan (1) 140:23  
fantastic (1) 163:20  
far (27) 7:12 8:24 12:9 29:16  
63:17 74:21 78:6 85:22  
86:5 102:13 103:23 120:17  
128:1 130:2,8  
139:11,11,16 146:14  
153:25 160:18 169:15  
180:3 186:24 187:3 195:14  
196:1  
fashion (1) 143:21  
fast (2) 30:15 134:25  
fatal (1) 132:21  
fatalities (2) 13:20 20:1  
fault (2) 6:23 180:12  
fbu (7) 47:23 48:2,12 111:18  
187:25 188:3 191:8  
fcp (3) 26:1,3 30:1  
fdo (13) 29:24 61:12 90:24  
93:19 94:1,2,4,5 136:23  
152:15,17,20 179:15  
fear (2) 57:3 143:19  
february (2) 83:24 161:8  
fed (2) 24:16 163:12  
feel (16) 66:23 80:4,5 88:21  
89:8 93:2 106:7 126:7  
137:9 146:16 155:3 163:11  
164:8 165:8 173:25 199:4  
feeling (5) 11:3 55:15  
181:16,21 188:20  
feet (1) 121:2  
fell (1) 150:8  
fellow (1) 150:9  
felt (19) 20:16 51:23 52:11  
55:15 80:13 82:21 89:8,15  
134:21 135:2,10,11  
166:9 167:16 175:5,12  
184:14 203:10  
few (4) 48:9 135:11 162:4  
174:24  
field (1) 138:20  
fifth (1) 24:8  
figurehead (1) 148:22  
final (1) 122:24  
finally (7) 63:17 66:17 68:15  
99:13 114:20 119:19  
124:11

find (13) 20:17 72:1,16 76:2  
93:2,16 95:6 108:12 114:2  
124:21 150:17 186:9  
193:23  
fine (6) 11:17 29:18 39:25  
94:6 184:23,23  
finished (3) 35:19 62:13 63:1  
finishing (2) 12:11 34:5  
fire (163) 1:16 2:3 3:23 4:2  
7:12 8:13,16 10:12,22  
11:19 13:1 16:9,13 21:17  
22:10 23:6,8,10,21,22,23  
25:6,11,25 26:6 32:12 35:6  
36:22 39:1,2 41:16,21  
42:3,20 44:10 46:8 47:21  
48:12 49:7,14,17 50:4  
51:25 52:1 54:19  
55:7,8,10,25 56:22 61:2  
62:24 65:9,19 66:14 68:2  
70:23 73:11 74:7,12  
75:2,13 76:20 77:6,25  
78:22 79:7,13 80:1  
83:2,9,12,23 84:5,22,25  
85:4,6,14,23 91:19,24  
92:8,13 93:7 94:11 95:17  
96:4,18 97:24 100:5,13  
101:10 102:25 103:2  
106:15 107:4,5,9,18,25  
108:5 112:2,13,19  
113:7,17 114:24 117:14  
118:4 119:21 120:8,14  
121:8 122:7,13  
123:2,8,16,18 127:22  
131:10 132:19 143:2,16  
145:10,17 149:9  
150:5,5,6,12 151:9  
157:8,18 165:1 168:3,15  
171:7 173:14 175:15  
177:16 178:2,22 180:20  
182:11 186:6,10 187:18  
188:22 190:4,13,24  
191:9,10,12 193:3 196:17  
203:21 205:2 206:25 207:1  
210:25  
firearms (28) 27:3 39:9 40:5  
56:21,23,25 57:18,20  
58:1,5 59:13,14,17,18  
60:13 61:22 85:18,20  
113:4,14,24 143:6 144:12  
172:10 201:21 202:3,8  
208:5  
firefighter (8) 20:2 37:20  
67:13 111:15 162:10,12  
181:16 198:23  
firefighters (65) 17:7,13  
18:4,6 21:3 33:22,24  
34:4,20 41:25 44:18 48:21  
49:24 50:2,8,14 51:6 56:1  
67:2,4 102:22 106:14  
110:14 111:21 112:9,15,16  
113:4 115:14,16 116:15  
132:19 133:4,9  
134:8,15,21,23 137:17  
166:8 169:22 170:1 180:20  
181:6,7,15 182:3,10  
183:16 186:15 199:1  
202:24 203:12,16  
204:6,8,11  
205:6,10,12,14,25  
206:2,10 208:10  
firmly (1) 152:21  
first (64) 3:7 8:8 12:5 19:17  
21:1 23:5 24:3 25:2 27:1  
28:3 30:6,9 35:20 37:21,22  
49:8,17 50:3 52:22 53:4  
54:2,3 55:5,19 56:18,24  
59:16 69:21 72:4 73:10  
77:1 78:25 80:10,11,24  
81:8 85:2,5,13 99:4 107:15  
110:10 113:22 116:1 126:3  
127:17 130:18 132:22  
133:8 137:7 139:2 142:24  
149:15 151:22,24  
153:13,15 194:12,25  
198:19,22 201:5 205:8,25  
209:13  
fishdock (1) 26:18

fit (1) 108:9  
five (2) 180:20 208:2  
fix (1) 29:21  
flagged (1) 119:12  
flame (1) 143:11  
flavour (3) 187:2 189:15,18  
flawed (1) 196:18  
fletcher (10) 6:3 10:15 12:8  
13:12 20:13 27:1 121:21  
163:24 171:23 172:2  
flies (1) 91:7  
flippant (1) 205:3  
flow (2) 19:25 24:5  
flying (1) 178:18  
focus (10) 64:7 95:14  
142:11,13,25 143:1 144:20  
147:7 209:13,16  
focused (4) 145:22  
147:10,11 159:9  
focusing (2) 133:13 142:3  
follow (9) 1:25 9:12 97:22  
105:16 118:2 128:7 158:20  
194:5 211:5  
followed (12) 68:3 78:7  
83:12 107:19 111:2,4,7  
121:18 144:14,15 185:17  
196:13  
following (13) 2:14 3:13  
8:5,5 27:22 62:9 128:8  
132:18 143:24 176:13,14  
178:19 190:14  
follows (4) 74:14,15 78:10  
118:9  
followup (5) 64:6-10 151:19  
161:24 209:25  
food (1) 81:13  
foot (2) 24:11 144:23  
force (16) 4:25 13:5 30:14  
31:16 65:5,7,9,12 92:11  
122:23 136:24 151:23,25  
186:7,8 187:15  
forefront (2) 72:4 146:9  
foreseeable (3) 100:18  
141:20 196:8  
forever (1) 100:12  
forget (3) 90:5 96:5 162:7  
forgive (6) 84:9 98:1 123:12  
136:18 137:23 142:23  
forgotten (4) 36:4 126:21,22  
144:25  
form (3) 39:6 195:4 202:16  
formal (4) 64:18,24 167:18  
168:1  
formalise (1) 4:6  
formality (1) 4:4  
format (1) 191:21  
formula (1) 205:17  
forum (1) 109:5  
forward (11) 44:1,3 45:2  
48:21 102:1 152:25 165:25  
193:15,18 194:7 195:14  
found (5) 17:2 22:7 52:11  
107:21 111:16  
four (4) 79:9 163:17 172:6  
208:2  
fourth (2) 181:18,22  
frame (1) 196:4  
frank (3) 185:23,24 189:6  
frankness (1) 199:17  
free (1) 146:17  
friends (1) 199:1  
front (4) 125:22 139:3  
141:25 196:6  
frs (3) 153:1 178:20,21  
fshq (2) 157:5,7  
full (12) 17:12 24:18  
51:19,19 81:18,20 82:25  
104:12,15 110:20 149:24  
187:13  
fully (7) 7:21 68:7 99:8  
109:7 133:14 143:7 187:16  
functions (2) 20:10,12  
fundamentally (1) 166:4  
funny (2) 90:7 149:3  
further (24) 7:2 45:22 93:15  
94:25 102:20 103:4 104:23

108:12 122:19 138:25  
146:12 155:2 156:1 175:24  
187:4 188:18 198:14  
199:22 200:3 207:15 209:8  
210:12 212:8,10  
future (3) 63:20,20 192:5

**G**

g21 (1) 138:22  
gagged (1) 126:7  
gain (3) 8:21,25 27:11  
gained (2) 26:11 27:16  
gap (2) 100:8 102:13  
gardening (1) 161:12  
gary (6) 42:20 47:19,20  
48:17,18 187:25  
gaskell (3) 119:23 120:8  
121:19  
gatekeeper (1) 23:8  
gather (2) 92:18 186:14  
gathering (1) 49:23  
gave (10) 46:24 55:6 79:19  
100:14 130:19 133:11  
148:14 149:11 162:24  
174:13  
gear (1) 24:8  
general (10) 86:5,13 140:18  
160:23 161:3 169:16  
186:22 189:2 194:17  
203:25  
generally (3) 52:15 122:24  
147:16  
genuinely (2) 147:21 165:9  
geoff (9) 19:12,24 20:23  
21:5,7 132:14 162:21  
163:12 181:13  
geoffs (1) 20:2  
get (65) 10:1 13:5 16:3  
18:17,19 23:9 24:4 26:1,9  
30:17 33:17,18,19 34:7  
35:10 40:22 48:10 51:5  
54:1 61:12 62:6 63:9,21  
65:12,19 72:6,24 73:22  
76:3 81:20 82:10 85:9  
90:20 91:2 93:19,20,25  
94:2,3 95:19 98:25  
100:6,10,11 103:9 104:1,5  
130:7 138:4 142:23  
148:13,17,20 150:19  
152:23 154:24 166:13  
169:20 176:22 187:4,10  
188:25 192:22 197:7 205:1  
gets (4) 54:18,21,22 106:9  
getting (19) 14:11 21:8  
51:14 56:16 61:11 64:11  
80:21 101:5,12 109:6  
111:17 114:4 115:21  
122:20 122:130 150:19  
157:19 185:14  
gilmour (1) 126:23  
give (27) 3:3 9:6 18:6 22:21  
51:19 56:9 59:20 70:15  
82:1 91:5 93:15 104:18  
131:23 132:7 133:5,15  
147:15 148:8 157:14,22  
159:5 184:11 187:1 189:3  
201:7 203:23 210:24  
given (30) 2:10 9:2 35:11  
52:19 78:12 81:18 83:7  
88:21 96:12 99:7 105:1  
116:21 120:22 128:10,17  
129:8 142:18 146:3  
155:16,17 161:22 170:25  
171:21 176:15 184:23  
189:13 199:18 200:16  
209:17 210:20  
gives (2) 70:8 157:23  
giving (6) 82:13,20 89:12  
110:20 133:13 176:4  
glad (1) 80:10  
glean (2) 114:6 187:17  
gmc (2) 178:20,21  
gmca (1) 66:18  
gmfrs (16) 5:16 6:15 49:22  
67:13 71:5 117:21  
131:10,17 132:20 141:24

153:6 173:1,6,11 180:17  
205:6  
gmp (11) 4:25 5:7,15 46:9  
47:1 62:17 63:3 67:7 92:8  
141:25 206:18  
goes (12) 25:8 26:10 54:22  
55:8 81:14 99:20 111:14  
138:21,24 144:10 192:22  
195:23  
going (109) 3:4 5:9,14 8:8  
18:13,17,18,18 19:17,20  
21:9 26:11 27:22 27:6 28:7  
29:17 39:23 40:19,22 41:8  
44:14,17,18 45:9,11,23  
53:1,1,7 54:8,9,25 55:17  
56:12 58:7,21 61:1 63:6,20  
65:7,11 66:18 71:23 72:2,5  
73:14,21 75:18 76:24  
83:17 90:19 92:21  
93:12,13 102:6 109:7  
114:8,17 116:3,11,12  
124:14,21 125:20 129:9,13  
130:9,15 134:21,25 139:15  
142:1 143:14 144:7,24  
146:6,13 149:19 150:11  
151:3,3,4 155:16,17 156:4  
157:9 160:11,18 163:15  
164:19 165:2 171:7 176:12  
179:3 181:12,14 182:15  
189:9 188:4,8 191:23  
192:17 193:22 194:1  
196:16 200:4,5,22 207:15  
gold (5) 4:25 149:4 178:2,23  
180:22  
golds (1) 31:19  
gone (9) 5:7 65:14 78:5  
87:23 108:5 139:5 183:24  
187:16 207:9  
good (16) 1:7,8 10:13,16  
61:13 68:22 84:18 91:2  
101:9 104:10 112:2,3  
113:9 154:20 165:12  
177:13  
government (1) 177:17  
grammar (1) 180:15  
granada (1) 130:24  
grandparent (1) 22:19  
grandparents (1) 22:24  
granted (1) 77:5  
grapple (1) 167:22  
grateful (4) 132:5 157:25  
158:19 199:16  
grave (2) 159:14 166:9  
greaney (62) 1:6,7,9 11:19  
16:13 19:9 22:17 25:24  
29:21 30:25 33:4 35:21  
36:7 40:22 46:2 47:8,12  
58:11 60:4 66:17 67:20,23  
68:1,15,22 69:2,4,19 70:21  
71:7,10 72:3 95:2 97:4  
124:16 125:15,20 126:10  
129:5,16,21 155:16,21  
156:1,2 157:23  
158:5,7,10,17 195:10  
198:16 199:21 200:3,4  
207:2,14 210:15,21  
212:4,8,10  
great (3) 93:13 130:10  
203:21  
greater (21) 22:10 23:6 24:2  
32:3 36:15 68:4 73:13 77:6  
78:22 83:23 112:13 115:17  
123:2 129:23 134:13 151:9  
157:1 173:18 186:15,16  
191:12  
greatest (1) 164:25  
gregson (4) 92:5 111:2  
120:20 128:2  
grenfell (2) 197:8,19  
grief (1) 210:8  
grip (2) 100:11 130:10  
gripping (1) 54:7  
ground (10) 21:24 52:6,19  
73:6 79:1 98:17 101:5,7  
175:14 192:25  
groundassigned (1) 61:21

group (19) 1:24 2:6 5:23 7:2  
9:4 26:15 65:2,4,11,15  
66:2 77:2 99:17 103:6  
121:18,21,25 122:2 151:3  
groups (1) 141:22  
guidance (5) 36:22 52:7  
117:21 118:2 155:14  
gun (2) 57:4,2  
gunman (2) 57:10 114:16  
gunmen (1) 143:17  
guy (1) 25:12  
guys (2) 27:2 60:19

**H**

hadnt (11) 8:4 15:10 17:24  
37:13 59:15 76:25 77:15  
89:15 105:4 179:15 187:16  
hair (1) 49:4  
half (2) 63:5 99:4  
halfway (3) 105:19 108:21  
178:1  
hand (3) 91:22 150:18,23  
handed (3) 50:23 59:6 62:1  
handful (2) 141:7,7  
handover (1) 202:5  
hands (1) 99:17  
handson (1) 140:12  
hang (3) 92:8 180:10 184:5  
happen (11) 54:9 63:20,22  
65:5,6,23 70:12 101:16  
129:11 145:3 200:10  
happened (22) 12:13 45:7  
55:10 62:4 63:10 65:1  
80:25 93:24 123:24,25  
127:6 142:2,7 147:5  
176:24 179:6 181:8  
188:10,13,15 193:5 210:17  
happening (11) 7:12 9:7  
14:9 36:15 53:21 59:8 61:4  
72:22,24 95:5 99:1  
happens (4) 49:14 94:6  
141:23 149:12  
happy (2) 94:7 189:1  
hard (1) 193:19  
hardly (1) 139:11  
harks (1) 54:11  
harris (6) 19:10 20:19 132:14  
162:21,22 181:13  
harrowing (1) 55:21  
hart (13) 46:16,18,18  
69:11,14,17,18,25  
70:5,7,13 175:16 208:23  
hasnt (3) 137:19 160:9,15  
havent (16) 41:3 71:25  
79:14,16 81:4 95:24 98:12  
100:9 111:1 118:1 122:25  
169:19 185:17 192:9 196:5  
210:25  
having (34) 13:20 18:11 41:6  
42:4,7,7 50:9 53:9  
60:6,14,24 62:14 64:23  
66:23 74:3 75:22 84:16,21  
100:21 107:14,22 108:3  
112:10,22 129:17 143:25  
149:9 150:24 169:8 170:5  
173:5 192:25 193:3 202:19  
195:22 212:1016  
hazard (2) 52:2 101:6  
hazardrisk (1) 44:5  
hazards (4) 38:23 51:21  
73:20 91:11  
head (4) 72:3 96:3 98:7  
107:8  
headed (1) 117:21  
heading (2) 80:8 157:5  
headquarters (27) 3:4 4:25  
5:7,9,15 6:5,20 8:13  
9:14,21 10:4,12,12  
31:16,19 63:3 65:5,8,9,12  
150:12 157:8,18 180:22  
182:5 186:7,9  
health (1) 111:19  
hear (12) 52:21 56:7,12 62:2  
69:3 105:24 135:7  
168:5,9,23 169:10 210:10  
heard (27) 12:15,22 13:13  
38:6,17,21 41:4 52:20,22

58:25 59:16 63:5 103:24  
106:4 129:17 135:1 137:12  
148:21 152:5,21 160:20,25  
169:11 188:19 204:20  
205:13 207:12  
hearings (1) 200:15  
heavy (1) 181:3  
hed (11) 2:17  
26:17,18,19,21,25 96:3  
102:10 104:1 149:20 191:7  
held (5) 11:10 13:25 44:3,13  
189:19  
hello (1) 169:18  
helmerich (2) 21:15 197:17  
help (20) 15:25 17:5,23 18:5  
19:19 33:24 41:12 67:6  
70:11 116:10 137:2 172:15  
173:23 176:12 178:18  
186:15 193:15 194:5  
200:13 209:12  
helped (1) 67:12  
helpful (6) 20:24 21:7 70:18  
81:25 192:8 201:19  
helpfully (2) 125:24 208:22  
helping (1) 64:11  
here (23) 18:23 55:18  
57:11,23 73:9 87:13  
94:9,10 96:22 115:9 127:7  
148:2 151:8 152:24 154:19  
167:21,22 169:21 170:24  
184:25 193:20 198:10  
202:24  
hero (2) 193:18 194:7  
hes (24) 21:2,5 25:8,12  
31:22 42:24 53:2,3 54:24  
57:25 58:7 59:23 66:11,13  
124:22 130:15 153:17  
155:17 158:13 159:19,20  
162:9,12 178:4  
high (1) 149:11  
higher (1) 165:20  
highgrade (1) 146:3  
highlight (2) 191:15,25  
highlighted (1) 206:19  
highlighting (1) 51:20  
highly (1) 210:6  
himself (3) 31:20 53:17  
178:3  
history (2) 69:22,24  
hive (1) 105:6  
hold (10) 10:1 13:5 72:6  
92:21,22 112:3,5 113:9,17  
189:11  
holding (7) 43:25 101:25  
185:10 186:4 189:8,14  
holds (1) 112:2  
holed (1) 54:6  
holland (7) 177:15,15,24  
178:14 179:13 190:4,20  
home (14) 1:18 8:1,15,17,21  
10:3 79:4 81:22 93:4 97:7  
149:1 182:15 190:6,9  
honest (9) 5:18 106:6 136:13  
144:24,24 172:16  
185:15,23 189:13  
honestly (5) 89:8 90:11  
92:17 95:24 185:18  
honour (1) 23:23  
hope (12) 29:5 54:24 70:8,10  
75:18 90:25 115:9 126:6  
145:5 158:1 198:20 199:4  
hoped (2) 21:16 210:21  
hopefully (5) 130:19 154:12  
168:18 170:7 191:17  
hoping (1) 58:20  
hopkins (5) 153:11,14  
154:1,7 157:1  
horwell (2) 68:4 129:21  
hospital (1) 38:10  
hour (10) 15:11,12,13 17:12  
65:23 67:22 99:4 125:9  
149:20 150:21  
hours (5) 62:15 107:3,21  
130:20 174:24  
house (3) 41:16,21 151:21  
however (3) 21:22

