

OPUS2

Manchester Arena Inquiry

Day 135

July 19, 2021

Opus 2 - Official Court Reporters

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1 Monday, 19 July 2021
 2 (9.30 am)
 3 SIR JOHN SAUNDERS: Mr Greaney, at the end of last week we
 4 had the very sad news that Darron Coster had died, last
 5 Wednesday, 14 July, following a road traffic collision .
 6 As you will recall , Darron gave evidence to the inquiry
 7 on 15 April of this year. Darron Coster worked for the
 8 Royal Military Police for 22 years, retiring in 2008.
 9 He then worked in planning and organising security for
 10 military events.
 11 On 22 May, he went to pick up his son and two others
 12 from the Ariana Grande concert. He had arranged to meet
 13 them at the bottom of the concourse steps. He was
 14 waiting there when the explosion took place. Having
 15 texted his son to make sure that he and his friends were
 16 safe, he went and did what he could to help in the
 17 City Room. He assisted those who were injured. Because
 18 of his training in Northern Ireland he had experienced
 19 explosions in the past and he knew how to help those who
 20 had suffered blast injuries . He applied improvised
 21 tourniquets to some of the more seriously injured. He
 22 encouraged other uninjured people who didn't have his
 23 medical skill to sit with the injured to talk to them
 24 and give to them what assistance they could. He
 25 remained in the City Room doing what he could in that

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1 vital first half hour to an hour and then went to find
 2 his son.
 3 I described him at the conclusion of his evidence as
 4 a hero for what he did on the night of 22 May 2017 and
 5 I don't think that anyone could or would disagree with
 6 that description. His former commanding officer has
 7 been in touch with the inquiry since his death. He
 8 described how very proud his former colleagues and his
 9 family are of him. He, the commanding officer says
 10 that.
 11 "'Lead by example' is the motto of the Royal
 12 Military Police."
 13 And the commanding officer's remark is that is what
 14 Darron did on that dreadful night. I am sure we would
 15 all agree with that.
 16 He leaves a wife, Alison, and a son, Charlie, and
 17 the thoughts of all of us connected with the inquiry are
 18 with them as they try to cope with his loss. His
 19 actions on 22 May will live on in the memories of many.
 20 Mr Greaney, I will now rise for a couple of minutes.
 21 (9.35 am)
 22 (A short break)
 23 (9.41 am)
 24 MR DE LA POER: Sir, good morning. We are joined by
 25 Ms Wilson. I wonder if we can begin by her being sworn,

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1 please.
 2 MS SARAH—JANE WILSON (sworn)
 3 Questions from MR DE LA POER
 4 MR DE LA POER: Please can you state your full name.
 5 A. Sarah—Jane Wilson.
 6 Q. Ms Wilson, are you the head of North West Fire Control?
 7 A. I am, sir, yes.
 8 Q. Before we begin with my questions, I understand that
 9 there is a statement that you wish to make.
 10 A. Yes, please.
 11 Q. You can do so now, please.
 12 A. Please forgive me for reading this but I wanted to make
 13 sure that I said everything I needed to say.
 14 I would like the inquiry to know that I have
 15 followed almost all of the evidence that has been given
 16 to the inquiry. I have also worked through the
 17 documents and evidence on the inquiry's portal, which is
 18 something I did before the inquiry started and have
 19 continued to do ever since. It was important to me to
 20 understand where my organisation went wrong and if I had
 21 not understood that, I would not be able to try to put
 22 things right.
 23 It has become very clear to me that on the night of
 24 the attack, North West Fire Control did not manage
 25 communications in the way that would have been expected

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1 of them by the public and by the Fire Service. The
 2 control room was responsible for significant failures
 3 in the management of information throughout that night,
 4 particularly in relation to the recording of
 5 information, the passing of information to the Fire
 6 Service and other agencies, and also in understanding
 7 the significance of the information that was in their
 8 hands.
 9 I have personally asked for those failures to be
 10 fully set out in a sequence of communications which
 11 North West Fire Control has provided the inquiry with.
 12 I stand by the decision made by the control room not to
 13 mobilise but to ask for the advice of the duty NILO —
 14 that is what I would have done in their circumstances —
 15 but the communication failures which followed are not in
 16 any way excusable.
 17 I want to say personally and on behalf of the
 18 control room that I deeply regret these failures and
 19 I want to unreservedly and publicly apologise to the
 20 families and to the Fire and Rescue Service for what we
 21 failed to do that night. I fully accept the evidence of
 22 the Fire and Rescue Service officers that if the control
 23 room had passed the key information that was not passed,
 24 this would have been of substantial value to
 25 Greater Manchester Fire and Rescue Service in deciding

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1 how it was going to manage its resources and support
 2 ambulance staff in the treatment and management of
 3 casualties .
 4 I accept these failures will have contributed to the
 5 delay in the Fire Service personnel reaching the scene.
 6 If because of that the inquiry finds that lives which
 7 could have been saved have been lost, I want to say now
 8 that I unreservedly apologise for these failings .
 9 Thank you, sir.
 10 SIR JOHN SAUNDERS: Thank you. Are you all right to carry
 11 on?
 12 A. I am, sir, thank you.
 13 MR DE LA POER: Before we turn to the substance of my
 14 questioning, can I just indicate for the benefit of
 15 everybody watching that you have done a number of
 16 witness statements, one of them is entitled , on the
 17 inquiry system, the lessons learned statement, which
 18 I ' ll be describing as your third witness statement.
 19 Part of that statement will be published on the inquiry
 20 website, meaning that you and I will not need to go
 21 through the detail of those changes, but rather they
 22 will stand as evidence in that way.
 23 A. Yes, sir .
 24 Q. Let's turn now to introducing you more fully. Is it
 25 right that you have worked in control rooms for nearly

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1 30 years?
 2 A. Yes, sir .
 3 Q. Did you join Lancashire Fire and Rescue Service in 1991?
 4 A. I did.
 5 Q. And whilst you were with them, did you hold a role that
 6 involved training?
 7 A. Yes, sir .
 8 Q. Did you reach the rank of station manager within
 9 Lancashire?
 10 A. Yes, sir .
 11 Q. Is that the highest rank that a person in charge of
 12 a control room can hold within Lancashire as it was?
 13 A. Yes, sir , it was.
 14 Q. Just pause for a moment, can I ask you to keep your
 15 voice up a little bit?
 16 Did you transfer to the North West Fire Control
 17 project in September 2012 in the role of senior
 18 operations manager?
 19 A. I did, sir, yes.
 20 Q. Was the effect of that that you were in charge of the
 21 operational side of North West Fire Control?
 22 A. From 2014 I was. In 2012, up until the point of
 23 transition , I was responsible for working with the
 24 transition teams to transfer across all of the data and
 25 ways of working from the existing fire control rooms

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1 into North West Fire Control.
 2 Q. Just help us to understand a little bit more about the
 3 senior structure of North West Fire Control. What you
 4 say in your witness statement is that the executive
 5 director , who was your line manager, left in 2013; is
 6 that correct?
 7 A. Yes, sir .
 8 Q. As a result, there was a period of time when you
 9 reported to two people who were not employees of North
 10 West Fire Control?
 11 A. That's correct, yes.
 12 Q. Did that mean that you were in effect the acting head of
 13 North West Fire Control from an internal point of view?
 14 A. No, sir, I was -- still remained in the role of senior
 15 operations manager but I did get involved in some of the
 16 day-to-day business because the executive directors that
 17 were in place at that time worked remotely from North
 18 West Fire Control.
 19 Q. So those are the two people who worked for Fire and
 20 Rescue Services?
 21 A. Yes, sir .
 22 Q. Was the position of head of North West Fire Control
 23 filled prior to you being promoted to that position in
 24 October 2016?
 25 A. No, sir .

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1 Q. Did the fact that there was no head of North West Fire
 2 Control between 2013 and your appointment in
 3 October 2016 in any way impact upon the business of
 4 North West Fire Control?
 5 A. I think it possibly did, sir , because I think, looking
 6 back, there were opportunities there to place a more
 7 robust governance structure around North West Fire
 8 Control. The chain of command really was from me
 9 directly to the board of directors , with the executive
 10 director kind of operating remotely, so they were there
 11 for me to get advice from, and they did support, so they
 12 were a lot of support to me, but I think we missed an
 13 opportunity to put robust governance structures in place
 14 during that time.
 15 Q. In practical terms, what does missing the opportunity to
 16 put in place robust governance mean?
 17 A. I think to create strong operational strategic links
 18 between North West Fire Control and the partner services
 19 and authorities .
 20 Q. In practical terms, in what way did that or might that
 21 have impacted?
 22 A. I think we operated as a control room rather than
 23 a company, so the way that we were set up was to be
 24 almost an extension of the Fire and Rescue Services,
 25 a shared control room as such, so where before they'd

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1 had their own individual control rooms, North West Fire
 2 Control became their shared control room. However, over
 3 time — while that was appreciated at the beginning by
 4 the people who were involved in the transition, over
 5 time that level of awareness of the purpose of North
 6 West Fire Control at a senior level became diminished
 7 and the structures weren't in place to then maintain
 8 proper governance of it.

9 Q. Plainly, there was a period from October 2016 through to
 10 May 2017 when you were in the position of head of North
 11 West Fire Control.

12 A. Yes.

13 Q. Did you address those governance issues by May 2017 or
 14 were there still issues outstanding?

15 A. No, sir, there were still issues outstanding.

16 Q. Can you identify specifically what those issues were,
 17 please?

18 A. As I've said, there was the operational link between
 19 North West Fire Control and the Fire and Rescue Services
 20 at a strategic level, which we have addressed now, but
 21 wasn't addressed at the time. Chief fire officers have
 22 always been involved with North West Fire Control and
 23 they act as strategic advisers to the board of
 24 directors. The board of directors are local authority
 25 councillors, members of the Fire Authority for each of

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1 the Fire and Rescue Service partners, so they are
 2 advised by the chief fire officers.

3 However, at that time, the strategic direction of
 4 North West Fire Control was dictated through the
 5 business case that had been written, so in effect in
 6 terms of the strategic direction, that operational input
 7 wasn't required because the business case was for
 8 10 years and we were operating within the parameters of
 9 that business case, and I was being measured in terms of
 10 performance against delivery against that business case.
 11 So as that business case had started to come to an end,
 12 we were now realising that the operational and strategic
 13 structures are not in place, but looking to the future
 14 and moving the organisation forward through a business
 15 planning process that sits outside of the original
 16 business case.

17 Q. Let's just have a look at the 22 May 2017. You say that
 18 the governance issues hadn't all been resolved in the
 19 months that you'd had from October 2016 to May 2017.
 20 Did any of those, in your view, impact upon the ability
 21 of North West Fire Control to respond to that emergency?

22 A. I'll just think for a moment, sir, if you don't mind.

23 Q. Of course.

24 A. I think it probably did and I think that's apparent
 25 through some of the evidence that we've heard,

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1 particularly with regard to training and the
 2 opportunities to conduct live training and exercising
 3 alongside the Fire and Rescue Services. So that's not
 4 something that I necessarily have the authority to
 5 arrange and do. That said, up to the point of 22 May,
 6 I'd not asked, so that is a failing on my part that
 7 I recognise now.

8 I think had that strategic operational input, in the
 9 form of principal officers and chief fire officers, been
 10 more embedded within North West Fire Control, there
 11 would have been a greater opportunity for me to have
 12 achieved that. But that wasn't in place at the time.

13 SIR JOHN SAUNDERS: Just help me for a moment. I am afraid
 14 I can't again remember exactly where this evidence came
 15 from, but there was certainly evidence from a fire
 16 officer that the possibility of exercising mobilisation
 17 as part of an exercise really couldn't take place
 18 because NWAS were saying they really didn't have the
 19 resources to do that. Is that anything you know about?

20 MR DE LA POER: You might mean North West Fire Control,
 21 I think you said NWAS.

22 SIR JOHN SAUNDERS: No, my understanding was it was the
 23 ambulance service.

24 MR DE LA POER: I do beg your pardon, sir; my interruption
 25 was entirely unwelcome.

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1 SIR JOHN SAUNDERS: (overspeaking) that they couldn't do it.
 2 Mr Smith.

3 MR SMITH: It's my recollection that was from Mr Gaskell's
 4 evidence and he was referring to North West Fire Control
 5 not being in a position — this may be a slightly
 6 different point — not being in a position to provide or
 7 make available the staff and the resources to engage
 8 in that training.

9 SIR JOHN SAUNDERS: Right. If my recollection is wrong
 10 about that, I have actually a fairly clear recollection
 11 of someone mentioning it was the NWAS control rooms
 12 which didn't have the staff, but...

13 MR SMITH: I have a recollection that there was other
 14 evidence that there may have been difficulties in that
 15 regard. So those are the two pieces of evidence —

16 SIR JOHN SAUNDERS: That's the evidence I'm thinking.
 17 We can have it checked.

18 But it's not something you're aware of?

19 A. No, sir.

20 SIR JOHN SAUNDERS: That's all I wanted to know.

21 MR DE LA POER: So within the answer that you just gave,
 22 you have identified training as being an area which
 23 perhaps was overlooked, would that be a fair way of
 24 characterising it, during the period when North West
 25 Fire Control was without a head and in the subsequent

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1 period that you had before May 2017?
 2 A. No, sir, I wouldn't say it was overlooked because that
 3 was part of my remit as the senior operations manager.
 4 Part of the transition was to look at the training
 5 frameworks that we needed to put into place as well as
 6 the training for new members of staff and staff that
 7 were transferring over from the existing Fire Controls.
 8 I think what was overlooked was the practical or, say,
 9 maybe not overlooked but not appreciated, was the
 10 practical element, the practical application of
 11 training, but particularly in an MTFA scenario, sir.
 12 Q. We're going to come on to the detail of this in
 13 a moment, but you will appreciate that generally
 14 speaking, there is an issue between North West Fire
 15 Control and Greater Manchester Fire and Rescue Service
 16 about the interpretation of two action plans? You're
 17 aware of that?
 18 A. Yes, I am aware.
 19 Q. We don't need to rehearse the detail of that
 20 immediately. But was that something, do you think, that
 21 was one of the issues that arose by reason of the lack
 22 of a head of North West Fire Control for a period of
 23 years or is that a separate issue?
 24 A. Um... I'm really not sure, sir. I think to have had
 25 a head of the organisation coordinating work at that

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1 strategic level on a permanent basis would have
 2 assisted, but I think, based on the issues that have
 3 arisen through the inquiry regarding the specific action
 4 plans that we've been referring to, I don't believe that
 5 that would have made any difference.
 6 Q. We'll come back perhaps to the --
 7 SIR JOHN SAUNDERS: Just help me because I have
 8 provisionally come to the view of what you have said,
 9 that actually the interpretation of action plans had
 10 nothing to do with it on the night. Was it a matter
 11 that NWFC didn't appreciate that the bomb action card
 12 related to unexploded bombs? Did you have that
 13 understanding?
 14 A. My understanding -- and please bear in mind that I don't
 15 perform an operational role in the control room. When
 16 I originally saw the "Bomb -- general" action plan,
 17 I interpreted that as being an action plan for use at
 18 a bomb-related incident regardless of whether it was
 19 exploded or unexploded. I think the evidence that has
 20 come out through the inquiry from other witnesses from
 21 North West Fire Control was that their understanding was
 22 that the "Bomb -- general" action plan was for an
 23 unexploded bomb.
 24 SIR JOHN SAUNDERS: Okay. It may be -- and certainly the
 25 evidence of your controllers is -- that it made no

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1 difference on the night because no one was looking
 2 at the "Bomb -- general" action plan.
 3 A. That's correct.
 4 SIR JOHN SAUNDERS: But there is room for misunderstanding
 5 in that?
 6 A. Yes, there is, sir.
 7 SIR JOHN SAUNDERS: There was room for misunderstanding?
 8 A. Yes, there was.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR DE LA POER: You have already referred to the business
 11 case and the fact that North West Fire Control is
 12 a company. I don't propose to take you through the
 13 detail of that. On behalf of North West Fire Control,
 14 a detailed opening statement was submitted, no doubt,
 15 with your approval, so we will rely upon that for that
 16 level of technical detail.
 17 My final question on this topic is this: why was
 18 there no head of North West Fire Control for a period of
 19 approximately 3 years?
 20 A. Yes. I don't know, sir.
 21 Q. Even though you were the senior operations manager,
 22 nobody during that period when you were having to report
 23 to people outside your organisation instead of a line
 24 manager within your organisation, nobody explained to
 25 you why you didn't have someone in that place?

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1 A. No, sir. From my understanding, the people who did take
 2 over the temporary roles -- so there was an executive
 3 director or chief executive in place during that time on
 4 a temporary, interim basis. I think that there was
 5 perhaps a bit of time being taken to fully understand
 6 what the requirement was, so whether or not a senior
 7 operations manager would be sufficient or whether the
 8 company was going to expand and potentially behave more
 9 like a company than a control room, a shared control
 10 room -- so I think there was possibly some, when I say
 11 reservation, I don't mean reservation in putting
 12 somebody into that post, but a period of time where they
 13 wanted to evaluate what exactly was required.
 14 Q. At all events, you took up that position in
 15 October 2016?
 16 A. I did, sir.
 17 Q. And you were in that role, as you still are, as
 18 I understand it, but more particularly on 22 May 2017?
 19 A. Yes, sir.
 20 Q. We'll just turn to your involvement in events on the
 21 night. We can do so, I hope, relatively briefly. As
 22 will be apparent from my next question, is it right that
 23 you did not hold a command role on that night?
 24 A. That's correct, sir.
 25 Q. As you saw it, once you arrived, your role was to

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1 support Ms Carden in the first instance and latterly
 2 Ms Tracey?
 3 A. Yes, sir.
 4 Q. At all events, bearing in mind the timeline that you
 5 have given us, and we'll come to review it in a moment,
 6 as a general proposition is it right that really you
 7 weren't in a position to make any decisions before 00.20
 8 in any event?
 9 A. No, sir, that's correct.
 10 SIR JOHN SAUNDERS: We've heard different rules depending on
 11 which organisation we're talking about. So do you
 12 follow, as a matter of principle, whoever is in charge
 13 controlling the situation remains in control even if
 14 more senior people come along or is it as a matter of
 15 principle as a more senior person comes along, they take
 16 it over or is it just something you made a decision on
 17 on the night?
 18 A. Yes, we made a decision on the night. So that is
 19 normally what would follow. However, it doesn't
 20 necessarily —
 21 SIR JOHN SAUNDERS: Can you tell me which? Because I gave
 22 you two alternatives.
 23 A. Okay, sir. Normally, the more senior person would take
 24 control of the incident. However, on the night of the
 25 22nd, Janine Carden seemed to be or was managing that

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1 strategic role perfectly well and Ms Gregson and Ms Owen
 2 were managing the tactical role, really, of managing the
 3 room. So at that point there was not a requirement
 4 for — it would have been Mrs Tracey to take over and
 5 there wasn't a requirement for her to take over
 6 strategic command of that.
 7 SIR JOHN SAUNDERS: Is it a matter of policy that in normal
 8 circumstances a more senior person takes over or would
 9 you just decide on any particular incident as it
 10 happens?
 11 A. I think you would decide on an incident as it happens,
 12 depending on what is — it depends on the scale of the
 13 incident.
 14 SIR JOHN SAUNDERS: And the personalities involved perhaps?
 15 A. And the experience of, yes, the people involved, yes,
 16 sir.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR DE LA POER: So let's just review your involvement by way
 19 of a timeline. Mr Lopez, {INQ041473/43}, please.
 20 We can see here in the orange marked row that you
 21 received contact from Tessa Tracey at 23.15; is that
 22 right?
 23 A. Yes, sir.
 24 Q. Did she tell you that she was intending to go into North
 25 West Fire Control?

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1 A. Yes, sir.
 2 Q. And did you tell her that you would do likewise?
 3 A. I did, yes.
 4 Q. In simple terms, is the explanation for that because you
 5 appreciated that it was a very serious incident indeed?
 6 A. Yes, sir.
 7 Q. {INQ041473/53}, please. We can see — it may be
 8 {INQ041473/52}, I may have a typo. 23.36, yes, there
 9 we are. We can see that Ms Carden contacted you at
 10 a time when you were proceeding to the control room;
 11 do you see that?
 12 A. Yes, sir.
 13 Q. Just doing our best to tie down the times of your
 14 arrival, bearing in mind that Ms Carden was in North
 15 West Fire Control at that time, were you still en route?
 16 A. Yes, sir.
 17 Q. What you say in your second witness statement — we can
 18 look at it if you need to but I'm sure you'll be able to
 19 take it from me — was that you arrived at 00.01.
 20 A. Yes, sir.
 21 Q. And that you tie that time to the fact that the
 22 multi-agency interoperability channel, as we are
 23 referring to it, had been used just before you arrived?
 24 A. That's correct, sir.
 25 Q. We'll all remember the evidence of Janine Carden, who

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1 answered the broadcast from GMP at just before midnight.
 2 What Ms Carden told us, and it may be that not an
 3 awful lot turns on it, but we'll try and get the timing
 4 as accurate as possible, her recollection is you arrived
 5 while she was receiving her first briefing from
 6 Michelle Gregson, timed some time around 11.30. I'm not
 7 looking to set up any sort of dispute between you and
 8 Ms Carden, I am just triers identify the time. What
 9 degree of confidence do you have about your 00.01
 10 arrival time?
 11 A. I'm very confident. I would need to check whether I had
 12 established that time from the clock machine, because
 13 I may have clocked in on arrival, which is where I've
 14 got that time from, but it did tie in with — my arrival
 15 was just after that transmission had taken place on the
 16 inter-agency Talk Group. And also, it tied in with
 17 Ms Carden being on the phone to, I think it was, Group
 18 Manager Nankivell at the time, and that tallies with her
 19 phone records, I believe.
 20 Q. What you say about the atmosphere in North West Fire
 21 Control was that it was calm when you arrived?
 22 A. Yes.
 23 Q. Do you stand by that?
 24 A. Yes.
 25 Q. Did you receive a briefing from Janine Carden?

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1 A. I did, yes.
 2 Q. We know that Tessa Tracey arrived at about 00.20; does
 3 that accord with your understanding?
 4 A. It does, sir, yes.
 5 Q. What you say in your witness statement is she arrived
 6 while you were receiving the briefing. Again, does that
 7 accord with your recollection?
 8 A. Yes, sir.
 9 Q. At the time —
 10 SIR JOHN SAUNDERS: Before we go on, so it's a major
 11 incident, you come in, so have other senior members of
 12 staff. We do know that because there was a possibility
 13 that you might get very busy with other calls and things
 14 like that, a text was sent out to other controllers and
 15 things like that to ask them to come in.
 16 A. Yes, sir.
 17 SIR JOHN SAUNDERS: I'm not criticising the people who
 18 didn't come in because it may be they wouldn't actually
 19 know how serious it was what was going on, they'd just
 20 been asked to come in if they were available. Is it
 21 a sensible policy, was it a sensible policy for it to be
 22 entirely voluntary or is that inevitable? Is there no
 23 other way of dealing with it?
 24 A. It's inevitable as the staffing model currently stands
 25 because to make standby hours compulsory for people to

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1 be available, it wouldn't currently fit with the working
 2 time directive in terms of the hours that they work. So
 3 at any particular time, there would be a team that's on
 4 days, a team that's on nights, a team that's either
 5 coming on days or nights the following day and a team
 6 that's on their rota days, so at any one time we only
 7 have a fairly small pool of people to bring in.
 8 However, you're absolutely right with what you have
 9 just said. At the time on the night, the text that went
 10 out was just an urgent recall for staff, and as part of
 11 the debrief recommendations from that, staff had
 12 indicated that had they known what they were being
 13 called back in for, that may have changed their decision
 14 as to whether or not or their arrangements as to whether
 15 or not they responded, and since then we have changed
 16 that so that we indicate the reason for the recall.
 17 SIR JOHN SAUNDERS: So can I just indicate, as I understand
 18 it, as it happens, you weren't particularly busy with
 19 a lot of other calls that night —
 20 A. No, sir.
 21 SIR JOHN SAUNDERS: — so the staff who were there were able
 22 to cope.
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: Of course it is a possibility that they
 25 wouldn't because we do understand that staffing levels

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1 are not high, they are reckoned to be enough to deal
 2 with the likely demand.
 3 A. Yes, sir, that's correct.
 4 SIR JOHN SAUNDERS: But if a lot of things did come in,
 5 there might have been difficulty in coping?
 6 A. Yes, sir. We have what we call buddy arrangements with
 7 other Fire and Rescue Service control rooms. They are
 8 designed so that with the job in the control room, quite
 9 often the call volumes can go from literally nothing to
 10 quite significant numbers. As you quite rightly say, on
 11 this particular night that wasn't the case, but had
 12 there been fire involved in a central city centre
 13 location, that could have been very different.
 14 SIR JOHN SAUNDERS: The buddying arrangement is that calls
 15 then go through a different room control room; is that
 16 right?
 17 A. Yes, sir, that is correct. They get diverted by the
 18 British Telecom emergency operator.
 19 SIR JOHN SAUNDERS: And they have all the necessary action
 20 cards and things like that, do they?
 21 A. They don't have the action cards and they wouldn't be
 22 expected to mobilise. We do have mobilising
 23 arrangements in place with them if North West Fire
 24 Control is not in a position to be able to mobilise, but
 25 where their activity is required to deal with duplicate

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1 reports of the same incident, their role is to gather
 2 the information from the caller, record that, and then
 3 pass that back to the control room.
 4 SIR JOHN SAUNDERS: I see. So it's when you have too many
 5 calls coming in for you to cope with, but they are often
 6 referring to the same incident?
 7 A. Yes, sir. Even with a recall to duty arrangement, quite
 8 often by the time those people, even if they live very
 9 close by, had responded, the demand may have dissipated.
 10 SIR JOHN SAUNDERS: Thank you very much. Sorry to divert
 11 you.
 12 MR DE LA POER: Not at all, sir.
 13 Ms Carden's briefing: I'd like to look at one aspect
 14 of it with you. It is probably best if you turn up your
 15 second statement, please, which is the statement which
 16 is dated 19 August 2019. If we go to page 6 of 18,
 17 paragraph 4.9. I'll just read out the first bit:
 18 "Operations Manager Carden informed me that Station
 19 Manager Andy Berry of GMFRS was the duty NILO who had
 20 been informed in accordance with the action plan for
 21 bomb provided to NWFC by Greater Manchester Fire and
 22 Rescue Service."
 23 And you go on to speak further about the action plan
 24 for a bomb incident. I think you have told us frankly
 25 a few moments ago that your understanding was that the

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1 bomb — your understanding at the time was that the bomb
 2 action plan related to any type of bomb—related
 3 incident, whereas your understanding was that the
 4 explosion action plan related to a non—malicious
 5 explosion?
 6 A. That's correct.
 7 Q. That's a distinction that existed in your mind at the
 8 time. With that in mind, and bearing in mind that the
 9 inquiry has heard a great deal of evidence about this
 10 issue about the action plans and in particular whether
 11 or not the bomb action plan was used or whether it was
 12 in mind, can I just ask you to reflect on what you have
 13 said there in your witness statement. Looking back on
 14 it, what degree of confidence do you have that
 15 Janine Carden told you that, in one form or another,
 16 North West Fire Control had worked to the bomb action
 17 plan?
 18 A. I don't believe that she did, sir.
 19 Q. Obviously, in your role as head of North West Fire
 20 Control, you had by the time you gave this statement
 21 known what members of your staff had said about that,
 22 and as at the date of this statement, August 2019, it
 23 was your understanding that they had been working to
 24 that.
 25 A. It was, sir, yes.

25

1 Q. Do you think you might have been influenced when you
 2 gave this statement by that external understanding?
 3 A. Yes, sir.
 4 SIR JOHN SAUNDERS: I do find it slightly concerning or
 5 concerning that the inquiry and everyone else has gone
 6 down a completely false line as a result of statements
 7 being made, not just by you, but by other members of
 8 your staff —
 9 A. Yes, sir.
 10 SIR JOHN SAUNDERS: — and then we get a sudden change when
 11 everyone realises: oh, that's all wrong and actually we
 12 were doing something else. How did that come about, do
 13 you think?
 14 A. Firstly, I apologise profusely for that.
 15 SIR JOHN SAUNDERS: There is no need for an apology, but it
 16 may be necessary for me to understand why.
 17 A. I do understand it has been inconvenient for people who
 18 have also provided statements based on that
 19 understanding. I think from my perspective, sir, the
 20 understanding that I had had come from the
 21 Kerslake Report and I believe that Ms Carden and
 22 Mrs Tracey had both been involved in interviews with the
 23 Kerslake team. So I think my understanding that that
 24 was the position had come from the Kerslake Report.
 25 Now, there was an error on my part that I take

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1 absolute responsibility for, that when we were
 2 responding to some of the inaccuracies that we'd
 3 identified within the initial Kerslake Report, Ms Carden
 4 had identified to me the fact that she was not aware
 5 that the bomb action plan had been followed and I missed
 6 that piece of information. We fed back on lots of
 7 different things, but it was only afterwards, when
 8 I revisited some of the documentation, that I understood
 9 that she had raised that and that was not something that
 10 I fed back to the Kerslake Review team.
 11 So that was partly my error — well, it was all my
 12 error, sorry. But then when I saw the witness
 13 statements of Michelle Gregson and Lisa Owen, they
 14 reaffirmed my understanding that that is what had
 15 happened. It was only some time later when we were
 16 trying to establish the full detail of what had happened
 17 because there was conflicting information that it came
 18 to light that Ms Gregson and Ms Owen had been incorrect
 19 in what they had put in their statements. That was the
 20 first time that I understood that.
 21 SIR JOHN SAUNDERS: As I understand it, the confirmation
 22 that the "Bomb — general" card/action plan was not
 23 involved at all came from looking at the log because
 24 it's not on the log.
 25 A. Yes, sir, it was not added on the log but you can still

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1 view an action plan and the contents of it without
 2 actually physically adding it to the log.
 3 SIR JOHN SAUNDERS: Okay, thank you.
 4 MR DE LA POER: At all events, we should not regard that
 5 paragraph as being a reliable account of what was said
 6 to you?
 7 A. No, sir.
 8 Q. Over the page of your witness statement, and again so
 9 that everybody can follow, I'll read it out, you
 10 continue explaining the briefing, and at 4.11 you
 11 indicate:
 12 "Ms Carden told me that the police had established
 13 a rendezvous point at the cathedral car park."
 14 A. That's correct.
 15 Q. Again, obviously we know now that that was information
 16 that was provided in the first call to David Ellis and
 17 recorded on the log. What degree of confidence
 18 do you have that Ms Carden told you that in her initial
 19 briefing?
 20 A. I'm very confident.
 21 Q. What you go on to say is:
 22 "I did not think it was unusual for the police to be
 23 located at a different rendezvous point and this was an
 24 opinion shared by both Senior Operations Manager Tracey
 25 and Operations Manager Carden."

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1 You say that you viewed a map and say:
2 "[You] concluded that in relation to accessibility
3 and in accordance with national operational guidance
4 around establishing cordons in the event of a
5 firearms-related incident, the location of the
6 rendezvous point at Philips Park had been a good
7 decision."

8 I'm going to ask you questions about that as you'd
9 expect but I'd just like to complete what you say in
10 your witness statement. At 14.13 you say:

11 "In my experience as a mobilising officer it had
12 been standard practice not to place all responding
13 emergency resources in a single location due to a risk
14 of secondary attacks or devices. However, my
15 understanding from a JESIP perspective and from the
16 training I'd received on JESIP principles was that
17 officers from each of the emergency services would be
18 co-locating or at least communicating, if not in the
19 same location physically then virtually via radio or
20 telephony links."

21 So there, do you agree you're pointing out something
22 of a tension between what you could see had happened
23 here and what you say at the time you thought was
24 correct or a good decision as against what JESIP says
25 about co-locating? I'm just wanting to understand from

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1 you, because I don't think we'd heard from any other
2 witness that their understanding was that JESIP would be
3 enacted through just individual officers co-locating as
4 opposed to a multi-agency rendezvous point. So can you
5 just help us with, firstly, where did you get your
6 understanding that in particular scenarios the emergency
7 services would not co-locate at a rendezvous point?

8 A. I've never had the understanding that emergency services
9 would not co-locate, but that previously, through my
10 experience of working in control rooms, it was common
11 practice for police resources and fire resources and
12 ambulance resources not to necessarily all be located in
13 the same place because of the risk of secondary
14 attacks --

15 SIR JOHN SAUNDERS: I think I can understand that, but
16 you're still saying that some of them would have
17 co-located?

18 A. But somebody should co-locate, yes, sir.

19 SIR JOHN SAUNDERS: So you don't send everybody into the RVP
20 for whatever reason?

21 A. You could do. You could do. But it would not be
22 unusual --

23 SIR JOHN SAUNDERS: To keep some in reserve?

24 A. -- to keep some separate but somebody should -- I would
25 have expected somebody to co-locate at that location.

30

1 MR DE LA POER: You thought that, having looked at the map,
2 that Philips Park had been a good decision. The
3 evidence we heard from Station Manager Berry, I hope
4 I repeat it correctly, was that he accepted that
5 Thompson Street was outside the cordon that would be
6 imposed by reference to the Victoria Exchange complex
7 but that in his mind he was concerned that if the
8 incident moved, Thompson Street would fall within that
9 cordon, which is why he has said he chose Philips Park.
10 Was your thinking when you reached the conclusion that
11 Philips Park was a good decision in those terms or for
12 some other reason?

13 A. No, sir, my understanding at the time was that the
14 hazard zone that had been placed around the area
15 incorporated --

16 SIR JOHN SAUNDERS: Just so you know, you probably wouldn't
17 say it anyway, we're not going to give any indication of
18 distances or anything like that.

19 A. Thank you. My understanding would have been that
20 Central Fire Station would have been in the hazard zone
21 area and generally, the rendezvous point, you would
22 expect to be outside that hazard zone. Plus we'd been
23 familiarising ourselves with the road closures that had
24 been notified to us by the police and that could
25 potentially have hindered access into the city centre.

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1 So Philips Park being on the outskirts was very easy for
2 us from a mobilising perspective to mobilise resources
3 to without becoming involved in the hazard zone or the
4 road closures. And had resources been moved forward, it
5 would have been an easy place to backfill. That was the
6 way that we were looking at it at the time, sir.

7 MR DE LA POER: You tell us that you asked Janine Carden
8 whether or not a major incident had been declared.

9 A. Yes, sir.

10 Q. And her answer, and I'm paraphrasing here, as according
11 to your witness statement, was that she had just assumed
12 one had been declared.

13 A. Is that... Sorry, sir, could I...

14 Q. Yes, paragraph 4.17.

15 A. Thank you.

16 Q. It says:

17 "I asked Operations Manager Carden whether the
18 incident had been declared a major incident. She told
19 me that it had not, however NWFC Ltd had assumed that
20 due to the circumstances it would be classed as a major
21 incident and had ensured that all the necessary
22 notifications and actions required by Greater Manchester
23 Fire and Rescue Service on their major incident action
24 plan had been carried out..."

25 A. Yes, sir, that's correct. She didn't say to me that she

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1 had assumed that a major incident had been declared.
 2 The way she put it to me, and I agreed with her, was
 3 that all of the indications and all of the information
 4 we had about this incident indicated that it was a major
 5 incident, and even though it hadn't been formally
 6 declared one, she had carried out the notifications on
 7 the major incident action plan for Greater Manchester
 8 Fire and Rescue Service.
 9 Q. Had either she or you at that stage of the evening
 10 declared a major incident or, so far as Fire and Rescue
 11 Services, did that lie exclusively with GMFRS?
 12 A. That would have lay exclusively with them, sir.
 13 Q. At 4.18 you deal with the issue of Operation Plato. And
 14 correctly, so far as she was aware, Operations Manager
 15 Carden advised you there had not been such
 16 a declaration.
 17 A. That's correct, sir.
 18 Q. Did you at that time think that you were dealing with an
 19 Operation Plato scenario?
 20 A. Yes, sir.
 21 Q. You say that Operations Manager Carden advised you that
 22 she had checked the action plans for Operation Plato to
 23 ensure that nothing had been overlooked so far as those
 24 were concerned?
 25 A. Yes, sir. She said she had carried out the actions on

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1 the -- I believe it was the "Operation Plato -- standby"
 2 action plan. Apart from two, there were two actions
 3 that hadn't been done. I'm not sure whether I can say
 4 one of them.
 5 Q. I don't think we need the detail. The point is really
 6 that Ms Carden was telling you that, just after
 7 midnight, she had in mind that this might be an
 8 Operation Plato scenario and she was making sure that
 9 from North West Fire Control's point of view, things
 10 weren't overlooked so far as what GMFRS had told you
 11 they wanted to be done?
 12 A. Exactly that, sir, yes.
 13 Q. You record in your statement that you asked whether
 14 there had been a METHANE message and you were informed
 15 that none had been received.
 16 A. That's correct.
 17 Q. And all of these different factors that we have been
 18 looking at, I hope I'm summarising fairly, in your
 19 witness statement, the use of Philips Park, the fact
 20 that there was no METHANE, the fact that no
 21 Operation Plato declaration had been communicated to
 22 you, although to your mind it was an Operation Plato
 23 situation, it appears, according to your witness
 24 statement, to indicate that you regarded this as being
 25 an incident which few resources had been sent to the

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1 scene; is that right?
 2 A. Yes, sir.
 3 Q. That essentially --
 4 SIR JOHN SAUNDERS: That's quite a complicated sentence that
 5 one, I thought.
 6 MR DE LA POER: I'm sure I could have done it much better.
 7 I can try and reframe it in a more intelligible way if
 8 that would help Ms Wilson.
 9 Did you understand what I meant, do you think?
 10 A. I did, sir, yes. And that was the impression that I had
 11 formed at that point.
 12 Q. So that was where you were in terms of your
 13 understanding based on what Ms Carden had told you.
 14 I just want to ask about the log at this stage. We know
 15 from another emergency service, and he was in a very
 16 different position so I'm not suggesting that you were
 17 in a comparable position, Chief Superintendent Gregory
 18 of British Transport Police, who was to take over as
 19 Silver commander, he told us that when he turned out to
 20 their control room, he spent a period of time reviewing
 21 the log in order to obtain situational awareness.
 22 A. Yes.
 23 Q. Is that something that you did when you arrived or did
 24 you rely upon an oral briefing only?
 25 A. No, sir, I relied upon an oral briefing only and it was

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1 much later in the early hours of the morning that
 2 I actually started to review the incident logs.
 3 SIR JOHN SAUNDERS: Why would you do that later?
 4 A. I was doing it later, sir, to put together a briefing
 5 for my board of directors.
 6 SIR JOHN SAUNDERS: I see, thank you.
 7 MR DE LA POER: Finally about any detail in relation to the
 8 night, I would like to take a step back. At the time
 9 that you received that information and had those
 10 exchanges with Janine Carden, were you planning to take
 11 over in a command position?
 12 A. No, sir.
 13 Q. If you arrived at 00.01, and Ms Carden had other duties
 14 of course and you were still being briefed at 00.20 when
 15 Ms Tracey arrived, I would just like to reflect, if you
 16 were not receiving that as a handover briefing, do you
 17 think that that was an appropriate use of Ms Carden's
 18 time in the situation that she was in that she should be
 19 spending that time speaking to you and answering
 20 questions rather than acting as a commander, or do you
 21 think that you might have obtained situational awareness
 22 from the log and then waited for a quieter time to speak
 23 to her? What's your view on that?
 24 A. No, sir, I think that it was or should have been
 25 a useful use of her time and I feel that there were

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1 things that I could have done better at that point. So
 2 as you quite rightly said, I was thinking in my mind
 3 that this was a major incident, there were clearly large
 4 numbers of casualties and fatalities. I was thinking
 5 that this is possibly a scene that none of the emergency
 6 services in Greater Manchester had been confronted with
 7 before and that possibly JESIP wasn't necessarily the
 8 first thing on their minds.

9 What I should have done when Ms Carden was briefing
 10 me is, when I asked about the major incident declaration
 11 and she said there hadn't been one, I was very clear in
 12 my mind that at the very least this would be a major
 13 incident for the Ambulance Service and I would have
 14 expected a major incident declaration from the
 15 Ambulance Service, which I believe there was, and at
 16 that point I should have directed Janine to find out
 17 that information to see whether or not a major incident
 18 had been declared.

19 I think I was thinking at the time that if there had
 20 been a major incident declared, that information would
 21 have been shared and therefore I came to the conclusion
 22 that if it hadn't been shared, it hadn't been declared.
 23 And that was a mistake on my part. If we'd sought the
 24 information about the major incident declaration, the
 25 next natural progression would have been to request

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1 whether a METHANE message had been sent. And I think
 2 there would have been a lot more information available
 3 at that time. So it should have been a useful use of
 4 her time.

5 SIR JOHN SAUNDERS: Had you already made up your mind to
 6 leave Janine running the organisation, running the
 7 response, before you had the debrief, the handover from
 8 her, that discussion? Or is it something you decided
 9 after you'd had it?

10 A. I think it was... It would be unusual for me to take
 11 over the command of the incident because normally that
 12 would be Mrs Tracey that would do that. However, having
 13 realised that it was Ms Carden who was the duty
 14 operations manager that night, I had absolutely every
 15 confidence in Ms Carden. She was an exceptional
 16 operations manager and she was also the operations
 17 manager that had the most detailed knowledge of the ways
 18 in which Greater Manchester Fire and Rescue Service
 19 worked. So she was very conversant with JESIP, she was
 20 very conversant with --

21 SIR JOHN SAUNDERS: I'm not doubting the decision. I'm just
 22 trying to ask when you took it, ie did you wait until
 23 after that briefing to decide she'd stay in charge?

24 A. Yes, I think I had decided -- yes, I think I decided
 25 after the briefing. It was clear that she was in full

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1 control of that incident.

2 SIR JOHN SAUNDERS: Because that may be a reason why the
 3 briefing is a good idea. Can I just ask one other thing
 4 while we're dealing with the question of looking at the
 5 log. We've heard quite a lot from GMFRS officers that
 6 the reason they didn't look or one of the reasons they
 7 didn't look at the log is they find it quite difficult
 8 to follow and understand it. Do you think it is quite
 9 difficult to understand and follow? Would you have any
 10 difficulty, for example, in following the log?

11 A. No, sir.

12 SIR JOHN SAUNDERS: Do you think it's difficult?

13 A. No, sir, I actually think it's easier than the main CAD
 14 log. It has a lot less detail in it.

15 SIR JOHN SAUNDERS: Thank you.

16 MR DE LA POER: Just to conclude the 22nd into the 23rd,
 17 plainly you remained in North West Fire Control for
 18 a period of time, you were aware of the deployments, and
 19 I think you tell us that you offered support to
 20 Ms Carden and latterly Ms Tracey.

21 A. Yes, sir.

22 Q. I would like to turn now to the issues which have arisen
 23 in the inquiry and it may be that we can take this more
 24 shortly given what you have said already. But let's
 25 begin, please, with topic 1 or issue 1. The

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1 multi-agency interoperability Talk Group.

2 The inquiry has heard evidence about the standard
 3 operating procedure that was under discussion or under
 4 review or not yet live, however it might be termed,
 5 at the time of the attack.

6 A. Yes, sir.

7 Q. We know that very shortly after the attack, an interim
 8 standard operating procedure was implemented.

9 A. Yes, sir.

10 Q. Whose responsibility was it, in your view, to drive that
 11 project to make sure that it was put in place in
 12 a timely way?

13 A. I believe it was the police because they had instigated
 14 that project. My understanding was that there was
 15 already inter-agency Talk Groups available for that
 16 purpose and that there was no reason why they could not
 17 have been used on the night for the same purpose.

18 Q. I hope I recount this correctly. You're absolutely
 19 right, the channel that we're speaking about was
 20 a tactical channel which existed badged as that.

21 I think the plan was that it would become a control room
 22 channel and, of course, we know that Mr Fletcher
 23 identified that channel so that it was being monitored
 24 by North West Fire Control from 23.36. But it does
 25 appear that there wasn't a drive from the start of the

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1 incident by all emergency services to use that channel
 2 as a method of communication. Would you agree with
 3 that?
 4 A. Yes, sir.
 5 Q. And an explanation for that may be because the idea that
 6 it would be used in that way by the control rooms hadn't
 7 been properly actioned and embedded at the time of the
 8 attack?
 9 A. Not for that particular Talk Group, no, sir.
 10 Q. Not for that particular Talk Group?
 11 A. Yes, that's right.
 12 Q. So it is possible, depending on how the chairman finds
 13 matters, that the delay in setting that up was a missed
 14 opportunity for the control rooms to speak to each other
 15 in a way that they all immediately recognised would be
 16 a good way of sharing their information from an early
 17 stage?
 18 A. I think we were already clear that that facility already
 19 existed, using different Talk Groups.
 20 SIR JOHN SAUNDERS: We do know there was another system that
 21 could have operated but that actually required the
 22 police to notify you all of which channel it was --
 23 A. That's correct, sir.
 24 SIR JOHN SAUNDERS: -- and then someone to open it. Is that
 25 what you're talking about?

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1 A. Yes, sir.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR DE LA POER: Whereas the channel that we're speaking
 4 about would be monitored by all control rooms 24 hours
 5 a day?
 6 A. That's correct, yes.
 7 Q. And we've heard evidence about the fact that it's tested
 8 three times a day to make sure that everybody is in fact
 9 listening and responding immediately?
 10 A. Yes, sir.
 11 Q. That facility wasn't in place, that very easy
 12 straightforward way of all four control rooms speaking
 13 to each other from the start. Bearing in mind that
 14 North West Fire Control was involved in that project,
 15 what comment, if any, do you have on the time it took to
 16 get that up and running and whether it should have been
 17 up and running before 22 May 2017?
 18 A. From the evidence that I've heard, I can't -- I find it
 19 difficult to understand why it couldn't have been in
 20 place for 22 May. But at the time, I didn't have an
 21 awareness of how long that project had been running for.
 22 I was aware that there were conversations around
 23 establishing a Talk Group of that kind, but I was still
 24 comfortable with the knowledge that there was something
 25 already in place.

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1 Q. So if we just have a look at what the tri-service review
 2 recommended in 2015. This is attached to the JESIP
 3 review that took place in August of 2017 of North West
 4 Fire Control. If we can go to {INQ000992/8}.
 5 Do you see that document there, headed -- would
 6 those recommendations have been received by North West
 7 Fire Control in 2015?
 8 A. I couldn't say for certain, sir. I'm not sure.
 9 Q. We can see at paragraph 4:
 10 "There needs to be a greater knowledge and
 11 understanding of the capabilities of Airwave and the use
 12 of the interoperable channels at incidents."
 13 It seems to be what that HMIC review was concluding
 14 in 2015.
 15 A. Yes.
 16 Q. Given the answers that you just given us, do you think
 17 that North West Fire Control did have sufficient
 18 knowledge and understanding, firstly of Airwave in May
 19 of 2017?
 20 A. Yes, sir.
 21 Q. And do you think that there was adequate use of the
 22 interoperable channels at incidents by May of 2017?
 23 A. No, sir.
 24 Q. Why do you say that?
 25 A. Because I'm not aware of many, if any, incidents where

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1 those interoperable channels have been used, certainly
 2 not between control rooms. They may have been on
 3 incident grounds by operational and tactical commanders,
 4 but I'm not aware of them.
 5 SIR JOHN SAUNDERS: We know it's there now. Does it work
 6 properly?
 7 A. Yes, sir.
 8 SIR JOHN SAUNDERS: And it's worked on incidents?
 9 A. Yes, sir. We have used it on incidents. It has changed
 10 now from the original Talk Group.
 11 SIR JOHN SAUNDERS: We don't need to know about that.
 12 A. But, yes, sir, we've used it several times now on
 13 incidents and it has worked.
 14 SIR JOHN SAUNDERS: Is there someone dedicated to listening
 15 to it?
 16 A. I'm not quite sure how each agency control room works,
 17 but in the North West Fire Control, it is permanently
 18 audio monitored on its position, so every operator
 19 position, and also on a desktop radio.
 20 SIR JOHN SAUNDERS: Right, thank you.
 21 MR DE LA POER: Issue 2., the decision to call the NILO.
 22 Can I just say that I'm not going to invite you to enter
 23 the arena, so to speak, on whether that was or wasn't
 24 the right position. You have told us in your statement
 25 that you made at the beginning that you support that

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1 decision, so you have given that evidence.
 2 What I want to just explore with you briefly,
 3 please, is the issue of discretion. The evidence, again
 4 I hope I summarise it accurately, of both Ms Gregson and
 5 Ms Owen was that their sense was that this was
 6 a decision that required the NILO and so rather than
 7 following the action plan that they were prompted to do
 8 by the system and by the inputs of Mr Ellis, they made
 9 a decision to contact the NILO.

10 A. Yes, sir.

11 Q. Which appears to be an exercise of decision-making by
 12 them, do you agree? They felt they had a choice and
 13 they made a choice.

14 A. I'm not sure whether it was a decision. The default
 15 position would be -- I think I've heard it mentioned in
 16 evidence on numerous occasions that you cannot have an
 17 incident type and an action plan for every single
 18 eventuality. We do our best to try and cover as many of
 19 those eventualities as we can, but sometimes you do
 20 encounter an incident scenario that doesn't fit
 21 specifically with one action plan or the another. The
 22 default position there is to then get advice from an
 23 expert, somebody who would know.

24 The discretionary element and the decision element
 25 of that was basically who was the person with the

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1 necessary skills and knowledge. So had this not been
 2 an MTFa incident, it could have been a normal
 3 operational incident, and the decision at that point may
 4 have been to contact the duty group manager for advice,
 5 for example. In this particular case, I believe because
 6 of the information that had been presented to them and
 7 the possibility of a terrorist element to that, the
 8 decision they took was to contact specifically the NILO.

9 SIR JOHN SAUNDERS: There are two elements of discretion,
 10 aren't there? So the explosion action card comes up
 11 automatically.

12 A. Yes, sir?

13 SIR JOHN SAUNDERS: So that is the one that would normally
 14 be followed?

15 A. Yes, sir.

16 SIR JOHN SAUNDERS: And that would involve sending people to
 17 the scene or maybe an RVP?

18 A. Yes, sir.

19 SIR JOHN SAUNDERS: So the decision not to follow that
 20 immediately is one exercise of discretion. The other
 21 one is who to contact. So you've dealt with the second
 22 one, you said the NILO is the obvious person. But
 23 equally, there is another discretion, isn't there, which
 24 was exercised on this particular night, which is: there
 25 has been an explosion, that's the action plan that's

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1 come up, I'm not going to follow it?

2 A. That's correct, sir. That action plan didn't have an
 3 element of mobilising to a rendezvous point within it,
 4 it was mobilising directly to the scene of the incident.

5 SIR JOHN SAUNDERS: Someone's being told about an RVP point
 6 and the action plan says go to the scene. Is that
 7 really difficult to work out whether you send them to
 8 the RVP point rather than the incident or would you need
 9 advice on that?

10 A. We would need advice on that. The requirement from
 11 Greater Manchester Fire and Rescue Service for an
 12 explosion incident type is to mobilise directly to the
 13 scene.

14 SIR JOHN SAUNDERS: So the explosion action card is
 15 defective on what we've been told by GMFRS in that it
 16 ought to say, "Mobilise to the scene or to an RVP if
 17 you're given one"?

18 A. Yes, sir, which it does now. As of February this year,
 19 it does now, but it didn't on 22 May.

20 MR DE LA POER: I was going to just follow that up. We know
 21 that in the immediate aftermath of the attack, the bomb,
 22 and plan was amended so that, in the event that the bomb
 23 exploded, a person was taken to the explosion action
 24 plan --

25 A. Yes.

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1 Q. -- which itself, as we understand it, was not amended,
 2 it required immediate mobilisation to the scene?

3 A. That's correct, sir.

4 Q. That was despite the fact that in practice, on the
 5 night, GMP communicated a location other than the scene
 6 for people who deploy to. So that nuance about events
 7 on the night wasn't incorporated into the action plans?

8 A. No, that's correct.

9 Q. Was that something that, bearing in mind that it would
 10 be North West Fire Control who were confronted with that
 11 apparent contradiction, something that North West Fire
 12 Control raised at the time of that amendment and said,
 13 "Look, if we actually look at the one worked example
 14 we have, what you're telling us to do isn't going to
 15 work very easily"?

16 A. Yes, sir, we did.

17 Q. You raised it?

18 A. Yes.

19 Q. And how long did you say it took from raising it to
 20 amendment?

21 A. It was amended to a rendezvous point, to include
 22 a rendezvous point, in February this year, I believe.

23 Q. And did you raise the concern back in 2017 about the --
 24 did you raise that particular concern back in 2017 when
 25 the action plans were amended?