71:13  
**hse** (2) 111:18 113:1  
**huddle** (2) 200:18 208:7  
**humble** (1) 25:6  
**hundreds** (1) 132:18  
**hunt** (2) 19:24 198:23  
**hurt** (1) 107:17  
**hynes** (59) 31:7,24 32:16  
 33:6 34:15,17,18 35:13  
 36:1 37:25 40:25 46:4  
 48:21 52:21 56:8 58:4  
 60:17 69:9,13 70:4  
 132:10,25 133:6,14 134:3  
 167:1,2,12,24 168:1,10  
 169:8,17 170:17,18  
 171:9,11,15,16 172:1,4  
 173:14,15 174:14,16,22  
 175:2,20,21 200:6,11,16  
 202:19 204:5  
 207:4,8,11,20,24

I

**ian** (6) 153:11 154:1 156:25  
 157:1,5,22  
**id** (24) 7:14 8:18 12:14  
 18:15 21:16 34:16 35:3,17  
 40:13 46:11 52:22  
 59:10,16 60:5 63:6 80:23  
 82:6 125:2 152:10 162:3  
 170:10 175:9 187:6 188:19  
**idea** (6) 15:4 46:25 101:9  
 150:18 176:20 177:13  
**identifiable** (1) 71:25  
**identified** (4) 52:3 58:15  
 65:3 101:2  
**ignore** (3) 124:15,22 172:1  
**ignored** (2) 124:16 163:17  
**ignoring** (1) 171:22  
**ill** (21) 3:21 34:7 54:8 62:13  
 68:1 82:23 94:17 109:5  
 127:18 132:3 138:13 141:1  
 146:17 152:8 155:14  
 161:18 166:24,25  
 175:19,25 191:16  
**illusion** (1) 113:25  
**illusions** (1) 104:12  
**illustrate** (1) 45:14  
**im** (112) 15:15 21:9,11,12  
 22:17 23:3,13,14 24:10,11  
 27:6 29:17 33:10 40:22  
 45:5,23 46:17 51:3  
 58:20,21,25 60:1 66:18  
 71:23 72:12,15 75:18  
 76:5,24 77:22 82:2,17,18  
 83:22 84:15 85:9 91:1 93:2  
 94:9,10 101:8 114:12  
 115:9 121:2 123:12 125:20  
 129:9,20 130:3 132:5,5,8  
 133:12,23 134:17,19  
 136:4,11 138:9 139:15  
 140:16,17,22,23 142:1,23  
 143:13,14 144:24 145:7,8  
 146:13,13 152:15,21 156:4  
 158:19 159:9,10,24,25  
 160:1,3,8,16 161:7 163:6  
 164:14,17 165:16 168:5,16  
 170:14 171:10 174:1  
 176:12 178:10 179:23  
 182:19 184:24,25 187:12  
 188:11,13,25 189:1,5  
 190:16 192:17 194:1 200:4  
 207:15  
**images** (3) 13:17 49:12,13  
**imagine** (2) 16:24 21:7  
**imagined** (2) 4:19 52:22  
**immediate** (4) 44:8 102:4  
 123:13 179:17  
**immediately** (18) 8:5 26:8  
 39:8,10 50:8 65:2 71:14,19  
 92:23 94:4 97:20 117:2  
 143:20 186:13,13 188:2  
 189:4 192:20  
**imminent** (1) 208:7  
**impact** (2) 24:13 185:21  
**implementation** (1) 132:17

**implemented** (3) 84:25  
 135:21 143:7  
**implied** (1) 89:17  
**importance** (3) 76:7 152:19  
 207:7  
**important** (17) 31:23 32:10  
 47:8 58:16 109:16 110:8  
 118:2 123:4 139:23  
 140:14,19 141:6,8 152:18  
 156:17 167:22 200:17  
**impossible** (1) 139:12  
**impression** (1) 54:21  
**improvements** (1) 192:15  
**inability** (1) 189:20  
**inadequacy** (1) 140:3  
**inadequate** (1) 140:21  
**inappropriate** (2) 113:6  
 210:6  
**inaudible** (1) 94:9  
**incident** (131) 3:16  
 4:18,20,20 5:10 6:11 7:20  
 8:9,9 15:21 19:17,25  
 21:1,24 25:1,18  
 28:12,14,15 36:4 37:5,5,6  
 38:13 41:19 44:7,8 48:5  
 49:5 52:6,8,19  
 53:18,20,24,25  
 54:4,8,14,18,20 56:20,25  
 57:3,5,11,11 59:17,23  
 60:1,2,4 61:7 63:24 65:11  
 67:5 72:5 75:4,6 76:21  
 77:1,7,9 78:21 79:15 80:8  
 81:7,15 82:2 83:18  
 85:18,20,24 91:9,10 93:1,5  
 95:18 97:6,6,20 98:15  
 99:14,21,22  
 100:2,3,10,19,21  
 101:2,4,11,19,20,21,24  
 102:3,10,12,19,21  
 107:8,22 110:20 114:7  
 115:25 116:24  
 117:4,7,10,13,17  
 119:12,24 125:25 126:5,11  
 136:21 137:14 143:12  
 151:7 170:14 175:14,15,18  
 196:9 198:7 203:1 206:20  
 209:20  
**incidents** (9) 6:10 7:17,23,25  
 15:22 119:9 126:8 132:19  
 141:20  
**inclinations** (1) 184:23  
**include** (3) 104:20 146:5  
 181:3  
**included** (6) 71:3 103:10,14  
 104:18 109:20 120:24  
**including** (4) 2:11 12:4 23:18  
 36:16  
**inclusion** (1) 109:24  
**inclusive** (4) 21:16 159:11  
 163:7,8  
**incorrect** (1) 103:17  
**increase** (1) 109:9  
**independent** (5) 167:11,23  
 170:19,21 173:12  
**indicate** (6) 67:23 68:6  
 129:21 141:17 156:9  
 210:21  
**indicated** (8) 1:9 77:13  
 85:6,15 88:4 129:22 156:7  
 159:3  
**indicating** (2) 157:9 188:12  
**individual** (5) 16:19 71:4  
 139:14,24 140:10  
**individuals** (3) 104:19 135:8  
 140:17  
**indulged** (1) 135:6  
**influenced** (1) 113:20  
**info** (1) 178:16  
**inform** (6) 48:16 77:18 81:5  
 82:17 106:14 193:4  
**information** (162) 2:10 3:1,3  
 5:8,20 7:14 9:3  
 18:9,9,12,18 20:16 21:24  
 26:25 30:2 31:15  
 39:14,16,17 44:5 48:20  
 51:5 56:9 64:14 66:9,9

72:21,24  
 73:5,12,16,20,22,24 75:10  
 76:1,3,16,18,19,24 77:9  
 78:2,8,12  
 79:18 19,20,23,25  
 80:12,15,17,24  
 81:2,5,9,14,16,19  
 82:1,10,13,14,17,21 83:1,6  
 85:5,14 88:3  
 89:9,11,13,16,19,22,23  
 90:15,21,24 91:3  
 92:13,19,24  
 93:4,7,15,18,19 94:4,12  
 95:6 96:3 97:22  
 98:8,12,14,16,17,23  
 100:25 103:13 104:15  
 109:19,20 110:3,12,24  
 113:12 114:5,5 117:21  
 118:3 122:8,12,16 123:25  
 126:4 130:20 135:19 137:1  
 140:25 143:8 144:9,12  
 146:4 149:12,21,24  
 151:16,18 154:9,10  
 155:2,10 163:6 170:7,11  
 176:1,3,4,9,20,24 177:2  
 179:11,14,15 185:24 186:2  
 187:2,17 189:11,18,18  
 190:11,24 193:6 201:7  
 203:23 208:23  
**informed** (5) 77:4 89:15  
 170:15 201:11,14  
**informing** (2) 36:5 99:1  
**initial** (6) 45:8 79:21 81:14  
 115:25 116:24 187:2  
**initially** (2) 60:22 88:22  
**initiative** (2) 24:3 173:12  
**injured** (3) 43:22 63:15 67:7  
**injuries** (5) 20:2 42:6  
 206:13,17,21  
**innocent** (1) 209:11  
**input** (1) 149:9  
**inq** (4) 2:4 7:3 176:21 179:21  
**inq0042735** (1) 191:19  
**inq0042739** (1) 192:4  
**inq0042791** (1) 97:5  
**inq0042792** (1) 97:11  
**inq0042793** (1) 97:11  
**inq0042794** (1) 97:14  
**inq0044501** (1) 36:24  
**inq0044505** (1) 36:25  
**inq0079881** (1) 138:16  
**inq0158591** (1) 130:17  
**inq0158791** (1) 130:19  
**inq0190491** (1) 177:14  
**inq0190981** (1) 156:22  
**inq0191111** (2) 152:13,23  
**inq0234971** (1) 194:12  
**inq0234973** (2) 193:11,23  
**inq0234974** (1) 195:21  
**inq025479a1** (1) 58:21  
**inq0256601** (1) 207:21  
**inq0256607** (1) 207:22  
**inq02673213** (1) 141:14  
**inq02673214** (1) 141:19  
**inq0267322** (1) 131:8  
**inq02673226** (1) 190:2  
**inq03090221** (1) 196:23  
**inq0309023** (1) 105:12  
**inq0356121** (1) 49:12  
**inq035612469** (1) 49:16  
**inq035612470** (1) 49:19  
**inq035612499** (1) 49:22  
**inq035612507** (1) 49:24  
**inq035612509** (1) 50:1  
**inq035612521** (1) 50:4  
**inq0403689** (1) 69:23  
**inq0406521** (1) 117:20  
**inq04065768** (1) 58:23  
**inq04147321** (2) 77:24 78:3  
**inq04147322** (1) 78:4  
**inq04147336** (1) 2:4  
**inq04147346** (1) 7:4  
**inq04147353** (1) 9:24  
**inq04147362** (1) 11:20  
**inq04147364** (1) 24:24  
**inq04147365** (1) 30:7

**inq04147371** (1) 34:8  
**inq04147384** (1) 50:20  
**inquest** (1) 201:13  
**inquiry** (26) 13:13 22:15  
 75:21 77:4 96:12,17  
 108:25 111:3 140:1 141:16  
 161:23 164:2 165:2  
 166:8,9 167:22 177:10  
 179:24 189:3 192:1,16  
 195:2,13 196:6 209:12  
 211:8  
**inquiries** (1) 160:9  
**inquisition** (1) 210:3  
**inside** (1) 204:16  
**insofar** (1) 59:19  
**inspector** (1) 116:5  
**instance** (13) 134:15,23  
 135:5,14 136:9,22 148:11  
 152:12 153:20,25 154:6  
 159:21 161:4  
**instead** (3) 18:13 41:15  
 99:17  
**instinct** (3) 17:25 18:8 72:23  
**instinctive** (1) 91:4  
**instinctively** (2) 18:12 76:2  
**instructed** (2) 34:14 121:9  
**instructing** (1) 19:11  
**instruction** (3) 35:10,11 43:9  
**instructions** (3) 42:24 55:1  
 120:24  
**intelligence** (1) 146:3  
**intended** (1) 157:17  
**intention** (4) 31:15 68:8  
 125:24 200:18  
**interest** (1) 126:4  
**interesting** (3) 24:3 115:16  
 138:3  
**interestingly** (1) 126:19  
**interfered** (1) 20:21  
**internal** (1) 21:17  
**interpretation** (4) 22:3 56:17  
 61:2 82:20  
**interrogated** (3) 89:10 114:2  
 122:19  
**interrupt** (1) 192:17  
**intervention** (3) 24:3 133:2  
 135:23  
**interview** (3) 130:24 194:19  
 195:7  
**interviewer** (2) 194:15  
 195:12  
**intimidated** (2) 162:16 164:9  
**intimidating** (19) 22:7,8  
 24:17 161:24 162:8,21  
 163:4,13 164:3,6,7,15,23  
 165:4,7 166:10 169:2,4,5  
**into** (47) 1:20 12:24  
 15:19,20 23:9,17 27:3  
 30:12 38:22 40:19 45:12  
 48:10 55:3 59:12 61:19  
 62:18,19 64:3,21 65:17,18  
 67:8 78:3 80:8 97:11  
 105:23 106:9 110:24  
 113:5,16 116:16 120:1  
 122:8 138:2,10 141:17  
 146:22 148:24 151:25  
 152:3 156:15 157:5 171:12  
 181:19,23 187:17 188:25  
**introduced** (2) 127:17,20  
**introductions** (2) 171:1,22  
**inverted** (1) 185:3  
**investigated** (1) 188:1  
**investigation** (4) 91:23  
 186:13 188:2,10  
**invite** (4) 23:2 66:20 129:10  
 207:15  
**invited** (1) 188:1  
**inviting** (2) 35:22 45:5  
**invoking** (1) 184:3  
**involve** (4) 40:11 86:2 89:1  
 189:2  
**involved** (7) 30:16 73:3  
 109:6 110:15 117:12  
 119:16 138:4  
**involvement** (6) 1:10 99:7  
 118:10,22 120:7 121:5

**iota** (1) 115:24  
**irish** (6) 25:15 163:1 164:22  
 165:5 166:12,14  
**irishman** (2) 185:3,5  
**irrelevant** (2) 139:9,13  
**isnt** (33) 27:15 57:14 58:18  
 64:17 74:25 79:1 80:2  
 83:3,5 97:19 109:1 111:19  
 118:19 120:5 123:9 136:5  
 140:5 146:19 153:18  
 156:14 159:19 164:5 165:1  
 166:13 177:19 179:25  
 180:4,25,25 186:4 192:24  
 200:17 201:16  
**isolated** (1) 178:8  
**issued** (1) 118:4  
**issues** (7) 73:9 74:24 96:22  
 141:8 148:5,10 150:25  
**itll** (1) 93:18  
**its** (134) 2:2 7:19 11:18  
 15:8,11 17:15 19:17 22:16  
 27:20 28:10 41:18,19,24  
 47:13,14,15 48:3,4,6  
 49:3,4,16 50:22 52:7 55:1  
 56:16,20,25 57:4,10,13,16  
 58:2,4 62:15 65:12,20  
 69:5,5,10 71:2 72:3 76:20  
 78:18 79:10,22 80:1,3  
 82:24 88:1,14 90:7  
 93:13,23 94:15 96:14  
 97:19 98:7 100:23,24  
 106:16 109:14,16 110:7  
 114:11 116:7,9,18,22  
 118:1 122:13 123:4,8  
 126:7,17 127:3,8 130:3,9  
 131:21 133:17 137:18,19  
 138:3,6,18 139:5,12 144:9  
 145:10 149:3 150:24  
 154:20,20 160:9,10  
 168:11,12 169:3,14  
 173:2,8 176:2,21 177:22  
 179:11 180:3,5,11,24,25  
 182:14,19 185:11 187:12  
 189:19 190:1 193:4,6,19  
 194:17,19 195:12,24  
 196:16,22 197:10 198:4,20  
 199:4 200:6,14 202:23  
 205:4  
**itself** (6) 10:23 15:25 50:5  
 140:1 156:19 172:9  
**ive** (34) 18:16 19:17 21:18  
 23:23 24:11,16 35:7  
 38:6,17,21 49:5 54:20  
 63:1,1 68:7 74:19 80:5  
 83:22 84:10 86:23 108:22  
 111:4 126:21 129:2,6  
 130:3 131:20,21 158:21  
 169:1 176:18 197:3 205:5  
 207:12

**janine** (4) 105:19 120:20  
 121:1 126:14  
**jesip** (23) 5:12,20 6:24 53:5  
 60:19 91:8,25  
 139:6,8,18,25  
 140:14,19,20 141:6,9  
 144:7,14 190:12,22 191:3  
 200:18 208:7  
**job** (4) 61:8,16 92:17,18  
**jobs** (1) 154:4  
**john** (238) 1:8 6:3 10:15  
 11:13,18 12:7,8 13:4,12  
 15:3,9 16:8,12 19:2,8  
 20:13 22:14 24:25  
 25:20,23 27:1 28:23  
 29:10,13,16,20 30:21  
 32:18,22 33:2 35:9,15 36:3  
 39:18,25 40:10,21 45:24  
 46:25 47:7,11 53:15,25  
 54:5,15 55:11,17 56:3,12  
 57:1,9,21,23 58:2,7,10  
 59:22,25 63:18 64:16  
 65:7,14,24 66:3,10,16  
 67:17 35:2 68:13,18  
 70:11,18 74:10,19,22 75:6

84:13,16 87:13,21,25  
 88:7,16,25 90:2,5,9,17  
 91:5,14,16 93:10,13,25  
 94:3,14,18,24 95:8,13,15  
 96:5,14 99:20,24 100:8,17  
 101:8,16 102:2,13,24  
 105:9 108:21 114:8,11,14  
 115:11,14,18,20  
 116:3,14,20 117:15  
 118:12,14,16 120:17,22  
 121:4,21 124:2,10,14,20  
 125:2,8,19 126:6,16,21,25  
 128:24 129:4,12,20  
 130:6,15 134:2,9  
 137:10,21 138:6 139:6  
 143:13 144:2,17 147:12,22  
 150:17 151:12 152:14  
 155:9,19 158:3,6,9,16  
 160:3,14,20,25 161:19  
 162:6,13,17,22  
 163:1,14,19 164:13,15  
 165:6,14 166:16,20,23  
 168:13 169:10,15 170:2,13  
 172:4,23 174:5 176:18  
 177:25 178:10 179:11  
 180:10,16 182:3,14,18  
 183:2 184:5,9 186:16  
 187:5,7,12 188:5,24  
 189:17 192:17 193:7,9,12  
 194:14,22 195:8,11  
 196:2,11,15,19 198:15  
 199:10,20,23 202:10  
 206:13 209:5 210:14,16  
 211:6  
**join** (1) 188:2  
**joined** (2) 129:25 170:22  
**joint** (5) 53:3 56:10 91:10  
 154:24 188:2  
**journey** (1) 61:11  
**judgement** (2) 172:16 207:5  
**jury** (4) 1:1 105:6 107:8  
 211:9  
**jumped** (2) 148:24,24  
**jumpy** (2) 190:6,9  
**june** (1) 126:17  
**justifiable** (1) 92:22