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1 A. Yes, sir, I raised it with Mr Topping.
 2 Q. What explanation, if any, were you given as to why it
 3 took 3.5 years to actually heed that?
 4 A. I think Mr Topping's view was that the crews that were
 5 responding directly to the scene, if they were given
 6 information that indicated that terrorist activity might
 7 be present, the incident commander of those crews — the
 8 officer in charge of those crews would make the decision
 9 as to whether they would continue to the incident or
 10 whether they would seek to find a cordon or divert to
 11 a rendezvous point.
 12 SIR JOHN SAUNDERS: Assuming the rendezvous point is further
 13 away from the incident, which by definition it must be,
 14 and bearing in mind that I think we've come to the
 15 situation where we have to say that operators or people
 16 in charge of the control room have to exercise a degree
 17 of discretion, it would have been possible, wouldn't it,
 18 to say, "Right, you mobilise to an RVP point and we will
 19 then check whether you should be going on to the
 20 incident", so it gets people on the way?
 21 A. That wasn't how we trained our managers at the time,
 22 sir, but yes, you're absolutely right, it could have
 23 been.
 24 SIR JOHN SAUNDERS: So how did you train your managers?
 25 Were you saying to them: if you are given an RVP on an

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1 explosion, rather than going to the scene you have to go
 2 and raise that with somebody?
 3 A. That was the instruction at the time, to inform the
 4 NILO, advise them of the police rendezvous point, and
 5 then take instructions from them following that.
 6 SIR JOHN SAUNDERS: It seems that at the time any discretion
 7 was being removed from the controllers.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: If they can't follow the exact word, you
 10 get advice?
 11 A. Yes, sir.
 12 MR DE LA POER: That was the training that was being
 13 given —
 14 A. It was, sir.
 15 Q. — by North West Fire Control, because it was really
 16 just around this issue of discretion or judgement or
 17 decision—making where either the action plan didn't fit
 18 precisely or there was a concern on the part of the team
 19 leader that following the action plan wasn't the right
 20 thing to do? What support were the team leaders being
 21 given to make those judgements before May of 2017?
 22 A. The key one would have been the MTFA training that
 23 they'd had. So North West Fire Control mobilises to
 24 a number of incidents. I do have the exact number, but
 25 I can't recall it off the top of my head, but I can

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1 provide it if it would be of assistance. We mobilise to
 2 a lot of explosion incident types and there is no
 3 concern around mobilising the crews to the scene.
 4 I think in all of the explosion incident types that
 5 we've ever had, this is the first one where there was
 6 supplementary information that the explosion had been
 7 caused by a bomb and there was a potential for secondary
 8 devices. That fitted with the MTFA training that they
 9 had had, which made them recognise that this incident
 10 was different from the usual explosion incident types.
 11 Then the fact that if they are in any doubt and they
 12 were concerned that they might be potentially putting
 13 crews at risk, they could then take advice on that.
 14 SIR JOHN SAUNDERS: Was that actually specific training to
 15 NWFC controllers? We've heard about the general
 16 training about MTFAs: this is what would happen, this is
 17 what we're concerned about. So what an MTFA is there
 18 was training about. Was there actual training which
 19 said to NWFC, "If you're in this situation, this is what
 20 you do"?
 21 A. I think it was custom and practice, probably, sir, more
 22 than specific training. I have asked that question and
 23 there isn't anything specifically written down in any
 24 specific training to that effect. However, that is the
 25 position that the team leaders hold, that they

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1 understand that if they are in any doubt, they can seek
 2 advice, either from a NILO or the duty group manager or
 3 an Airwave tactical adviser, for example, as somebody
 4 with the specialist knowledge to be able to support and
 5 make that decision.
 6 SIR JOHN SAUNDERS: It's quite difficult to say custom and
 7 practice when you've never had an MTFA before.
 8 A. No, that's correct, sir, and we haven't, but it happens
 9 with other incidents.
 10 SIR JOHN SAUNDERS: So it's derived from these other things?
 11 A. Yes, sir.
 12 SIR JOHN SAUNDERS: One of the things which is becoming
 13 apparent is that the way GMFRS operated is that actually
 14 the whole thing gets going when someone gets to the
 15 scene.
 16 A. Yes, sir.
 17 SIR JOHN SAUNDERS: And if they don't get to the scene then
 18 there's at least the possibility that the whole rescue
 19 attempt will stall.
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: So actually getting people to the scene
 22 is really quite a priority —
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: — or was at the time.
 25 A. Yes, sir.

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1 MR DE LA POER: We've dealt extensively with action plans
 2 with other witnesses and you've already touched upon
 3 them and I don't want to go over that ground. I just
 4 want to ask you about the "Operation Plato — standby
 5 phase" action plan. You're familiar with its contents,
 6 are you?
 7 A. Yes, sir.
 8 Q. We don't need to go further than the fact that that
 9 tells you to call a NILO as the first action.
 10 A. Yes, sir.
 11 Q. Whereas the explosion action plan, as it was amended,
 12 involved sending people straight to the scene?
 13 A. Yes, sir.
 14 Q. You have told us that it's been updated. Can you see
 15 the potential tension between those two action plans as
 16 they were post-May 2017? In other words, if you think
 17 that you are facing an Operation Plato scenario, phone
 18 the NILO. But if you have an exploded bomb, as might be
 19 the case through the amended route, you send people
 20 straight to the scene. Can you see potential tension
 21 there?
 22 A. Yes, sir.
 23 Q. Do you agree it rather depends upon whether or not the
 24 person thinking about it and deciding which action plan
 25 to follow perceives the exploded bomb as being

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1 a precursor, which it may be, to an MTFA or an MTA —
 2 A. Yes.
 3 Q. — or whether or not they simply think it's
 4 a freestanding bomb attack?
 5 A. Yes, sir, there is a potential for that, I can see that.
 6 However, I think that the MTFA training that goes
 7 alongside that is designed to assist team leaders,
 8 control room operators, to recognise the potential for
 9 unfolding terrorist incidents, which is what would make
 10 it different from a normal explosion incident type.
 11 Q. As we understand it, GMFRS specifically amended the bomb
 12 action plan to route you to the explosion action plan
 13 in the event the bomb went off. I am just trying to
 14 understand from North West Fire Control's point of view
 15 what thinking was done around that in terms of what it
 16 meant for your operators, for your team leaders
 17 practically. Because on the one hand, the team leaders,
 18 do you agree, were receiving training that a bomb going
 19 off may be the start of an MTFA?
 20 A. Yes, sir.
 21 Q. On the other hand, they've received a specifically
 22 amended action plan from GMFRS, which says, "If a bomb
 23 goes off, use the explosion action card, send everybody
 24 to the scene"?
 25 A. Yes, sir.

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1 Q. Do you see?
 2 A. Yes, sir.
 3 Q. Was that tension recognised at the time that GMFRS made
 4 that amendment?
 5 A. It was, sir, yes, and probably to a certain extent still
 6 is, because I think where we are improving in terms of
 7 our training is around the involvement of control room
 8 in JESIP. Mrs Tracey mentioned it, that we kind of
 9 viewed JESIP as a process and not necessarily a dynamic
 10 way of thinking that involved control room operators
 11 in that dynamic risk assessing, that shared situational
 12 awareness and joint understanding of risk.
 13 I think that was seen to be more information that
 14 would be gathered by incident commanders on the incident
 15 ground and not something that the control room could be
 16 involved in. So we've altered our training to try and
 17 encompass that dynamic thinking element into the role of
 18 the team leader because I think had more of
 19 a conversation taken place between Ms Gregson and
 20 Mr Berry around the rationale and the thinking around
 21 what had been done, that may have prompted Mr Berry to
 22 make a different decision to the one that he did.
 23 SIR JOHN SAUNDERS: Okay. It's all very well to say it's
 24 the team leader's training, but the reality is that this
 25 particular incident need never have got to the team

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1 leader. When the phone call originally came in and the
 2 explosion comes up, there's nothing to stop the operator
 3 just pressing "go" and mobilise?
 4 A. No, sir.
 5 SIR JOHN SAUNDERS: So how do we know it's ever going to get
 6 to the team leader?
 7 A. Sorry, when I say the team leader, the training that is
 8 being done, it's the JESIP training, so it is going to
 9 all of the members of staff.
 10 SIR JOHN SAUNDERS: It may be — and we'll have a break in
 11 a minute — but it may be that the conflict is between
 12 saying: we set up this new control room system, NWFC, we
 13 give — whichever the particular authority that we're
 14 dealing with, we give a series of action cards which
 15 really just can be followed automatically, we're not
 16 leaving any discretion because maybe the controllers
 17 aren't people who can do that. Now it's been discovered
 18 that actually you can't do that, you cannot do action
 19 cards to cover every situation.
 20 A. No, you can't.
 21 SIR JOHN SAUNDERS: Therefore you have to rely on the
 22 discretion. Was the system really set up to allow for
 23 that discretion at the time this happened on 22 May?
 24 A. I don't believe so, no, sir.
 25 SIR JOHN SAUNDERS: You have more to do before we break?

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1 MR DE LA POER: I had one follow-up question, sir, relevant
 2 to your line of questioning.
 3 We can do it by reference to a document we've
 4 already looked at, {INQ000992/1}. It may be that
 5 there's further detail around the answer you have just
 6 given which is contained within this document.
 7 {INQ000992/5}. This is from the JESIP assurance
 8 visit which took place in August 2017, so we're talking
 9 about post-attack.
 10 In particular if we can have a look at paragraph 6,
 11 it says:
 12 "Training. All staff are required to undertake the
 13 JESIP e-learning every year. This is also recorded on
 14 their PDR Pro record. During the focus group it would
 15 appear that individuals across all grades haven't
 16 completed the JESIP e-learning or had an input since
 17 2015."
 18 Is that finding by the JESIP assurance visit
 19 relevant to the answer you have just given us about
 20 whether or not staff were sufficiently well-equipped to
 21 make a decision or is that a different point?
 22 A. No, I think that might possibly be a slightly different
 23 point because I think that there were... Mrs Tracey
 24 would be able to answer this question better than I can.
 25 But I believe that she looked into that and the reason

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1 that some members of staff hadn't had input was either
 2 because they hadn't been working or they'd been off sick
 3 for whatever reasons. Because the JESIP e-learning is
 4 incorporated into the phase 3 maintenance of skills
 5 training, so has to be completed by everybody on an
 6 annual basis. So it would either be that at that point
 7 that wasn't the case, and the JESIP e-learning wasn't
 8 part of the phase 3, but I believe that it was, so I'm
 9 thinking that the reason that not everybody had
 10 completed it was because they were absent from work in
 11 order to do that.
 12 Q. But if it's part of phase 3, just to conclude this
 13 topic, that would mean that Vanessa Ennis wouldn't have
 14 done it, bearing in mind that she was, depending on what
 15 views one takes of the evidence, only just or not quite
 16 approved for independent action. Dean Casey, who told
 17 us that he was, I think, not yet at the end of his
 18 period, he won't have done it either; is that right?
 19 A. I believe it's covered on the phase 1 training and also
 20 in phase 2.
 21 Q. So it's covered in phase 1?
 22 A. I believe so. I can find that out for definite, but
 23 I believe that it is.
 24 MR DE LA POER: Sir, I wonder if that would be a convenient
 25 moment.

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1 SIR JOHN SAUNDERS: It would. I just want to leave you with
 2 this thought, which we will come back to later, perhaps.
 3 You said in what you helpfully said to start with, or
 4 perhaps questions after that, that in this early stage
 5 when there wasn't anybody really running NWFC, you were
 6 operating simply as a control room really rather than
 7 developing your own identity as a company; is that
 8 right?
 9 A. Yes, sir.
 10 SIR JOHN SAUNDERS: I just want to understand if and what
 11 difference that could make when actually that is what
 12 you were doing, being control rooms. Perhaps we can
 13 just deal with that after the break.
 14 A. Yes, sir.
 15 SIR JOHN SAUNDERS: Thank you. Quarter of an hour.
 16 (11.02 am)
 17 (A short break)
 18 (11.30 am)
 19 MR DE LA POER: Sir, I apologise to you and to the witness
 20 and everyone following for the delay in our restart.
 21 There was a matter that needed to be dealt with.
 22 SIR JOHN SAUNDERS: Okay, thank you.
 23 MR DE LA POER: Ms Wilson, I'd like to complete the topic of
 24 training before turning to two further issues. Firstly,
 25 in relation to JESIP training, the ever-helpful

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1 Ms Gilmour has drawn my attention to the fact that it is
 2 provided within the phase 2 programme, I hope I've
 3 understood her email correctly, so I'm sure you can take
 4 that from me given that that's come from North West Fire
 5 Control's legal team.
 6 A. Yes, sir, thank you.
 7 Q. Next, under the heading of training, Michelle Gregson
 8 has told the inquiry that she raised concerns about
 9 training and preparedness prior to the attack. Did you
 10 hear her evidence?
 11 A. I did, yes.
 12 Q. Has that been investigated?
 13 A. I believe it has, yes, sir.
 14 Q. In summary form, what do you understand the position to
 15 be?
 16 A. I understand that Ms Gregson did raise concerns about
 17 the time available to her and her team to carry out
 18 training, but it was dealt with as a time management
 19 issue and she did not specifically raise issues about
 20 JESIP training specifically. That's my understanding,
 21 sir.
 22 Q. No doubt we'll have a formal update. I just wanted to
 23 see if there was anything arising from that while you're
 24 with us in the witness box.
 25 So far as exercising is concerned, you've already

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1 said that potentially by reason of the governance issue
 2 and the oversight that would have come with having
 3 a head of North West Fire Control, that that might have
 4 been something proactively pursued by North West Fire
 5 Control prior to 22 May. Was there any internal
 6 exercising prior to 22 May 2017 as to mobilisation?
 7 A. I would need to check that, sir, in terms of prior to
 8 22 May. The JESIP training itself did contain some
 9 scenario cards, where there would be scenarios played
 10 through in a test scenario. I believe those were in
 11 place prior to 22 May. I think they were part and
 12 parcel of the training that we delivered then, but
 13 I would need to confirm that.
 14 Q. As you understand it, accepting that you may wish to
 15 confirm this, did you understand that those scenarios
 16 were played out by using your mobilisation system and
 17 the action cards that had been provided to you so that
 18 operators could practice with the system that was in
 19 place under supervision to check that they were doing
 20 things correctly?
 21 A. Yes, sir.
 22 Q. What explanation do you have for the fact that there was
 23 a failure to communicate adequately between GMFRS and
 24 North West Fire Control over exactly what the action
 25 plans for bomb and explosion were for?

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1 A. I'm not really clear on how that misunderstanding has
 2 come about, sir, because the information was supplied to
 3 us by the transition teams from each Fire and Rescue
 4 Service and it is clear from the evidence that has been
 5 submitted from GMFRS what their previous action plans
 6 looked like and the content of them and the references
 7 made to the emergency call management prompts and their
 8 service orders, that at that point they clearly intended
 9 its use to be for an unexploded bomb.
 10 But that level of information was not incorporated
 11 into our mobilising system. I can't say it wasn't
 12 provided because I don't know whether it was or it
 13 wasn't, sir. As far as I understand it, those action
 14 plans were not provided to North West Fire Control, they
 15 were held by the transition team and the transition team
 16 completed templates in the form of spreadsheets that
 17 were then given to our system suppliers for bulk loading
 18 on to the system. So that is the information that was
 19 provided to North West Fire Control. My understanding
 20 is that that additional information that was contained
 21 was not on the spreadsheets and therefore that "Bomb --
 22 general" title has created ambiguity in terms of its
 23 meaning, sir.
 24 Q. Do you know whether there was any of this internal
 25 exercising in the JESIP context that used either of

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1 those action plans in a scenario?
 2 A. I don't know, sir, I would need to check that.
 3 Q. Next issue, the passing on of information to GMFRS.
 4 You've already accepted that certain information could
 5 have been passed on, and had it been passed on, it would
 6 have been capable of influencing decision-making.
 7 I don't want to go back over that.
 8 A. Yes, sir.
 9 Q. I really want to look at the mechanics of how you might
 10 have expected your staff in May of 2017 to have passed
 11 that information on.
 12 The information provided by the first caller, who
 13 was the GMP control room to David Ellis, that was a very
 14 lengthy call, wasn't it?
 15 A. Yes, sir.
 16 Q. And that required Mr Ellis to be selective about what he
 17 recorded on the log in the first instance?
 18 A. Yes, sir.
 19 Q. He wasn't able to write down verbatim a transcript of
 20 what was given; he had to apply his knowledge and
 21 experience to pick out the important information?
 22 A. Yes, sir.
 23 Q. Do you agree?
 24 A. Yes, sir.
 25 Q. And there's been no suggestion on anyone's part that he

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1 failed to do that in terms of the information that
 2 he was being given at that time and what he put on the
 3 log. Once it is on the log, the question then comes:
 4 how does anybody reading it know where the important
 5 information is to be found as a situation develops? Do
 6 you understand?
 7 A. Yes, I do.
 8 Q. As a general idea, obviously not everything that
 9 Mr Ellis put on the log when he first put it on was
 10 necessarily the most up-to-date or important information
 11 because, as we know, further information came in and
 12 that resulted in the addition of more items on the log.
 13 A. Yes, sir.
 14 Q. So as it was in May 2017, how were operators who were
 15 reading that log to be able to identify what information
 16 might be important for them to pass on to GMFRS
 17 officers?
 18 A. The operators are trained to pass all information on to
 19 those officers, so they are not necessarily skilled or
 20 qualified to make an assessment of how important or
 21 unimportant that information may be to an incident
 22 commander. That is for the incident commander to
 23 evaluate. Their role is to pass that information to the
 24 incident commander or relevant officer to make that
 25 judgement.

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1 Q. Might there be a potential problem with that approach?
 2 Let me see what you think: if further on in the
 3 incident, say quarter past 11, a control room operator
 4 speaking to an officer is expected to pass on everything
 5 on the log, that could be a very lengthy recital,
 6 depending on how much information has come in; do you
 7 agree?
 8 A. Yes, sir, yes, absolutely.
 9 Q. It might take some minutes potentially to rehearse it?
 10 A. Yes, sir.
 11 Q. It might contain information which is subsequently
 12 superseded by later information, do you agree?
 13 A. Yes, sir.
 14 Q. And that fact might deter, because it's going to take
 15 time, people asking for it. Can you see how that might
 16 be the case if somebody is wanting to just get a grip on
 17 the situation, "What do I need to know"?
 18 A. Yes, sir.
 19 Q. The risk is, if they're then expecting a control room
 20 operator to go right back to the beginning of the log
 21 and just read out line by line everything that's on it,
 22 that in that dynamic situation people might be deterred
 23 from even asking for it if they think that is what's
 24 coming?
 25 A. Yes, sir.

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1 Q. Do you see that as a possibility?
 2 A. Yes, I can see, yes.
 3 Q. And having a mechanism to identify what is really
 4 important and what a person needs to know may fix that
 5 potential problem?
 6 A. Yes, sir.
 7 Q. But was the position in May 2017 that your staff,
 8 generally speaking, just weren't competent to provide
 9 that selective information?
 10 A. It would appear that way from the incident, sir, yes.
 11 It isn't something that happens regularly and operators
 12 are dealing with incidents all the time and gathering
 13 information and sharing that information with officers
 14 at the scene. But on this occasion, yes, it would
 15 appear that they were unequipped to be able to determine
 16 what would and would not have been of value at the
 17 incident ground.
 18 SIR JOHN SAUNDERS: 99% of the time they are sent to the
 19 scene?
 20 A. Correct, sir, yes.
 21 SIR JOHN SAUNDERS: They got their own situational
 22 awareness, there's no need for all this information to
 23 be handed on.
 24 A. Yes, sir.
 25 SIR JOHN SAUNDERS: There's a very small number of times

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1 when this will or could happen.
 2 A. Yes, sir.
 3 SIR JOHN SAUNDERS: You said it's important that you hand on
 4 all the information to the incident commander. I want
 5 to know really what they are trained to do now. Are
 6 they trained to give all the information to anyone who
 7 rings in to ask for it or do they give it only to the
 8 incident commander? It's just the practicalities of
 9 what the training is you're giving and do you say to
 10 them: you read through, right from the beginning,
 11 everything, every bit of information you have, however
 12 long it takes, to whoever asks for it?
 13 A. It's a combination of those things. The way that we
 14 operate now, and you're absolutely right, normally it's
 15 very straightforward because you have one incident
 16 commander located at the scene. For this incident, we
 17 had numerous locations with different resources located
 18 at them different locations. So I think there was
 19 a general perhaps lack of understanding as to where that
 20 information needed to — so who needed that information,
 21 was it the duty NILO, was it the other NILOs that were
 22 then also located at Philips Park, was it the command
 23 support room?
 24 So I think to start with, the information was being
 25 passed based on the principle of the more senior officer

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1 becoming the person in charge of that with the grip of
 2 what was going on. And I think that happened to be
 3 Group Manager Nankivell along with Mr Berry.
 4 What we would do now is the control room has
 5 instructions to determine a contact point at each of
 6 those locations to where that — who will receive that
 7 information when it becomes available. If an officer
 8 rings in and asks for information, the expectation is
 9 they will be given all of the information that they have
 10 not previously had.
 11 SIR JOHN SAUNDERS: That raises a significant issue. The
 12 first time they ring, they get one operator; the next
 13 time they get another operator. How do they know what
 14 the person was told the first time around?
 15 A. The only way they would know would be either to ask them
 16 when they last rang or what was the last information
 17 available.
 18 SIR JOHN SAUNDERS: "You tell us what you know and then
 19 we'll tell you what you don't know"?
 20 A. What they were given, yes — or to go back through the
 21 log and ask, "Were you aware of this, were you aware of
 22 this?" That's the current way of working.
 23 I think there is — I might be jumping ahead here to
 24 some things that are changing. There is currently no —
 25 where you have an incident command structure on an

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1 incident ground, there is no equivalent guidance for
 2 a control room. That's something that's been identified
 3 by the Mobilising Officers Group, through the NFCC, and
 4 they are creating and have out for consultation
 5 a guidance document that looks at commanding a control
 6 room. So looking at the different levels of
 7 operational, tactical, strategic command, and indicating
 8 what actions would be expected for people at that level
 9 in alignment with the incident ground.

10 SIR JOHN SAUNDERS: So is this looking at what people need
 11 to be told?

12 A. It's looking at the control room and assigning
 13 responsibilities so it may be possible that you would
 14 have, on that — there was nothing to stop anybody from
 15 doing this on the night (overspeaking).

16 SIR JOHN SAUNDERS: Tell me about this new development. I'm
 17 not sure I'm following what it is, I'm afraid. It's no
 18 doubt my fault.

19 A. No, sir, it's about looking at the tactical command of
 20 a control room and understanding and allocating specific
 21 roles to make sure that specific areas are covered. So
 22 in this case, you could have allocated a person or two
 23 people to monitor the incident logs, check what
 24 information was coming in, check who had received that
 25 information and at what time so that there was a better

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1 awareness of being able to record that. And there may
 2 also be — we have —

3 SIR JOHN SAUNDERS: Can you just stop for a moment as
 4 I really need to understand this. So during the
 5 incident, someone is going to keep another log or a note
 6 saying, "On this occasion we spoke to A, B, C and D on
 7 different occasions, this is what they were told?"

8 A. At the moment, that's how it would have to be managed
 9 but I think we're going to try and look and whether or
 10 not the mobilising system can be adapted to support that
 11 and developed to support that but we haven't made any
 12 enquiries into that yet, it is just something that's —

13 SIR JOHN SAUNDERS: So we don't know how that could work
 14 because it is quite difficult to see at the moment how
 15 that could work?

16 A. We know that the mobilising system is capable of being
 17 able to display a narrative that can be filtered based
 18 on a type of message and the thinking is whether or not,
 19 when there are resources assigned to it, you can
 20 potentially log which information has been provided to
 21 which resource. I know it currently doesn't work like
 22 that. We would have to put a change request in for our
 23 suppliers to develop the system to be able to work in
 24 that way and I don't even know yet whether it could, but
 25 that is something that we've talked about.

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1 SIR JOHN SAUNDERS: Okay. So the problems that you've
 2 accepted occurred on the night, passing on information
 3 to the relevant people, which you have said didn't
 4 happen and should have happened, have you solved that
 5 yet?

6 A. I don't believe we have fully, no, sir.

7 SIR JOHN SAUNDERS: Have you solved it in part? What have
 8 you done to solve it?

9 A. So in an incident of this kind, the only way we have
 10 solved that is to reiterate that there is a requirement
 11 to pass all of that information. So at the moment, it's
 12 that long-winded version that you have just talked about
 13 at the beginning that.

14 SIR JOHN SAUNDERS: You pass all the information on to
 15 everybody?

16 A. To key points of contact at each location. So not
 17 necessarily everybody, but to a contact point at those
 18 locations.

19 SIR JOHN SAUNDERS: How do we establish who the single point
 20 of contact is?

21 A. We ask them.

22 SIR JOHN SAUNDERS: So Dean Nankivell rings in and you say,
 23 "Are you the single point of contact for the" — sorry,
 24 I always forget the name of this.

25 A. The command support room?

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1 SIR JOHN SAUNDERS: Yes, okay.

2 A. What we would do is we would establish beforehand who
 3 the contact point is in that location.

4 In the command support room it's less of a —

5 SIR JOHN SAUNDERS: Would you know? I'm sorry to cut across
 6 you all the time, but —

7 A. No, sir, it's fine.

8 SIR JOHN SAUNDERS: Would you know in advance who's going to
 9 be at the CSR?

10 A. Not necessarily, but the command support room is less of
 11 an issue because the information that's going in
 12 there is contained, whereas the rendezvous point is
 13 slightly more problematic because you've got officers in
 14 cars that are responding separately to crews in
 15 vehicles, so it would be impractical to try and pass
 16 that information to every crew on every vehicle. So
 17 in that scenario we would request a contact point
 18 through which that information would be fed and then the
 19 expectation would be that they would share that at that
 20 location.

21 In the command support room it's less of an issue
 22 because the information is contained so they can share
 23 that information quite readily.

24 SIR JOHN SAUNDERS: What you actually have in practice is
 25 a number of officers ringing in either from home or

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1 actually when they're on their way.
 2 A. Yes, sir.
 3 SIR JOHN SAUNDERS: So you can't then have a single point of
 4 contact.
 5 A. No, sir, and the expectation is we pass everything to
 6 those people as and when they ring in. The normal way
 7 of working --- I think it was mentioned in the evidence
 8 of one of the North West Fire Control witnesses --- the
 9 standard way of working is that if you take information,
 10 it is then your responsibility to then pass that
 11 information on. So the expectation is that if you read
 12 a log and there is information on it, that information
 13 should have been shared by the person who put it there.
 14 SIR JOHN SAUNDERS: It can't be to everyone who might want
 15 to know it, can it?
 16 A. No, sir.
 17 SIR JOHN SAUNDERS: So that doesn't work?
 18 A. No, sir, and it didn't work on the night, sir.
 19 SIR JOHN SAUNDERS: But it can't work, can it, because in
 20 this situation you have got lots of people ringing in,
 21 you're not going to know who's going to ring in, you're
 22 not going to know who is going to come in from duty ---
 23 A. No, sir, and part of the purpose of having the iNet
 24 viewer access --- because the other issue as well is that
 25 had the control room been exceptionally busy with large

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1 numbers of fire calls, it may have been possible that
 2 they wouldn't have been able to answer those calls from
 3 those officers or they may have been delayed in
 4 answering those calls to those officers. So the
 5 availability of the iNet viewer remotely enables them to
 6 view those logs on occasions where they can't get hold
 7 of the control room for that additional information.
 8 SIR JOHN SAUNDERS: But they don't want to do that. GMFRS
 9 don't want to have to look at the log.
 10 A. I believe not, sir.
 11 MR DE LA POER: It might be thought that there were
 12 substantial problems with JESIP that night. Do you
 13 agree?
 14 A. Yes, sir.
 15 Q. There's certain information that JESIP requires to work
 16 effectively --- before you agree, although I see you
 17 nodding --- where the rendezvous point is?
 18 A. Yes.
 19 Q. Where the forward control point is. Who the
 20 Bronze commanders are, who the Silver commanders, who
 21 the Gold commanders are. Those are all readily
 22 understandable aspects of JESIP, would you agree?
 23 A. Yes, sir.
 24 Q. And had there been a focus on obtaining that
 25 information, what North West Fire Control did know and

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1 didn't know, what it was able to pass on at a glance in
 2 terms of JESIP information may have led to North West
 3 Fire Control being in a better position to communicate
 4 more information; do you agree?
 5 A. Yes.
 6 Q. So wouldn't it be possible, just as you have a front
 7 screen on your computer --- and I appreciate this is
 8 a technical question for the IT side --- but from your
 9 point of view, if you were to have a space on your
 10 system, on your incident for key JESIP information that
 11 people could populate, you'd then have all of that in
 12 one place which you'd be able to pass on at a glance:
 13 the Bronze commander is on scene, we don't know who
 14 that is yet, the police have given us a rendezvous point
 15 of the cathedral parking. All of that would just be in
 16 one place and in those 1%, if it's even that many, of
 17 incidents where it's an enormous multi-agency response
 18 so it is not well practised, isn't that just the sort of
 19 at-a-glance information that would really help make sure
 20 that co-location, communication and coordination took
 21 place?
 22 A. Yes, sir, absolutely.
 23 Q. Isn't that something that you could take up with those
 24 who are responsible for your IT to see whether or not
 25 that ring-fenced space could be created?

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1 A. Yes, definitely, sir. Yes, sir.
 2 SIR JOHN SAUNDERS: But that hasn't been thought of before
 3 now?
 4 A. No, sir.
 5 SIR JOHN SAUNDERS: Mr de la Poer is not a particular
 6 computer expert. I just wonder whether someone within
 7 your organisation might have had what you're accepting
 8 is a good idea.
 9 A. As I said, we have picked up on it as a result of this.
 10 I think the difficulties that we've had with this
 11 particular incident was the remote location of the
 12 officers because I think... As I said before, I did
 13 expect it to be a major incident, and I could have asked
 14 that question and I could have got the METHANE message,
 15 which would have then provided some of that missing
 16 situational awareness.
 17 I think in the absence of that, and I think
 18 everybody in North West Fire Control, all of the
 19 operators, are skilled and equipped to understand the
 20 relevance and the importance of the contents of the
 21 METHANE message. When the information wasn't presented
 22 in that format, they'd been less able to process that
 23 and I think that's where it's fallen down on this
 24 occasion.
 25 Q. If you had a space on your system which prompted, "What

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1 is the METHANE information from BTP?" — for example, we
 2 know that Vanessa Ennis spoke to BTP, there may be other
 3 issues concerning whether she should have been doing
 4 that and we know she told BTP, "This is where we're
 5 going".
 6 A. Yes.
 7 Q. But what she didn't do in the course of that
 8 conversation is say, "Is there a METHANE message?"
 9 A. No, that's correct.
 10 Q. And had she asked that question, well, we know that BTP
 11 had received a METHANE message by that time. Whether it
 12 would have been given is perhaps a different issue.
 13 But again, it's about having a space where JESIP
 14 information can readily be recorded so everybody is
 15 looking at that, they're seeing what the information
 16 gaps are and then they've just got all of that
 17 information in one place just to pass it on. It may not
 18 be the only information, but do you agree if people are
 19 going to develop JESIP working in practical terms,
 20 that's exactly the sort of at-a-glance information
 21 that's required?
 22 A. Yes, sir, definitely.
 23 Q. That takes me to my final issue, which perhaps we've
 24 covered already, which is the requirement to seek
 25 information from other services. Let me acknowledge

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1 from the start that what Michelle Gregson was told at
 2 22.40 was that the NILO thought that the best person to
 3 get the information from was the force duty officer.
 4 And that obviously was the right thing for the NILO to
 5 be thinking at that moment.
 6 A. Yes.
 7 Q. I'm sure you agree with that.
 8 A. I do.
 9 Q. Therefore, the best information from GMP at that moment
 10 was going to come to North West Fire Control via the
 11 NILO from the FDO. That's what everybody expected to
 12 happen?
 13 A. Yes, sir.
 14 Q. Let's put GMP to one side for a moment, although we'll
 15 come back to them. At the time were your staff trained
 16 proactively to seek information from other control rooms
 17 when confronted with something which might be a major
 18 incident and therefore require a JESIP response?
 19 A. I don't think that they were, sir, not adequately
 20 trained, no, sir.
 21 Q. So if that is a failing, that is not a failing of the
 22 individuals who didn't pursue that, but something which
 23 is organisational?
 24 A. Yes, sir.
 25 Q. Do you think that that was a failing in the sense that

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1 it was something that should have been instilled in the
 2 staff in May 2017?
 3 A. I do now. I don't think I fully appreciated that at the
 4 time. I was clear that one of the reasons that JESIP
 5 was introduced was to make sure that information and
 6 situational awareness was shared. I think that — my
 7 understanding was that in a situation where you have
 8 a major incident where all of the emergency services are
 9 busy and all of the control rooms are busy, the
 10 requirement to share that information was designed to
 11 reduce the impact of going to other organisations to try
 12 and get that information.
 13 SIR JOHN SAUNDERS: Okay, I can well understand that the
 14 primary responsibility is on the person who has that
 15 information to share it with others.
 16 A. Yes, sir.
 17 SIR JOHN SAUNDERS: I think we're looking at the situation
 18 which did occur here where, for whatever reason, they
 19 don't.
 20 A. Exactly, sir. I think that's what is missing. There is
 21 no plan B or contingency within that training that says:
 22 if you don't get it, you should look for it. It sounds
 23 like such common sense, but I think because of the
 24 understanding of the JESIP principles and how it was
 25 supposed to work and what its purpose was, the

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1 understanding is — certainly I shouldn't speak for
 2 other witnesses but my understanding was that had that
 3 information been there, it would have been shared, and
 4 that was wrong.
 5 MR DE LA POER: Whilst that no doubt would be a valid way of
 6 approaching things in the immediate term, "Don't start
 7 bombarding other control centres for information when
 8 it's on its way", there must come a point, mustn't
 9 there, when, for example, we know there's a paramedic
 10 Bronze commander on scene, NWAS probably have some
 11 pretty good information, why don't we phone them up and
 12 find out what they've got?
 13 A. Yes.
 14 Q. Are your staff now trained in understanding that there
 15 must come a point when they haven't had relevant
 16 information that they go looking for it?
 17 A. Absolutely, sir, yes.
 18 Q. As I've said and I'm moving away, sir, from my issues.
 19 SIR JOHN SAUNDERS: Right. Let's deal with one issue
 20 relating to that and that's this: a decision is made,
 21 which obviously I'll have to make a finding about at
 22 some time, about contact with the duty NILO and then
 23 just everything goes to sleep.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: No one's been mobilised, nothing's

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1 happened, we've got a major incident going on and fire
 2 are playing no part in it. What obligation was there on
 3 you, do you think, to actually be chasing up what was
 4 actually going on and what had gone wrong?
 5 A. It is such a difficult question to answer because it
 6 wasn't... The control room on the night was not in
 7 a position where there was no information coming in and
 8 no conversations being had. I think there is a normal
 9 and accepted way of working that the control rooms
 10 provide operational and incident support to the incident
 11 ground --
 12 SIR JOHN SAUNDERS: Do you mind if I just cut across you?
 13 I do understand all that and in a moment I'll stop and
 14 you can answer it to the fullest of your ability. But
 15 the reality is what's happened is, "We are ringing you,
 16 the NILO, for advice". "Okay", says the NILO, "I'll get
 17 hold of the FDO and I will come back to you", and he
 18 never comes back.
 19 A. He did come back, sir. He originally asked for
 20 a response to be sent to the rendezvous point and then
 21 came back with an additional response after
 22 a conversation that had been had with the duty group
 23 manager for additional specialist resources and
 24 officers. So the, as it turns out, misunderstanding
 25 that the control room was under was that those

1 conversations were being had and that information was
 2 being shared, and that was the basis upon which these
 3 decisions were then being made and we were then
 4 responding to that.
 5 SIR JOHN SAUNDERS: So he said go to Philips Park, rightly
 6 or wrongly, and that is an interim measure. Everyone
 7 understands that: "Until I've got hold of the FDO,
 8 that's an interim measure".
 9 A. Yes, sir.
 10 SIR JOHN SAUNDERS: Putting it brutally, does NWFC then sort
 11 of wash their hands of it and say, "Fine, everyone else
 12 will work it out"?
 13 A. No, sir, there was still more information coming in that
 14 we were then sharing. I accept that we tended to share
 15 information better with the other agencies than we did
 16 with the fire officers on the ground, and that was
 17 a failing on our part. I would have expected that
 18 information to have been shared and it wasn't. But
 19 there was other information coming in at that time and
 20 there were conversations taking place. I can see --
 21 I absolutely see now -- when I first read the
 22 Kerslake Report and I read the term "passive",
 23 I interpreted that to mean that the control room wasn't
 24 doing anything, and the control room was -- the sequence
 25 of communications evidences that there was a lot of

1 communications being had.
 2 SIR JOHN SAUNDERS: I accept that. I'm really -- and I do
 3 understand that and I'm not really meaning to be
 4 difficult about this. It's just that there wasn't much
 5 communication with Mr Berry, who was the man who was
 6 actually key to it all because you've gone to him to get
 7 guidance --
 8 A. Yes, sir.
 9 SIR JOHN SAUNDERS: -- and then it never really comes back,
 10 does it?
 11 A. No, and I'm not sure whether or not there was an
 12 expectation that it would at that point. I think
 13 we were expecting -- or I would have been expecting for
 14 an instruction to move crews at a point when he deemed
 15 it prudent to do that based on the tactical plan that
 16 was being developed at the scene. We didn't appreciate
 17 the lack of communication and the lack of information
 18 that was available operationally at the incident. I do
 19 believe that had we been aware of that, then perhaps
 20 there would have been more -- we would have been more
 21 conscientious in the sharing of the information that we
 22 had.
 23 SIR JOHN SAUNDERS: Just remind me, so we have the initial
 24 contact with Mr Berry, who says, "I'll contact the FDO".
 25 When does the control room next hear from him and to

1 what effect?
 2 A. We next hear from him when he says he's not been able to
 3 contact the force duty officer at that time, he says,
 4 for obvious reasons.
 5 SIR JOHN SAUNDERS: Can someone tell me the time of that?
 6 MR DE LA POER: 22.47. Dean Casey, I think, takes the call.
 7 SIR JOHN SAUNDERS: When do we next hear from him?
 8 A. I'm not sure, sir.
 9 MR DE LA POER: I think it's 22.58, although Mr Smith will
 10 know much more readily than I when he next speaks to
 11 Vanessa -- at 22.52 he speaks to Vanessa Ennis, who, as
 12 we know, was the least experienced person --
 13 A. Yes, she was.
 14 Q. -- in the control room, and it's there, I think, he
 15 gives the instruction to Ms Ennis to make NILOs three.
 16 A. Yes, sir.
 17 SIR JOHN SAUNDERS: Okay. I now remember. But no offer to
 18 take over, trying to get the FDO to contact? We've just
 19 got this stalling going on, haven't we? I just wonder
 20 what the obligation was of the control room to try and
 21 break it, if you can break a stalling (overspeaking).
 22 A. I think the problem that occurred, sir, was that the
 23 control room, I don't believe, realised that that
 24 position had stalled. I think the control room, based
 25 on the training it had and the understanding of what

1 JESIP would look like at the incident -- I know
 2 certainly when I arrived, sir, I didn't -- I knew there
 3 were three NILOs. I don't ever remember being aware
 4 that they were all in the same location. My
 5 understanding was that there would be a requirement for
 6 three NILOs but those NILOs would be located in
 7 different areas, communicating via the NILO Talk Group.
 8 I believe they communicated via a WhatsApp group.
 9 I didn't know about the WhatsApp group prior to the
 10 evidence that came out in the Kerslake Report. But my
 11 understanding was that they would be located at
 12 different locations, sharing information via the NILO
 13 Talk Group.
 14 SIR JOHN SAUNDERS: Mr Nankivell said it's important that
 15 everything, all the information goes through the control
 16 room, and he indicated that there may be bit of
 17 a problem with GMFRS officers, that they don't share
 18 everything with the control room, and there should be
 19 a central repository of all knowledge, which should be
 20 the control room. Do you think that's right? Is that
 21 a problem you had?
 22 A. Could I just clarify, did Mr Nankivell say that the
 23 information was to come through the control room or the
 24 command support room?
 25 SIR JOHN SAUNDERS: No, no, he was saying people should be

1 ringing in to control and he had always encouraged
 2 people --
 3 A. -- or the command support room --
 4 SIR JOHN SAUNDERS: -- with information to be ringing into
 5 control.
 6 A. That would --
 7 SIR JOHN SAUNDERS: I don't know if I've got that wrong
 8 again.
 9 MR DE LA POER: I don't think so. That's my recollection of
 10 the evidence as well (overspeaking) and Mr Jamieson nods
 11 as well.
 12 A. Normally, that's what you would expect, normally you
 13 would expect everything to come through the control room
 14 and then the control room would act on that, either to
 15 assist, if it's a request for further assistance, or to
 16 share the information if it's information.
 17 SIR JOHN SAUNDERS: Okay. Thank you very much.
 18 A. Sorry, that was hard work.
 19 SIR JOHN SAUNDERS: No, I cut you off at the beginning of
 20 your answer. Is there anything else you haven't had the
 21 opportunity to say?
 22 A. No, sir, I don't think so.
 23 SIR JOHN SAUNDERS: Okay, thank you.
 24 MR DE LA POER: Can I just now move to changes and
 25 recommendations, which we can deal with quite shortly,

1 I think.
 2 Firstly, we've indicated that your appendix 1 to
 3 your third statement will be published as part of the
 4 parts that are published and we'll see there the
 5 introduction of a major incident plan.
 6 Two further matters. Firstly, what is your view
 7 about having an officer or officers from the respective
 8 fire services permanently embedded in the control to be
 9 able to give advice when required?
 10 A. I can see why that would be of benefit. The logistics
 11 of achieving that are probably slightly more difficult.
 12 However, what I can see the benefit of, and what we are
 13 currently in the process of doing, is we have written
 14 a job description for what we're referring to as
 15 a partnership manager. That partnership manager is
 16 required to have extensive operational experience to
 17 a senior level, who would work -- the terms of the
 18 employment haven't been finalised yet, whether or not
 19 they would be seconded from the Fire and Rescue Service
 20 to work permanently out of North West Fire Control for
 21 a period of time or whether that person would be
 22 employed by North West Fire Control. We're still
 23 working the detail of that.
 24 But the idea of the partnership manager is that they
 25 would have extensive operational experience, that they

1 would work Mondays to Fridays, office hours, out of the
 2 control room, but potentially to provide support on
 3 an on-call rota as well. They would take over the
 4 responsibility for chairing the Mobilising and
 5 Communications Group. The Mobilising and Communications
 6 Group, I think, may have been referred to in statements
 7 previously as the ops group and they consist of
 8 operational officers who -- the group was initially set
 9 up at the point of transition to manage changes from the
 10 Fire and Rescue Services and basically the changes would
 11 go into that group. The group would discuss the change,
 12 try and apply a convergence where convergence was
 13 possible, but at the very least to develop a way of
 14 implementing it that presented a single workflow for the
 15 operator rather than them having to operate in different
 16 ways for different Fire and Rescue Services.
 17 Then that group would then work with the single
 18 points of contact with North West Fire Control to try to
 19 implement the outcome of that. Over time, and
 20 I think -- I don't know if you want me to reference the
 21 subject that you asked me to consider during the break
 22 around the governance. I think at the very start when
 23 North West Fire Control was transitioning into
 24 a regional control, there was a spirit of collaboration
 25 around that. It was very much a joint enterprise, this

1 was a shared control room between the Fire and Rescue
 2 Services, utilising the existing staff, albeit a new
 3 building and new mobilising system, but the same control
 4 room service that they had previously had, but sharing
 5 it on a regional level to make efficiencies, mainly, of
 6 having four different control rooms all housed,
 7 accommodated separately, all using different mobilising
 8 systems that had to be procured, supported and
 9 maintained that didn't communicate with each other, they
 10 weren't linked together, and also four controls — well,
 11 five at the time we initially looked at transition
 12 because Merseyside were included in that — all staffed
 13 24 hours a day, 365 days a year and cross-border
 14 mobilising was quite problematic.

15 So I understand the reason that they agreed to put
 16 together a shared control room, but it was definitely
 17 in the spirit of collaboration at that point. I think
 18 over time, the chief fire officers who were involved in
 19 it at that stage and the single points of contact have
 20 changed over time and that understanding around that
 21 collaborative nature of the control operations has
 22 diminished and people have placed more emphasis on the
 23 fact that it is set up as a company and therefore is
 24 a third party service provider rather than a partnership
 25 arrangement. I think that's where that lack of

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1 governance over that time has perhaps manifested itself
 2 most significantly.
 3 So going back to the partnership manager role, the
 4 Mobilising and Communications Group, that was originally
 5 set up to apply convergence and single ways of working
 6 and almost be the gatekeepers of things coming into
 7 North West Fire Control. That role has diminished as
 8 well and it's almost become a conduit through which
 9 change is fed rather than managed. So the idea of the
 10 partnership manager is they take a grip of that, they
 11 become the chair of that group, they manage change and
 12 convergence, but most importantly they also provide
 13 operational support and advice to the control room. One
 14 of the key areas that we would — that is specified in
 15 the job description is that they establish an annual
 16 training plan of live training and exercising, joint
 17 training and exercising, with the Fire and Rescue
 18 Services and other agencies.

19 I feel that if we can manage the way that
 20 information and change is managed within the
 21 organisation and the way that training is managed, the
 22 need for an officer 24 hours a day becomes less
 23 necessary, if that's the right word.

24 SIR JOHN SAUNDERS: That's absolutely fine. At some stage
 25 I would like you to deal with the benefits of what NWFC

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1 provides as compared with what was before, because we've
 2 heard from GMFRS a number of officers who actually
 3 preferred the old system.

4 A. Yes, sir.

5 SIR JOHN SAUNDERS: So I would like you to look at that.
 6 But also, when I've asked about the different action
 7 plans for each of your four areas, people explain, well,
 8 they are different parts of the country, they have
 9 different problems, and all the rest of it, and I can
 10 understand how it might be necessary to have some action
 11 plans which are unique to one place, but do you have too
 12 many? Is there too much divergence between the action
 13 plans?

14 A. The divergence between the action plans isn't a problem
 15 because the mobilising system manages that, and the
 16 operators are very capable of using the system to do
 17 that. The problem comes where — you're absolutely
 18 right, divergence has crept in, and that divergence is
 19 seeing action plans used for mobilisations which should
 20 be on the response plan, and we are seeing changes being
 21 introduced to North West Fire Control with minimal
 22 consultation, and in some cases no consultation, around
 23 how that change is to be managed.

24 So I think the Fire and Rescue Services feel that —
 25 I think they do it for the best of reasons, I think they

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1 feel they need to solve our problems for us, but we are
 2 the experts using the mobilising system, and if we are
 3 advised in a timely way of changes that they want to
 4 introduce, that gives us the opportunity to work with
 5 our suppliers to develop the system or configure —
 6 sometimes development isn't required, it's just
 7 a configuration issue — to enable the change to be
 8 dealt with correctly and for the system to operate
 9 correctly. At the moment, that isn't always happening
 10 and the operators are having to use workarounds because
 11 we just haven't had the notice to implement the changes
 12 that we've needed to do it properly.

13 Again, that will be part of the partnership manager
 14 role, to manage a clear change control process that has
 15 within it an escalation route. Because one of the other
 16 things that we have implemented and implemented at the
 17 back-end of last year — I think it was about October of
 18 2020 — I mentioned about the strategic governance and
 19 the involvement of the chief fire officers.

20 We've now established within North West Fire Control
 21 a strategic steering group that sits within the
 22 organisation between my role and the board. It's
 23 a governance role, so anything that... It has been
 24 established for the purposes of business planning so
 25 that we can understand what the requirements are for

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1 each of the Fire and Rescue Services in terms of what it
2 wants North West Fire Control to deliver, both in terms
3 of services , performance and technology over the next 3
4 to 5 years.

5 That business plan will be put together by the
6 strategic steering group and the strategic steering
7 group consists of me, as the head of North West Fire
8 Control, the four chief fire officers and the three
9 advisers to the board, who advise on legal, HR and
10 financial matters. So the business plan will be pulled
11 together by that group and then will be presented to the
12 board, and that group is now accountable to the board,
13 as I am along with it.

14 So previously, I would have reported as a line
15 manager to the chair of the board, who, while they have
16 a wealth of experience of managing the Fire Authority,
17 have less knowledge of the control room operations.

18 SIR JOHN SAUNDERS: Putting this board this place has given
19 you more input into the people who are actually running
20 the day-by-day things?

21 A. Absolutely, and I am now reporting directly into the
22 chair of that group, which is the chief fire officer
23 rather than the chair of the board, and the group itself
24 is accountable to the board. So I've now also got
25 operational advice at a strategic level , which I did

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1 have before but it wasn't --

2 SIR JOHN SAUNDERS: You think it's a better structure?

3 A. Definitely , definitely .

4 MR DE LA POER: Can I conclude by asking you these short
5 questions. Firstly , has information come to light by
6 reason of the inquiry , which is relevant to North West
7 Fire Control's way of operating?

8 A. Yes, sir .

9 Q. Have changes been made beyond those which you've
10 identified in your lessons learned statement?

11 A. Yes, sir .

12 Q. Do you have any recommendations that you would wish the
13 chairman to consider in terms of driving future change?

14 A. Yes, sir . I think some of them I've just referred to
15 there, particularly in terms of the partnership manager.
16 Whether or not it's that role, but in order to be able
17 to arrange and plan and execute live training and
18 exercising scenarios, joint training and exercising
19 scenarios, that is quite a difficult thing to achieve,
20 certainly from the control room's perspective. So
21 definitely a recommendation around establishing an
22 annual joint training and exercising plan, even within
23 control rooms that are within the Fire and Rescue
24 Service, I think would be definitely beneficial for all
25 incident types, not just this incident type, but

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1 particularly for this incident type.

2 Q. I don't want to stop you unnecessarily, but would you
3 find it convenient, if it accords with the view of chair
4 takes about the way this might be dealt with, for those
5 three answers to my questions that I have just posed,
6 namely whether or not there's been learning as a result
7 of the inquiry, whether there have been changes that
8 have already been made and whether or not there are
9 specific recommendations, would you find it convenient
10 to reduce those to a further witness statement for the
11 chairman to consider?

12 A. Of course, if that would be helpful.

13 SIR JOHN SAUNDERS: That would be helpful. Thank you.

14 A. Yes, sir .

15 MR DE LA POER: Sir, bearing in mind that very substantial
16 topic can be dealt with in that way, those are all the
17 questions that I have. Thank you very much indeed,
18 Ms Wilson.

19 SIR JOHN SAUNDERS: I'm just going to ask you about this
20 because we've heard a lot from GMFRS officers about it.

21 You used to work in the Lancashire control room, as I
22 understand it?

23 A. I did, yes.

24 SIR JOHN SAUNDERS: So you have a direct comparison between
25 how that worked and how NWFC's control room works.

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1 A. Yes, sir .

2 SIR JOHN SAUNDERS: Which works better in your view?

3 A. The regional control room.

4 SIR JOHN SAUNDERS: Why?

5 A. Well, there was the efficiencies , as I've said. I don't
6 think we were particularly operating efficiently as
7 independent control rooms --

8 SIR JOHN SAUNDERS: Does that efficiency mean in financial
9 terms or other efficiencies ?

10 A. No, not necessarily . Obviously, financial is one of
11 those, but the ability to be able to mobilise across
12 Fire Service boundaries as one region rather than four
13 individual ones is a huge step forward.

14 SIR JOHN SAUNDERS: So it makes it easier to call on other
15 fire services for help; is that what that means?

16 A. Within the region. So previously, if you had incidents
17 that were occurring on the border of each Fire and
18 Rescue Service -- say that was on the border of
19 Lancashire and Manchester, the Lancashire control room
20 would not have visibility of the Manchester resources
21 and it would not be able to mobilise those resources
22 even though those resources might be able to respond
23 more quickly than Lancashire's own.