L

**labouring** (1) 15:15  
**lack** (2) 76:1 89:24  
**lands** (1) 60:23  
**large** (1) 149:12  
**largely** (2) 64:7 142:16  
**last** (9) 12:21 18:17 59:25  
 138:22 141:21 146:15  
 174:10 187:5 210:10  
**lasted** (7) 31:10 33:10 167:3  
 170:25 171:21 209:14  
 210:1  
**lasting** (4) 24:23 34:11 47:14  
 50:22  
**lasts** (1) 53:8  
**late** (3) 64:21 114:21 125:16  
**lateish** (1) 114:21  
**later** (9) 3:2,13 31:20 70:12  
 82:18 122:17 130:15 179:6  
 204:9  
**latest** (2) 10:17 119:6  
**lawlor** (14) 3:4 5:17 6:4,5,20  
 10:11 23:18 25:3 63:3  
 65:24 66:10 121:23 127:22  
 128:22  
**lead** (4) 173:20,21 190:22  
 191:1  
**leader** (2) 131:11 164

leave (15) 34:6 58:20 82:3  
103:5 104:23 108:11  
116:21 119:19 124:11  
125:4 128:15 161:12,18  
165:8 184:21  
leaves (1) 53:25  
leaving (6) 8:21 81:22 97:7  
99:13,17 114:12  
led (4) 143:10 144:15 172:5  
174:6  
lee (3) 153:10,13,17  
left (9) 9:20 35:19 53:16  
82:6 117:19 149:2 208:25  
209:1,4  
legitimate (1) 94:21  
les (1) 187:24  
less (7) 10:23 16:6,16 29:2  
120:23 170:25 171:21  
let (21) 17:22,24 22:25 48:6  
49:7 62:11 80:4,5,13 93:10  
132:10 147:12 148:5  
158:22 161:2 164:21 176:8  
180:12 183:22 188:10  
200:5  
lets (24) 13:21 19:1 42:13  
49:8 63:1 71:21 76:9  
90:5,17 92:21 96:5 131:7  
141:17 152:12,23  
154:12,19 162:6 166:13  
178:15 184:21 185:22,22  
190:1  
letter (1) 107:20  
letting (3) 35:2 48:18 80:7  
level (11) 19:18 22:20 31:1  
139:18 140:18,20,24  
150:15 181:16,21,25  
levels (1) 22:21  
levy (40) 21:10 24:22,25  
25:4,25 26:7,15 27:8,10,19  
28:4 29:23 30:4,10  
34:10,13 35:22 36:8 41:1  
42:23 43:5 53:17 54:18,20  
59:25 99:18,22 103:6,23  
105:1 121:25 163:24  
171:23 172:1 174:14,16,22  
175:2,19,21  
levys (3) 27:20 55:12,14  
liaison (2) 66:4 154:3  
life (9) 17:19 19:24 76:4  
112:12,13 132:4 153:5  
199:2,5  
liferisk (3) 7:17,23 119:9  
light (3) 119:22 142:21  
178:17  
like (38) 11:9 15:21 23:19  
24:9 25:18 52:6,7 57:14  
59:16 63:25 74:23 87:25  
88:1 91:6,9 97:4 105:5,18  
109:13,16 121:10 126:25  
129:1 130:8 137:14 142:19  
148:8 152:9 154:14 162:9  
163:5,9 165:2,9 172:18  
173:4 185:20 199:22  
liked (2) 135:18 147:6  
likelihood (1) 4:22  
likely (7) 4:11,24 5:2 11:22  
43:18 121:11 198:4  
likes (3) 64:7 180:17 193:2  
limit (1) 128:1  
limited (1) 79:23  
line (13) 22:18,19 29:24  
62:4,7 92:9 116:3 126:1  
141:25 142:24 169:1  
180:8,8  
lines (8) 56:24 62:2,8 80:20  
91:23 141:21 152:24 208:2  
link (2) 68:14 180:12  
links (1) 152:6  
list (2) 118:9 192:7  
listed (1) 27:13  
listen (6) 35:4 52:24 53:7  
58:13 163:9 189:20  
listened (4) 29:24 103:24  
121:18 122:11  
listening (5) 24:13 146:18  
148:1 151:21 172:5

lists (1) 71:1  
literally (2) 15:18 49:16  
little (13) 70:8 92:2 108:12  
132:10 134:10 157:13  
159:3 170:7 176:3  
179:5,25 203:23 211:2  
live (10) 12:15,21,22  
13:18,18 17:18 99:12  
144:5 151:21 198:6  
lived (2) 112:18 143:25  
lives (1) 198:4  
living (1) 148:15  
lms (1) 139:9  
loads (1) 179:16  
local (3) 145:2,8 177:17  
locally (1) 20:6  
located (3) 46:15 126:23  
156:18  
locating (2) 28:6 117:17  
location (4) 65:3 75:10  
118:8 206:19  
locations (2) 8:10 64:7  
log (11) 8:16 11:19  
97:6,20,23 98:3,5,9,23  
119:12 204:10  
logs (3) 187:18,18,19  
london (3) 68:10 150:5,6  
lone (3) 145:20 184:12 185:1  
lonewolf (6) 142:9,14 143:3  
144:23 145:4 146:23  
long (8) 33:16 70:12 127:3  
148:17,20 187:5 200:4  
208:7  
longer (2) 56:20 93:22  
longstanding (1) 208:1  
look (20) 24:19 36:22 37:21  
49:13 53:15 56:14  
77:23,25 82:5 90:10 98:3,5  
131:7 138:25 151:5 152:12  
177:14 180:7 194:1 201:4  
looked (6) 25:12 36:23 84:17  
97:20 196:21 207:8  
looking (10) 8:11 29:22  
60:25 72:19 98:23 121:1  
152:14 179:4 187:21  
189:21  
looks (1) 194:16  
looming (1) 82:3  
lopez (28) 2:4 9:24 11:21  
24:24 49:10 50:6 58:18,22  
78:4 97:10 105:11 108:12  
117:19 130:17,19,22  
138:16 141:13,19 179:3  
191:19 192:4 193:11,25  
194:13 200:14 207:20  
209:6  
losing (1) 15:22  
loss (3) 93:2 112:16 199:5  
losses (1) 186:21  
lost (4) 19:24 61:11 112:12  
183:14  
lot (20) 12:12 24:14 26:4  
31:11 72:1 101:14 109:8  
139:24 145:1,25 147:3  
163:9 169:19 171:18  
172:15 181:1 183:5,13,13  
209:24  
loved (1) 183:14  
luck (1) 6:3  
ludicrous (1) 15:8  
lunch (3) 124:21 125:9,11  
lunchtime (1) 125:18

M

madrid (1) 147:5  
magnitude (2) 80:21 193:5  
mainly (1) 209:17  
maintain (3) 88:3 90:14  
111:10  
maintained (1) 43:9  
maintaining (1) 132:15  
major (5) 8:8 48:5,7 49:5  
65:11  
makes (2) 68:24 86:14  
makeup (1) 116:1

making (19) 14:6 27:23 28:4  
31:16 37:15 38:12,13  
39:13 40:14 41:6 64:13  
76:5 101:10 108:24 123:16  
153:8 181:3 182:19 207:5  
man (4) 57:2,4 78:13 166:3  
manage (4) 48:14 53:14  
68:13 100:16  
managed (3) 154:6 171:11  
180:11  
management (13) 21:13,14  
22:16,22 52:15 131:14,17  
158:25 159:6,14 161:6  
162:1 208:11  
manager (27) 1:25 2:6 7:2  
9:4 22:18,19 29:9 55:8  
77:2 79:11,12 99:2,18  
100:21 103:6 106:16  
107:18 108:16  
121:19,21,23,25 122:2,4  
159:19 164:5 186:12  
managers (1) 196:4  
managing (1) 53:12  
manchester (43) 3:17 12:14  
21:18 22:10 23:6 24:2  
31:5,6 41:22 46:8 47:22  
68:4,11 70:1 77:6,19 78:22  
83:23 109:14,18 110:10  
112:13 113:15 115:17  
119:10 123:2 129:23 131:9  
134:13 141:24 151:9 157:1  
173:18 181:14 182:12  
186:15,16,20,22 191:12  
209:9,12 210:8  
manner (1) 202:14  
many (14) 15:21 23:21 42:11  
61:16 62:12 67:9 125:2  
134:12 135:2 142:3 177:20  
178:25 189:3 203:10  
marauding (12) 27:3 39:9  
56:23 57:9 60:13  
113:4,14,24 143:6 144:11  
201:21 208:5  
mark (9) 38:18,19 56:18,19  
57:19 59:13 60:11 105:2,4  
marks (1) 60:12  
marshalling (1) 101:23  
massive (1) 131:4  
match (1) 89:2  
material (1) 84:17  
matt (3) 182:11 187:23  
191:8  
matter (15) 7:20 17:16  
18:7,8 24:10 47:10 68:23  
75:15 76:8 105:5 111:25  
115:5 137:8 176:2 209:8  
matters (6) 71:7 125:3 148:7  
177:10 192:10,12  
maybe (13) 15:11 42:16,19  
65:20 93:4,16 103:20  
151:14 152:24 163:16  
165:12 181:13 189:20  
mayor (15) 42:19  
109:13,18,23 110:9,17,20  
111:15,24 112:5,22,25  
184:19,21 188:25  
mayors (3) 81:23 153:18  
161:15  
meakin (2) 26:24 27:9  
mean (9) 1:14 6:15 16:18,18  
32:22 93:18 137:22 167:10  
190:8  
meaning (2) 32:23 67:18  
meaningful (1) 210:22  
means (5) 57:23,25 126:10  
195:12 208:14  
meant (13) 1:15 14:20 33:18  
40:16 55:3 60:12 89:21  
129:1 131:10 152:16  
190:25 204:4 208:13  
media (1) 202:3  
medical (3) 45:20 133:20  
174:2  
medicalwise (1) 32:15  
meet (4) 25:6 182:13,16,23  
meeting (15) 53:5 64:24

106:16 109:13,18 125:18  
181:12 186:23 187:1,23  
188:5,5 197:2 209:10,14  
meetings (3) 146:2 163:8,8  
member (2) 91:24 156:10  
members (5) 37:19 48:9  
69:24 70:5,7  
memorial (1) 49:21  
memory (4) 77:20 136:5  
185:16 209:16  
mentioned (7) 27:1 47:13  
112:8 158:8,24 199:11  
202:3  
merseysides (1) 10:15  
mess (3) 32:20,23,24  
message (14) 3:22,25 4:3  
5:25 6:1 8:6 19:10 81:23  
156:12,14,17,19,25 158:12  
messages (4) 9:19 81:22  
98:2 153:24  
met (2) 51:6 210:25  
metaphorical (1) 148:17  
metcalf (1) 112:12  
method (1) 167:18  
michelle (4) 92:5 111:2  
120:20 128:2  
mick (11) 3:4 5:17 6:4,5,20  
10:11 23:18 25:3,5 127:22  
128:22  
mid (1) 130:11  
middle (2) 12:7 196:24  
midnight (1) 16:23  
mist (1) 47:25  
might (22) 6:12 27:1 31:20  
43:21 47:25 48:24 52:13  
59:11 61:19 84:4,20 98:19  
112:7 129:17 145:17  
147:25 148:4 149:5 159:21  
162:15 183:8 196:7  
miles (3) 102:19 195:24  
196:10  
mind (23) 11:14 18:14,23  
24:19 28:23 41:24 42:10  
64:2 72:5,13,17 75:21  
108:9 111:10 113:21  
124:17 129:16 137:11,12  
138:10 143:23 160:22  
176:24  
minds (3) 27:5 62:13 146:9  
mine (8) 11:3 18:25 23:2  
71:17 82:11 164:21 194:1  
207:15  
minijesp (1) 154:19  
minimum (1) 196:17  
minister (30) 176:6,13,23  
177:1,12 179:5,22 180:1  
182:2,5,16,20,24  
183:2,9,20,25 184:11  
185:6,25 186:3 187:1  
188:6,12,14 189:7,12  
209:9,13  
ministers (1) 186:19  
minute (9) 2:8 7:4 14:24  
34:11 56:12 167:25 171:4  
184:22 192:17  
minuted (1) 64:24  
minutes (36) 2:7 6:2 10:2  
17:3 24:23 27:20 30:8  
31:11 33:10 47:14,18  
50:22 53:8 62:15 67:5  
73:11 74:2 80:22 85:5  
122:14 129:11 149:20  
151:11 167:3,5 170:25  
171:2,21 187:6 188:16,16  
196:7,10 199:24 204:9  
209:15  
misconstrued (1) 52:20  
misgivings (1) 159:14  
misleading (5) 22:9 91:1  
179:9 180:3,5  
misled (1) 182:21  
misquote (1) 162:6  
misquotes (1) 162:4  
missing (2) 131:23 180:25  
misspellings (1) 180:15  
mistake (2) 154:5 158:11

mistakes (2) 107:25 185:19  
misunderstood (1) 84:10  
mmhm (6) 10:20 30:3 34:12  
45:1 57:8 97:18  
mobile (6) 1:22 167:13,15  
168:19,22 208:16  
mobilisation (3) 76:13  
117:22 123:17  
mobilise (4) 92:25 95:3  
101:19 135:24  
mobilised (8) 10:9 75:3,15  
79:10 83:10 101:19,22  
118:7  
mobilising (6) 3:23 71:1  
75:22 76:8 87:1 92:7  
model (1) 73:19  
moment (27) 13:16 14:13  
27:6 40:22,24 44:14 47:13  
53:8,15 56:16 63:18 68:6  
71:21 92:7,8 121:3 128:16  
130:7,16 144:19 147:13  
163:25,25 176:22 188:10  
192:21 203:17  
moments (1) 47:8  
more (57) 6:3 10:6  
16:6,14,16 18:17 20:12  
22:11 28:25 29:2 31:13  
32:15 36:23 40:3 52:25  
57:20 62:15 71:22 73:12  
74:19 75:18,19 76:21  
78:21 81:11 82:10 90:20  
92:2 93:18 98:23 99:10  
103:12 111:16 129:11  
132:5 141:8 142:17 144:2  
145:19 159:3 166:13 170:7  
171:6 172:15 177:9 179:6  
182:9,9 183:6 187:9 189:3  
196:16 203:23 204:21  
206:15,25 208:24  
moreover (1) 32:5  
morning (17) 1:7,8 47:4  
63:11 74:2 107:14 148:22  
158:24 159:4 162:25  
174:14,16 182:6 185:17  
186:6 209:10 211:3  
most (27) 3:1 17:8,24 21:3  
25:6,14 31:23 36:24 54:3  
64:11,12 72:20 81:14  
87:20 121:20 122:11,11  
125:23 144:9 171:17,17  
173:23 186:17 187:6,13  
192:23 200:9  
mostly (2) 139:9,13  
moth (1) 143:11  
mottrams (2) 30:5,19  
move (15) 42:13 45:23 46:3  
63:1 74:23 93:11 108:11  
109:13 146:18 148:5  
158:22 166:24,25 175:25  
195:13  
moved (4) 115:24 180:19  
193:17 194:6  
movements (3) 7:16,22 82:7  
moving (3) 49:25 97:2 98:19  
mps (1) 141:23  
ms (12) 68:3,22 69:1,2,5  
70:11,15,20,21 126:23  
208:22 212:5  
mtfa (56) 2:18 3:2 10:9,15  
11:4 32:16 34:3,22,24  
40:16 44:23,24  
45:3,15,17,21,25  
46:5,7,13,17 48:13,25  
69:11,14 84:1 104:13,15  
118:18,23,25  
119:4,7,12,15,18 127:7,8  
128:3,17,20,21 141:18  
152:2 169:23 170:17  
178:20 180:17  
196:11,12,16 200:23  
202:1,23 203:1 208:7  
mtfas (1) 120:23  
much (38) 9:2 14:25 16:19  
24:10,18 32:2 50:6 61:15  
69:2 70:19 73:13 76:21  
80:9 81:5 92:19 93:22

98:12 114:13 125:8 128:24  
139:12 142 140:11 141:2  
155:20,21 156:2 157:21  
161:19 176:9 187:4  
199:20,24 207:14 209:6  
210:8,16,19  
multiagency (2) 135:18  
141:3  
multichoice (1) 139:4  
multiple (2) 4:13 20:1  
multipronged (1) 142:18  
mumbai (1) 145:22  
mumbaicentric (1) 146:20  
murdered (1) 209:11  
must (5) 71:21,24 97:2  
171:21 211:3  
muster (2) 54:6 86:18  
musted (1) 11:5  
myself (7) 18:16 31:1 128:1  
134:19 147:13 151:1  
184:15  
mysterious (1) 147:20  
mystery (1) 156:9

N

n (1) 212:1  
naive (3) 11:11 15:14 137:23  
name (3) 33:15 196:24  
201:11  
namely (1) 20:20  
names (1) 184:3  
nankivell (17) 1:25 2:6,9,22  
7:3,6 8:2 9:22 10:2 18:19  
20:19 21:2 25:3 35:16  
36:12 55:5 77:2 78:1,12  
79:7,17 82:1,4 97:16,21  
98:11 122:2 148:11  
151:20 162:9 163:24  
171:23 172:2 174:6 181:13  
205:22  
nankivells (5) 77:17 78:14  
119:1 152:15,20  
national (2) 20:3 132:17  
nature (2) 13:24 20:24  
nb (3) 194:3 195:5,12  
near (2) 12:9 177:25  
nearest (1) 10:22  
nearly (3) 30:8 47:14 63:1  
necessary (6) 82:17 101:7  
125:17 127:1 137:5 156:15  
necessitate (1) 159:2  
necessity (1) 64:20  
need (42) 18:22 19:12 21:12  
33:19,20,23 34:1,3,4,22,24  
38:2,5 40:16 46:5 59:21,22  
60:13 64:4 69:23 73:16,22  
93:11 94:15 96:14,16  
124:11 126:10 155:20  
158:20  
169:20,22,23,24,24,25  
173:25 174:8 187:19  
190:23 196:21 201:4  
needed (40) 9:10 11:6,6,10  
13:25 14:7,25 16:19 17:23  
20:17 22:6 33:17,18,22  
38:1,4 42:12 51:24 52:18  
59:4,9 64:11 82:21 92:14  
94:12 99:24 106:25 149:25  
154:23 155:3 169:22  
170:17 172:14,15,17  
173:22 175:9 186:16 188:1  
208:16  
needing (2) 92:23 116:10  
needlessly (1) 112:10  
needs (9) 58:2 86:17  
147:18,18 148:12,18 174:3  
192:20 200:10  
neil (4) 21:15 197:4,17,17  
neils (1) 22:3  
never (11) 23:23 59:17 74:21  
88:12 108:17 115:24 135:4  
143:8 144:25 152:17  
159:23  
news (2) 14:16 145:2  
newtown (1) 191:22

next (16) 5:6 18:20 21:9  
30:7 47:3,12 49:19 62:3  
73:2 80:22 84:15 109:13  
159:1 176:7,18 183:15  
nick (1) 108:13  
night (51) 1:11,12,18 5:20  
6:2 12:2 17:19 37:3,14  
52:15,17 55:16  
61:10,13,15,16,17 63:15  
64:14 66:24 67:3 74:14  
93:24 101:16 103:15  
107:16,23 113:21 123:6,24  
124:3 133:7,15 138:23  
139:2 143:12 144:10 148:6  
177:7 183:1 185:16  
188:3,15,20 191:4,13  
198:11 200:7 209:10,18  
210:18  
nighttime (2) 15:23 16:1  
nilo (51) 10:10 25:7 26:15  
54:12 65:21 85:4,12,17  
87:23 90:23 91:2 92:1,5,10  
93:17 94:11 95:5,24 96:5  
105:21,21,22 108:18  
109:20 111:12 114:6  
117:11,12,15  
118:7,8,10,22 119:15  
120:4,14  
127:12,12,20,22,23,24,24  
128:6,20,22,23 193:17  
194:6 195:18,22  
nilos (9) 2:20 24:21 26:10  
27:16 93:20 96:2,20  
127:17 146:1  
nobody (4) 72:11,11 101:19  
20:8  
noise (1) 39:23  
nominated (3) 94:22 101:24  
118:8  
none (5) 12:2 39:16,16 64:2  
183:21  
nonetheless (3) 76:11 120:3  
170:4  
nonprotected (2) 55:21,22  
nonsense (1) 165:1  
nonspecialist (4) 13:24  
44:17 55:21,22  
nor (1) 210:15  
normally (4) 12:3 14:5 80:19  
100:17  
norms (1) 23:4  
north (64) 2:2 3:23 4:2 8:16  
11:19 13:1 16:9 25:25  
30:23 31:8 35:6 42:1,2  
52:1 55:9 65:9 68:2 70:22  
73:11 74:6 76:20 77:25  
79:7,13 80:1 83:1,12  
84:22,25 85:3,6,14,23 93:6  
94:11 95:17 96:4 97:23  
106:15 107:4,5,8,18,25  
108:5 113:17 117:14 118:4  
119:21 120:8,13 121:8  
122:7,13 123:8 127:22  
133:18 135:12,19  
168:2,2,15 172:22 187:18  
northern (2) 25:15 198:24  
northwest (3) 69:17 70:6  
107:24  
note (2) 107:15 194:14  
notes (1) 193:13  
nothing (6) 14:3 18:3 53:20  
122:22 130:9 160:6  
notice (1) 176:15  
notification (1) 67:5  
notified (2) 99:4 136:20  
nowadays (1) 139:11  
number (22) 2:22 8:7,14  
22:20,21 36:19 55:4 63:23  
74:23 134:24 141:16 146:1  
147:3 148:7 150:25  
153:3,4 168:17 188:21  
198:17 203:11 205:6  
nwas (27) 2:11 7:7 13:10  
14:17 31:18 35:1 45:25  
46:7,13 55:22 67:7  
132:16,20 134:11

135:6,8,9 137:7  
171:5,12,24 172:24  
173:1,7 178:22 200:7  
202:6  
nwfc (9) 49:11 50:20 88:2  
90:21 96:7 118:8 128:19  
137:12 153:3

---

**O**

**object (1)** 160:5  
**objection (1)** 117:7  
**objective (1)** 198:9  
**obscured (1)** 193:25  
**observation (3)** 63:8 139:23  
181:25  
**observations (1)** 192:15  
**observed (2)** 61:10 62:16  
**obvious (8)** 40:14 43:12,15  
74:6 75:1,1 150:22 184:19  
**obviously (27)** 3:11 16:3  
17:16 33:15 43:16 47:8  
48:10 57:1 63:25 76:17  
92:6,24 93:4 109:6 120:18  
129:8 145:14 148:7 159:10  
168:11 177:2,9 180:14  
186:25 195:24 200:7  
210:17  
**occasion (2)** 101:3 210:2  
**occasions (2)** 64:19 141:16  
**occur (2)** 112:1 144:5  
**occurred (14)** 4:10,11 16:15  
64:1 80:8 107:15,22,23  
110:21 136:9 170:6 176:13  
185:16 209:18  
**occurring (8)** 3:16 7:10  
17:21 51:20 62:22 113:15  
145:23 181:10  
**oclock (4)** 6:2 74:2 182:7,17  
**odd (1)** 47:25  
**offer (2)** 73:25 80:17  
**offered (3)** 140:25 164:8  
199:17  
**office (8)** 23:13,17 81:23  
104:9 153:18 161:15  
190:6,9  
**officer (42)** 1:12 9:13 13:5  
23:8,10,22 25:16 30:14  
32:14 34:6 37:3,4,14 51:16  
54:3 92:11 96:9 101:20  
102:5 103:2,2 112:3,19  
113:7 122:23 123:16,22  
131:10 136:24 150:5  
151:23,25 170:1 172:13  
186:7 187:16 192:20,25  
193:4 196:1 208:4,9  
**officers (29)** 9:3 15:5,24,25  
16:4,6 20:14 25:6 61:2  
62:17 72:20 81:8,16 90:19  
96:18 97:13 98:10,17  
113:7 122:12 123:19  
124:3,7,8 149:15 150:20  
154:23 165:2 172:6  
**officials (1)** 210:9  
**often (1)** 139:11  
**okay (35)** 3:21 16:8 33:2  
34:6 35:15 54:15 56:3 57:1  
66:16 88:7 91:14 95:13  
102:24 115:12 116:8  
118:14 124:10 126:6 134:2  
151:12 155:7 157:16,20  
162:13,22 163:1,14 165:14  
169:21 170:2 178:19  
182:18 186:18 193:9,22  
**old (6)** 30:1 87:25 88:1  
123:6,14,18  
**oldstyle (1)** 162:10  
**once (9)** 20:16 27:11 31:15  
35:12 49:14 71:22 93:17  
102:25 116:25  
**onduty (1)** 192:19  
**oneday (1)** 206:18  
**onerous (1)** 166:9  
**ones (3)** 47:8 127:7 183:14  
**ongoing (10)** 7:21 30:13  
48:7,19 57:19 59:18  
101:21 190:17 209:21,24

**online (2)** 140:12,23  
**onscene (3)** 51:11 172:23,24  
**onward (2)** 38:10 152:25  
**open (11)** 2:14 13:9 23:5,14  
103:11 106:6 109:7 125:22  
147:15 163:7,8  
**opened (2)** 9:13 16:9  
**openly (1)** 22:23  
**operate (2)** 88:15 198:8  
**operates (1)** 88:2  
**operating (5)** 5:16  
6:16,19,22 55:22  
**operation (4)** 41:2 42:15  
84:24 191:22  
**operational (13)** 21:23 38:12  
51:13 54:14 55:25 65:16  
69:9 71:20 81:7 124:8  
131:12 198:5,12  
**operationally (1)** 144:1  
**operations (4)** 31:8 106:16  
108:16 172:21  
**operatives (1)** 137:13  
**opinion (14)** 36:11 38:8  
76:23 103:20 107:24 108:5  
115:1,24 122:16 140:11  
144:16 173:2 174:5 184:20  
**opportunity (18)** 17:20  
18:23,24 82:9  
106:13,17,19 108:2,7  
125:5 129:9 131:24  
132:7,8 148:8 157:25  
184:15 198:7  
**opposed (4)** 103:5,8,17  
140:12  
**opposite (4)** 21:6 22:5 23:19  
37:8  
**oppressive (1)** 161:25  
**ops (1)** 23:21  
**options (3)** 18:15,16 19:16  
**oral (1)** 200:14  
**order (11)** 56:13 63:9 67:23  
68:9 73:17 76:12 81:5  
102:3,4 119:14 191:18  
**ordinarily (4)** 14:2 65:23  
81:1 100:16  
**ordinary (2)** 54:23,23  
**oreilly (68)** 1:5,9 2:6 10:1  
11:13 67:21 69:8 70:4,25  
71:20 72:11 74:25 78:20  
79:17 96:11 97:19 106:13  
109:17 121:6 125:21 126:2  
129:8 130:4,13,23 132:22  
138:14 147:25 155:17  
156:5,13,21,23 158:20  
161:3,21 163:15 164:19  
165:3 168:14,17 174:7,13  
178:2,3,22 179:19 180:13  
184:9,25 189:6,23 191:20  
198:18 199:13,21 200:4  
201:6,20 202:20 207:19,23  
208:4,9 209:8 210:13,16  
212:3  
**oreillys (3)** 69:7,13 210:23  
**organisation (15)** 6:23 16:18  
22:23 23:15,20 72:20  
131:11,15 132:2 134:7  
135:11 148:23 150:15  
151:5,7  
**organised (1)** 138:8  
**orientated (1)** 161:24  
**orourke (1)** 186:12  
**others (21)** 15:4 20:17 29:7  
60:24 69:16 70:8 90:7  
99:10 101:1 103:20 106:5  
142:8 145:16 146:7,12  
158:5 159:13 162:5 165:21  
194:24 210:7  
**otherwise (9)** 6:5 45:23  
54:10 70:12 77:14,15  
95:22 150:23 191:16  
**ought (7)** 36:15 45:14 53:11  
129:7,8 160:12 207:4  
**ours (1)** 134:8  
**outline (1)** 137:8  
**outset (5)** 37:12 65:1 94:9  
98:15 202:25

**outside (12)** 17:21 22:23  
23:3 49:23 50:9,10 61:1,4  
116:12 151:4 198:3,8  
**over (14)** 2:24 28:8 32:6  
59:6 68:14 99:18 102:2  
108:21 124:21 141:18  
165:21 168:8 171:2 190:24  
**overarching (1)** 24:14  
**overemphasise (1)** 147:17  
**overnight (3)** 26:11 68:7,11  
**override (1)** 198:12  
**oversight (1)** 37:12  
**overspeaking (14)** 54:4 95:7  
164:8,13 176:11,15  
180:7,7,8,17 183:2 184:4  
185:14 196:14  
**overstepped (1)** 105:4  
**overstepping (1)** 105:2  
**own (20)** 1:10 5:9 8:22 18:14  
20:15 31:3 42:10 56:17  
60:25 64:5 89:20 122:16  
144:25 152:8,8 154:19  
165:12 173:12 206:11  
207:5

---

**P**

**p3 (4)** 208:11,13,14,19  
**pa (2)** 23:8,10  
**pager (11)** 4:3 135:20  
136:7,8,16,20,22 137:2,6  
193:2,7  
**pagery (1)** 136:12  
**pages (1)** 201:3  
**paging (2)** 135:14 136:1  
**paragraph (33)** 36:25 45:24  
51:9 66:19 69:7,12 70:25  
77:5 78:10 109:15 110:11  
111:14 124:12 125:21  
126:1,3 131:7 132:12  
133:16,17,24,25 138:20  
141:12,17,21 188:9 189:24  
190:18,19 191:5,6 207:23  
**paragraphs (1)** 33:11  
**paramedic (4)** 26:20 79:9  
97:12 171:18  
**parent (1)** 22:18  
**paris (3)** 145:19,22 146:19  
**parisstyle (5)** 141:23  
142:4,13 143:1 144:20  
**park (19)** 2:19 7:10  
10:9,19,21,25 16:25 19:5  
24:21 26:18,19 28:8 71:18  
72:10,15 79:10 157:23  
180:18 199:2  
**parkway (1)** 31:4  
**parliament (1)** 141:22  
**parry (3)** 211:3,4,5  
**part (23)** 5:24 23:15 43:14  
46:18 50:13 62:24 63:19  
91:19 97:14 116:1 125:3  
132:22,23 133:25 135:21  
157:13 160:15 164:24  
170:16 178:5,6,8 193:25  
**participants (1)** 125:16  
**participate (2)** 50:16 134:3  
**particular (14)** 29:14,15 57:7  
113:8 133:6,14,21,22  
134:14 140:4,16 156:13  
166:21 174:9  
**particularly (6)** 119:23  
145:16 153:25 189:1,6  
191:25  
**partner (2)** 92:18,23  
**partners (5)** 37:23 64:13  
144:6,13 150:10  
**pass (2)** 66:9 144:8  
**passage (1)** 127:3  
**passed (5)** 66:25 78:2 81:9  
98:9 176:10  
**passes (1)** 139:10  
**past (4)** 20:4 153:24,24  
160:21  
**patients (5)**  
208:11,13,14,16,19  
**paul (7)** 3:20 12:6 20:12  
36:10,11 112:12 122:4

**pauls (1)** 49:4  
**pause (6)** 13:21 27:6 68:6  
78:11 108:23 146:16  
**pda (4)** 77:7 108:14 116:25  
122:15  
**peculiar (1)** 48:3  
**pedantic (1)** 25:15  
**peers (3)** 22:19,24 159:4  
**people (75)** 13:20 17:5  
18:5,5 22:22 23:3,17,19  
24:1,9,13 35:10 39:6  
41:12,17 43:22 44:12 45:2  
55:2 57:6 59:12 61:16,18  
64:22 67:9 84:18 88:11  
92:22 100:25 106:7 107:17  
111:17 116:9 128:25 129:2  
135:5 137:25 141:8  
142:4,7,12 145:6 146:8  
147:23 148:1 149:25 152:7  
154:3 162:8,17  
163:9,11,13,16,22 164:1  
165:3 173:22,24 176:4  
183:13,14 186:16,21  
188:21 189:1,3,21 192:21  
195:6 198:11 206:14,20  
209:11 210:10  
**peoples (1)** 62:12  
**perceived (2)** 143:17,19  
**perception (3)** 105:2,4  
121:11  
**perfect (1)** 136:5  
**perfectly (2)** 68:14 147:22  
**perform (1)** 20:10  
**performance (2)** 131:14,17  
**perhaps (20)** 93:20 130:4  
140:15 141:5 142:11,19  
143:2 144:20,21 148:1,3  
162:2,11 165:11,20 166:2  
178:4 197:24 199:14  
204:21  
**period (8)** 2:24 6:15,21 8:15  
26:1 50:10 198:8 210:22  
**permission (1)** 51:10  
**permitted (1)** 44:21  
**permutations (1)** 145:15  
**pernickety (1)** 25:15  
**perpetrators (1)** 64:6  
**person (16)** 12:5 21:1 25:2  
35:20 38:11 54:2 61:7  
137:16 147:14 151:8  
156:11 158:7 162:19  
172:20 178:4 196:16  
**personal (1)** 56:17  
**personalising (1)** 160:22  
**personally (8)** 48:18 65:17  
99:6,14 124:14 132:1  
158:23 171:19  
**personnel (3)** 49:22 62:20  
178:21  
**perspective (5)** 141:3  
145:4,5 152:24 173:24  
**pete (6)** 157:6 177:20  
178:24,25 196:24 197:10  
**peter (19)** 1:5 24:7 52:23  
53:1 169:18 177:15,15,24  
178:14 179:13 190:4,20  
200:19,20,21 202:22,23  
203:9 212:3  
**phase (5)** 64:1,2,3,10 98:25  
**phases (1)** 63:24  
**philips (16)** 2:19 7:10  
10:9,19,21,25 16:25 19:5  
24:21 28:8 71:18 72:10,15  
79:10 180:18 199:2  
**phone (20)** 28:5 29:23 33:15  
42:17,18 43:2 50:23 51:14  
59:5 62:1,3 70:3 108:3  
119:6,6 167:13,15 168:22  
201:12 202:6  
**phones (1)** 168:20  
**phrase (4)** 11:9 36:4 42:24  
130:11  
**pick (10)** 19:1 25:17 49:8,10  
66:6,8 78:2 97:11,14 107:7  
**picking (3)** 30:1 69:6 108:3  
**pickstone (2)** 159:17,18

**picture (1)** 27:4  
**pictures (2)** 55:20,21  
**piece (5)** 20:16 65:18 81:8  
94:12 150:14  
**pieces (1)** 149:11  
**pinpointed (1)** 101:21  
**pioneered (1)** 134:12  
**pips (1)** 21:20  
**pit (1)** 205:17  
**place (29)** 6:7 10:18 12:14  
14:7 16:11 20:3 21:10  
37:16 40:4,17,17,19 63:4,7  
65:4 79:1 82:15 96:23  
101:1 135:25 136:2,4  
170:4 171:1 181:3 182:15  
185:14 190:15 202:9  
**placed (1)** 173:24  
**plainly (2)** 61:17 155:17  
**plan (17)** 38:4,9,24 52:4  
83:11 84:24 85:3,8,22  
86:1,5,7,10,13 172:14  
174:4 211:4  
**planning (1)** 63:19  
**plans (2)** 83:14 178:16  
**plato (28)** 39:18,21 40:22  
41:2 42:15,25 43:5,12,15  
55:23 56:20,25  
57:3,4,5,6,6,10,11 84:24  
85:7,15,20 179:15  
190:7,10,12,16  
**plototype (1)** 114:7  
**play (3)** 20:21 58:22 130:17  
**played (4)** 58:24 130:21  
131:2 184:20  
**please (64)** 24:24 34:8 36:25  
46:10 49:16,19,22,24  
50:19 69:6 73:2 74:23  
77:24 78:4,20 84:12 85:13  
97:5,10 98:1 105:6,11,18  
108:12 109:14 115:11  
117:20 122:24 124:13  
126:15 130:17,18 131:7,18  
132:10,22 136:18 137:23  
138:14,17 141:12 147:17  
148:5 152:12,23 155:15  
171:24 172:3 177:14  
178:15 179:3 180:13  
189:23 190:19 191:6,14,19  
192:4,16 193:11,24 194:12  
196:23 207:22  
**pm (9)** 125:10,12,14  
155:22,24 178:16 199:25  
200:2 211:7  
**po (4)** 19:18,22 37:2 153:9  
**pointed (2)** 96:1 154:20  
**police (44)** 3:4 4:18,19 6:20  
10:12 13:9 26:21 29:7,8,12  
31:19 38:15 44:11 55:22  
62:17 64:5,8 68:4 75:12  
85:20 87:14 88:9,20  
89:12,22,24 92:8 94:20  
97:13 115:3 118:6  
122:19,22 129:23 149:9  
157:2 180:22 182:5  
190:22,23 191:1  
209:17,23,25  
**polices (1)** 136:24  
**policies (2)** 145:17,19  
**policy (25)** 44:21 53:22  
54:12 55:25 56:25  
101:14 127 107:19 117:14  
146:21 151:8,8  
190:7,10,16 195:25  
196:2,3,18 197:9,20  
198:1,2,8,12  
**poor (2)** 135:17 186:10  
**portrayed (1)** 41:18  
**pose (2)** 41:8 68:9  
**position (21)** 26:7 30:22 60:6  
74:25 75:4,8 77:11,14,15  
89:17 96:20 105:3 117:16  
120:3,5 125:21 149:20  
159:13,25 174:1 184:10  
**positive (1)** 99:10  
**possibility (3)** 40:1 114:25  
146:22