24 So the process would be that Lancashire would then
25 ring the Manchester control room, the Manchester control

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1 room would then input that as an incident, mobilise the
 2 resources. We wouldn't have any communication with
 3 those resources, we would have to do that through the
 4 Manchester control room.
 5 So to be able to just locate an incident and then
 6 locate the quickest pumps, regardless of which Fire
 7 Service they come from, is a huge step forward,
 8 particularly for life –risk incidents that occur on those
 9 border areas.
 10 SIR JOHN SAUNDERS: What you're saying is something might be
 11 technically in the Manchester area but actually could be
 12 got to quicker by fire appliances in another area?
 13 A. Correct, absolutely. Then there's also the technology
 14 that's available to us. So in Lancashire we didn't have
 15 the enhanced information service for emergency calls, so
 16 the ISEC that provides you with information on the
 17 location of the caller, we just got a telephone number
 18 from BT --
 19 SIR JOHN SAUNDERS: So you have better technical equipment
 20 because you've got joint --
 21 A. Much better.
 22 SIR JOHN SAUNDERS: -- you have put your resources together?
 23 A. Yes, sir. We've got an in-built geographical
 24 information system that enables us to track automatic --
 25 through automatic vehicle location the locations of the

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1 appliances when they're en route.
 2 SIR JOHN SAUNDERS: Which you didn't have before?
 3 A. Which we didn't have before. We're able to locate
 4 callers through pinpointing locations on a map, even
 5 though we don't know the street name they are nearest
 6 to, particularly for areas like Cumbria where you have
 7 large rural areas, you can pinpoint on a map and get
 8 a grid reference location.
 9 SIR JOHN SAUNDERS: I can understand technical advances.
 10 Another?
 11 A. We didn't have that. All of those things enable a much
 12 quicker response to incidents than we what we previously
 13 would have had before. I'm sure there are others as
 14 well.
 15 SIR JOHN SAUNDERS: If you think of other things, you can
 16 put that in writing too.
 17 MR DE LA POER: Can I turn to Mr Warnock QC or Ms Johnson.
 18 I'm not sure which one it is. I think they'll be
 19 joining us remotely.
 20 (Pause)
 21 Questions from MR WARNOCK
 22 MR WARNOCK: A word of warning, I have had quite a glitchy
 23 connection this morning, so I do apologise if that
 24 interferes.
 25 Ms Wilson, can I ask you, first of all, about the

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1 explosion action plan as it was at the time of the arena
 2 bombing.
 3 Mr Lopez, could you kindly put {INQ004404/1} up, the
 4 explosion action plan. Thank you.
 5 What we see here, Ms Wilson, is that the plan said
 6 that in response to an explosion there were certain
 7 resources to be sent. Do you see that?
 8 A. Yes, sir, I do.
 9 Q. What the action plan didn't spell out was where they
 10 were to be sent to; is that right?
 11 A. That's correct, sir.
 12 Q. If North West Fire Control were told of an incident, the
 13 important thing that they needed was an address to go to
 14 or to send the resources to; is that right?
 15 A. Yes, sir.
 16 Q. So if given an address by the police, why not go there?
 17 A. The action plan is not what would be used to determine
 18 the PDA to the address in that scenario. There would
 19 have been a response plan attached to the explosion
 20 incident type and that response plan would have been
 21 automatically presented to be mobilised to the location
 22 that had been input by the operator, which in this case
 23 was the Manchester Arena.
 24 Q. But if the police have given an address for
 25 mobilisation, here a rendezvous point, why would the

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1 operator not input that address?
 2 A. The operator would only do that on the instruction of an
 3 officer. The normal way of working, sir, would be to
 4 mobilise the resources to the location that the incident
 5 has been identified as being at. There's no arrangement
 6 to mobilise resources to a different location than that
 7 unless that's been approved by an officer.
 8 Q. Well, is it really in fact unusual for a Fire Service
 9 appliance to be mobilised not to the precise address of
 10 the incident itself but to a nearby rendezvous point?
 11 Is that unusual?
 12 A. Is it not unusual, did you say?
 13 Q. Well, is it unusual for that to happen?
 14 A. It would be unusual to mobilise pumps to an alternate
 15 location -- it's not unheard of, we do do it, and there
 16 are certain incident types that require it, the bomb
 17 action plan being an example of that and the Plato
 18 action plans being an example of that. But in the case
 19 where there is no instruction to mobilise to
 20 a rendezvous point, we would mobilise directly to the
 21 incident scene.
 22 Q. You say that's the case even if the police have given an
 23 address to mobilise to?
 24 A. It was on 22 May, sir, yes. I believe that that has
 25 changed now. As of February this year, the explosion

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1 action plan has been changed to state that if
 2 a rendezvous point has been given by one of the blue
 3 light agencies, the control room has authorisation to
 4 mobilise the deployment there.
 5 Q. I suppose the question, Ms Wilson, is whether that
 6 change is really spelling out what ought to have been
 7 obvious in any event. I suppose that's really what I'm
 8 asking.
 9 A. That may be the case, sir, yes, but the agreement for
 10 the services that we are operating under did not enable
 11 that discretion at that point without an instruction
 12 from GMFRS, which was why we contacted the NILO.
 13 Q. But if the agreement didn't allow that discretion, how
 14 is it then that the operator exercises a discretion not
 15 to mobilise directly to the scene, which the explosion
 16 action plan provided for?
 17 A. Because the training that they'd had on recognising the
 18 potential for an unfolding terrorist incident indicated
 19 that there was additional risk to crews that wouldn't
 20 normally be present at an explosion incident type.
 21 Q. And would going to the RVP given by the police not
 22 mitigate that risk?
 23 A. It would have done, sir, yes, but there was no
 24 instruction available to North West Fire Control at that
 25 point to do that.

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1 Q. The second issue I would like to ask you about,
 2 Ms Wilson, is the providing of information. You've been
 3 asked about the fact that there were a number of people
 4 phoning in to whom information might have been
 5 provided —
 6 A. Yes, sir.
 7 Q. — from the Fire and Rescue Service. But in fact, isn't
 8 the obvious person to whom all relevant information
 9 ought to have been provided the duty NILO?
 10 A. Yes, sir.
 11 Q. Then a separate point, perhaps related to that. You
 12 gave some evidence about your understanding of the
 13 location of the NILOs.
 14 A. Yes, sir.
 15 Q. And you said that you thought the problem that occurred
 16 was that the control room didn't realise that the Fire
 17 Service response had stalled. Do you think the control
 18 room, based on the training it had and its understanding
 19 of JESIP — you said:
 20 "[You] knew there were three NILOs. I don't ever
 21 remember being aware that they were all at the same
 22 location."
 23 Do you remember saying that?
 24 A. I do, sir.
 25 Q. But do you agree that the control room, others in the

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1 control room, knew exactly where they were because they
 2 had mobilised the NILOs?
 3 A. Yes, sir.
 4 Q. Indeed, if anyone had been mobilised to the scene, that
 5 would be something that the control room would have
 6 known about because the mobilisation would have been
 7 something the control room would have actioned; isn't
 8 that right?
 9 A. Yes, sir.
 10 Q. One final topic from me, Ms Wilson, which is in your
 11 witness statement, and it's paragraph 4.27, it's the
 12 statement — I've forgotten its date. I think it's
 13 18 August.
 14 SIR JOHN SAUNDERS: It's the second statement anyway.
 15 A. Yes, sir, I have it.
 16 MR WARNOCK: Thank you. You said that:
 17 "[You were] initially surprised to hear that the
 18 chief fire officer was at the command support room at
 19 Fire and Rescue headquarters, as [you] would normally
 20 have expected him to have proceeded to the strategic
 21 coordinating group at police headquarters. I therefore
 22 asked Operations Manager Carden whether the strategic
 23 coordinating group had been established at police
 24 headquarters, to which she replied it had been."
 25 {INQ001161/1}. I wonder if there had been some

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1 confusion there as to what had been established.
 2 Mr Lopez, I wonder if you could put up
 3 {INQ001161/1}, please. Obviously that's a call made at
 4 23.46. It's between Mr Berry and North West Fire
 5 Control. The operative from North West Fire Control,
 6 it's the fourth entry down, said:
 7 "Just had the police on and they've just advised
 8 that the police are setting up central control at
 9 Central Park and they've said can a NILO attend or
 10 a FIM."
 11 And Mr Levy then advised that Mick Lawlor was
 12 en route.
 13 In fact, I don't know if you're aware of this, you
 14 can tell me if you are or aren't, an SCG wasn't in fact
 15 called until about 1.10 in the morning.
 16 A. Yes, sir.
 17 Q. Were you aware of that?
 18 A. I was aware of it after the incident, I wasn't aware of
 19 it at the time. I think on the night of the incident,
 20 there was some confusion because the reference to both
 21 the tactical command group and the strategic command
 22 group was being referred to as the force command module
 23 by the police, and that wasn't terminology that I was
 24 familiar with, I'd not come across that terminology
 25 before.

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1 Q. So do you agree that you had wrongly understood what was
2 being discussed in that call between Mr Berry and the
3 operative of North West Fire Control to be a reference
4 to an SCG as opposed to a more tactical group?
5 A. I'm not sure that in that call it was misunderstood.
6 I think my evidence was based on the fact that when
7 I arrived, at that time I'd expected a strategic command
8 group to be set up and therefore I was surprised that
9 the chief was still in the command support room and not
10 at the strategic command group. But I don't know that
11 that has any bearing on this -- what I understood to be
12 said in this call.
13 Q. But you realise now that in fact at that time
14 a strategic coordinating group had not been called by
15 the time you arrived at North West Fire Control, had not
16 been called by the police.
17 A. I only know that through the evidence, sir, yes.
18 Q. And knowing that, I take it, it's less surprising to you
19 that the chief fire officer was at the Fire Service
20 Headquarters?
21 A. Yes, of course, sir, yes.
22 MR WARNOCK: Thank you very much, Ms Wilson, those are the
23 only questions I had for you.
24 I think the video feed has held up.
25 SIR JOHN SAUNDERS: Help me about this: you have just

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1 accepted that the obligation on the control room was to
2 notify the duty NILO of any information it had as it
3 came in.
4 A. Yes, sir.
5 SIR JOHN SAUNDERS: Did it do that?
6 A. No, sir.
7 SIR JOHN SAUNDERS: Why did that happen? You may not be
8 able to answer that, but is it a training issue or is it
9 a person's decision on the night?
10 A. I can't explain it, it's something that I am going to
11 have to address. The control room operators are trained
12 to, as we talked earlier, to pass that information
13 through. I think there was difficulty with this
14 incident, because, as I said previously, normally it's
15 quite straightforward because you have an incident
16 commander or you have a contact point and that's where
17 you feed the information through. And I think there was
18 some uncertainty in this incident as to firstly who the
19 incident commander was, which I know through evidence
20 it's established that there wasn't one, apart from
21 Mr Levy for a period of time. And the NILO is an
22 adviser to the incident commander, so when there's no
23 incident commander there, then it would naturally follow
24 that you would pass that information to the NILO and it
25 wasn't passed, and there was an expectation that it

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1 would have been and should have been.
2 SIR JOHN SAUNDERS: The other thing is that the information
3 which was not passed by and large was that there's an
4 ambulance commander at the scene, various indications
5 that there were others of the rescue services actually
6 there on the scene at the incident.
7 A. Yes, sir.
8 SIR JOHN SAUNDERS: Would the significance -- and I know
9 it's very significant to GMFRS officers -- would control
10 room operators understand the significance of that or
11 have understood it at the time?
12 A. I ... I'm not sure that they would. I'm not sure that
13 they would have appreciated the fact that unprotected
14 ambulance crews were proceeding into a warm zone or even
15 if they knew that ambulance crews were proceeding into
16 the warm zone. I think there was information there that
17 ambulances were arriving on scene. There wasn't any
18 information around where they were located in regard to
19 the Plato zoning because obviously we didn't know that
20 Plato had been declared at that point.
21 So if they had understood that, I think they would
22 have placed a greater level of importance on it.
23 I think they understood the importance of the NWAS
24 Bronze/paramedic Bronze being on scene because that was
25 information that was passed, but only to the duty group

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1 manager in the command support room and not to the NILO.
2 So I think they did recognise that that was critical
3 information, but the ambulances arriving on scene, I'm
4 not sure that they really appreciated the significance.
5 And nor did I, sir.
6 SIR JOHN SAUNDERS: Okay, thank you.
7 MR DE LA POER: Next, can I turn to Mr Jamieson, please, on
8 behalf of the families, who has a time permission in
9 excess of what he'll be able to get through before
10 lunch. So can I invite him to take a convenient moment
11 around 1 o'clock at your convenience, sir.
12 SIR JOHN SAUNDERS: Thank you.
13 Questions from MR JAMIESON
14 MR JAMIESON: Thank you, Mr de la Poer.
15 Ms Wilson, I represent the families. Thank you for
16 the evidence you have given so far.
17 To follow the theme of it, what I'm going to aim to
18 do is to highlight some of the structures and systemic
19 issues that you've been talking about with the chair and
20 Mr de la Poer to see if they led to what went wrong on
21 the night and see whether they still subsist now and to
22 see whether there's additional learning that we can
23 identify together with your assistance.
24 Can I take it all the way back, please, to the
25 beginnings of NWFC because you'll be an expert in this

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1 given your pedigree, as I understand it. In 2004 there
 2 was a national project to create regional fire control
 3 rooms across the country?
 4 A. That's correct, sir, yes.
 5 Q. That was supposed to be complete in 2009, but it was,
 6 I think to use the National Audit Office's term,
 7 a catastrophe?
 8 A. Yes, sir.
 9 Q. It cost a great deal of money and it didn't work?
 10 A. Yes, it did.
 11 Q. What had happened in the course of it is that a number
 12 of sites for regional control centres had been
 13 purchased?
 14 A. Yes.
 15 Q. And it was difficult to repurpose them?
 16 A. Yes.
 17 Q. And they were costing money?
 18 A. Yes, sir.
 19 Q. Am I right that the NWFC premises was one of those
 20 assets that had been bought --
 21 A. Yes, it is.
 22 Q. -- during the national scheme?
 23 I don't for a second need to know anything about
 24 what it was or the extent of it, but was a financial
 25 incentive offered to the local FRSs if that asset was

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1 used?
 2 A. Yes, there was, sir.
 3 Q. So that's how it came about. It wasn't that there was
 4 a regional programme, the FRSs got together and said,
 5 "We need to get a regional centre", it was a national
 6 programme that didn't work?
 7 A. Partly, sir. There was another part to it, to that,
 8 that the government issued some collaborative funding --
 9 collaboration funding, sorry, I can't particularly
 10 remember what it was called -- and that was some funding
 11 that was provided to every Fire and Rescue Service
 12 in the country to improve its collaborative
 13 arrangements, either between the Fire and Rescue
 14 Services or between the Fire and Rescue Service and
 15 other agencies.
 16 The funding didn't specify how it was to be used
 17 other than to improve collaborative working.
 18 Q. So there was another pot of money that --
 19 A. There was another pot of money that each of the four --
 20 well, at that point, sir, it would have been five Fire
 21 and Rescue Services had. I don't know whether you need
 22 to know how much that was or if I can say how much it
 23 was. I'm assuming it's public domain.
 24 Q. Not for my part. I just wanted it to be understood.
 25 You talk about five. The fifth that decided not to

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1 carry on with NWFC was Merseyside?
 2 A. Yes.
 3 Q. They took a rather different path in that they took
 4 their Fire and Rescue Service control room and
 5 amalgamated it with the police control room in
 6 Merseyside?
 7 A. No, sir, they didn't amalgamate the control rooms, they
 8 just occupy the same building.
 9 Q. So they're separate but they're physically within the
 10 same space?
 11 A. Correct.
 12 Q. May I just understand this: you have talked about, as an
 13 advantage in the NWFC column, cross-border mobilisation.
 14 A. Yes.
 15 Q. How does that work with Merseyside?
 16 A. In exactly the same way as it did before the control
 17 rooms, so we would need to ring the control room --
 18 Q. Does it cause problems? Sorry to cut across you, but
 19 just to understand it, is it causing problems today or
 20 are they mitigated?
 21 A. I don't believe it causes any problems, no, sir.
 22 SIR JOHN SAUNDERS: It just takes longer is what you're
 23 saying?
 24 A. It just takes longer, yes, sir.
 25 MR JAMIESON: But in terms of the range of options,

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1 Merseyside have certainly managed to locate their FRS
 2 control room in the same place as the police control
 3 room?
 4 A. Correct, sir, yes.
 5 Q. All right. In terms of the benefits that NWFC was
 6 designed to deliver, efficiency, which some might call
 7 at least partly including cost-cutting, you've talked
 8 about that and candidly acknowledge it. The other
 9 prominent benefit was supposed to be harmonisation.
 10 A. Yes, sir.
 11 Q. And there's just a document that I would like to put on
 12 the screen, please, to reflect on whether or not that
 13 has happened.
 14 Mr Lopez, please, it's {INQ100072/1}. We have
 15 looked at this briefly already. It's an email from you,
 16 Ms Wilson, of last year. There's some quite dense text,
 17 but for my purposes I just want to look at the last
 18 sentence of the third paragraph. You're responding to
 19 an email from Mr Keelan below, which is not necessary to
 20 look at. But here on 7 August 2020 you are in that
 21 paragraph reflecting some of what's going on with your
 22 organisation.
 23 A. Yes, sir.
 24 Q. You say:
 25 "There are good examples supporting the need to

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1 introduce tighter change management processes to
 2 establish better ways of working for our operators ...”
 3 This is what I want to focus on:
 4 “... to manage the divergence that is now prominent
 5 among the FRS partners and to ensure that NWFC is
 6 resourced sufficiently to manage change within its
 7 organisation as well as in response to your FRS needs.”
 8 A. Yes.
 9 Q. So you are there flagging two issues: the divergence
 10 continues, if it's not getting even more prominent, and
 11 you are raising the question of whether or not NWFC is
 12 resourced sufficiently to meet its needs?
 13 A. To meet the — to sufficiently manage change within the
 14 organisation and meet the FRSs' needs.
 15 Q. Yes.
 16 A. Yes.
 17 Q. To manage the change that's necessary, but also there's
 18 a second part of that, if it's resourced enough to do
 19 what the FRSs want it to do?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So divergence has increased rather than
 22 diminished or stayed the same?
 23 A. No, divergence has increased and that's part of the
 24 reason that the idea of this partnership manager role to
 25 control that and liaise — it's designed to strengthen

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1 the operational links between North West Fire Control
 2 and the Fire and Rescue Services, but —
 3 SIR JOHN SAUNDERS: This is what you were talking as being
 4 imposed on you, that they would simply send down a
 5 message, “This is what we want you to do for us now”?
 6 A. Yes, sir, and we don't have sufficient resources within
 7 our operational support department to manage that
 8 change, which is why we've identified the need for an
 9 additional resource.
 10 SIR JOHN SAUNDERS: So one of the aims of NWFC and the other
 11 organisations was to try and increase convergence and
 12 actually over the time it has been open we've had more
 13 divergence?
 14 A. That's correct, sir, yes. But I think that —
 15 I don't... I'm not sure that's a deliberate thing.
 16 SIR JOHN SAUNDERS: I'm not suggesting it's deliberate.
 17 A. We've not managed it properly and the divergence has
 18 started to creep in.
 19 SIR JOHN SAUNDERS: Okay, thank you.
 20 MR JAMIESON: Thank you. It's good of you to say, “We have
 21 not managed it”, but in fact just to understand
 22 a relationship between NWFC and the FRSs, whatever the
 23 structure, and just to simplify it for a moment, they
 24 tell you what to do and how to do it, it's not that
 25 you have an equal say as to what's going to be done,

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1 they impose the terms?
 2 A. I think the initial intention was that there would be an
 3 equal say because there are representatives of North
 4 West Fire Control that sit on that Mobilising and
 5 Communications Group, which at the point of transition
 6 was called the ops group. We have the specific points
 7 of contact in both North West Fire Control and in the
 8 Fire and Rescue Services. I think where it hasn't
 9 worked as well as we'd expected it to, or as I'd
 10 expected it to, is in — the idea was that the
 11 Mobilising and Communications Group and/or the single
 12 points of contact — because the single points of
 13 contact sit on that group — would provide North West
 14 Fire Control with information on changes that they
 15 expected to make within their organisations at the point
 16 that the change was identified, not at the point that
 17 the new process had been agreed.
 18 Q. I wasn't suggesting that you didn't have a voice or an
 19 ear, if those are the right words, and you're talking
 20 there about implementing change, but that's still change
 21 that is given to you by the FRSs?
 22 A. It is, yes.
 23 Q. And again, just in the interests of identifying some
 24 structural issues that might be relevant, can we just
 25 look or I'll ask you to look very briefly at some of the

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1 governing documents.
 2 If we could have next, please, the cooperation
 3 agreement, which was made at the outset.
 4 A. Yes, sir.
 5 Q. {INQ000934/1}. Let's look at the first page to identify
 6 it.
 7 This is the cooperation agreement. If we can go,
 8 please, to {INQ000934/6}, under the heading of
 9 “Changes”. This is how this agreement anticipates that
 10 change will be brought about in NWFC.
 11 A. Yes, sir.
 12 Q. And there are two portions I draw your attention to.
 13 Firstly, paragraph 8.1, which is says, to paraphrase,
 14 that changes are handled in a way that does not have the
 15 effect of disadvantaging one or more of the authorities.
 16 A. Yes.
 17 Q. So any change mustn't disadvantage any of the FRSs?
 18 A. Correct, sir, yes.
 19 Q. And then the final sentence of 8.2:
 20 “The authorities acknowledge that significant
 21 changes will require the approval of all of the
 22 individual authorities and that normally such decisions
 23 will be made by elected members.”
 24 So unanimity for significant changes?
 25 A. Yes, sir.

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1 Q. Those parameters, nothing that disadvantages anybody,
2 unanimity for significant changes, do they delimit how
3 compromise can be arrived at? Is it quite difficult to
4 arrive at compromise within there?
5 A. Um...
6 Q. The nature of compromise is push and pull, isn't it, to
7 a degree?
8 A. I don't believe sir, no. I think --
9 Q. May I give you an example?
10 A. Yes, please.
11 SIR JOHN SAUNDERS: No. Let her answer and then give an
12 example if you don't mind.
13 You carry on.
14 A. I've forgotten what I was going to say now.
15 MR JAMIESON: Push and pull with compromise.
16 A. Yes. I think generally, where there are significant
17 changes, they would have to be agreed by all four, but
18 generally those significant changes are being brought
19 about by all four. I don't recall a situation other
20 than possibly the co-responder arrangements with North
21 West Ambulance Service where there was a significant
22 change that hadn't been agreed by all four. But in
23 terms of the wording in 8.1, they are not permitted
24 within that agreement to implement anything that may
25 affect North West Fire Control's ability, either due to

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1 a large increase in call volumes, for example, through
2 a new initiative that they want to introduce that would
3 then compromise our ability to deliver our services to
4 the other three. I'm not sure I've answered that
5 question, I'm sorry.
6 Q. If the chair thinks --
7 SIR JOHN SAUNDERS: I'm fine, thank you.
8 MR JAMIESON: The example I wanted to give and to examine
9 whether that structure leads to a slow rate of change,
10 if I can call it that, is the example of the tri-service
11 interoperable control room channel --
12 A. Yes, sir.
13 Q. -- and what happened after 22 May 2017. You deal with
14 this in your first statement at paragraph 8.22, which is
15 on {INQ023877/36}. It doesn't need to go up, thank you
16 very much.
17 This statement was a statement that you made in
18 2019, August 2019. At the date you gave this statement
19 what you said is this:
20 "Each Fire and Rescue Service has subsequently met
21 with its respective resilience forum to agree
22 a methodology in establishing three-way communication.
23 Due to local agency constraints, it has not been
24 possible to produce a standard procedure."
25 I understand we have moved on since, but is there

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1 a standard procedure?
2 A. There is now, yes.
3 Q. But this was 2 years after Manchester Arena?
4 A. Yes, sir.
5 Q. And there still wasn't an agreed standard operating
6 procedure that all of the FRSs could sign up to
7 24 months later.
8 A. No, sir. But part of the reason for that was to do with
9 the resourcing in the police control rooms to be able to
10 manage that. So in some areas, they could, but in other
11 areas they were unable to commit to that in those areas.
12 Q. Because you as a region deal with -- your constituent
13 areas are very different, there's a difference between
14 Greater Manchester and rural Cumbria, as you've drawn
15 attention to already?
16 A. Yes, sir.
17 Q. Okay. I've drawn your attention to it, thank you.
18 Finally, just before lunch, on the topic of
19 structural issues, I would invite your assistance with
20 two issues. Firstly, under the heading of staffing
21 levels, all right?
22 A. Yes.
23 Q. From an efficiency point of view, one of the chief
24 values of NWFC is it's allowed a reduction in staff
25 numbers across the board?

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1 A. Yes.
2 Q. Which, as a business as usual position, you're able
3 pretty accurately to predict what the demand is going to
4 be and adjust your staffing accordingly?
5 A. Yes.
6 Q. But, and I'm interested here in the matter that you were
7 telling the chair about, about thinking about the
8 tactical management of control rooms and a piece of work
9 that's going to be done with that, and you mentioned
10 perhaps allocating somebody to watch the log or somebody
11 to be in charge of the output of information?
12 A. Yes, monitoring the Talk Groups, et cetera, yes.
13 Q. But if you take one of your lean organisation and you
14 give them that specific responsibility, they're not
15 going to be available to meet the other needs of the
16 control room, are they?
17 A. That depends on the circumstances, sir.
18 Q. It does, because the fact of the matter is with this
19 terrible tragedy, in fact there were few calls to NWFC
20 that related --
21 A. That's right, sir.
22 Q. -- to the arena attack -- four, I think, or something of
23 that order: one from the public and then several from
24 other of the blue light services. But it's not
25 difficult to think of a circumstance where a no-notice

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1 major incident would have a lot of calls?
 2 A. Absolutely, sir, yes.
 3 Q. And London provides an all too tragic example.
 4 A. Yes, sir.
 5 Q. How is your lean organisation going to be able to
 6 accommodate those specific roles if demand peaks?
 7 A. So currently, some of that demand is dealt with through
 8 the buddy arrangements that we have with other Fire
 9 Service —
 10 Q. May I just pause to ask you about that? Please do
 11 develop your answer in a minute. But the buddy
 12 arrangement means it goes outside of the region?
 13 A. Yes, sir.
 14 Q. Does that have all of those demerits that you were
 15 talking about when you used to have to try and mobilise
 16 cross-border, so you can't speak to their assets, they
 17 won't necessarily have the same operating system that
 18 you do?
 19 A. It does, but in ... We provide support to each other for
 20 probably three main reasons. One is referred to as
 21 spike conditions where you get a lot of calls over
 22 a short period of time to a single incident. We provide
 23 support — and mobilising will not take place during
 24 that. That's a case of they handle the calls for you
 25 because they have just as experienced operators and

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1 a mobilising system, not necessarily the same mobilising
 2 system that we have, but they are skilled operators that
 3 can answer and process that call on our behalf and then
 4 present it back to us.
 5 Q. Just dwelling on what that means, they'll answer to the
 6 telephone, they'll get the information and they'll
 7 provide it to you?
 8 A. Yes.
 9 Q. But in terms of actually relaying it to other people
 10 within your organisation, in terms of mobilising
 11 resource, all that is still going to stay with you?
 12 A. Yes.
 13 Q. Even when the buddy arrangement is in place?
 14 A. Yes, sir, it does.
 15 Q. I see.
 16 A. Sorry, sir, if I could just say that one of the things
 17 that we've put in place with regard — I mentioned the
 18 strategic steering group earlier that the chief fire
 19 officers sit on, we've also agreed with them a change
 20 control process for managing things like new national
 21 operational guidance, national operational learning, and
 22 outcomes from inquiries such as this and Grenfell Tower.
 23 Because one of the things that we've experienced at
 24 North West Fire Control is when that kind of guidance
 25 gets published or those inquiry reports gets published,

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1 they are issued to each individual Fire and Rescue
 2 Service who then go away and look at them individually
 3 and all come back with potentially a different view. So
 4 we've established a change control process for managing
 5 that type of information where it will be looked at
 6 collectively, including North West Fire Control. And
 7 where it is deemed that taking into account what you've
 8 just talked about there with the operational — the
 9 control command arrangements, if it is deemed that that
 10 guidance recommends that there are more roles than we
 11 currently have in the control room then that's reliant
 12 on me to then put a business case forward to the board
 13 via that steering group and endorsed by that steering
 14 group to request additional resources if we feel that we
 15 need them in those circumstances.
 16 Q. Is that a thought that you've had so far?
 17 A. Yes.
 18 Q. And is it something that you've put forward?
 19 A. I have not put it forward yet because the guidance
 20 hasn't been issued yet.
 21 Q. But it's certainly within your mind that additional
 22 resource may very well be called for?
 23 A. Well, we've already identified the fact that there's
 24 additional strategic/operational input required which we
 25 have now got through the strategic steering group, the

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1 partnership manager and potentially additional resource
 2 to manage the change control process in our operational
 3 support department.
 4 Q. May I just try and squeeze a final matter in under this
 5 heading before lunch.
 6 Equipment, and in particular I'm interested in the
 7 IT system. You spoke to Mr de la Poer about one
 8 improvement which would be the summary page on the
 9 front, summary of key information?
 10 A. Yes, sir.
 11 Q. One of the other potential difficulties here, it didn't
 12 eventuate because nobody seemed to read the logs, but
 13 there were four different ones?
 14 A. Yes.
 15 Q. Each attached to different addresses and that different
 16 people were using for different purposes. So even if
 17 somebody was looking at a log and even if there was
 18 a summary page, potentially they'd have to look in four
 19 different locations. And as I understand it, the reason
 20 for that, what you were taking us through a moment ago,
 21 is that the Fire Service response is focused on an
 22 address, that's what's entered into the system,
 23 that's —
 24 A. That's correct, yes.
 25 Q. — what the PDAs point to?