**possible (11)** 9:3 20:24  
65:13 68:11 72:12 75:3  
81:5 159:11,12 204:12,13  
**possibly (2)** 170:23 195:9  
**postbombing (1)** 178:17  
**potential (6)** 7:22 64:6  
114:15,19 136:21 201:25  
**potentially (3)** 22:19 132:21  
156:17  
**powerpoint (1)** 120:10  
**practical (4)** 21:3 94:10  
140:12 141:4  
**prealert (1)** 136:20  
**precaution (1)** 11:5  
**precise (3)** 25:16 208:25  
209:3  
**precisely (1)** 30:25  
**predetermined (5)** 74:7  
84:22 93:8 107:2,3  
**predicated (1)** 73:19  
**preempted (1)** 145:12  
**preemptively (2)** 124:19  
125:5  
**prefer (3)** 125:2 140:11  
141:2  
**preference (1)** 37:19  
**prefix (1)** 87:8  
**premises (1)** 116:16  
**preparation (1)** 16:13  
**preparatory (1)** 195:1  
**prepared (2)** 123:14 146:21  
**preplanned (1)** 100:24  
**presence (5)** 71:9 72:13  
76:13 106:14 125:20  
**present (6)** 11:20 68:8 74:3  
105:13 151:1,4  
**presentation (1)** 120:10  
**presented (4)** 91:11 120:11  
179:20 195:2  
**presenting (2)** 165:23,25  
**press (1)** 166:7  
**pressed (1)** 200:8  
**pressing (1)** 133:22  
**pressure (1)** 175:11  
**presumably (1)** 186:20  
**presume (7)** 154:9,12  
174:18,25 190:15,17  
197:17  
**presumption (1)** 99:20  
**pretty (4)** 7:24 94:15 154:12  
174:8  
**prevent (1)** 114:16  
**prevention (1)** 132:14  
**previous (7)** 5:19 6:9 9:5  
87:6 94:17 141:1 195:23  
**primacy (2)** 5:22 75:12  
**primary (5)** 38:7 64:7 91:8  
95:14 186:19  
**prime (31)** 176:6,13,23  
177:1,12 179:5,9,22 180:1  
182:2,5,16,20,24  
183:2,9,20,25 184:11  
185:6,25 186:3,19 187:1  
188:6,12,14 189:7,12  
209:9,13  
**principal (8)** 1:12 9:13  
37:3,14 103:2 192:20,25  
193:4  
**principle (2)** 73:16 149:14  
**prior (1)** 15:22  
**priority (1)** 44:6  
**private (1)** 147:18  
**proactive (2)** 14:6 86:19  
**probably (33)** 4:1 6:6  
9:5,17,19 15:14 16:22 21:2  
25:5,14 40:3 65:15 66:13  
72:7,18 78:7 90:2 98:4  
105:19 117:17 129:8  
137:23 141:7 148:25 150:7  
157:21 170:25 171:14  
175:12 189:13 202:22  
204:9 206:2  
**probe (1)** 169:13  
**probed (4)** 37:24 169:8,11,12  
**probing (5)** 169:9,13  
170:3,25 171:1

**problem (3)** 54:11,16 198:10  
**problems (3)** 151:22,24  
177:7  
**procedure (3)** 146:21 192:21  
196:13  
**procedures (1)** 168:20  
**proceed (1)** 4:3  
**proceedings (3)** 1:3 27:21  
125:13  
**proceeds (1)** 91:18  
**process (7)** 5:25 18:13 54:16  
144:14 195:17 201:12,13  
**processes (2)** 145:16,19  
**professional (2)** 8:10 20:14  
21:3 25:8,14 103:20  
104:10,25 108:4 146:1  
151:5 159:10 162:12  
171:15,18 172:13  
173:2,12,24 208:1  
**professionalism (1)** 151:6  
**professionally (1)** 48:17  
**profoundly (1)** 199:16  
**project (3)** 32:6 134:22  
135:21  
**projects (2)** 23:25 24:1  
**promotion (1)** 132:13  
**proper (4)** 108:4 110:8  
117:16 173:17  
**properly (3)** 69:19 160:13  
200:8  
**property (1)** 198:5  
**proposal (4)** 160:7 178:6,7,9  
**proposals (1)** 160:15  
**propose (2)** 124:22 126:1  
**proposed (1)** 45:19  
**proposition (3)** 96:21 112:2  
127:2  
**prosecuted (2)** 112:14,15  
**prosecution (1)** 113:8  
**prospect (1)** 82:3  
**protect (1)** 148:2  
**protection (7)** 34:2 46:6 55:3  
61:19 62:18 132:14 169:24  
**protocol (1)** 55:7  
**protocols (2)** 19:25 20:3  
**provide (8)** 39:7 75:25 88:8  
153:9 157:14 173:9 175:18  
205:8  
**provided (14)** 17:9 39:3  
75:11 79:24,25 97:23  
120:7 122:14 128:22 129:6  
133:19 134:7 143:8 208:23  
**provides (2)** 88:11 127:1  
**provision (5)** 16:10 86:13  
100:20,23 102:7  
**provisions (1)** 86:11  
**public (6)** 147:19 163:10  
190:23 210:6,9,9  
**pull (1)** 60:18  
**pulled (1)** 106:9  
**pumps (1)** 79:10  
**purely (1)** 53:22  
**purpose (1)** 186:23  
**purposely (1)** 23:2

42:13,22  
 43:4,8,12,18,21,24  
 44:12,17,20,24  
 45:2,5,14,22 46:16,19  
 47:20,23,25 48:10,23 49:8  
 50:19 51:9 52:7,13 53:7  
 59:3,19 60:6,21  
 61:6,15,21,25 62:11,22  
 63:1,8,13,17 71:7,13,20  
 72:11 73:2,8,16,25 74:9  
 75:18 76:5,7,11,24  
 77:4,11,13,17,21,23  
 78:12,20,25 79:4,6,22  
 80:4,14,17 81:4,10,22  
 82:16 83:3,5,9,19,21  
 84:3,8,11,24 85:9,18,22  
 86:1,5,10,13,17,22 89:17  
 91:22 92:1,13 95:21  
 97:2,10,19 98:1,6,11,18  
 99:2,6,13,17 103:5,23  
 104:3,23 105:5,16,18  
 106:1,3,13,20,23 107:7,11  
 108:2,8,11 109:4,11,13  
 110:2,5,7,17,19,22  
 111:2,5,9,14,21 112:2,25  
 113:9,18,20  
 117:3,5,9,11,25 118:24  
 119:1,3,11,14,19  
 120:7,10,13  
 121:8,14,16,18,21,23,25  
 122:2,4,6,24 123:4,14,24  
 131:2,4,7,20 132:5  
 133:5,13,21 134:14,17,23  
 135:2,5,8,14,25  
 136:8,14,22,25 137:2  
 139:21,23 140:7,14  
 141:5,12 142:7,11,19,25  
 145:12 146:6 149:7 151:22  
 152:2,5,12 153:17,20,25  
 154:6,12,15,18 155:4  
 157:4,9,12  
 159:13,17,19,21,24  
 161:8,11,14,18 164:12,25  
 165:18,20,23 166:7  
 167:5,8,10,15,18,21  
 168:5,8,12 169:1,7  
 170:7,18,24 171:20  
 173:4,11 174:21  
 175:2,19,24 176:8,12  
 177:6,9,14,19,23 178:15  
 179:3,8 180:3,7 181:5,16  
 183:8,22 185:8,10,22  
 186:2 189:15 190:15,19  
 191:5,14 192:4,14 193:22  
 194:5,10,12 195:20  
 197:2,17 198:10 201:3,19  
 203:5,15 204:3,14,19  
 205:4,10,12,22 206:4  
 208:15,19,22 209:21 210:2  
**qualitative (1)** 75:9  
**quality (2)** 149:11 163:19  
**quarter (6)** 15:11,12,13  
 67:22 150:21 198:24  
**query (1)** 10:25  
**question (63)** 5:6 26:10  
 27:16 46:23 57:15 62:12  
 71:13,15 74:15,18 75:19  
 76:10 82:16,25 83:3 84:10  
 85:1,13 92:3 95:8  
 123:10,11 124:2 126:5  
 127:4,5,14,25 128:1,6,9,15  
 131:21 134:2,6 135:7  
 137:23 138:3,11,12 140:18  
 142:2,24 144:19 145:12  
 146:17 148:19 153:13  
 161:11 166:1 172:25  
 175:19 179:20 182:20  
 183:22 191:4 200:17  
 201:5,19,24 202:20  
 203:5,15  
**questioning (6)** 13:17 130:4  
 155:12 156:4 159:2 169:1  
**questions (55)** 1:6 8:14  
 40:23 45:23 56:13 59:10  
 60:8 67:20 68:2,3,9,16  
 69:1,6,10 70:22,24  
 126:19,23 129:2,22,24  
 130:8 139:4,8 146:7  
 156:1,24 158:18,21  
 159:1,24 160:1 161:4  
 162:3 188:11 189:5  
 198:14,17,19 199:22 200:3  
 207:15,16,17 210:12  
 212:4,5,6,7,8,9,10,12  
**queue (1)** 25:19  
**quick (4)** 64:4 82:5 134:25  
 209:19  
**quicker (3)** 111:17 143:17  
 148:15  
**quickly (6)** 13:15 16:14  
 33:14 65:13 75:3 134:22  
**quiet (1)** 21:6  
**quite (35)** 3:3 5:9 25:5,20  
 40:7 42:10 46:1,2 48:9  
 60:14 64:18,21 69:19 70:7  
 75:8 80:25 82:24 100:1  
 101:14 103:11 127:3 130:7  
 139:23 145:25 154:15  
 162:4 166:3 175:8 177:3  
 181:1 193:4 202:22,25  
 205:15 210:1  
**quote (1)** 128:4  
**quoted (1)** 95:2  
**quotes (1)** 162:5  


---

**R**

---

**radio (3)** 12:15 151:20,21  
**radius (2)** 136:17,19  
**raft (1)** 93:7  
**raise (1)** 105:8  
**raised (2)** 148:10,16  
**raising (1)** 139:25  
**rang (10)** 9:6 29:11 33:13  
 35:20,21 85:16 94:11  
 128:6 190:5,20  
**rather (15)** 11:6 21:19 45:21  
 57:15 64:23 88:18 92:15  
 106:8 111:12 160:22  
 165:11 172:5 192:23,25  
 194:16  
**rattled (1)** 149:7  
**reached (3)** 14:23 98:11  
 127:6  
**reaching (1)** 89:19  
**react (1)** 114:25  
**reaction (2)** 3:25 27:8  
**read (10)** 59:1 66:20 126:18  
 129:9 139:24 141:17,19  
 156:5 176:19 193:19  
**readily (1)** 73:24  
**reading (2)** 129:6 191:5  
**ready (6)** 8:12,12 80:21  
 141:24 149:22 157:19  
**real (4)** 51:14 146:22,22  
 164:22  
**realise (6)** 4:17,24 5:2 24:8  
 31:10 152:19  
**realised (5)** 99:8,9 146:25  
 149:19 152:18  
**realising (1)** 107:16  
**reality (4)** 44:13 104:7  
 112:18,18  
**really (33)** 5:18 14:23 48:22  
 52:7 56:3 57:10 62:12  
 64:18 66:17,22 69:5 72:9  
 78:17 93:13 94:14 145:21  
 149:11 154:20 157:21  
 159:2 164:1,19 168:8  
 169:19 180:10 185:20  
 187:4,8,19 189:2,21  
 200:21 209:17  
**reason (28)** 30:18 55:6,12  
 71:24,25 84:4,18 92:22  
 94:21 100:9 101:13  
 109:11,12 115:20,21  
 122:18 125:16 126:6  
 133:22 139:15 147:14  
 152:17 155:20 167:10  
 183:9 186:8,19 188:23  
**reasonable (14)** 36:7  
 37:7,9,17 62:22 85:7  
 94:24,25 95:3,9 96:13,19  
 122:6,21  
**reasonably (2)** 166:14 196:8  
**reasons (3)** 75:22 143:16  
 189:19  
**reassurance (3)** 52:18  
 104:19 148:1  
**reassure (3)** 146:18  
 147:13,23  
**recall (17)** 2:21 10:7 28:22  
 59:9 92:4 136:11  
 137:11,12,16,18 139:22  
 162:18 165:10 202:9  
 203:11 209:14,16  
**recalled (4)** 156:12,24  
 205:22 208:3  
**recalling (1)** 158:12  
**receipt (3)** 103:12 149:24  
 187:13  
**receive (4)** 3:22 107:18  
 149:21 178:13  
**received (29)** 6:1 7:2,14  
 77:1,9 80:24 82:5 83:1  
 85:14 89:22 96:3 104:14  
 119:22 120:21 124:1  
 132:11 133:9,11 135:9  
 150:14 153:3 156:8,10  
 160:8 178:14 190:3,21  
 202:5 205:19  
**receiving (10)** 29:25 48:9  
 73:11,19 89:10 126:4  
 151:16,18 206:9,11  
**recently (3)** 62:16 80:25  
 200:9  
**recognise (5)** 71:17 76:7  
 103:19 130:23 199:5  
**recognised (1)** 33:14  
**recollect (3)** 3:2 47:4 204:8  
**recollection (18)** 27:20,22  
 28:9,18 34:13 46:21 56:15  
 69:13 120:19 136:16  
 156:13,16 158:14 201:1  
 203:3,13 204:5 207:24  
**recommendation (1)** 101:9  
**recommendations (4)** 101:8  
 103:10 106:11 192:5  
**recommended (1)** 120:13  
**record (10)** 31:12 46:4  
 167:6,7,7,10,11,11,23  
 168:20  
**recorded (3)** 167:9,19 192:1  
**recording (4)** 38:20 58:14,21  
 194:21  
**records (3)** 11:19 33:9 167:4  
**recovery (4)** 33:24 38:9  
 64:3,10  
**reduce (1)** 116:15  
**refer (3)** 132:23 133:16  
 203:15  
**reference (21)** 2:1,4 7:3  
 45:25 78:16 86:23 90:16  
 92:6 105:18 108:13 109:24  
 148:12 160:10 190:1  
 191:17 193:16 195:20,20  
 196:20 198:22 208:22  
**references (1)** 97:12  
**referred (5)** 125:25  
 133:23,25 140:15 208:1  
**referring (7)** 124:6 132:24  
 133:21,23 134:20 140:10  
 205:24  
**refers (1)** 178:1  
**reflect (4)** 26:11 48:23 67:16  
 107:23  
**reflected (1)** 66:23  
**reflecting (1)** 107:14  
**reflection (2)** 52:16 87:17  
**reflections (1)** 185:15  
**reflective (1)** 21:7  
**refute (2)** 189:10,10  
**regard (1)** 121:2  
**regarding (3)** 51:5 64:6  
 209:24  
**regardless (4)** 83:16 121:10  
 140:3 171:9  
**regards (7)** 32:16 51:15  
 64:11 72:21 174:2 203:9  
 206:6  
**region (1)** 196:7  
**regret (4)** 17:16 76:4 132:3  
 185:19  
**regular (6)** 23:17 139:10  
 146:2 205:19 206:9,11  
**regularly (2)** 104:9,9  
**rejecting (1)** 37:18  
**relate (1)** 155:10  
**relates (3)** 118:23,25 138:3  
**relation (34)** 3:1 6:18,19  
 20:11 40:9,15 42:6,9 55:19  
 64:5 76:19 80:19 81:7,13  
 86:25 88:12,19 91:8 94:8  
 105:2 115:13 122:20  
 132:25 135:17 136:1  
 140:10 142:14 144:4 146:4  
 151:8 155:18 180:14  
 184:20 209:25  
**relationship (1)** 208:2  
**relationships (1)** 150:9  
**relative (1)** 154:4  
**relay (2)** 81:18 83:1  
**relevance (1)** 89:13  
**relevant (8)** 17:8,9 44:18  
 81:14 82:24 83:3 98:10  
 144:9  
**relied (2)** 150:13 151:6  
**rely (5)** 144:8 146:6  
 149:13,14 150:20  
**relying (1)** 133:5  
**remain (1)** 77:11  
**remarked (1)** 129:2  
**remember (28)** 12:2 29:24  
 30:15 47:3 50:12 52:19  
 60:1 71:11 105:25 114:22  
 140:4 145:25 148:14,19  
 149:4,5,8,9,17 150:2,3  
 188:19 193:20 194:22  
 195:17 204:19,20,24  
**remembered (2)** 38:5 204:22  
**remind (4)** 30:21 47:17  
 69:16 153:17  
**reminded (3)** 51:11 200:10  
 203:15  
**remotely (1)** 100:16  
**rendezvous (22)** 17:2  
 26:16,17,19 29:5,8  
 75:10,11,14 78:8 91:13  
 93:9 94:13,21,23 95:4,10  
 101:23 122:15 123:13  
 180:18 209:2  
**rendezvousing (1)** 26:5  
**repeat (3)** 100:15 163:21  
 172:3  
**repeated (1)** 188:20  
**replied (4)** 157:12,15 201:22  
 203:18  
**reply (4)** 19:12 91:4 154:17  
 157:20  
**report (1)** 200:21  
**reported (1)** 149:25  
**represent (2)** 146:16 199:14  
**representations (1)** 104:16  
**representative (1)** 65:25  
**represented (1)** 123:7  
**represents (3)** 11:22 62:23  
 66:21  
**reproduction (1)** 163:19  
**request (12)** 51:3 87:13  
 88:5,9 92:10 117:8 118:5  
 135:23 168:1,14 175:13,14  
**requested (8)** 35:1,5 36:1  
 190:20 204:5,11 207:4  
 208:8  
**requesting (2)** 34:20 117:13  
**require (6)** 118:10,21 130:9  
 196:17 200:24 202:23  
**required (20)** 8:9 16:7 39:5  
 44:5 85:3,12,18,23 86:25  
 103:8 104:15 138:1 147:1  
 153:1 188:22 196:4 201:20  
 202:21 208:4,8  
**requirement (2)** 89:4 91:22  
**requirements (2)** 118:9  
 170:19  
**requires (1)** 157:13  
**rescue (42)** 1:17 7:13 21:17  
 22:10 23:6 32:12,23 36:22  
 39:4,5,7 48:12 49:14 50:4  
 62:24 65:19 66:14 75:2,13  
 77:6 78:22 83:23 91:24  
 96:18 100:5 112:14 115:25  
 123:2,16,19 145:10 151:9  
 175:6 177:16 186:11,23  
 190:4,13 191:12 193:3  
 206:24 210:25  
**reservations (1)** 11:15  
**resilience (1)** 19:22  
**resolve (1)** 207:7  
**resonates (1)** 150:2  
**resource (13)** 33:19 39:1,15  
 42:12 44:3 45:25 46:7 47:5  
 64:12 69:11,14 103:18  
 116:18  
**resources (65)** 1:16 9:7  
 11:4,8,10,14 13:23,24  
 14:3,7,12,25 16:20,21,24  
 17:25 18:2 19:2,4,5  
 26:22,23 29:3,4 30:4 36:17  
 37:13,13,25 38:3 39:9,10  
 40:16,19 41:7,10 44:14,17  
 51:15 52:2 62:7 72:9 73:20  
 82:12 88:6 92:14,25 94:22  
 95:3 99:11 100:6,9,25  
 102:11,25 103:4 116:23  
 117:1,13 119:7 200:23  
 203:10,11 209:19,21  
**respect (8)** 21:19,22 24:17  
 84:15 126:2 134:16 144:15  
 164:25  
**respectful (1)** 25:9  
**respectfully (1)** 160:11  
**respects (3)** 134:12 143:10  
 150:11  
**respond (14)** 114:3 120:25  
 121:9 136:16,21  
 139:18,20,21 151:7 175:16  
 191:13 196:4 202:21 207:4  
**responded (5)** 103:19 137:16  
 139:22 149:5 175:14  
**responder (1)** 24:3  
**responders (2)** 137:7 149:15  
**responding (15)** 9:4 47:25  
 64:14 80:20 81:3,8  
 132:18,20 140:4 141:25  
 144:22 148:8 173:21 196:1  
 206:6  
**response (42)** 4:18,19 7:13  
 13:23 17:15 42:9 43:14  
 63:14,25 64:2,20,21 67:15  
 71:2 81:6 82:22 83:16  
 85:20 87:1 88:23  
 96:6,7,13,19 97:3 103:9,14  
 104:21,21 117:22 118:6,19  
 122:15 123:22 132:16  
 133:1 143:5 147:1,4  
 149:14 186:10 210:3  
**responsewise (1)** 32:16  
**responsibilities (1)** 91:25  
**responsibility (11)** 37:6,11  
 51:12 99:6 103:3  
 131:5,14,16 173:8,11  
 184:18  
**responsible (2)** 98:21 179:8  
**rest (9)** 17:18 47:1 76:4,22  
 78:10 93:20 132:3 144:2  
 190:18  
**restricted (1)** 82:7  
**restricting (3)** 7:16,22 119:9  
**result (10)** 17:12 45:7 48:8  
 51:23 63:8,10 103:22  
 156:15 157:10 181:7  
**results (2)** 32:24 197:7  
**resumes (1)** 156:3  
**retain (1)** 139:11  
**retains (1)** 103:3  
**retired (4)** 83:23 159:20  
 161:8,12  
**retracted (1)** 143:9  
**return (2)** 68:1 200:6  
**returned (3)** 149:1 181:15  
 202:18  
**returning (2)** 74:9 144:18  
**revisit (1)** 126:14  
**revisiting (1)** 147:8  
**rig (1)** 148:24  
**righthand (1)** 12:9  
**rightly (3)** 58:15 80:22 113:7  
**rightminded (1)** 142:12  
**rights (1)** 48:11  
**ring (8)** 31:22 35:4 42:19,20  
 82:9 154:1 167:15 171:5  
**ringing (1)** 154:5  
**riots (1)** 49:4  
**rise (2)** 105:1 129:10  
**risk (35)** 7:22 24:2 40:18  
 47:15,16 51:7,13 52:2  
 56:11 57:13,17,24 60:12  
 61:3 66:6 102:22 110:14  
 111:6 112:20,21 113:6  
 115:7 116:6,8,9,11,15  
 124:4 133:2 135:22 143:17  
 144:5 145:8 153:5 172:11  
**riskbanded (1)** 123:20  
**risks (8)** 38:24 51:21 73:20  
 91:11 110:23 111:9 112:19  
 154:25  
**roberts (11)** 68:3,22 69:1,2,5  
 70:11,15,20,21 208:22  
 212:5  
**robust (1)** 173:17  
**rochelle (1)** 26:2  
**role (10)** 26:12 36:21 66:4,5  
 127:20 128:23 131:9,10,13  
 139:9  
**ron (3)** 150:3,4,14  
**room (88)** 10:21 12:4,25  
 15:16,19,19,20,20,22,23  
 16:3,5,10 17:21,21  
 20:8,11,15 30:12,13  
 31:4,14 35:5,12,14,20 37:4  
 45:16 46:12 55:9 62:19  
 63:19 64:23 65:17,18,22  
 66:8 68:8 71:10 72:2  
 73:8,14 74:4,24 75:23 76:2  
 80:9 81:18 82:23  
 89:2,3,12,18 90:21  
 91:19,22 92:9,16 93:15  
 94:6,19 95:11 99:15  
 103:1,20 109:8,9  
 110:5,23,25 111:9 112:3  
 113:9,11 122:8,24  
 123:1,15,18,19 124:6,8  
 150:12 153:7 157:5 164:10  
 168:2 172:7 183:12  
**rooms (6)** 91:9  
 92:9,17 20:15 204:11  
**roughly (1)** 186:6  
**rounds (1)** 80:6  
**roundthunder (1)** 209:19  
**route (1)** 152:8  
**roy (5)** 190:20,21,22 191:1,7  
**rudd (1)** 182:8  
**ruled (1)** 92:1  
**rumours (1)** 187:15  
**run (3)** 20:12,15 67:7  
**rung (2)** 154:6,7  
**running (6)** 12:4 13:19 16:7  
 20:11 24:5 110:10  
**rush (1)** 117:25  
**rvp (27)** 69:15,21,25 70:6  
 75:3,6,7 76:8 86:11,14  
 87:14 88:8,9,18,24  
 89:5,9,14 90:20 92:15  
 94:5,15 95:18 96:8 97:1  
 120:4 178:20  


---

**S**

---

**sack (2)** 104:1,5  
**sacked (1)** 54:20  
**sad (1)** 73:23  
**saddening (1)** 147:9  
**safe (7)** 38:19 58:4 86:18  
 88:21 89:14 94:5 95:10  
**safety (5)** 23:1,24 90:19  
 102:22 111:19  
**same (24)** 7:3 12:8 20:25  
 26:25 30:1 31:1 55:15  
 62:19 73:16 74:16 103:13  
 113:12 114:9 127:21  
 135:10 138:19 158:10  
 163:11 175:10,12 181:10  
 190:1 192:14 194:25  
**satisfaction (2)** 114:4 122:20  
**satisfied (3)** 36:9 60:11  
 61:23  
**saucy (2)** 168:21,22  
**saunders (227)** 1:8 11:13,18  
 15:3,9 16:8,12 19:2,8  
 22:14 24:25 25:20,23  
 28:23 29:10,13,16,20  
 30:21 32:18,22 33:2  
 35:9,15 36:3 39:18,25  
 40:10,21 45:24 46:25

<p>53:6,23 54:1 55:20 60:3,23 61:7 69:9,19 70:2,7,17 71:8,14,18 72:10,14,17,22,24 73:15 74:13 75:4,6 76:14,17 79:9 82:12 83:10 84:5,19 85:24 88:6,11,18 97:12,13 99:11 100:7,10,11,18,19 101:5,12,13 102:21 103:7,9 104:13 107:17 109:21 110:13 111:11,22 114:16 116:2 117:4 121:12 123:21 148:18 149:16 152:11 172:9,12,12,17,24 175:7,9 180:21 192:22 201:14 208:9</p> <p>scg (17) 5:3 6:9,12 19:20 31:17 63:3,6,10 64:1,5 82:3 98:19 153:9 178:2,23 181:11 187:1</p> <p>scgs (1) 64:18</p> <p>schanck (1) 208:25</p> <p>schree (3) 2:2 50:20 209:1 screen (12) 13:19 30:18 34:8 50:19 69:23 97:7 105:11 138:16 156:22 190:1 193:25 194:1</p> <p>scroll (1) 97:10</p> <p>sean (1) 202:7</p> <p>second (9) 11:21 14:16 25:3 37:17 49:17 70:13 150:3,14 153:16</p> <p>secondary (12) 110:15,22 111:6 114:14,15,19,23 115:4,7,22 116:7 119:24</p> <p>secondly (2) 28:16 199:7</p> <p>seconds (5) 2:8 3:11 49:9 130:18 171:12</p> <p>secretary (4) 47:21,23 48:2,6</p> <p>sector (1) 159:2</p> <p>security (5) 142:16 146:3,7 147:14,16</p> <p>see (46) 2:5 3:21 5:10 12:3 22:25 30:18 31:20 40:18 49:17 50:1 55:11 57:2 59:3 60:21 69:2 76:5,6 78:1 80:11 82:24 117:18,25 130:7,14,15 138:18 139:5 141:15 145:13 147:13 155:7,11 157:16,20 165:23 177:25 178:13 185:21 190:15 191:20 193:22 194:2 195:14 196:24 200:16 207:23</p> <p>seeing (11) 18:11 60:25 61:4 71:8 72:13,17,25 75:25 76:1,13 140:22</p> <p>seek (2) 27:11 52:14</p> <p>seeking (8) 6:23 48:14,16 51:10 52:9 89:19 203:5,19</p> <p>seem (4) 100:20 174:7 203:25 210:2</p> <p>seemed (3) 51:10 72:21 150:22</p> <p>seems (6) 15:6 24:15 46:21 100:8 160:5 211:2</p> <p>seen (32) 2:2 12:5 13:15 15:4 18:15 38:7 50:7 55:20 69:25 73:14 79:8 83:22,24 87:17 102:10 111:1 117:23 118:1 120:10 130:3,6,9 131:20 152:11 156:5 160:15 162:3 170:11 178:6 181:17 194:25 201:11</p> <p>segment (1) 130:24</p> <p>select (1) 90:15</p> <p>selective (5) 179:11,25 180:2,6,24</p> <p>selfawareness (2) 159:7,9</p> <p>selfish (1) 210:11</p> <p>selfreflectionselfawareness (1) 23:1</p> <p>send (16) 6:5 35:6 55:2 62:11 74:7 87:14 88:9,17,23 89:4,9 93:8 98:2 108:17 120:4 121:12</p>	<p>sending (16) 18:12 40:19 41:21 44:1,3 61:18 84:5,18 88:5,8 94:22 97:1 105:22 119:25 171:10 173:16</p> <p>senior (15) 15:5 32:13 54:3 96:18 102:5 123:15,18 124:3,7 150:20 152:7 165:1 166:7 172:6 190:6</p> <p>sensational (1) 41:24</p> <p>sense (12) 15:25 48:23 52:9 68:24 86:14 88:19 94:10 140:24 141:4 164:18 165:16 203:6</p> <p>sensible (3) 15:7 57:4 107:11</p> <p>sensitive (4) 40:3 115:9 116:17 146:14</p> <p>sensitivity (2) 183:5,12</p> <p>sent (33) 9:19 19:3,3,10 42:9 48:21 55:7 62:10 65:25 72:9 74:12,12 75:14 76:15 81:16,22 84:23 92:15 99:11 102:9 107:4 108:14 111:11,22 112:9 113:5 139:17,21 156:25 160:1 178:20 179:13 180:18</p> <p>sentence (1) 126:3</p> <p>sentiment (1) 140:9</p> <p>sentiments (1) 139:16</p> <p>september (1) 132:17</p> <p>sequence (3) 49:11,11 77:23</p> <p>series (2) 21:9 49:13</p> <p>serious (9) 20:2 124:24 140:5 164:2,4 186:12 182:19 187:25 191:3</p> <p>seriously (1) 146:22</p> <p>seriousness (1) 182:21</p> <p>servants (2) 190:6,9</p> <p>servd (1) 23:23</p> <p>service (73) 1:17 7:13 8:13 10:12 21:18 22:11 23:6 26:2 29:1 30:24 31:8 32:12,14 36:22 42:1,3 49:15 50:5 51:25 55:25 56:22 62:24 65:20 66:14 72:7 75:2,13 77:7 78:22 83:23 91:19,24 92:14 96:18 100:5,13 101:10 102:25 112:14 123:2,16,19 133:19 135:13,20 137:22 142:20 143:2,16 145:10,17 147:15 150:12 151:9 157:8,18 168:2 170:20,21 171:5,7,13 172:22 180:22 181:19,23 186:11 191:9,10,12 193:4 203:21 210:25</p> <p>services (22) 5:13 37:23 48:13 53:4 102:18 116:10 136:15 137:4 142:8,16,21 143:3 144:6,22 146:7 147:16 152:7 154:24 178:17 182:24 183:17 186:24</p> <p>servng (1) 123:22</p> <p>session (1) 156:8</p> <p>set (14) 5:23,24 15:6,23 16:3,5,14 63:21 64:21 66:14 150:19 153:8 186:13 207:24</p> <p>setting (3) 3:9,19 164:9</p> <p>setup (1) 135:18</p> <p>severe (1) 23:7</p> <p>shall (5) 84:11 130:13 157:23 165:15 180:7</p> <p>shant (1) 69:17</p> <p>shape (2) 39:6 195:4</p> <p>shared (5) 2:23 56:10 159:6 172:11 182:4</p> <p>sharing (1) 190:24</p> <p>shave (3) 8:12 149:22 150:24</p> <p>shaved (1) 149:1</p> <p>shaving (1) 151:15</p> <p>shed (1) 128:9</p> <p>shift (1) 139:2</p> <p>shirk (1) 166:1</p> <p>shock (3) 14:14 72:18 186:22</p>	<p>shoes (1) 55:14</p> <p>shooter (4) 48:20 109:21,25 170:14</p> <p>short (17) 2:24 14:11 21:18 68:20,23 130:23 136:8 155:23 171:1,3,19 191:17 198:8 199:22,23 200:1 201:19 202:22</p> <p>shortcomings (1) 210:3</p> <p>shorter (1) 31:11</p> <p>shorthand (1) 54:24</p> <p>shortly (7) 5:15 16:17 26:8 34:9 63:2,9 181:6</p> <p>shot (1) 110:14</p> <p>should (93) 7:5 8:25 14:7 16:11 20:15 25:8 26:9 27:14,15,16 28:1,24 43:13 54:19 64:25 65:2,3,10 67:4 68:8 74:8,11,12 75:1,2,13,15 76:15,18,22 80:14 82:25 84:23 85:16 88:17 89:9,11,18,24 92:14 95:23 96:6,7 99:10 100:20 101:10 103:9,13,21 104:17,18,20 106:6 107:4 109:2,17 111:11 113:20 114:24 116:1,23 117:6,9 118:6 120:4,14,25 121:9 122:14 123:1,5 141:9 144:12,14 146:21 147:10,15 150:22 166:10 172:19 175:6 183:19,25 184:10,14,20 188:12 192:11,12 199:4 200:10 204:16,17</p> <p>shoulder (1) 21:20</p> <p>shouldnt (7) 54:7 55:24 80:14 94:22 113:10 117:7,19</p> <p>show (1) 167:4</p> <p>showed (2) 204:10,24</p> <p>shower (1) 149:22</p> <p>shown (3) 156:12 197:8,19</p> <p>sic (1) 130:18</p> <p>side (8) 12:9 21:2,6 23:19 53:7 59:8 173:13 174:6</p> <p>sight (1) 62:8</p> <p>significance (2) 4:15 205:5</p> <p>significant (8) 4:10 10:18 68:10 78:21 134:23 182:25 188:21,22 184:5,9 185:7,12 186:1,5,18 187:3,5,7,12 188:5,18,24 189:15,17,22 192:3,13,17 193:2,7,9,10,12,21 194:9,11,14,22 195:8,11,19 196:2,11,15,18,19 198:13,14,15,17,25 199:4,9,10,12,19,20,23 202:10 203:4 204:2 205:11,13 206:5,13,17 208:14,22 209:5 210:12,14,15,16,21 211:6</p> <p>sit (1) 65:21</p> <p>sitting (4) 12:6 64:23 107:13 165:24</p> <p>situation (26) 15:9 48:14 50:12,14 53:9,16 54:7,12 86:2,7 88:1,1 89:6 98:18 111:5 119:21 121:10 127:6,10 154:24 156:9 173:4,5 175:10 201:7 209:18</p> <p>situational (20) 8:22 9:1 12:16,23 26:11,12,14 27:11,16 28:25 32:2 44:8 51:19 56:11 60:25 61:8,12 101:6 172:12 200:21</p> <p>situations (1) 100:16</p> <p>six (2) 49:13 152:24</p> <p>skarratts (1) 187:24</p> <p>skills (1) 133:3</p> <p>slight (1) 150:17</p> <p>slightly (8) 42:16 45:18 67:18 95:8 122:17 123:8</p>	<p>125:16 138:15</p> <p>small (1) 198:17</p> <p>smith (50) 68:1,25 70:22,24,25 74:10,16,21,23 75:15 84:15,20 89:1 90:4 91:18 93:11,12 95:16 96:11,16 100:1 102:25 105:10 108:24 114:8,10,12 116:21 117:18 118:13,15,20 120:19 121:1,5 124:5,11,16 125:1,7 126:10,14,17,22 127:1 129:3,6 176:2 202:5 212:6</p> <p>smiths (2) 87:16 90:25</p> <p>socialled (1) 161:5</p> <p>social (1) 261:3</p> <p>sole (1) 37:5</p> <p>solicitors (1) 187:24</p> <p>solution (3) 71:17 136:6,7</p> <p>somebody (9) 19:18 24:14 46:12 54:1 65:13,25 93:3 101:23 104:4</p> <p>someone (14) 32:5,8,11 37:20 54:7,16 87:22 101:1 138:19 139:25 150:19 159:17 165:20 187:20</p> <p>something (63) 4:9,15 7:19,23 15:10 17:18 32:20 46:21 48:3,4 49:3,4 53:11,13 60:16 62:2,8 63:23 80:20,25 86:20 87:5 88:14 98:7,16 99:12 104:7 106:17 111:24 114:14 124:16 129:17 130:3 131:1 137:10,14 138:6,7 140:14,19 141:6 144:5 145:3 149:12 152:9 155:9 157:18 158:23,25 160:4,11 164:11 166:13 171:6 183:18 193:5 195:14 197:7 199:7 200:23 203:11 204:4 205:3</p> <p>sometimes (9) 128:25 162:20 163:13 165:10,13 197:9,20,25 198:2</p> <p>somewhere (4) 55:13 88:21 149:2 193:19</p> <p>soon (3) 34:7 35:18 74:13</p> <p>sort (7) 4:12 106:9 111:25 160:5 172:20 186:14 196:15</p> <p>sorts (3) 93:19 124:23 145:23</p> <p>sought (2) 50:11 158:21</p> <p>sound (1) 129:1</p> <p>sounded (1) 210:11</p> <p>sounds (3) 57:14 203:5 205:23</p> <p>sources (2) 92:13 114:2</p> <p>sources (1) 89:10</p> <p>south (1) 149:6</p> <p>spat (2) 210:7,9</p> <p>speak (20) 5:10 40:25,25 50:24 59:6 61:11 67:12 90:22,23 92:7,18 93:3,16,19 107:8 128:20 154:2,16 161:3 208:6 speaking (15) 16:4 29:23 34:17 35:17 40:15 44:9 91:24 108:3 121:2 133:7 140:16 163:10 168:10 170:16 188:16</p> <p>speaks (2) 15:25 50:15</p> <p>special (1) 117:22</p> <p>specialism (1) 169:25</p> <p>specialist (17) 11:9,14 13:24 19:4 36:16 39:4 41:7,10 43:9 44:13 103:14 104:21 115:25 116:22 117:1 175:6 206:24</p> <p>specialists (2) 115:18,21</p> <p>specifically (1) 206:14</p> <p>specific (11) 39:1 114:7 123:1 125:25 126:5 135:14 178:16 186:8 194:16,21</p>	<p>206:15</p> <p>specifically (4) 7:14 128:18 131:21 132:6</p> <p>specifics (1) 140:9</p> <p>spectrum (1) 22:5</p> <p>speculative (1) 202:4</p> <p>speed (1) 195:17</p> <p>spend (1) 75:18</p> <p>spent (1) 139:2</p> <p>sphere (1) 141:8</p> <p>sphere (2) 17:14 72:25</p> <p>spike (11) 2:12 9:23 30:8,11 35:16 50:25 176:6,23,25 177:11 196:22</p> <p>spoken (12) 4:1 42:23 43:5 51:17 68:7 79:7,11 123:15 179:22 182:2 186:3 191:7</p> <p>spontaneous (2) 100:24 101:4</p> <p>spot (1) 199:15</p> <p>srt (7) 42:5,8 45:18 103:7 118:11,15 206:14</p> <p>srv (3) 117:22 118:7,18</p> <p>staff (4) 21:21 40:7,8 127:23</p> <p>stage (62) 3:11,14 4:9,17,24 5:2,3,7 7:6,9,13 8:1 9:18 10:2,14 12:19 16:25 17:5,17 18:8,14 19:21 28:15 38:6 39:18,20,22 41:1,3 6:9 43:23 45:2,15 48:12 50:2 52:17 62:14,23 63:13 65:15 70:9 71:18 73:10 76:21 80:12 82:11 92:1 93:5,6 99:24 106:21 119:11 129:13 130:11 154:11 155:3 157:2 160:17 195:2 201:25 204:15</p> <p>stages (4) 116:25 116:24 120:2 195:12</p> <p>staging (1) 101:22</p> <p>stand (10) 96:10 102:9 116:12 131:2 153:2 174:18,24 192:1,3,10</p> <p>standard (3) 7:24 115:17 133:8</p> <p>standby (1) 84:24</p> <p>standing (3) 55:23 61:1 157:7</p> <p>stark (2) 20:19 25:5</p> <p>start (10) 5:25 25:24 58:14 109:5 125:16 156:7 184:3 187:21 210:6,23</p> <p>started (4) 8:13 9:20 169:18,20</p> <p>starting (2) 36:20 211:2</p> <p>stated (1) 153:1</p> <p>statement (30) 32:19 33:11 42:23 44:2 51:9 57:15,16 66:19 69:7 70:25 77:4 79:16 87:17 108:25 109:15 112:23 124:12 131:7 132:12,23 141:13 145:14 169:14 176:19 182:14 188:24 189:24 203:15 207:20,25</p> <p>statements (1) 129:1</p> <p>station (20) 10:22 17:13 26:6 46:8 49:9,23,25 50:5,8 55:7 60:9 61:5 62:19 79:12 99:2,3 102:9 121:23 196:3 205:20</p> <p>stations (1) 205:7</p> <p>step (4) 85:2 119:16 123:5,7</p> <p>stephen (2) 19:24 198:23</p> <p>steps (4) 8:21,25 82:18 116:14</p> <p>steve (70) 31:7,22,24 32:16 33:3,13,22 34:6,15,17,18,18,23,23 35:13,17 37:25 38:3,22 39:4,8,12,12 40:2,4,6,13,13,25 42:9 46:4,11,11,13 47:5 48:21 52:21,22,23,25 56:8,8,9 58:4 60:16,17 69:9 132:10 167:1 168:1 169:18,21</p>	<p>170:10,17,18 171:15,16 172:19 174:1,14,16,19,19,22 175:2,8,8 200:24 204:7 207:12,20</p> <p>steves (2) 38:7 172:16</p> <p>still (29) 8:1 10:22 17:4 30:13 46:7 55:23 57:11 66:21 67:16 76:18 79:4 81:2 88:3,13 90:13 94:8 111:10 114:4 116:7 123:15 136:12 145:8 147:6 149:13 150:2 154:22 175:4,21 209:21</p> <p>stimulated (1) 138:13</p> <p>stock (1) 13:17</p> <p>stood (5) 10:16 60:15 153:7 178:21 180:19</p> <p>stop (6) 63:18 91:16 99:24 130:14 160:3 174:11</p> <p>stopped (2) 18:3 132:20</p> <p>stour (1) 112:16</p> <p>straight (3) 26:23 121:12 148:25</p> <p>straightaway (4) 58:19 108:17 184:1 193:1</p> <p>straightforward (1) 58:18</p> <p>strange (2) 57:12 107:21</p> <p>strategic (6) 32:12 54:13 63:24 131:11 149:10 150:10</p> <p>stream (1) 23:17</p> <p>street (21) 16:25 19:6 26:5 27:24 28:2,6,8,17,24 29:1,17 30:5 41:9 44:25 46:15 60:15 70:1,13,16 180:19 209:2</p> <p>strength (3) 23:2 110:24 159:7</p> <p>stretchers (1) 49:25</p> <p>struck (4) 21:5 24:10 103:8 164:7</p> <p>structural (1) 88:22</p> <p>structures (1) 102:17</p> <p>struggling (2) 31:14 61:12</p> <p>stuck (1) 197:7</p> <p>stuff (3) 98:25 179:16 180:15 stupid (1) 165:9</p> <p>style (15) 21:13,14 22:16,22 52:15 158:25 159:6,15 160:21 161:6,15,23 162:2 163:7 168:19</p> <p>subject (3) 24:10 113:8 192:14</p> <p>submit (1) 160:11</p> <p>subordinates (5) 9:9 22:20,24 159:5 166:2</p> <p>subsequent (2) 2:18 81:15</p> <p>subsequently (2) 43:1 179:18</p> <p>subserviate (1) 173:7</p> <p>subsidiarity (1) 149:13</p> <p>subsidiary (2) 125:3 145:12 substantial (3) 10:6 17:9 78:21</p> <p>subtly (2) 114:11,20</p> <p>success (1) 13:6</p> <p>successfully (1) 60:18</p> <p>successor (1) 132:13</p> <p>suffered (3) 183:13 206:20,23</p> <p>suffering (2) 132:21 186:21</p> <p>suggest (16) 37:7,17 41:20 62:22 71:23 78:25 96:11 134:24,24 166:10 170:24 178:4 189:7 194:17,20 198:18</p> <p>suggested (2) 186:11 187:7 suggesting (3) 164:12 178:10 179:23</p> <p>suggestion (3) 37:9 179:8 182:19</p> <p>suggestions (2) 160:21 192:8</p> <p>suitable (1) 129:13</p> <p>suite (3) 152:1,3 170:12</p> <p>summarise (4) 6:13 43:24 66:22 126:25</p>
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summary (1) 50:17  
 superior (3) 163:16,23  
 164:10  
 supplementary (1) 82:14  
 supplied (2) 80:14 98:14  
 supplies (1) 179:12  
 supply (2) 182:12 207:10  
 support (35) 12:3,25  
 15:19,20 16:3,5 20:11  
 21:21,25 25:17 31:4,14  
 35:12,14,19 37:4 45:16  
 55:9 71:10 74:3 75:23 80:9  
 81:17,18 82:14,22 99:15  
 103:1 127:1 133:6 145:21  
 153:7,9 178:21 203:19  
 supported (3) 47:1 82:8  
 132:15  
 supporting (1) 203:22  
 supposed (1) 136:8  
 sure (31) 8:10 11:7 13:21  
 14:6 19:21 21:11 22:14  
 37:15 51:3 64:13 67:11  
 68:13 77:21,22 101:10  
 115:11 129:20 130:3,7,11  
 132:6,8 142:23 159:10  
 160:8 168:5 169:23 170:14  
 183:6,7,8  
 surely (4) 17:4 27:12 71:21  
 106:14  
 surprise (12) 14:14 29:2  
 33:13 51:14 78:13,16  
 90:13 150:8 155:18  
 162:13,15 176:16  
 surprised (4) 33:21 60:5  
 107:13 203:7  
 surreal (1) 13:16  
 suspect (2) 87:9 128:20  
 suspected (2) 115:6 128:3  
 suspicions (1) 127:9  
 system (20) 97:20 123:6,14  
 135:15,17,19,20,22  
 136:1,7,8,20,22  
 137:2,6,13,15,16,18 193:2  
 systems (1) 137:21