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1 A. Yes.
 2 Q. And that's what generates the log.
 3 SIR JOHN SAUNDERS: As I understand the evidence we've had,
 4 although you start other logs, important information
 5 which goes to the main incident would be transferred
 6 from those other logs on to the main log.
 7 A. It should be, sir, yes.
 8 MR JAMIESON: That's precisely what I wanted to explore,
 9 thank you, sir.
 10 Is that an automatic or a manual process?
 11 A. It's a manual process, sir.
 12 Q. So somebody has to identify what is important and put it
 13 on to the key log?
 14 A. Yes. They can either enter the information in exactly
 15 the same format on two separate logs manually or there
 16 is a process where you can link the two incidents
 17 together, so when you view one incident, it will
 18 automatically signpost you to the one that it's related
 19 to.
 20 Q. But in real time, when there's a lot going on, when your
 21 resources are going to be stretched, would it be simpler
 22 if you could put more than one address on a log?
 23 A. It's not so much the address because there is actually
 24 available areas where you could add additional
 25 addresses, albeit you would not be able to then generate

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1 a predetermined attendance to that, so you can only
 2 generate a predetermined attendance if the address has
 3 been entered into the address field and then validated
 4 against an address location in the gazetteer and it's
 5 that that then presents, through the automatic vehicle
 6 locating, the dynamic PDA at that point in time. So
 7 that process can only be done by completing the
 8 incident.
 9 Q. But if we're in a circumstance of not necessarily these
 10 facts but a major incident that has rendezvous points
 11 and different sites, it doesn't sound like the territory
 12 of a predetermined attendance, frankly; it sounds like
 13 the territory of discretion and oversight, whether
 14 through the NILO or through the control room. So
 15 is that really a difficulty that other addresses can't
 16 be linked?
 17 A. But we would still need to know which were the quickest
 18 resources to attend that location.
 19 Q. I understand that when this starts and there's an
 20 incident and the location and you have to allocate the
 21 resource, I understand that process. I'm thinking more
 22 as the incident progresses, so here we had Philips Park
 23 was added and then the command support room was added
 24 subsequently. There was no predetermined attendance to
 25 those locations. The NILO had decided what was going to

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1 Philips Park and the GMFRS officers had decided who was
 2 going to the support room.
 3 A. Yes. I appreciate what you're saying and you're right,
 4 there was no predetermined attendance to those
 5 particular rendezvous points. However, the way that the
 6 mobilising system currently works, and I'm not saying
 7 that it couldn't be changed to manage this better, but
 8 the way that mobilising systems currently work is that
 9 as resources are added to that incident, they appear as
 10 a list in the order in which they were assigned. So you
 11 only have the capability of having one header address,
 12 if you will, one lead address, and then attached -- so
 13 if we use for example the incident --
 14 SIR JOHN SAUNDERS: Ca I just cut this short? You need to
 15 know where people are, don't you?
 16 A. Exactly, yes. You wouldn't be able to tell which
 17 resources were located at which area. That's
 18 primarily -- it's not really the address issue, although
 19 that is one of the issues, the important thing is that
 20 on that night our control room knew exactly which
 21 resources were located at which point, and then, had
 22 they moved -- sorry.
 23 MR JAMIESON: No, no --
 24 A. Had they moved -- well, as they did from Philips Park to
 25 a new location, you could see which resources had moved

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1 and then on to the incident itself.
 2 Q. In entirely understand the imperative of all of that.
 3 Really why I am suggesting this to you -- and it may be
 4 that the solution I'm suggesting is too simplistic, but
 5 we know that -- we have heard from a series of
 6 firefighters that when something happens their instinct
 7 is to get out of the door and to get moving and they
 8 don't want to read a log and open a computer.
 9 A. Yes, of course.
 10 Q. Some changes have been put in place to remedy that, but
 11 that is the culture as we understand it. It is going to
 12 be more difficult to encourage them to read a log if
 13 there are four and they are in different places and,
 14 really, for your attention what I'm inviting to you
 15 consider is whether that particular difficulty,
 16 different logs requiring manual inputs or a link from
 17 one to the other, can be remedied.
 18 A. Yes, sir. Of course that is something that we can give
 19 close consideration to. But I don't think that,
 20 certainly not through my evidence, I don't think I have
 21 intended to imply that operational crews responding to
 22 incidents should look at the log. I was thinking more
 23 along the lines of the command support room or officers
 24 who were located at home or the force command module.
 25 MR JAMIESON: Would that be a convenient moment?

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1 SIR JOHN SAUNDERS: Yes. An hour, thank you.
 2 (1.07 pm)
 3 (The lunch adjournment)
 4 (2.07 pm)
 5 MR JAMIESON: I would like to move on, please, and just talk
 6 about — you told us about your understanding of JESIP
 7 in 2017. I would like to talk about the policies and
 8 the training that were around at the time. Not to
 9 establish breaches, you have accepted that already, but
 10 what I'm interested in is how NWFC responded or could
 11 respond to policy changes as they came along. All
 12 right?
 13 A. Yes, sir.
 14 Q. The key training was the JESIP control rooms and
 15 supervisors training, and you have told us about that in
 16 your witness statement. In a moment I'm going to take
 17 you to some of the slides from that. But just before
 18 I do, that was training that came out to accompany the
 19 new piece of JESIP policy, it came out to accompany the
 20 interoperability framework in July 2016.
 21 A. Yes, sir.
 22 Q. Did you as the head of NWFC — were you sighted on
 23 what was in that policy?
 24 A. I don't believe so, no.
 25 Q. Okay. Were there reporting lines designed to sight you

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1 on changes in such an important policy?
 2 A. I think the expectation was that that would come through
 3 the Mobilising and Communications Group through the Fire
 4 and Rescue Services to the single points of contact.
 5 Q. Let me just check — so the individual FRs have to
 6 recognise that change is necessary, feed it into the
 7 working group, and then it comes to you?
 8 A. Yes. It depends on how the document gets circulated.
 9 If it's circulated to Fire and Rescue Services
 10 specifically then I am dependent on them feeding that
 11 through into North West Fire Control.
 12 Q. So you wouldn't look at it yourself?
 13 A. I would if I was given it, sir. I don't recall that
 14 specific document that you're talking about, but maybe
 15 if I saw it, I might recognise it. I'm not sure.
 16 Q. We'll just have a quick look at some it. {INQ004542/1}.
 17 Sir, this is not the JOPs, this is the
 18 interoperability. We have looked at it earlier in the
 19 process, but haven't in some time.
 20 SIR JOHN SAUNDERS: Okay, thank you.
 21 MR JAMIESON: That's what it looks like on its face.
 22 A. The joint doctrine, yes, I am aware of that document.
 23 Q. Could we go to {INQ004542/10}, please. This is
 24 a section of this document which is framed very directly
 25 at control rooms.

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1 A. Yes, sir.
 2 Q. And we're going to pick up some of these things when we
 3 look at the training, but I want to look at them in the
 4 policy. The importance of the frame is set there in the
 5 first paragraph, isn't it:
 6 "Control rooms play a vital role in managing the
 7 early stages of a multi-agency incident?"
 8 A. Yes.
 9 Q. "There cannot be a coordinated response or effective
 10 communication if control rooms do not deliver a swift
 11 and joint approach to handling them."
 12 A. Yes.
 13 Q. If we look at the bottom of the page, please, at 6.1,
 14 some particulars — I'm not going to take you through
 15 all of them — as to how early management of a control
 16 room is to be arrived at. First sentence:
 17 "A dialogue between control room supervisors should
 18 be established as soon as possible."
 19 A. Yes.
 20 Q. If we go down just over the page, please, to the top of
 21 {INQ004542/11}:
 22 "Nominating a single point of contact in each
 23 control room and establishing a method of communication
 24 between all of them."
 25 Then examples are given as to how that can happen

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1 and we know that in the case of Plato we have the
 2 tri-service radio group that is supposed to be set up?
 3 A. Yes, sir.
 4 Q. But just standing back from it, this is a policy which
 5 is pointing at control rooms and saying: in the event of
 6 a multi-agency incident, these sorts of things need to
 7 happen?
 8 A. Yes, sir.
 9 Q. How was NWFC capturing those changes?
 10 A. That was included in the joint operating principles
 11 between — within the regional ones, not the national
 12 ones. I think it was — sorry, I'm... I get confused
 13 with all the titles, but I think it was the joint
 14 operating procedures for an MTFA incident in the
 15 north-west region.
 16 Q. Going back to the first thing that I pointed you to,
 17 which was team leaders in control rooms talking to each
 18 other, I don't understand that to be in any of the PDAs
 19 or action plans that were present at the time.
 20 A. No, sir. It isn't. But there was a facility for the
 21 control rooms to link together to speak to each other.
 22 Q. I understand the technology was there.
 23 A. Yes, sir.
 24 Q. But in terms of it's the team leader's responsibility to
 25 talk to a control room and to nominate a single point of

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1 contact that's going to do that --

2 A. Yes, sir.

3 Q. -- is an action. I don't understand that to be anywhere

4 within the processes that (overspeaking).

5 A. I don't believe that it is.

6 Q. And the reason for that is because, as I understand your

7 evidence, the way NWFC is operating is you are not, as

8 a matter of structure, looking at this policy as it

9 comes out and deciding how your process changes, you're

10 reliant on FRSs feeding that back to you through the

11 operating group?

12 A. Yes, I think that's right. The way that the control

13 rooms would have worked when they were independent

14 control rooms is that the Fire and Rescue Service --

15 they would be part of that Fire and Rescue Service, they

16 would -- together they would look at this document and

17 together they would agree how they are going to approach

18 that in a control room environment.

19 The arrangement that we have at North West Fire

20 Control and the agreement that we have in place requires

21 the Fire and Rescue Service to provide the information

22 to North West Fire Control. I think that -- well,

23 I don't think, I know that post this incident, when we

24 reviewed the documentation, it would appear that only

25 the operational elements had been included in those

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1 instructions and not the control room elements and that

2 there was an expectation on the Fire and Rescue

3 Service -- an expectation of the Fire and Rescue

4 Services that North West Fire Control would fill in the

5 control room blanks and an expectation on North West

6 Fire Control that the Fire Services would include the

7 control room elements in those procedures.

8 Because the control room -- there are hundreds of

9 pieces of national operational guidance that may have

10 some control room elements built into them and North

11 West Fire Control isn't currently resourced to be able

12 to review all of those pieces of guidance and extract

13 the control room elements of those.

14 Q. So unpacking that, and I understand what you say about

15 lots of pieces of policy, but on any view this is a

16 pretty substantial national piece of policy, no?

17 A. Yes, absolutely.

18 Q. NWFC are expecting GMFRS or the other FRSs to tell them

19 how to implement it and GMFRS are expecting NWFC to do

20 it themselves?

21 A. Yes, and there are some elements that actually we have

22 had joint approaches to and the way that we managed the

23 interoperability radio channels was one of those.

24 Q. There were just another couple of features of this that

25 I would like to draw your attention to before we move on

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1 to the training. Could we have the bottom of the page,

2 please, Mr Lopez?

3 6.2:

4 "Developing shared situational awareness and joint

5 understanding of risk."

6 It's both of those small paragraphs:

7 "Talking to commanders, both before the first

8 commander arrives at the scene and throughout the

9 incident, will contribute to shared situational

10 awareness."

11 That's pointing at the control room:

12 "The process should include identifying risks and

13 hazards to all responders. Discussion between control

14 rooms should be frequent and cover the following key

15 points... "

16 And if we could go over the page {INQ004542/12} and

17 have a little look at those. Because what I'm going to

18 suggest to you, and we'll look at this in the training

19 again, is that those sort of questions, those sorts of

20 issues, are the sort that would be covered by a formal

21 METHANE message.

22 A. Yes.

23 Q. What this is pointing at is at a time before a formal

24 METHANE message is available, these are the sorts of

25 issues control room operatives should be hardwired to be

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1 thinking about?

2 A. Yes.

3 Q. And you've accepted, I'm not going to labour it, but

4 that wasn't the position in 2017?

5 A. No, not wholly. There were elements of that. I think

6 that it was clear that the lead agency at that point

7 would be the police, we understood that through the

8 training, so we did understand that. We did enquire of

9 both the police and the ambulance for what information

10 they had, although we weren't specific in that request

11 in terms of asking has there been a major incident

12 declaration, et cetera.

13 We did check with callers around specific hazards

14 that might be present. We asked about whether there

15 were potential building collapses, chemicals in use or

16 whether there were any signs of fire. So we were

17 checking for those additional hazards, but what we

18 didn't do, and what we realised is possibly a negative

19 approach to the way that we work, I guess, is that we're

20 very good at notifying officers on the ground of hazards

21 that are present, we are not as good at notifying them

22 of hazards that are not present.

23 I think that there was a lack of appreciation on how

24 important some of that information that things were not

25 occurring had on the commanders at the scene on their

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1 planning.
 2 Q. It's all part of the evaluation (overspeaking)?
 3 A. It'd be just as useful to know those things weren't
 4 present as they were.
 5 Q. The final bit of this that I want to look at, please, is
 6 {INQ004542/13}. It's 6.3.2. I would just like to look
 7 at this and then reflect on something that you said
 8 at the outset:
 9 "The lead responder will suggest a location for
 10 commanders to co-locate in the early stages of
 11 a multi-agency incident when operational commanders may
 12 be travelling to the scene."
 13 A. Yes, sir.
 14 Q. "When early location information is unverified and the
 15 suitability of potential rendezvous points is unclear,
 16 the lead responder and other control room supervisors
 17 should jointly agree an initial rendezvous point and
 18 communicate it to commanders as soon as possible."
 19 A. Yes, sir.
 20 Q. Which puts the responsibility for identifying the
 21 initial rendezvous point not on the distant commander
 22 heading to the scene but in the control room?
 23 A. It's a joint decision between the control rooms --
 24 Q. Let me make myself clear: the RVP comes from the lead
 25 agency and on our facts that is the police.

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1 A. Yes.
 2 Q. What I suggest this says is: if you're not sure about
 3 it, if you're worried about it, the control room talks
 4 to the police, assesses the risk, and decides if that is
 5 the suitable location.
 6 A. Yes, sir. I don't think that the control room just --
 7 just to be clear, I don't think the control room had any
 8 concerns about the location of the cathedral car park
 9 rendezvous point. I think that was the NILO that had
 10 those concerns, sir.
 11 SIR JOHN SAUNDERS: Would they know? Would the control room
 12 operators actually have the necessary geographical
 13 knowledge?
 14 A. They would have the geographical knowledge because they
 15 would be able to see it on a map in front of them or
 16 they would have that knowledge themselves. But the
 17 knowledge of whether or not a rendezvous point is
 18 suitable bearing in mind hazard zones, et cetera --
 19 SIR JOHN SAUNDERS: They are unlikely to know?
 20 A. They wouldn't know that, no, sir.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR JAMIESON: I was dealing with it in a general rather than
 23 a specific, but you mentioned the cathedral car park.
 24 In fairness to Mr Berry, whilst I accept it was his
 25 decision, the phone call that comes from NWFC and from

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1 Michelle Gregson finishes with or -- cathedral car park
 2 is given and then there is the clause of the sentence:
 3 "Obviously we are not mobilising at the moment."
 4 A. Yes.
 5 Q. "So can you just speak to them and we'll hang fire?"
 6 I know there is this debate about the action plan
 7 and what was required and the different PDAs -- but on
 8 any view that is not a rendezvous point being agreed
 9 in the control centre and given to an operational
 10 commander, is it?
 11 A. I believe that it was, sir. And Mr Berry --
 12 Q. "Obviously we are not mobilising" ?
 13 A. We needed Mr Berry to -- there was no PDA available to
 14 mobilise to a rendezvous point. There was the PDA
 15 associated with the explosion action plan that deployed
 16 to the scene, but the action cards that enabled
 17 a deployment to a rendezvous point required the NILO to
 18 tell control what resources they wanted sending to that
 19 location.
 20 Q. To a degree we are at cross-purposes because I'm not,
 21 for this part, suggesting that NWFC operatives were
 22 doing other than following the cards in front of them.
 23 What I'm saying is that those cards and those policies
 24 didn't fit the national JESIP interoperability
 25 framework.

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1 A. I see what you're saying, sir. I understand what you're
 2 saying. I'm not so sure because, reading that -- I'm
 3 not talking about the whole thing, I'm talking about
 4 this paragraph:
 5 "When early location information is unverified and
 6 the suitability of potential rendezvous points is
 7 unclear, the lead responder and other control room
 8 supervisors should jointly agree an initial rendezvous
 9 point and communicate it to commanders as soon as
 10 possible."
 11 I think that is what happened, albeit we weren't
 12 sure -- it wasn't clear which action plan was being
 13 followed, it was just based on the team leader's
 14 knowledge of their training and the MTFa implication
 15 that they opted to advise the NILO of that rendezvous
 16 point in the first instance.
 17 Q. I'll move on from this in a moment, but just the first
 18 half of that sentence in that paragraph:
 19 "Where the information is unverified and unclear..."
 20 Which in the early moments of this incident,
 21 obviously that was the situation that presented itself.
 22 Doesn't that suggest that seeking to gain clarity is
 23 a responsibility of the control room?
 24 A. Sir, I'm not really understanding why the location
 25 information was unverified or unclear. It was verified

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1 by the police that that was the rendezvous point to
 2 which the police were proceeding to and that was clear,
 3 I believe.
 4 Q. But Mr Berry had a concern that there was a threat at
 5 that particular rendezvous point. To deal with it in
 6 simple terms, he rejected it and he went to
 7 Philips Park.
 8 A. He did, but he didn't rationalise that at the time to
 9 the control room; that came later in his statement, sir.
 10 SIR JOHN SAUNDERS: My difficulty about that is that it
 11 doesn't actually seem to fit in with the action cards.
 12 At that time GMFRS are saying to you: this is what you
 13 do. You're not meant to be looking at whether or not
 14 it's a suitable RVP point or whether to go there, you
 15 just follow the action card. Whereas this is actually
 16 saying that control room supervisors ought to have an
 17 input into it and if they think it's unclear or
 18 unsuitable, then they need to agree something. So that
 19 just doesn't seem to match up with what was happening in
 20 NWFC.
 21 A. No, sir, when you put it like that, it doesn't, because
 22 the operators would only be in a position to be able to
 23 accept a rendezvous point as suggested by the police
 24 with the understanding, I think it was in Mr Keelan's
 25 evidence, that a risk assessment would have been carried

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1 out at that location and it would be deemed safe. But
 2 the operators themselves wouldn't necessarily be able to
 3 state what was that safe rendezvous point or not.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR JAMIESON: The chairman has put it in a way I was trying
 6 to ---
 7 A. Apologies, sir.
 8 Q. It's my fault, it's my fault. Let's look at the
 9 training now, please, because what I'm going to suggest
 10 to you is it's the same thing. The operatives from your
 11 organisation receiving this training were being trained
 12 to do something which didn't fit with your processes.
 13 What I will seek your comment on is how you didn't come
 14 to know that, all right?
 15 It's {INQ001028/1}, please. Just on the first page
 16 to begin with. This is the training which we
 17 understand, as you tell us in your witness statement,
 18 7.1 for the record, people were undertaking. Did you do
 19 this training?
 20 A. I did.
 21 Q. Then I will ask you about it in particular. It's a very
 22 long document, it's 150 slides, we're not going to look
 23 at all of it, I'm going to pick out bits.
 24 Can we go to {INQ001028/51}, please. This is the
 25 particular guidance, practical guidance, about how

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1 control centres should work effectively together and the
 2 things that they should use, the joint decision model
 3 and METHANE.
 4 {INQ001028/55}, please, the joint decision model.
 5 We have seen it a number of times. At the centre it
 6 has:
 7 "Working together, saving lives and reducing harm."
 8 This point, although it's in a circle, might be
 9 thought in the circumstances of a no-notice incident to
 10 be where we start:
 11 "Gather information and intelligence."
 12 I just want to, on this slide, focus on the word
 13 "gather". It's not a passive process, it's not
 14 receiving, it's actively getting information.
 15 A. Yes, sir.
 16 Q. That is required. One of the ways that this is done ---
 17 {INQ001028/67}, please, Mr Lopez --- here is our METHANE
 18 message. I just want to be familiar with the mnemonic.
 19 Some of the sorts of information that are included in
 20 a METHANE, it is worth looking at those and reflecting
 21 back on the information that was provided to NWFC in the
 22 early stages.
 23 A. Yes, sir.
 24 Q. The exact location. The type of incident. What hazards
 25 or potential hazards could be identified. The number of

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1 casualties. And the E at the bottom, which and how many
 2 emergency responder assets or personnel are required or
 3 are already on scene. So the METHANE message is telling
 4 everybody that that information is important?
 5 A. Yes, sir.
 6 Q. Thank you.
 7 SIR JOHN SAUNDERS: Before we leave that, oddly enough on
 8 hazards, you would actually include in that not only
 9 what hazards or potential hazards can be identified but
 10 what can't be identified?
 11 A. Yes, sir. I'm not sure that we did that. We didn't do
 12 that on the night ---
 13 SIR JOHN SAUNDERS: But as a general rule on a METHANE
 14 message that's what you think, from a control room point
 15 of view, should be included?
 16 A. I don't know, sir, on a national level, because it does
 17 state in this:
 18 "What hazards or potential hazards can be
 19 identified."
 20 It doesn't necessarily promote the fact that hazards
 21 that are not present are equally as important.
 22 SIR JOHN SAUNDERS: I understand that, and you're saying it
 23 should do?
 24 A. I am, yes, sir.
 25 SIR JOHN SAUNDERS: I'm asking about your improvement on the

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1 METHANE message, how you think it can be improved.
 2 A. Yes, sorry.
 3 MR JAMIESON: Could we go to {INQ001028/79}, please.
 4 So this is particular guidance under that heading of
 5 the joint decision model. And then we go on to
 6 {INQ001028/80}. These are the questions that it is
 7 suggested control room operatives should be asking.
 8 A. Yes, sir.
 9 Q. Those questions go back to the information that is
 10 contained in a METHANE message, don't they?
 11 A. Or the initial call, sir.
 12 Q. Yes. But if I received a call and I asked these
 13 questions:
 14 "Where is it? What is happening? Who is involved?
 15 What could happen? What are the risks? What
 16 capabilities do we have? What do other people know?"
 17 I'm going to end up with a fair proportion of the
 18 information that would be included in a METHANE message?
 19 A. Yes, sir.
 20 Q. And I'm going to get that far earlier than a formal
 21 METHANE message is going to be available?
 22 A. Yes, sir. And we did have a lot of that information
 23 from the initial call. What we didn't do was continue
 24 to check the validity of that information or any changes
 25 in that information as the incident progressed.

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1 Q. May I also suggest that what didn't happen is that the
 2 particular pieces of information that were important
 3 were not recognised and they were not consistently
 4 communicated to others as they should have been. What
 5 I'm suggesting to you is that this training was quite
 6 an important — quite a helpful piece, resource, in
 7 identifying what was going to be important in a major
 8 incident situation?
 9 A. Yes, it was, sir, yes, that was the purpose of it.
 10 Q. Yes. May we just go to {INQ001028/103}, please.
 11 You remember from the interoperability policy
 12 we were looking at it, it talked about supporting
 13 principles. Here is some training on precisely those
 14 issues.
 15 If we go to {INQ001028/108}, please. They are set
 16 out. Just looking at that, supporting principle 1:
 17 "A dialogue between control room supervisors should
 18 be established as soon as possible."
 19 To take a particular example, number 5:
 20 "The lead responder will suggest a location for
 21 commanders to co-locate in the early stages of an
 22 incident when operational commanders may be travelling
 23 to the scene."
 24 Perhaps just focusing on the first one, when you did
 25 this training, did you pick up that your PDAs and action

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1 plans did not point to a dialogue between control room
 2 supervisors?
 3 A. No, I did not, sir — sorry, no, that's not entirely
 4 accurate. We did understand that the control rooms
 5 needed to speak to each other and we did understand that
 6 there was an arrangement in place to do that, but
 7 I don't think that — well, I know they haven't
 8 adequately picked up the fact that control room
 9 supervisors should be — specifically supervisors should
 10 be conversing with each other.
 11 Q. There was a mechanism for control rooms to speak?
 12 A. There was, yes.
 13 Q. There was a mechanism by which NWFC could receive
 14 information from partners?
 15 A. Yes.
 16 Q. It's happened and we can see some of it is logged.
 17 There doesn't seem to have been any PDA or action plan
 18 that encouraged the gathering of information: you, the
 19 team leader, should ask these questions?
 20 A. No, there wasn't. There is now, sir. We have corrected
 21 that.
 22 Q. Can we go over the page to {INQ001028/109}:
 23 "Particular things that should happen: share
 24 information on all resources, nominate a single point of
 25 contact.

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1 "The situation may be unclear before the first
 2 responders arrive ... dialogue between control rooms will
 3 assist in developing this clarity."
 4 Over the page, please {INQ001028/110}. We don't
 5 need to dwell on that. On to {INQ001028/111}:
 6 "Discussion between control rooms should be frequent
 7 and cover: who is the lead agency, what information does
 8 each agency have, what hazards and risks are known, what
 9 people and equipment have been or are being deployed and
 10 why?"
 11 Again those are all features of a METHANE update,
 12 aren't they?
 13 A. Yes, they are, sir.
 14 Q. Page 112, please {INQ001028/112}:
 15 "The control room should coordinate communication
 16 between specific points of contact, timings should be
 17 agreed for subsequent communication."
 18 So when one phone call one radio message finishes an
 19 agreement that we'll speak again at a period in the
 20 future?
 21 A. Yes.
 22 Q. "Take initial action to manage the incident."
 23 Then {INQ001028/113}:
 24 "The control room will agree the initial rendezvous
 25 point. Share this as soon as possible. If the

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1 rendezvous point changes, share this as soon as
2 possible."