---

T

table (3) 197:11,14,22  
 tackling (1) 198:24  
 tactical (18) 5:23  
 38:4,9,12,24 40:5 52:3  
 54:13 61:22 65:1,4,11,15  
 66:2 172:10,14,19 174:3  
 tactics (1) 115:12  
 tail (2) 144:18 188:11  
 takeaway (3) 31:23 171:5,12  
 taken (21) 8:25 12:14  
 26:22,22 38:22 55:9 80:23  
 82:18 123:6,7 132:9  
 142:14 145:10,18  
 146:10,19 147:16 155:18  
 167:23 172:19 206:6  
 takes (2) 131:13 171:1  
 taking (16) 10:18 29:3 54:19  
 79:1 112:21 114:5 135:25  
 146:21 148:3,4 159:25  
 171:24 172:25 182:14  
 202:9 210:1  
 talk (10) 27:7 33:16 52:24  
 64:22 106:5 163:9,10  
 169:19 180:11 207:13  
 talked (5) 54:2 80:10 135:19  
 149:18 150:4  
 talking (13) 13:19 15:11  
 38:20 44:23 46:16,17  
 158:13 168:14,16 175:8  
 184:6 200:19 206:13  
 talks (1) 178:3  
 tall (8) 163:1 164:22 165:5  
 166:12,14 185:2,3,4  
 tape (1) 13:19  
 target (2) 42:4,7  
 taught (1) 149:4  
 team (27) 6:7 10:15 25:17  
 37:19 39:4,7 46:18,18  
 69:20,25 70:5,13 103:14  
 104:13,21 110:23 111:9

118:15 119:21 125:18  
 133:2 153:2 156:11 160:2  
 161:5 175:6,16  
 teams (8) 10:9 24:3 69:17,18  
 116:1 135:23 178:20  
 180:17  
 technically (3) 55:23 57:25  
 58:5  
 technician (3) 42:5,8 150:20  
 technicians (8) 133:12,18  
 134:4 205:2,7,10,19  
 206:12  
 technology (2) 12:3 137:8  
 techs (1) 204:13  
 telephone (18) 12:11 23:14  
 34:19 35:12 46:14 48:9,22  
 52:5,20 92:4 95:4 107:7  
 151:18 153:21 168:4,16  
 171:3 190:21  
 telephoned (2) 24:22 30:7  
 television (4) 14:17 75:22  
 130:24 170:11  
 televisions (2) 12:5 13:14  
 telling (13) 13:4 34:16,25  
 35:2 40:15 58:4 62:7 104:9  
 154:25 155:5 179:21  
 183:20 187:10  
 tells (1) 85:10  
 temperature (1) 109:9  
 tend (1) 150:25  
 tending (1) 131:24  
 tenor (1) 103:23  
 tense (1) 205:23  
 term (1) 23:20  
 terms (19) 32:10 83:9 121:11  
 140:14 160:10,23 161:3  
 169:16 189:2 200:22,25  
 201:2,20 202:4,25  
 203:2,21,25 208:4  
 terrible (4) 48:1 61:10,15,16  
 terribly (1) 200:17  
 terrorism (1) 145:8  
 terrorismrelated (1) 202:16  
 terrorist (19) 27:3 39:9 56:23  
 60:13 111:23 113:4,14,24  
 119:24 120:2 143:6 144:11  
 145:15 146:4,11,20 201:21  
 202:11 208:5  
 terroristrelated (1) 115:6  
 tertiary (1) 115:8  
 testified (1) 78:14  
 text (19) 3:22,25 8:6 9:19  
 19:10 62:10,11 81:22 98:2  
 153:13,21,24 154:7  
 156:12,17,19,25 180:14  
 190:3  
 texted (2) 153:10,23  
 texting (1) 154:18  
 texts (1) 158:3  
 thank (82) 11:18 16:12  
 19:8,9 24:18 25:23 29:20  
 33:3 40:21 42:13 47:7,11  
 50:6 66:16 67:20 68:13,18  
 69:2 70:18,18,20,21 74:22  
 88:25 100:1 102:24  
 105:9,10 114:13 116:20  
 124:10 125:7,8,9,19  
 128:24 129:4 130:22 134:9  
 138:8 147:24 151:12,13  
 155:14,21 156:2  
 158:16,17,19 161:1,19,19  
 166:16,23 170:2 175:25  
 177:19 189:22 190:19  
 192:4,14 193:9,10 196:19  
 198:14,15,16  
 199:9,12,19,20,24 201:19  
 207:14,18 209:5,6  
 210:12,14,16,19 211:6  
 thanked (1) 153:5  
 thankfully (1) 23:18  
 thanks (2) 177:20 178:25  
 thats (128) 7:3,23  
 11:11,11,15,17,20 12:21  
 14:9 17:18 28:18 31:12,17  
 32:1 36:18 37:2,9 38:16  
 39:25 41:4,23 45:4 47:4

50:16,18 52:11,23 54:21  
 55:10 57:9,17,25 58:5  
 59:13 60:21 63:8 70:9 71:6  
 72:1 73:2 78:12 79:3 84:21  
 85:13 86:9,12 91:15,21,25  
 92:17 96:9,11 99:12  
 102:21 106:23 109:1,3,11  
 111:19 115:1,5 118:13,20  
 120:5 123:10 124:5 125:7  
 130:9 131:1,23,24  
 133:5,25 134:6 139:7,10  
 140:4 142:1,16 146:15  
 147:1,22,24 150:7 153:19  
 154:5 157:3 161:10  
 164:4,8,9,11,23,24 165:1  
 167:4,10,14 168:25 169:20  
 174:15,17,20,21 175:16  
 177:24 179:23 181:25  
 183:9 186:1,4 187:11  
 193:19,23,25 194:18,21  
 196:12 197:16 201:19,23  
 202:5 203:17 205:9,11  
 207:12,13  
 theme (2) 74:9 192:18  
 themselves (8) 145:17 173:7  
 181:18,22 205:14,17  
 206:10,22  
 thereafter (1) 190:15  
 thered (2) 59:16 77:18  
 therefore (9) 32:2 43:18  
 55:24 81:1 91:18 117:25  
 128:6 168:22 188:23  
 thereof (1) 91:12  
 theres (51) 3:18 8:7 13:12  
 18:3 19:23 20:5 22:10  
 26:20,21 37:21 38:5 39:4  
 48:7 50:21 55:4,17,25 56:6  
 57:12,16,24 58:5 63:23,25  
 71:25 78:5 88:20 96:17  
 101:21 102:7,13,16 112:20  
 116:7 131:22 139:12,25  
 146:25 150:25 153:5 160:6  
 164:10 166:13 167:10  
 179:16 180:14 193:15  
 197:14,22 200:12 208:24  
 theyd (7) 87:19 88:16  
 122:16 150:21 204:10  
 205:16 206:5  
 theyll (1) 57:24  
 theyre (5) 26:1 54:13 57:23  
 101:11 119:25  
 theyve (2) 100:11 119:22  
 thing (25) 12:21 14:16 32:18  
 55:5 57:16 59:25 62:3  
 73:23 78:25 90:20 95:25  
 107:11,21 112:1 128:13  
 131:23 134:20 146:15  
 164:3,4 174:9 185:11  
 194:17,25 210:10  
 thinking (3) 110:19 145:19  
 194:6  
 thinks (3) 54:20 165:20  
 207:7  
 third (3) 41:8 71:4 178:4  
 thompson (21) 16:25 19:6  
 26:5 27:24 28:2,6,8,17,24  
 29:1,17 30:5 41:9 44:25  
 46:15 60:15 70:1,13,16  
 180:19 209:2  
 thompsons (1) 187:24  
 though (4) 37:24 81:12  
 102:12 192:24  
 thought (19) 8:18 10:13  
 14:9 20:6 31:11 36:15  
 47:25 53:13 57:18 60:5  
 67:1 87:16 145:23 147:2,6  
 157:22 204:15 210:5,17  
 threat (8) 56:21 57:20  
 58:1,5 59:13,14,18 148:3  
 threats (2) 146:5 147:1  
 three (25) 2:23 24:9,21  
 25:17 27:2 38:19 54:15  
 55:7,8 56:10 71:1 72:19  
 83:25 86:22 91:9 12:9 93:3  
 102:8,18 119:5 142:20  
 178:17 181:19,23 201:3

through (24) 2:1 15:18 18:14  
 23:22 38:6 72:2 77:4 93:25  
 94:2,3 97:10 106:16 114:6  
 127:18 132:16 133:19  
 168:1 180:8 191:23 193:13  
 201:12 202:3,14 204:11  
 throughout (2) 114:19  
 131:20  
 tick (1) 139:3  
 tickbox (1) 140:23  
 ticker (1) 13:19  
 tie (2) 48:21 90:17  
 tight (1) 196:5  
 time (152) 2:24 5:8 6:12,15  
 10:5 11:22,23 12:4,8,12,16  
 14:4,11 17:8,9 19:17 21:18  
 22:4 27:5 30:1,15 36:11  
 37:22 40:12 42:12,13  
 43:4,11 47:22 48:24 52:11  
 53:4 56:21 57:17 59:16  
 63:10 64:4,13 65:21 71:23  
 72:3,4,8 73:4,13 75:18,25  
 76:23 78:2,13,19,22  
 79:6,19,24 82:13,22  
 83:7,11 84:14 88:4 89:21  
 93:14 94:11 97:16  
 98:2,3,4,24 101:3 106:3,5  
 107:7 108:10  
 109:4,10,17,19,23  
 110:19,21 114:22 115:5  
 118:3 123:22 129:3,3,14  
 131:9 137:3 139:3,20  
 145:24 146:8 147:7 148:12  
 149:11,23,25 150:1,11,23  
 151:14,15,24 154:23  
 155:20 157:19 158:14  
 161:2,18 163:7 164:22  
 165:10 169:19 172:24  
 173:20,23 175:5,11  
 177:3,18 179:4 181:4,9,10  
 182:2 183:6,8,11 184:21  
 185:9,13,18 187:14 194:25  
 196:4,17 198:6,8 201:16  
 202:2,15 205:3 207:12  
 208:24,25 209:3  
 210:1,7,9,22  
 times (5) 22:5,9 24:14 38:19  
 162:4  
 timings (1) 70:15  
 today (8) 68:8 150:3 152:21  
 154:21 160:19 184:25  
 198:22,25  
 together (4) 2:2 5:12 60:18  
 77:25  
 told (82) 2:17,20,25 3:7 5:22  
 6:9 7:7 10:11,13 13:1,3,7  
 19:14 23:13  
 26:2,16,17,18,20,21  
 28:1,16 31:13,18 33:20,22  
 34:18,19 35:17 41:3  
 46:12,21 54:18,25  
 56:18,19 60:16 63:6 65:10  
 69:14 75:7 77:14,15 78:15  
 82:7 83:14 94:20 95:22  
 102:8 111:5,15 113:13,22  
 119:3 127:5,6,8 128:18,19  
 130:5 135:4 146:8 151:24  
 153:7,8 161:8 162:20  
 167:3 169:22 179:5 180:1  
 181:12 183:25 187:25  
 188:12 190:5,21,22 191:7  
 192:25 201:17 206:10  
 tomorrow (2) 211:3,4  
 tone (2) 168:5,9  
 too (11) 125:2 130:15  
 134:21,25,25 139:11,12,12  
 145:6 165:11 172:23  
 took (12) 8:1 21:10 23:12  
 77:5 96:23 99:14,18 136:2  
 148:12,17 170:3 190:15  
 topic (8) 21:11 122:24  
 124:11 138:4,10 141:13  
 166:21 200:5  
 tops (1) 154:4  
 total (2) 36:4 82:11  
 touch (4) 74:24 125:23

157:6 176:1  
 touched (1) 97:4  
 tour (1) 139:2  
 towards (2) 49:20 138:25  
 towers (1) 112:10  
 track (1) 204:14  
 tradition (1) 151:2  
 traditional (6) 25:11  
 145:5,20 146:5,11 147:9  
 traditions (1) 162:11  
 ticker (1) 148:6  
 tragic (1) 148:6  
 train (1) 141:8  
 trained (15) 115:14,17,18  
 127:9,14 204:12,16,23  
 205:6,12,15,25 206:3,14  
 208:10  
 trainers (1) 128:18  
 training (79) 41:12 42:1,2,6  
 44:18,20 67:10 95:22,24  
 96:5,20 105:21 111:5  
 115:3 116:19 119:22  
 120:7,21,22,24  
 121:5,13,17 127:21,23  
 128:9,12,17,19,21,21,22  
 132:11,24,24  
 133:1,3,5,8,9,10,15,17,18,21,22,23,25,27,28,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,66,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145,146,147,148,149,150,151,152,153,154,155,156,157,158,159,160,161,162,163,164,165,166,167,168,169,170,171,172,173,174,175,176,177,178,179,180,181,182,183,184,185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224,225,226,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,245,246,247,248,249,250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,267,268,269,270,271,272,273,274,275,276,277,278,279,280,281,282,283,284,285,286,287,288,289,290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,306,307,308,309,310,311,312,313,314,315,316,317,318,319,320,321,322,323,324,325,326,327,328,329,330,331,332,333,334,335,336,337,338,339,340,341,342,343,344,345,346,347,348,349,350,351,352,353,354,355,356,357,358,359,360,361,362,363,364,365,366,367,368,369,370,371,372,373,374,375,376,377,378,379,380,381,382,383,384,385,386,387,388,389,390,391,392,393,394,395,396,397,398,399,400,401,402,403,404,405,406,407,408,409,410,411,412,413,414,415,416,417,418,419,420,421,422,423,424,425,426,427,428,429,430,431,432,433,434,435,436,437,438,439,440,441,442,443,444,445,446,447,448,449,450,451,452,453,454,455,456,457,458,459,460,461,462,463,464,465,466,467,468,469,470,471,472,473,474,475,476,477,478,479,480,481,482,483,484,485,486,487,488,489,490,491,492,493,494,495,496,497,498,499,500,501,502,503,504,505,506,507,508,509,510,511,512,513,514,515,516,517,518,519,520,521,522,523,524,525,526,527,528,529,530,531,532,533,534,535,536,537,538,539,540,541,542,543,544,545,546,547,548,549,550,551,552,553,554,555,556,557,558,559,560,561,562,563,564,565,566,567,568,569,570,571,572,573,574,575,576,577,578,579,580,581,582,583,584,585,586,587,588,589,590,591,592,593,594,595,596,597,598,599,600,601,602,603,604,605,606,607,608,609,610,611,612,613,614,615,616,617,618,619,620,621,622,623,624,625,626,627,628,629,630,631,632,633,634,635,636,637,638,639,640,641,642,643,644,645,646,647,648,649,650,651,652,653,654,655,656,657,658,659,660,661,662,663,664,665,666,667,668,669,670,671,672,673,674,675,676,677,678,679,680,681,682,683,684,685,686,687,688,689,690,691,692,693,694,695,696,697,698,699,700,701,702,703,704,705,706,707,708,709,710,711,712,713,714,715,716,717,718,719,720,721,722,723,724,725,726,727,728,729,730,731,732,733,734,735,736,737,738,739,740,741,742,743,744,745,746,747,748,749,750,751,752,753,754,755,756,757,758,759,760,761,762,763,764,765,766,767,768,769,770,771,772,773,774,775,776,777,778,779,780,781,782,783,784,785,786,787,788,789,790,791,792,793,794,795,796,797,798,799,800,801,802,803,804,805,806,807,808,809,810,811,812,813,814,815,816,817,818,819,820,821,822,823,824,825,826,827,828,829,830,831,832,833,834,835,836,837,838,839,840,841,842,843,844,845,846,847,848,849,850,851,852,853,854,855,856,857,858,859,860,861,862,863,864,865,866,867,868,869,870,871,872,873,874,875,876,877,878,879,880,881,882,883,884,885,886,887,888,889,890,891,892,893,894,895,896,897,898,899,900,901,902,903,904,905,906,907,908,909,910,911,912,913,914,915,916,917,918,919,920,921,922,923,924,925,926,927,928,929,930,931,932,933,934,935,936,937,938,939,940,941,942,943,944,945,946,947,948,949,950,951,952,953,954,955,956,957,958,

week (1) 23:11  
 weeks (1) 197:3  
 wellinformed (3) 82:2 154:13  
 166:15  
 wellknown (1) 106:21  
 wellversed (1) 19:24  
 went (20) 5:15 8:24 23:22  
 35:13 45:2 53:22 60:3 62:3  
 76:2 89:11 127:11 128:4  
 148:25 149:21  
 182:10,16,23 183:18 187:3  
 203:23  
 werent (21) 14:17 18:17  
 35:21 47:6 79:4 94:14 99:9  
 114:4,23 115:22 138:4  
 142:5 147:10 170:4 181:8  
 182:1 183:6 186:15  
 187:13,16 203:8  
 west (65) 2:2 3:23 4:2 8:16  
 11:19 13:1 16:9,13 25:25  
 30:23 31:8 35:6 42:1,2  
 52:1 55:9 65:9 68:2 70:22  
 73:11 74:7 76:20 77:25  
 79:7,13 80:1 83:2,12  
 84:22,25 85:3,6,14,23 93:7  
 94:11 95:17 96:4 97:23  
 106:15 107:4,5,8,18,25  
 108:5 113:17 117:14 118:4  
 119:21 120:8,14 121:8  
 122:7,13 123:8 127:22  
 133:18 135:12,19  
 168:2,15 172:22 187:18  
 weve (20) 7:20 11:15 15:3  
 36:23 47:9 53:16 55:20  
 74:16 79:8 114:18 122:22  
 131:2 139:24 146:1 160:25  
 166:16 167:5 189:21  
 207:8,9  
 whatever (4) 46:17 100:9  
 101:13 148:2  
 whats (11) 35:4 55:3 61:1  
 63:20 121:11 168:21 171:7  
 187:7 189:1 190:8 200:22  
 whatsoever (2) 59:21 93:4  
 whenever (9) 15:16 16:9  
 19:23 23:25 29:11 60:22  
 73:14 96:3 182:23  
 whereby (4) 22:18 102:18  
 137:13 196:3  
 whilst (6) 14:17 29:22 129:5  
 137:11 138:22 155:4  
 whiteboard (1) 12:10  
 whoever (3) 67:11 179:8  
 197:17  
 whole (8) 5:12 23:22 57:16  
 77:17 93:7 114:21 144:13  
 186:23  
 whos (4) 59:6 81:15 93:3  
 185:5  
 whose (1) 172:19  
 widely (1) 179:16  
 wider (1) 148:3  
 wideranging (1) 131:13  
 wigan (2) 195:18,22  
 willing (1) 184:17  
 wisher (1) 190:20  
 windows (1) 149:7  
 wish (9) 70:9 72:8,9 87:25  
 124:17 125:5 126:8 186:3  
 192:9  
 wishes (4) 34:14 68:23 126:3  
 199:8  
 withhold (1) 185:24  
 witness (12) 33:11 51:9  
 66:19 127:2 128:4  
 160:6,9,14,17 165:25  
 207:20,25  
 witnesses (4) 133:10 168:18  
 169:3 174:6  
 woken (1) 1:22  
 wolf (1) 145:20  
 wolverhampton (1) 164:17  
 wonder (2) 84:13 192:19  
 wondering (1) 108:14  
 wont (7) 100:19 130:6  
 138:6,20 174:11 175:24

189:16  
 work (9) 25:8 58:19 73:19  
 132:15 138:20 148:25  
 177:4 178:19 209:24  
 worked (4) 21:4 35:7 67:6  
 109:2  
 working (11) 5:12,21 13:22  
 14:1,2 15:15 40:11 51:8  
 56:1 137:3 148:24  
 works (3) 24:8 25:10 54:5  
 world (2) 49:4 93:20  
 worried (2) 90:19 180:16  
 worse (3) 20:2 61:15 167:21  
 worst (1) 196:15  
 worstcase (1) 14:8  
 worth (3) 64:9 150:24 169:3  
 wouldnt (21) 6:6 18:7 45:12  
 49:2 53:23 73:4 81:1 83:13  
 85:2,19 87:23 94:8 95:14  
 97:24 105:1 107:11 117:12  
 137:1 154:16 205:1 206:15  
 wrack (3) 182:11 187:23  
 191:8  
 write (1) 178:16  
 writing (2) 168:11,12  
 written (1) 107:14  
 wrong (11) 45:6 72:7,23  
 104:10 108:5 112:8 123:12  
 136:17 162:2 183:18,24  
 wrongfoot (2) 142:19 143:2  
 wrongs (1) 48:11  
 wrote (1) 47:3

---

X

x (1) 212:1

---

Y

yeah (1) 171:25  
 years (5) 18:17 25:11 132:18  
 171:15 198:25  
 yesterday (12) 1:10 14:6,23  
 17:14,15 29:25 47:16 95:2  
 96:1 100:14 102:16 198:23  
 yet (9) 86:20 87:5 110:3  
 130:6 159:25 171:20 175:2  
 181:2 211:1  
 youd (4) 77:14 78:25 94:7  
 186:3  
 youll (17) 2:1 15:4 17:4  
 18:22 25:6 29:24 36:19  
 50:12 58:25 90:9 98:1  
 117:25 130:23 141:15  
 177:25 204:19 210:18  
 youre (63) 10:4 29:16 38:20  
 44:23 53:22 59:23 62:14  
 64:16,19,25 70:7 76:11  
 84:6 85:22 90:18 93:22  
 100:1 101:18 102:5,13  
 108:24 128:2,16  
 133:5,21,23 134:19 137:22  
 141:18,20 146:24 150:16  
 151:14,16,16 154:18 158:6  
 162:9 163:1,2  
 164:15,15,20,22 165:23  
 166:2,2 168:10,13  
 169:7,15 170:19,22 171:22  
 179:21 184:6 185:2,14,24  
 187:23 188:16 189:7  
 206:13  
 yours (3) 71:11 90:25 159:7  
 yourself (9) 8:19 13:17 53:23  
 61:9 62:16 71:3 90:10  
 134:12 171:4  
 yourselves (1) 142:19  
 youve (24) 34:15 71:14  
 74:11 76:7 77:13 78:14  
 79:13,16 80:4 98:11  
 101:15 106:4 110:2 116:21  
 143:22 145:12 161:8 163:1  
 171:3 180:11 186:2 189:15  
 191:16 210:17

---

Z

zone (11) 40:11,20 43:19,22  
 44:1,22 45:10,11 58:6  
 59:12 61:19  
 zoned (1) 27:3  
 zones (3) 40:4 43:13,16  
 zoning (9) 40:1,4,9,17,17,18  
 50:11 57:12,13

---

0

0002 (1) 30:6  
 0003 (2) 30:7,10  
 0009 (1) 70:16  
 0012 (3) 33:9 40:25 69:10  
 001348 (1) 209:2  
 0016 (3) 34:9 40:25 42:24  
 0019 (4) 42:14,25 70:2,17  
 0026 (3) 42:22 47:14,18  
 0037 (2) 49:10,17  
 003728 (1) 49:19  
 0038 (1) 74:3  
 0044 (1) 49:22  
 0047 (1) 49:24  
 0049 (1) 50:1  
 0053 (1) 50:21  
 0054 (1) 50:4  
 0068 (1) 7:4

---

1

1 (11) 2:8 14:12 34:11 49:17  
 63:5 74:2 138:20 149:20  
 205:17 212:3,4  
 10 (7) 25:11 73:11 74:4  
 80:22 85:5 204:9 209:14  
 100 (1) 125:10  
 101 (1) 189:24  
 1012 (1) 190:3  
 1015 (1) 187:6  
 102 (2) 190:19 191:5  
 1030 (3) 1:20 123:24 124:3  
 106 (1) 66:19  
 109 (1) 70:25  
 10minute (1) 155:19  
 11 (2) 182:7,17  
 1100 (1) 209:10  
 1108 (4) 1:22 2:12,20 3:7  
 1115 (1) 68:19  
 1120 (2) 153:15,21  
 11201130 (1) 154:13  
 1121 (1) 153:15  
 113 (2) 200:14,15  
 1130 (1) 182:17  
 1135 (1) 68:21  
 118 (3) 124:12 125:21 126:3  
 12 (16) 6:2 33:22,24 34:4,20  
 105:6 107:8 169:22,25  
 203:12,16 204:6,8,11  
 205:1 208:9  
 122 (1) 27:21  
 125 (1) 126:17  
 12745 (1) 58:22  
 12oclock (1) 6:21  
 13 (3) 1:1 2:7 6:2  
 130 (1) 212:7  
 13210 (1) 58:22  
 14 (1) 211:9  
 15 (3) 188:16 204:9 209:15  
 153 (2) 24:23 27:20  
 156 (1) 212:8  
 158 (1) 212:9  
 16 (2) 27:21 77:5  
 17 (5) 132:12  
 133:16,17,24,25

---

2

2 (13) 5:16 24:11 62:15  
 63:2,9 102:19 126:1  
 132:18 167:3,5 170:25  
 171:2,21  
 20 (8) 2:8 6:2 15:7 74:2 153:24  
 178:21 180:20 196:7,10  
 200 (2) 125:12 212:10  
 20142015 (1) 136:3  
 2015 (1) 136:2

2017 (7) 21:14 105:6 109:14  
 131:17 132:17 136:10  
 142:22  
 2018 (2) 83:24 161:8  
 2021 (2) 1:1 211:9  
 207 (1) 212:12  
 21 (2) 77:23 153:24  
 210 (1) 125:14  
 213 (1) 33:10  
 22 (15) 1:11 131:17 132:2  
 135:25 136:10 137:4  
 142:22 147:8 148:6 156:25  
 165:3 195:24 196:10  
 208:20 209:11  
 2240 (4) 95:17 109:19  
 110:2,25  
 2252 (2) 2:10 79:8  
 2257 (1) 79:12  
 22nd (3) 133:7 143:4 148:4  
 23 (4) 63:2 107:3,14 209:8  
 230 (2) 63:7,11  
 2301 (1) 79:12  
 2302 (1) 79:12  
 2306 (2) 2:18 79:13  
 2308 (9) 2:5 8:5 77:1 79:24  
 82:16,19,20 97:15 98:11  
 2315 (5) 3:22 4:9 8:6 46:20  
 69:20  
 2320 (1) 81:23  
 2321 (1) 156:24  
 2323 (3) 7:2,4 119:4  
 2330 (1) 9:12  
 2336 (1) 9:22  
 2337 (3) 9:23 10:1,17  
 2341 (1) 24:21  
 2343 (1) 70:16  
 2346 (1) 70:16  
 234936 (1) 11:20  
 2350 (2) 11:25 16:17  
 2352 (3) 19:10 25:24 29:22  
 2353 (3) 24:22 27:19 50:15  
 2354 (1) 70:16  
 2355 (1) 30:9  
 23rd (2) 182:7,15  
 24 (2) 109:14,15  
 247 (1) 16:2  
 25 (2) 190:3,10  
 255 (1) 155:22  
 27 (1) 207:23  
 28 (1) 71:2  
 2minute (3) 169:7,9,13

---

3

3 (8) 30:8 31:11 36:25  
 47:14,18 126:17 130:20  
 188:15  
 30 (5) 78:5 126:17  
 176:14,14,17  
 305 (1) 155:24  
 31 (1) 124:13  
 34 (1) 10:2  
 35 (1) 171:14  
 360 (3) 22:12,15 158:25  
 360ed (1) 22:11  
 360s (1) 24:7  
 3mile (2) 136:17,19  
 3minute (1) 31:2

---

4

4 (5) 18:17 67:5 171:14  
 186:6 188:16  
 40 (1) 31:11  
 407 (1) 199:25  
 414 (1) 200:2  
 415 (1) 63:11  
 430 (1) 211:7  
 445 (1) 211:2  
 45 (2) 53:8 149:20  
 48 (1) 141:12

---

5

5 (8) 12:15,21,22 50:22  
 129:11 151:21 179:6  
 199:24  
 53 (1) 130:18  
 59 (1) 77:5

6

6 (4) 24:11 83:24 131:7  
 161:8  
 60 (1) 151:11  
 69 (4) 33:11 45:24 69:7  
 212:5

---

7

70 (2) 33:11 212:6  
 77 (3) 147:3 150:4,6

---

8

8 (1) 198:25  
 82 (1) 51:9

---

9

9 (1) 69:24  
 90 (1) 171:12  
 9074 (2) 97:6,20  
 911 (1) 112:10  
 92 (1) 188:9  
 93 (3) 109:15 110:10,11  
 930 (2) 1:2 211:8  
 936 (1) 1:4  
 94 (2) 110:10 111:14  
 99 (1) 22:4