3 It's the same question. It didn't strike you when
4 you were going through this training that this didn't
5 really fit what NWFC did?

6 A. It did. The fact of agreeing the initial rendezvous
7 point, that actually our operators wouldn't necessarily
8 be in a position to agree a suitable rendezvous point
9 but would be in a position to accept a rendezvous point,
10 and that is how Fire Service control rooms work
11 nationally, so I'm not quite sure what is intended by
12 the word "agree" in that context. We did recognise the
13 initial rendezvous point and we did share that as soon
14 as possible and if we had been advised that the
15 rendezvous points had changed then we would have shared
16 that information also. But nor did we enquire as to
17 whether or not those rendezvous points had changed and
18 nor were we advised that there had been a problem in
19 co-locating at that scene.

20 Q. So when you looked at this, did you notice the "agree"
21 and think that didn't apply to you because you were
22 a fire control room?

23 A. I did, but I understood it to be a national document
24 that maybe in the context of the Ambulance Service or
25 the police, that their ability to agree a rendezvous

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1 point might be different to ours. We would accept the
2 rendezvous point and then pass that to the NILO and then
3 they would make that decision as to whether or not they
4 were going to mobilise resources to it.

5 Q. In common with many Fire and Rescue Services, as
6 I understand it, GMFRS sends its command structure to
7 the incident, so incidents tend to be commanded from the
8 scene rather than remotely.

9 A. Correct, yes, absolutely.

10 Q. And other emergency services work differently?

11 A. Sorry?

12 Q. Other emergency services work differently?

13 A. Yes.

14 Q. They organise their commands in a different way?

15 A. Yes, sir.

16 Q. So that aspect you have in common with other control
17 rooms, even when they are within Fire and Rescue
18 Services?

19 SIR JOHN SAUNDERS: Mr Jamieson, I'm grateful for the
20 increase in volume because every now and then, maybe
21 because of all this perspex between us, I lose the end
22 of phrases sometimes, so thank you.

23 MR JAMIESON: Thank you.

24 So you have that in common with other FRs. What we
25 dealt with at the start, you are, although there's an

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1 idea of partnership, an external company to GMFRS and
2 the other groups. They set the terms within which you
3 operate, the PDAs and the action plans?

4 A. They set the terms in the way we operate. We are
5 a separate company to the Fire and Rescue Services,
6 however the Fire and Rescue Services opted to establish
7 a separate company to enable them to have an equal say
8 in how North West Fire Control operated. It was
9 a mechanism -- I'm not sure that the company's status
10 was set up to be a trading company of any sort. It was
11 set up to enable them to have a 25% equal voting right,
12 if you will, in terms of how the organisation was to
13 operate.

14 Q. I have not expressed myself clearly. Let me try again.
15 Whatever the structure be, you are a separate entity?

16 A. That's right.

17 Q. And you received your instructions?

18 A. Yes, sir.

19 Q. If it were the old system and you were a command/control
20 room attached to a FRS, you're part of the same
21 organisation. You still have the feature whereby
22 command goes to an incident, perhaps there's rather more
23 freedom though to agree initial rendezvous points?

24 A. I wouldn't -- no, sir.

25 SIR JOHN SAUNDERS: Can you answer that? I would be quite

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1 interested to know how within an ordinary system, if
2 I can put it that way, of a control room attached to
3 a particular Fire and Rescue Service, whether this
4 actually operates there either in practice. It may be
5 the Fire Service can give me some -- I'm not asking for
6 a detailed analysis to be made, but it may seem
7 impractical in quite a lot of occasions even for
8 a single operation.

9 Maybe you don't have the knowledge of what everyone
10 else does.

11 A. Sir, the only knowledge I do have is how it operated
12 from Lancashire and, Lancashire Fire and Rescue Service
13 had a series of what they referred to as service orders
14 and one of those service orders was a mobilising service
15 order. So within that, it detailed the way in which the
16 control room would manage mobilisations to certain
17 incidents. We didn't have action plans but we had text
18 files, which were the equivalent type of thing, so it
19 operated in very much the same way. What I would say
20 is that there was probably more discussion between the
21 Fire Service and the control room around how that would
22 work. It's more of a fait accompli with North West Fire
23 Control, but -- and I think from the evidence that
24 Mr Keelan gave the other day, I think there's definitely
25 an appetite on both sides, on both North West Fire

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1 Control's side and the operational side, to bridge some
 2 of that gap. That's what we're trying to do with the
 3 partnership manager and kind of make those operational
 4 links tighter between the two organisations.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR JAMIESON: There's just one more slide, please,
 7 {INQ001028/118}.
 8 The intention of this slide appears to be giving
 9 some foresight as to what is likely to be encountered in
 10 a multi-agency no-notice incident and it might be
 11 suggested to have foreshadowed some of what you
 12 encountered on 22 May.
 13 A. Yes.
 14 Q. "Information sharing in a fast-moving incident is
 15 complex, multi-dimensional and difficult. Information
 16 and the levels of sharing it will often be ambiguous.
 17 In the early stages much of the responsibility for
 18 gathering, assessing and sharing information will fall
 19 on control rooms. This will not be easy, but is
 20 essential in working together to save life and reduce
 21 harm."
 22 That is stark language, is it not?
 23 A. It is, sir, and I think I agree with it, that in the
 24 early stages much of the responsibility for gathering
 25 and sharing information falls on the control room, but

1 not all of that responsibility falls on the control
 2 room, and I don't mean to sound critical, although
 3 I probably will do, of the duty NILO, and I know that he
 4 indicated that at one stage he'd not been able to get
 5 hold of the force duty officer yet, but had it been
 6 communicated to the control room that he had not until
 7 much later in the incident been able to gather that
 8 situational awareness, the control room was under the
 9 misapprehension that that information was available to
 10 him and those conversations were being had.
 11 I can't say for certain, but I would expect that had
 12 they known those conversations weren't being had, that
 13 the value judgement placed on that information may have
 14 been increased.
 15 SIR JOHN SAUNDERS: I was interested that you actually let
 16 out when saying gathering and sharing, you left out
 17 assessing.
 18 A. Sorry.
 19 SIR JOHN SAUNDERS: It seems to me very deliberate. Would
 20 you assess the information you're getting?
 21 A. Yes, sir.
 22 SIR JOHN SAUNDERS: You would?
 23 A. Yes, we would. I think I've mentioned before that
 24 we can see from the sequence of communications that
 25 there was some information that was considered of value

1 and was shared to various agencies and to the Fire and
 2 Rescue Service and there was some that was not. So
 3 there was an element of assessment going on there. But
 4 I think there was also perhaps a lack of full
 5 understanding about some of the less obvious information
 6 that could have been of use.
 7 SIR JOHN SAUNDERS: But your operators are trained, are
 8 they, in the assessment of information?
 9 A. Oh yes, sir, yes.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR JAMIESON: What I would ask is this: having seen this
 12 slide when you did this training and looked at it and
 13 reflected upon it --
 14 A. Yes, sir.
 15 Q. -- did you reflect upon the processes of North West Fire
 16 Control and as to whether or not they met the problem
 17 that was being identified here about confusion in the
 18 early stages?
 19 A. Possibly, possibly not fully enough, and the reason
 20 I say that is because the context in which probably --
 21 I can only speak for myself, but the context in which
 22 I was doing this training was one where we had a major
 23 incident where -- not necessarily a terrorist-related
 24 incident.
 25 Q. And in fairness to you, the case study within the

1 training I think is about a burning building, isn't it?
 2 A. To be honest, I can't recall that, what the actual
 3 scenario is in the example. But that was how I viewed
 4 the training: that commanders would be on scene, they
 5 would recognise each other because they would have
 6 commander tabards on, and they would co-locate and they
 7 would share information and contact would be made with
 8 the force duty officer.
 9 I don't -- well, I know that I didn't consider this
 10 in a context of all of the emergency services being
 11 located in separate locations, which I think is
 12 where I mentioned before about the live training and
 13 exercising that would have perhaps flushed some of this
 14 out rather than just doing a standard training pack.
 15 Q. The final topic on this slide and on this -- the final
 16 question on this topic and this slide is this: are there
 17 now in place processes and procedures to capture
 18 important policy changes to allow NWFC to meet them?
 19 A. Yes. We have captured them. I think that the procedure
 20 for capturing future ones has just been approved in
 21 North West Fire Control with the new steering group and
 22 the way in which those changes are going to be managed
 23 in the future, including involvement and consultation
 24 with North West Fire Control at a regional level rather
 25 than at a local level. But they've also definitely been

1 captured within the operating procedures for North West
 2 Fire Control with the introduction of the major incident
 3 action plan that is our own major incident action plan,
 4 which prompts the managers to cover some of these
 5 things.
 6 On reflection, from the conversation we've just had,
 7 I'm still not -- I'm not convinced that the requirement
 8 for control room supervisors to speak to each other has
 9 been fully addressed by any of the agencies. The
 10 communication route has, but I'm not clear from the
 11 other agencies whether there would be supervisors at the
 12 other end of that line.
 13 Q. I'm going to come in just a moment to the action plan if
 14 I may, the new multi-agency one. But may I just ask you
 15 a question or two about discretion generally --
 16 A. Yes.
 17 Q. -- and how it operates in NWFC. In a normal business
 18 emergency call, the operatives are guided as to what to
 19 do by the PDA, which is the initial actions they need to
 20 do, and in many cases that will be all they need to do
 21 for an incident, and then, if there's anything else,
 22 there is something called an action plan, which tells
 23 them the follow-on actions they need to undertake. Have
 24 I got that right?
 25 A. Yes, sir.

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1 Q. I think we heard from another witness that the benefit
 2 of all of that is that the thinking has been done in
 3 advance.
 4 A. Yes, sir.
 5 Q. One of the consequences of doing thinking in advance
 6 is that day to day, that thinking isn't necessary
 7 because you follow a PDA and you follow an action plan
 8 and you don't have to ask yourself the question, "Why
 9 am I doing this, what is the purpose?"
 10 A. Yes, sir.
 11 Q. "What's important?" Mr de la Poer explored the issue
 12 with you if, heaven forbid, there were an explosion
 13 tomorrow. There are still -- I'm not critical of
 14 this -- two potential ways that NWFC could deal with
 15 that.
 16 A. Yes, sir.
 17 Q. Is it an explosion PDA or is it the beginning of
 18 an MTFA, which takes you in a different direction?
 19 Discretion needs to be exercised there. Decisions need
 20 to be made. Information needs to be gathered. We've
 21 looked at the training and the sorts of topics.
 22 A. Yes, sir.
 23 Q. If day in, day out, what the CROs are doing are
 24 following scripts and PDAs, do you think there is a risk
 25 that they do not develop that critical thinking that is

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1 going to be necessary in the case of a no-notice major
 2 incident?
 3 A. I think there is a risk of that, sir, yes, absolutely.
 4 I'm not sure that following strict mobilising rules that
 5 are non-negotiable, if you will, is necessarily a good
 6 way for the control room to work. It was necessary
 7 at the very beginning because we had different Fire and
 8 Rescue Services all coming together who operated in
 9 different ways and so in order to be able to accommodate
 10 those different ways, the action plans were introduced.
 11 Q. Yes.
 12 A. But I think we're seeing more -- a shift in the way that
 13 control rooms operate. I think through inquiries such
 14 as this one and the Grenfell Tower, I think the profile
 15 of control rooms has been raised more and the value that
 16 they can add to that process has been raised more, which
 17 in turn is giving more -- I say "discretion" for want of
 18 a better word -- to operators. In order for us to be
 19 able to manage that we need to be able to develop the
 20 critical thinking and we need to include that critical
 21 dynamic thinking and risk assessing within our training
 22 and I don't believe that our JESIP training fully
 23 captures that at the moment.
 24 I think our operators understand about joint
 25 decision-making and a shared understanding of risk, but

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1 I think they associate that more with the officers on
 2 the ground and I'm not sure that they fully appreciate
 3 the contribution that they can and should be making to
 4 that and we need to address that in our training.
 5 SIR JOHN SAUNDERS: First of all, is this a view shared by
 6 those who are in charge of GMFRS at the moment?
 7 A. I would... Based on Mr Keelan's evidence the other day,
 8 I would say he sounded fully committed to that kind of
 9 approach.
 10 SIR JOHN SAUNDERS: Secondly, trying to put myself in the
 11 position of being a control room operator, I think this
 12 might result in more references for further guidance
 13 from NILOs and the like because they're such important
 14 decisions.
 15 A. It could. It isn't something that we will be able to
 16 change overnight and I think it's something that is
 17 a cultural change that's required, both within North
 18 West Fire Control and with its partners, because
 19 currently -- the way that Mr Keelan described our
 20 approach in terms of being able to make that judgement
 21 to change to a rendezvous point rather than the
 22 location, while it would be welcomed, it is not
 23 currently what's acceptable by GMFRS. So if we do
 24 deviate from those action plans, we are pulled up on
 25 that, even if common sense has been applied or --

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1 SIR JOHN SAUNDERS: So the answer is you're working at it,
2 but it hasn't yet been fully accepted?
3 A. That's right. We are definitely making progress and
4 there is clearly a commitment at the highest of levels
5 within the organisations to achieve that. What we need
6 to do now is to understand what needs to change and
7 certainly our learning and development strategies are
8 key to that and developing that critical thinking.
9 SIR JOHN SAUNDERS: Thank you.
10 MR JAMIESON: Just reflecting those two things, you
11 mentioned the need to change the training and the
12 culture. I think you are in fact ahead of where I was
13 going next, which the action plan doesn't fix
14 everything, does it?
15 A. No, sir, and I don't think we ever expect to have an
16 action plan that fixes everything. The action plan
17 isn't designed to be a list of actions to be applied at
18 every incident, it's designed to be a prompt to assist
19 team leaders to bridge that critical thinking gap before
20 we can get the appropriate learning and development
21 strategies.
22 SIR JOHN SAUNDERS: The trouble is again that the change is
23 reactive rather than proactive. So if you do what
24 happened in relation to this incident, so GMFRS decided,
25 rightly or wrongly, that you should have followed the

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1 explosion plan. So because there was shown at the time
2 to be some ambiguity, they changed the explosion plan to
3 make it completely clear that if a bomb goes off, that's
4 the explosion plan and you follow that. Now, that's
5 reactive --
6 A. It is, sir.
7 SIR JOHN SAUNDERS: -- rather than proactive. I suppose the
8 exercise of a discretion can be more proactive, but one
9 just needs to make sure it can work properly and that
10 people have the necessary knowledge and training to
11 exercise their discretion correctly.
12 A. Yes, sir. We're working with all of the Fire and Rescue
13 Services now, not just GMFRS, to look at themes across
14 action plans where we can potentially apply some of that
15 discretion on a themed basis. So you're absolutely
16 right, what we've identified is that some of those
17 changes that were made were reactive and only applied to
18 the action plans that were in question at this incident.
19 And actually, now, some other incident types and action
20 plans contradict the information in them. So what we're
21 doing now is looking -- we've started with
22 terrorist-related incident types to start with because
23 they're topical, but there's a larger piece of work --
24 I think Mr Keelan referred to him having a group manager
25 who is dedicated to working on North West Fire Control

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1 issues. That is the work that he's doing, he's looking
2 at the incident types, response plans, action plans, as
3 a whole and looking to theme those so that we can make
4 sure that we don't just reactively change one and then
5 create a problem somewhere else.
6 SIR JOHN SAUNDERS: Thank you.
7 MR JAMIESON: Just finally, I think it probably would be
8 worth looking at this action plan just to bring that
9 point to light. {INQ000932/1}, please, Mr Lopez.
10 I have selected this version, NWFC have kindly
11 disclosed two --
12 MR SMITH: Could I say that the first line is a sensitive
13 issue.
14 SIR JOHN SAUNDERS: Let's take it down, please. Thank you.
15 MR JAMIESON: In fact, we saw it very briefly. What it is
16 are a series of prompts.
17 SIR JOHN SAUNDERS: Mr Suter has now gone out to try and get
18 it removed.
19 MR JAMIESON: Sorry to have caused such a fuss right at the
20 end.
21 SIR JOHN SAUNDERS: You're not the first.
22 MR JAMIESON: I'm grateful to Mr Smith because I can see the
23 issue that he's relating to.
24 SIR JOHN SAUNDERS: Thank you, Mr Smith.
25 MR JAMIESON: It's a series of prompts that populate on to

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1 a screen?
2 A. Yes.
3 Q. So what the control operative or the team leader gets
4 is that box of text that says: you must do these things.
5 And they are the sorts of issues that have arisen in
6 this case: you must gather this information, you must
7 talk to this person, you must share this information.
8 A. Yes.
9 Q. But a series of prompts in real time in a multi-agency
10 incident is no substitute for training, learning,
11 ingraining these principles?
12 A. No, that's absolutely right and I absolutely agree with
13 that. However, to bridge the gap to put those learning
14 and development systems in place, this is intended to
15 try and bridge that gap until we can develop those
16 learning strategies.
17 Q. I think I probably do have to observe, we are some
18 4 years on from the arena attack. That is on any view
19 quite a significant gap that is being bridged.
20 A. I absolutely agree with that, but some of the
21 information that was available we didn't know about
22 at the time. Some of that information we found out
23 through the Kerslake Report and some of it we're finding
24 out through the evidence that's come about. So that was
25 why there was a delay.

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1 Q. You raised that and so, again, I think I must ask you
2 about it. You have a debrief process after every
3 incident?
4 A. We do, sir, yes.
5 Q. However, whatever the efficacy of that debrief process
6 was, 2 years after the incident you were writing your
7 statement on the basis that the bomb action plan had
8 played some relevance to the role?
9 A. Yes, sir.
10 Q. So for those 2 years, your debrief process had not
11 uncovered a key factual feature of what had actually
12 happened?
13 A. No, it hadn't, you're right, sir.
14 Q. Had you as part of that process gone back and listened
15 to calls?
16 A. Yes, sir.
17 Q. Had you looked at logs?
18 A. Sorry, as part of that debrief process?
19 Q. Before we get to Kerslake, before we get to --
20 A. No, sorry, not before, no. I personally wasn't involved
21 in the debrief, so I couldn't say what was --
22 Q. Sorry, when I say you, I mean -- and it is rude, you're
23 here as the representative of NWFC, I mean you
24 corporately, not you individually. The debrief process,
25 because you say part of the reason of these changes

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1 hadn't happened yet is because Kerslake and others
2 hadn't brought them to your attention.
3 A. Yes.
4 Q. What I'm trying to establish is NWFC's corporate
5 capacity to learn its own lessons.
6 A. Yes.
7 Q. Had that debrief process, before Kerslake, included
8 consideration of the logs?
9 A. Yes, it would do, sir. And the call, yes, sir.
10 Q. But still those features were not noticed?
11 A. No, sir.
12 Q. And the instances of failure to pass information had not
13 been noted either?
14 A. No, sir, and we recognise that our debrief procedure was
15 not acceptable because of the fact that it didn't flush
16 those things out and should have done. That's now been
17 changed and we've actually -- we actually give training
18 to our team leaders and operators on more appropriate
19 ways of conducting debriefs.
20 Also, I think that when that debrief was conducted,
21 it was done so just looking at what was deemed at that
22 time to be the responsibility of North West Fire
23 Control, so to recognise that a potential MTFA incident
24 was unfolding, to tell a NILO to respond it. It was
25 done with that --

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1 Q. You looked within the parameters --
2 A. -- passive approach that the incident was dealt with and
3 didn't delve into that detail that was required of it
4 in that JESIP doctrine.
5 Q. So that passivity infected the review process?
6 A. It did, sir, yes, as well as a lack of information
7 around what was available. So normally, we would have
8 attended a multi-agency debrief, Ms Carden did attend
9 the inter-agency debrief, but I'm not sure that -- there
10 was an element of information, it was --
11 Q. Mr O'Reilly had a view, didn't he?
12 A. He did, he had that view that we had not -- while we
13 shared it with other agencies, we hadn't shared it as
14 well with other officers on the ground, and it was from
15 that that we started to develop the major incident
16 action plan to address that and look at our debrief
17 procedures because the debrief that we'd done didn't
18 recognise any of those things.
19 MR JAMIESON: Thank you very much. Those are all of my
20 questions.
21 SIR JOHN SAUNDERS: Thank you, Mr Jamieson.
22 MR DE LA POER: Before I turn to Mr Smith, can I just say
23 this about my unhelpful interruption to your question
24 first thing today about whether it was NWS who had not
25 sent representatives or did not have representatives

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1 available for exercising. Mr Suter has helpfully drawn
2 my attention to Exercise Powerhouse, which post-dated
3 the attack, and that has led to the identification of
4 Janine Carden's evidence. For those that want the
5 reference, it's Day 125, pages 76 and 77 {Day125/76:1},
6 in which she indicated that although some
7 representatives from NWS attended the preparation for
8 Powerhouse, nobody from the control room did, so that
9 may be at least the start of our investigation into that
10 point. It seems like you were quite right.
11 SIR JOHN SAUNDERS: Right. I had something else in mind,
12 but that's fine. That may be where it comes from.
13 Thank you.
14 MR DE LA POER: We will continue to run it down. Thank you
15 very much indeed.
16 SIR JOHN SAUNDERS: I don't want people to spend too much
17 time on it, but I think we do need to know from NWS at
18 some stage whether or not it's correct that the number
19 of people they have in their control rooms means that
20 they can't actually practice an exercise which goes back
21 that far involving control rooms.
22 MR DE LA POER: I know that Ms Roberts is listening and I'm
23 sure she will have heard you say that. I am sure no
24 response is required now --
25 SIR JOHN SAUNDERS: No, no, absolutely not.

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1 MR DE LA POER: — but I am sure she will take that up with
 2 those that instruct her.
 3 Can I now turn to Mr Smith QC and indicate that
 4 we've been going about an hour, so if he could find
 5 a convenient moment in about 30 minutes' time.
 6 MR SMITH: Thank you.
 7 SIR JOHN SAUNDERS: Are you all right or do you need a break
 8 now?
 9 A. No, I'm fine, thank you.
 10 Questions from MR SMITH
 11 MR SMITH: Could I take you, first of all, please, to an
 12 enquiry which the chairman has indicated is of interest.
 13 That is the circumstances in which statements were made
 14 by control room staff which appeared to suggest that the
 15 "Bomb — general" plan was followed.
 16 A. Yes, sir.
 17 Q. If I could ask Mr Lopez to put an extract for the
 18 chairman and the inquiry on to the screen from Kerslake,
 19 please. This is {INQ000009/95}, please. It's
 20 paragraph 3.152. Perhaps Mrs Wilson, you could just
 21 refresh your memory about that and in particular the
 22 last sentence:
 23 "Following the plan's instructions, they then opened
 24 the action plan for bomb."
 25 Did you indicate earlier in your evidence that

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1 that is something that you had failed to pick up on
 2 reading Kerslake —
 3 A. It is, sir, yes.
 4 Q. — that error?
 5 A. Yes, sir. I didn't know what had — which action plans
 6 they had looked at or followed, so when I read the
 7 Kerslake Report and it referred to that, my assumption
 8 was that that information had been provided to them by
 9 North West Fire Control.
 10 Q. In fact, you're probably aware, are you, that
 11 Janine Carden has indicated that a note made by the
 12 Kerslake investigation team is defective insofar as it
 13 records her views on an occasion when Mr Goodwin visited
 14 North West Fire Control?
 15 A. Yes, sir.
 16 Q. However, this is the final point I want to draw the
 17 chairman's attention to, please.
 18 Mr Lopez, could you put up, please, {INQ035378/1}.
 19 I don't want to go through the whole of this letter,
 20 but is this a letter that was sent on your instructions,
 21 dated 7 August of last year —
 22 A. Yes, sir.
 23 Q. — for the attention of the chairman, setting out in
 24 some detail, and if we go to the next page {INQ035378/2}
 25 as well, we'll just get a general flavour of this,

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1 Mr Lopez, and again to the third page {INQ035378/3}, the
 2 history by which North West Fire Control came to
 3 conclude that in fact the "Bomb — general" action plan
 4 had never been followed?
 5 A. Yes, sir.
 6 Q. At that time, at the end of July 2020, and immediately
 7 before this letter was written, what information was
 8 assembled by North West Fire Control and analysed to
 9 permit you to come to the conclusion that in fact the
 10 "Bomb — general" action plan had never been followed?
 11 A. We'd identified some gaps in the statement of Ms Gregson
 12 and Ms Owen. Mrs Tracey met with Ms Gregson to try and
 13 get her to talk through the actions that she took on the
 14 night.
 15 SIR JOHN SAUNDERS: Who to talk through?
 16 A. Ms Gregson —
 17 SIR JOHN SAUNDERS: You mentioned two people. Her and?
 18 A. Mrs Tracey and Ms Gregson to talk through the actions
 19 that were taken on the night. It was following the
 20 statement of the fire expert, I think it was — I may
 21 have got the chronology wrong here — I think Ms Carden
 22 had got in touch to say that she was surprised that it
 23 said that they'd followed the bomb action plan because
 24 that wasn't something she was familiar with.
 25 MR SMITH: I will just interrupt you there because you have

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1 asked a question.
 2 On 30 July of 2020 — and this is on the portal —
 3 Janine Carden had sent an email to you; is that correct?
 4 A. That's right.
 5 Q. Stating that she was shocked —
 6 A. Yes, sir.
 7 Q. — having reading Mr Hall's report and having been given
 8 access to it —
 9 A. That's correct, sir.
 10 Q. — to see that proposition, which was the first that she
 11 had heard of it?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: But it post-dates Kerslake, so that
 14 presumes she didn't see Kerslake.
 15 MR SMITH: That appears to be the case, yes.
 16 A. Sorry, can I interrupt? I think that was the point
 17 I was making earlier, that when we'd been going through
 18 the drafts and feeding back to the Kerslake Review team,
 19 Ms Carden had actually advised me that —
 20 SIR JOHN SAUNDERS: Sorry, you said that.
 21 A. Yes, and I missed that at her update.
 22 SIR JOHN SAUNDERS: Can we just have the letter back up?
 23 And can you go back a page? The second page, the next
 24 page {INQ035378/2}.
 25 (Pause)

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1 Okay, I think it's perfectly understandable that
 2 Mr Hall included in his report that which he included.
 3 MR SMITH: Yes, and you'll have noticed, sir, that one of
 4 the concerns that the North West Fire Control legal team
 5 had was that Mr Hall had presented his report on a false
 6 basis, effectively, a false factual basis.
 7 SIR JOHN SAUNDERS: Okay. Well, fine, thank you for going
 8 through that.
 9 MR SMITH: Just one more point that may assist you, sir.
 10 It's really for your purposes rather than that of the
 11 witness. On the current page that we have on the
 12 screen, {INQ035378/2}, in the fourth paragraph there are
 13 references to statements, brief statements, that were
 14 made to Greater Manchester Police. Those reports to
 15 DC Moriarty in fact do not suggest that the "Bomb --
 16 general" action plan was followed.
 17 SIR JOHN SAUNDERS: Okay.
 18 MR SMITH: That's the first record made by either of those
 19 witnesses.
 20 SIR JOHN SAUNDERS: But after that, Michelle Gregson and
 21 Lisa Owen made statements indicating that maybe they
 22 were following Kerslake, maybe they were -- who knows.
 23 Anyway that's the explanation. Can I make it clear,
 24 I am not in any way, nor is anyone as I understand it,
 25 criticising Kerslake. We obviously have more

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1 information to look at and we need to reach our
 2 conclusions on the basis of the evidence that we have.
 3 MR SMITH: And a very different process.
 4 SIR JOHN SAUNDERS: Absolutely.
 5 MR SMITH: Thank you very much, I'll just move on from
 6 there, if I may.
 7 Can I take you to the sequence of communications,
 8 please, and first of all to page 17 {INQ041473/17}.
 9 We're just picking up the end there of that conversation
 10 with Mr Berry. If we go back to {INQ041473/16}, we can
 11 then follow 16 into 17 in the right-hand column. That's
 12 the information that was not provided to Station Manager
 13 Berry at that time.
 14 I would like to be very clear about your position,
 15 please. Should that information have been passed to
 16 Mr Berry?
 17 A. Yes, it should.
 18 Q. Then if we turn next to {INQ041473/28}, please, where we
 19 see a further call involving Mr Berry. Mr Berry was not
 20 provided with the detailed information that had been
 21 provided to Group Manager Nankivell in the call made to
 22 him at 22.52. Then there follows in the right-hand
 23 column a longer list still of principally five points
 24 that would have assisted the Fire and Rescue Service.
 25 A. Yes, sir.

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1 Q. Is it your view that that information should certainly
 2 have been passed to him?
 3 A. Absolutely, sir, yes.
 4 Q. What is the significance of Mr Berry's position in terms
 5 of the failure to pass that information in your view?
 6 A. Sorry, can you just say that...
 7 Q. What would be the significance of Mr Berry's situation
 8 and status in terms of assessing the failure to pass
 9 that information on? How might it have impacted on
 10 Mr Berry if that information had been passed to him?
 11 A. I would expect that Mr Berry would have understood from
 12 that that ambulance crews were arriving at the scene,
 13 that a paramedic Bronze officer was already at the scene
 14 and that other ambulances -- ambulances were proceeding
 15 to that area near --
 16 SIR JOHN SAUNDERS: I'm not convinced that -- it's obviously
 17 important information. I think really we're saying,
 18 because Mr Berry is the duty NILO, he, as you've already
 19 said, is the absolutely first point conduit for
 20 information; is that right?
 21 A. Yes, sir, he would be, and certainly was when there were
 22 no other officers advised of it. I'm thinking... This
 23 one follows on from the one from Group Manager
 24 Nankivell.
 25 MR SMITH: Yes.

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1 A. So I can't say, but how the team leaders were viewing
 2 the situation at this point in time but I am thinking --
 3 SIR JOHN SAUNDERS: As to who was in charge, as it were?
 4 A. Yes. They may have thought the NILO, Mr Berry, was
 5 going to be an adviser to another commander and the next
 6 commander that was told was Mr Nankivell.
 7 SIR JOHN SAUNDERS: So this does highlight a point which is
 8 of some importance, isn't it? Partly because of the
 9 system run by GMFRS, which is: a higher ranking officer
 10 comes in, he takes over, and so on down the line --
 11 A. Yes, sir.
 12 SIR JOHN SAUNDERS: -- you really do need to know who is
 13 your most important single point of contact or incident
 14 commander, whatever you call it?
 15 A. Yes, sir.
 16 MR SMITH: That's the point, isn't it, so far as you are
 17 concerned, that it is important to know who should
 18 receive all this information as the person who's going
 19 to utilise it --
 20 A. Yes, sir.
 21 Q. -- to inform the mobilising response?
 22 A. Yes, sir.
 23 Q. Is that right?
 24 A. It is, sir, and I think there was also an expectation
 25 that the officers would be speaking to each other and

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1 sharing information with each other, which appeared not
 2 to be the case. So that's made that point even more
 3 important now, that we share information with the
 4 different locations.
 5 Q. Of course the important thing is that having
 6 a scattergun approach of informing every officer who
 7 rings in doesn't assist when it's possible to be able to
 8 identify, if you like, a single point of contact or the
 9 principal point of contact who can make best use of that
 10 information?
 11 A. That's right, sir.
 12 Q. Do you agree with that?
 13 A. Yes, I do.
 14 Q. I just want to clarify one aspect that you raised in
 15 evidence in answer to Mr de la Poer QC. You indicated
 16 that you had been responsible for failing to enquire
 17 further of Janine Carden about the question whether
 18 a major incident had been declared.
 19 A. I did, sir, yes.
 20 Q. Had you been informed that a major incident had been
 21 declared and had been declared by North West Ambulance
 22 Service, what process of reasoning would you have gone
 23 through?
 24 A. I would have considered that a major incident
 25 declaration would then be supported by a METHANE message

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1 and generally that major incident declaration is part of
 2 that METHANE message so that there may have been other
 3 information or an actual METHANE message itself that
 4 I could have had.
 5 Q. So it's the last E of METHANE; is that correct?
 6 A. That would have been the -- yes. But I think most of
 7 the information under METHANE we had --
 8 Q. Yes.
 9 A. -- but the bit that we were missing was which emergency
 10 services were on scene and which emergency services were
 11 still required to attend.
 12 Q. Is that something that you regret not enquiring further
 13 about?
 14 A. Absolutely, sir, yes.
 15 Q. Moving on from there to the major incident action plan,
 16 the one that was created by North West Fire Control, on
 17 whose initiative was that created?
 18 A. Mine, sir.
 19 Q. Could you assist with your reasoning which led to the
 20 process of creating that major incident action plan, the
 21 one that's just been taken down rapidly from the screen?
 22 A. Yes, sir. As Mr Jamieson said, at the debrief there was
 23 an issue raised by Mr O'Reilly to say that information
 24 hadn't always been shared, and as a result of that we
 25 went through incident logs and the calls to identify

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1 what information we had received and what information
 2 had been passed and also what information had not been
 3 passed.
 4 We then also, from the Kerslake Report, identified
 5 that information had been available and, had we asked
 6 for it, the likelihood is we would have got it. So it
 7 highlighted the fact that the control room -- the team
 8 leaders' and the operators' training did not adequately
 9 address the critical thinking that Mr Jamieson referred
 10 to. We understood also from some of the recommendations
 11 emerging from the Grenfell Tower Inquiry that that
 12 ability to think dynamically and actively seek
 13 information and share that information was something
 14 that we needed to include in our training, but I was
 15 also conscious that it would take time to achieve that.
 16 So I decided to create the major incident action plan as
 17 a means of providing a prompt, not necessarily for
 18 an MTFA incident, it isn't designed specifically for
 19 an MTFA incident, it's designed for any multi-agency
 20 incident where JESIP is expected to take place and it
 21 places the team leaders and the operators in a more
 22 proactive role or was intended to.
 23 I believe it has done. We have used it on a number
 24 of occasions and it has produced results where
 25 information has been available and we've been able to

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1 gather that information when it's not been passed.
 2 Q. There's one important point here and we do have it in
 3 a different format, which is not operationally
 4 sensitive. If Mr Lopez could put on the screen
 5 {INQ000931/1}, please.
 6 We can see that these are the actions which were
 7 devised by North West Fire Control; is that correct?
 8 A. Yes, sir.
 9 Q. (1) and (2). (1) is the radio check on the Airwave --
 10 A. Yes, sir.
 11 Q. -- to make sure that police and ambulance control rooms
 12 are monitoring that Talk Group and that it will be used
 13 as the method in the initial stages of the incident to
 14 pass critical information. What's the significance of
 15 the initial stages of the incident, please?
 16 A. It's to cover the period of time between officers being
 17 deployed and actually arriving on scene where they can
 18 then gather their own situational awareness.
 19 Q. It's the early stages until that point is reached?
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: Until co-location or until they've
 22 arrived?
 23 A. Good question. Until they are in a position where they
 24 can gather that information for themselves, so yes,
 25 co-location.

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1 MR SMITH: And then we can see, before moving away from this
2 document, that at point (3):
3 "To ensure the Fire Service response is mobilised to
4 the multi-agency rendezvous point. It may be
5 necessary ..."
6 Is this the prompt:
7 "... to prompt the Fire Service incident commander
8 to do this?"
9 A. Yes, sir.
10 Q. Who would be the Fire Service incident commander?
11 A. It would depend on how far developed the incident had
12 got. So if at that stage we had only advised a NILO,
13 then that would be the person that we would prompt.
14 Other than that, it would be whoever had declared
15 themselves the incident commander.
16 Q. Is this now a revised or to be a revised document to
17 take account of the new Talk Group --
18 A. Yes, sir.
19 Q. -- which we saw briefly? The reference for that is
20 {INQ041600/1} -- we saw it briefly I think last week.
21 A. Yes.
22 Q. -- in which a new Airwave had been allocated?
23 A. Yes, that's right.
24 Q. And the original Airwave has gone back to its original
25 function?

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1 A. Yes, sir.
2 Q. To support the command process?
3 A. Yes, sir.
4 Q. I would like to move on now, please, to the issue of
5 discretion. Do you find this an easy question to
6 analyse in terms of what discretion does the control
7 room -- did the control room actually have at the time
8 we are concerned with, 22 May, in connection with the
9 predetermined attendance?
10 A. It had no discretion to reduce it. The only
11 discretion -- sorry, with that predetermined attendance
12 for that particular incident on that day, it had no
13 discretion in terms of whether or not it deployed those
14 resources to the scene or not.
15 Q. We may be talking about two things here, which I think
16 may assist the inquiry, the answer to which may assist
17 the inquiry. First of all, do you consider a decision
18 "We are going to consult the duty NILO" to be an
19 exercise of discretion or do you look at it in some
20 different way?
21 A. I possibly looked at it in a different way, but I think
22 earlier we kind of talked about it being discretionary.
23 But my understanding would have been the team leaders
24 had a decision to make as to which action plan to follow
25 or which incident type or action plan to follow based on

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1 the information they had at the time. I think their
2 judgement was that the decision certainly didn't fit the
3 explosion action plan. I'm not sure that they
4 considered whether it was bomb or Plato, but in either
5 case their thinking was around that they needed to
6 mobilise to a rendezvous point and therefore needed to
7 get approval from the duty NILO to do that, advice from
8 a duty NILO to do that.
9 So I don't know whether you would call that
10 discretion or a decision or whether it was a fallback
11 position because they weren't sure what action to take,
12 so the position was to get advice from an expert.
13 Q. I want to draw this distinction if I may: did the
14 control room in your view have any discretion to look at
15 an action plan and say, "No, we're not going to send
16 eight pumps, ten pumps, whatever it may be, we're going
17 to send 12", if the requirement imposed on North West
18 Fire Control was to send a different number? Did you
19 have any discretion to alter --
20 A. There was an element of discretion. They would be
21 expected to, as a minimum, mobilise the PDA that's
22 specified either on the response plan or the action
23 plan. However, if there was information that indicated
24 that other resources may be useful at the incident, so
25 for example a multi-storey building where there's fire

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1 in the roof or that an aerial appliance might be helpful
2 then they have the discretion to be able to mobilise
3 that aerial appliance in response to the information
4 they're getting. Likewise, if you're getting a lot of
5 calls that indicate a large building fire, they do have
6 the discretion to mobilise more pumps, but they must
7 mobilise the minimum requirement that is on the response
8 plan and the action plan in the first instance.
9 Q. So it's a discretion to increase the number of
10 appliances or resources; is that correct?
11 A. Yes, sir.
12 Q. But not to decrease the number of appliances?
13 A. No, sir. The only time they have the discretion to do
14 that is for calls like automatic fire alarms where they
15 go through a series of questioning to understand what
16 the position is with regard to the fire alarm and then,
17 if the fire alarm can be checked, they are able to
18 reduce the response to that, but that is following a
19 series of questions supplied to us by the Fire and
20 Rescue Service.
21 Q. How is this process, this exercise of discretion,
22 conveyed in terms of training to the control room staff
23 so that they understand what the limits of their
24 discretion are?
25 A. In the way that I have just said really, sir. They are

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1 trained to, as a minimum, mobilise the PDA that is
2 specified on the response plan and the action plan, but
3 part of the team leader training is that they can
4 increase that if they feel that that is necessary.
5 I must say that if we ever do do that, there's very
6 little criticism from the Fire and Rescue Services for
7 doing that, but there's no discretion to change it in
8 any way or reduce it in any way other than the automatic
9 fire alarms.

10 For the automatic fire alarms, the questions are
11 supplied to us, they get loaded into the mobilising
12 system and the operators are trained to run the call
13 prompts while they're managing that call. That's how
14 they're trained to do that.

15 Q. Where does the escalation procedure within North West
16 Fire Control fit into this question of what decision
17 a control room operator is going to make: do I mobilise
18 do I not, do I seek advice? How does the escalation
19 procedure operate to assist a control room operator in
20 a major incident, for example?

21 A. Are you talking about the escalation process within
22 North West Fire Control?

23 Q. Yes, I am.

24 A. The escalation process is designed to support the team
25 leaders so that if an incident escalates beyond, say,

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1 a tactical level, where they're managing the room, to
2 a more strategic level in terms of having command
3 support rooms or multiple locations or multi-agency
4 response, that they can then escalate that to -- it
5 doesn't have to be one of those sort of incidents, it
6 could just be to get advice, it doesn't necessarily have
7 to be in response to an incident. There's always a duty
8 operations manager available 24 hours a day and they can
9 seek advice from the duty operations manager and the
10 duty operations manager can review what actions have
11 been taken and determine whether or not they feel at
12 that level that those actions have been appropriate.

13 Q. My next question is this: how, therefore, does the
14 system operate in terms of a major incident like this
15 attack whereby somebody like Mr Ellis takes the step of
16 seeking advice from the next level up, team leader --

17 A. Yes, sir.

18 Q. -- instead of simply mobilising resources in accordance
19 with the incident type and PDA?

20 A. I'm not entirely ... Please correct me if you know
21 otherwise, but my understanding was that Mr Ellis didn't
22 escalate it. I believe that Mr Ellis drew attention to
23 the incident that he was taking and then was advised by
24 the team leader not to mobilise, that that was the team
25 leader's decision. But that would be a normal way of

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1 working, to attract the supervisor's attention --

2 SIR JOHN SAUNDERS: I think the question is: if that's what
3 is meant by escalation, how does he know that he needs
4 to attract the attention of the team leader rather than
5 making the decision himself?

6 A. I suppose through the fact that, again, he would have
7 had MTFA training, so there's something that has
8 registered with him as being different, because had that
9 just been a normal explosion incident type, I would
10 imagine that Mr Ellis would have probably mobilised
11 in the first instance and then raised awareness to the
12 team leader because that is what would happen. But
13 there's been something that has registered with Mr Ellis
14 that has made him think that this is a different kind of
15 incident that he now needs to take advice on because for
16 some reason he has concerns that by deploying
17 immediately, there is a risk associated with that.

18 SIR JOHN SAUNDERS: Thank you.

19 MR SMITH: And he's indicated that it's a type 1 incident or
20 category 1 incident?

21 A. Yes.

22 Q. So he raises his hand to inform the team leader?

23 A. Yes.

24 SIR JOHN SAUNDERS: Does that necessarily follow that if
25 it's a category 1 incident, you immediately raise your

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1 hand?

2 A. No, there was something specific about this incident
3 that Mr Ellis has not been happy with.

4 SIR JOHN SAUNDERS: Okay, I understand.

5 MR SMITH: What I would like to be clear about is that in
6 theory, therefore, could Mr Ellis have mobilised the
7 requisite number of pumps to the arena without
8 consulting somebody in a senior position, and if that
9 had happened he would have acted in a way which the team
10 leaders decided not to do?

11 A. Yes, sir, that could have happened.

12 Q. That could have happened?

13 A. Yes, sir.

14 Q. Do you think that's a desirable state of affairs?

15 SIR JOHN SAUNDERS: Well, it would have been on this night.

16 MR SMITH: It would indeed, sir, of course.

17 A. I was just about to say that. I would have said --
18 initially I would have said no, but through the course
19 of the evidence it would indicate that actually, yes,
20 it would have been.

21 SIR JOHN SAUNDERS: That's the consequences rather than
22 whether it's the right idea. We need to have break at
23 some stage for the witness's benefit.

24 MR SMITH: We do. I was just go to bring this part to an
25 end, if I may.

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1 You see the point, Mrs Wilson, that the inquiry may
 2 be interested to look at this situation, that on the one
 3 hand the course of events was followed as a result of
 4 the team leaders consulting with each other and making
 5 a decision, consult Mr Berry, as a result of Mr Ellis
 6 escalating it to them.
 7 A. Yes, sir.
 8 Q. In terms of training and instruction, could he have done
 9 the opposite? Could he have mobilised, therefore, to
 10 the scene?
 11 A. He could have done, yes, sir.
 12 Q. Is there anything in training which ought to guide
 13 control room operators to take in those circumstances
 14 a specific step, in other words to require or ask for
 15 authorisation?
 16 A. I think there is, and as I have just explained, I think
 17 there was in this case because the training indicated to
 18 Mr Ellis that this was not a normal incident, this was
 19 not a normal explosion incident type, and there is built
 20 into the response plans that we are given by the Fire
 21 and Rescue Services — there is a built-in risk
 22 assessment around the safety of crews factored into
 23 that. So I think from the training that Mr Ellis had,
 24 that was sufficient for him to realise that there was
 25 a potential risk to responding crews if they were

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1 mobilised direct to the scene and that maybe mobilising
 2 direct to the scene on this occasion was not the most
 3 appropriate course of action or not a course of action
 4 that he felt comfortable with and wanted to escalate
 5 that to his team leader.
 6 Q. So before leaving this, do you consider, to assist the
 7 chairman, that this should be more closely and carefully
 8 defined for a control room operator?
 9 A. What should be more?
 10 Q. Whether to escalate it in these circumstances and not to
 11 deploy or mobilise or do you think that this situation
 12 doesn't need improvement in that regard?
 13 A. My personal view is that on a normal daily basis,
 14 control room operators do not need to escalate incidents
 15 to the team leader, they will just mobilise to them.
 16 That's not to say that they won't flag incidents of
 17 particular note or severity to a team leader once
 18 they've mobilised to them. So for example, a house fire
 19 with persons reported, they would mobilise to that and
 20 then flag that to the team leader and draw their
 21 attention to it if they weren't already aware of it.
 22 SIR JOHN SAUNDERS: I presume the guidance would simply be:
 23 if you are worried about the safety of the fire
 24 officers, if you deploy, then take some advice? But
 25 I don't know, perhaps that's too simplistic.

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1 MR SMITH: I was going to come to that finally, sir.
 2 SIR JOHN SAUNDERS: Sorry.
 3 MR SMITH: So therefore, does the answer lie in good
 4 training and a clear understanding of the risks and how
 5 the control room operator should respond, in other words
 6 good training?
 7 A. Yes, sir.
 8 SIR JOHN SAUNDERS: Put much better than me, Mr Smith.
 9 We'll have a 10-minute break, if that's all right. It
 10 would be nice to finish by 4.30.
 11 MR SMITH: We will be finished by 4.30.
 12 SIR JOHN SAUNDERS: Good, thank you.
 13 (3.45 pm)
 14 (A short break)
 15 (3.58 pm)
 16 SIR JOHN SAUNDERS: Thank you, Mr Smith.
 17 MR SMITH: So on that question of training, Mrs Wilson,
 18 could I take you, please, through Mr Lopez, to
 19 {INQ040418/1}.
 20 This is the control room operator phase 2 programme
 21 for training; is that correct?
 22 A. Yes, sir.
 23 Q. It was updated in November 2016, this particular
 24 document.
 25 A. Okay, sir.

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1 Q. If we look at the second page, please, {INQ040418/2},
 2 we can see the purpose of the phase 2 programme, you
 3 having been asked about this earlier today, and what you
 4 were asked was whether JESIP was incorporated within the
 5 training. Do you remember?
 6 A. Yes, sir.
 7 Q. So we can see on that page, the purpose of the phase 2
 8 programme, and if we go now please to {INQ040418/130},
 9 we can see that incorporated within the phase 2 training
 10 was a section related to JESIP; is that correct?
 11 A. Yes, sir.
 12 Q. Thank you, that could come down now.
 13 What emphasis was placed on JESIP training prior to
 14 22 May 2017 with your control room staff going through
 15 phase 1 and phase 2 to become competent?
 16 A. There was quite a significant emphasis placed on it
 17 because we set up a JESIP team to first of all attend
 18 the JESIP learning event so that they were in a position
 19 to be able to put together the correct training
 20 programmes. I think Mrs Tracey elaborated on that in
 21 her evidence because she was the JESIP lead for North
 22 West Fire Control and the training that was given from
 23 the College of Policing was adapted for supervisors and
 24 operators, so the principles of JESIP have been quite
 25 well covered in the training.

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- 1 Q. So just standing back from the evidence relating to
2 communication failures, are you able to deal in a few
3 sentences with the question:
4 "If the staff were trained accordingly, control room
5 staff, and if they were aware of the importance of the
6 multi-agency response and the receipt and passing of
7 communication, how did they fail to pass critical
8 information to the Fire and Rescue Service"?
- 9 I'm not asking you to speak for the control room
10 operators, you understand the point.
- 11 A. Yes, I do, sir. I think it goes back to that practical
12 application of that training. I think the training that
13 we've focused on has been very theoretical in its nature
14 and where there has been practical scenario training, it
15 has been done within the control room by the control
16 room for the control room, and the opportunity to
17 practice those JESIP principles in a live and
18 dynamically moving environment situation has been
19 necessary but not included.
- 20 Q. So would you be able to state again, shortly, please,
21 what you consider would be the advantages to be derived
22 from the involvement of the Fire Service control room in
23 multi-agency exercises from the point of call?
- 24 A. From the point of call, we'd be able to assess the lines
25 of thinking of the team leaders, the logic that they are

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- 1 applying to the decisions that they are making, and then
2 be able to review the response to that, the decisions
3 that they've taken in terms of mobilising or not
4 mobilising.
- 5 I think if we -- I know that Winchester Accord has
6 been covered a lot in the inquiry and I know that you're
7 probably clear on the information that wasn't shared
8 there. I think had the control room been involved
9 in that, then they would have had an awareness that it
10 was possible for communications to fail to that extent
11 because I don't think that the JESIP incidents -- sorry,
12 the incidents where JESIP had been applied previously
13 had demonstrated that potential for failure and
14 therefore there was an assumption on the part of the
15 control room that those JESIP actions were being
16 followed at the incident.
- 17 I think involvement in a multi-agency exercise like
18 that would have highlighted the difference. And also,
19 the ability to be able to exercise with other agencies
20 and other agency control rooms would be beneficial, not
21 just live training and exercising with the Fire and
22 Rescue Services, but also with the other agencies
23 in that and starting to build a relationship between the
24 control rooms and understanding how they work.
- 25 Q. With what frequency would you like to see the

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- 1 involvement of the control room in live exercises,
2 bearing in mind your staffing issues, resources and all
3 those aspects of the business case?
- 4 A. Absolutely. Where we do carry out live exercises, for
5 example when we're operating in a fallback situation, we
6 try to do that at least four times a year so that each
7 team gets to experience one of those exercises.
- 8 SIR JOHN SAUNDERS: That's obviously important because while
9 you're exercising, business as usual has to go on --
- 10 A. Yes.
- 11 SIR JOHN SAUNDERS: -- so not everybody can take part in the
12 exercising?
- 13 A. Yes, that's right, sir.
- 14 MR SMITH: I would like to turn, please, to the issue of
15 national operational guidance. Because you've touched
16 on this already in your evidence, but I believe there
17 may be more valuable evidence you can give about it to
18 the chairman today.
- 19 Is it the case that there's no national operational
20 guidance specific for control rooms?
- 21 A. There is one piece of national operational guidance and
22 that's on emergency call handling.
- 23 Q. But for the balance, is there any operational guidance?
- 24 A. No, apart from one new piece that's just been written on
25 fire survival guidance, which is part of the new

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- 1 arrangement that's in the National Fire Chiefs Council
2 currently.
- 3 Q. It's that new arrangement I want to ask you about.
4 There's something known as the National Mobilising
5 Officers Group; is that correct?
- 6 A. That's correct.
- 7 Q. What is that group?
- 8 A. That's a group of control room managers from all over
9 the country, including Scotland, Wales and
10 Northern Ireland, who meet probably about four, three
11 times a year. It has been less just recently because of
12 obviously the COVID situation, but that group was put
13 together originally to review progress against the
14 collaboration funding that was being spent and then that
15 group started to become more developed and start to
16 share issues and best practice and learning that they'd
17 picked up from their control room.
- 18 Q. Are you a member of that group?
- 19 A. I am, sir, yes.
- 20 Q. Is there a plan, moving forward, in relation to control
21 rooms and the way in which responsibilities can be given
22 to control room staff, specific responsibilities?
- 23 A. Yes, sir. So the piece of operational guidance on
24 control command?
- 25 Q. Yes.

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1 A. Yes, sir. that has just been peer reviewed by the
2 Mobilising Officers Group and is out for full
3 consultation with the Fire and Rescue Services and other
4 key stakeholders.

5 Q. Could you just very briefly explain to the inquiry what
6 the proposal is in the current draft?

7 A. Yes. It is quite a lengthy draft and it covers quite
8 a lot of information that I think some of it may end up
9 being extracted into training rather than in the actual
10 guidance itself. But it assists the mobilising officers
11 to basically command the room and to allocate tasks
12 at the different operational levels. So if we were to
13 view the incident on 22 May, the guidance would identify
14 possibly Ms Owen as being the operational commander
15 responsible for allocating tasks to the operators or
16 overseeing those tasks to make sure that they were being
17 done appropriately.

18 Ms Gregson would have become the tactical adviser
19 and she would determine who was doing what or what
20 needed to be done that Ms Owen was going to oversee, and
21 then Janine Carden would have become the strategic
22 commander in the control room. And it tries to align
23 those command levels within the control room to the
24 command levels on the incident ground so that you are
25 sharing information at an appropriate level for what

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1 your role is in the control room.

2 Q. So are there any particularly important specific roles
3 that would apply within the control room to the
4 circumstances with which the inquiry is concerned on
5 22 May by way of example?

6 A. Yes. So you could allocate a role to monitor the
7 information that's coming in, to process the information
8 that's coming in and monitor how that information is
9 being fed back out. The guidance won't specifically
10 state how you are to do that, it will recommend that you
11 do it, so the conversations we were having earlier about
12 the mobilising system and adapting that to try and make
13 that process more effective would need to be done
14 locally. But they can do that by monitoring the
15 inter-agency Talk Groups, passing information via the
16 emergency Talk Groups, all of those things are covered
17 in that guidance. It's quite a substantial document at
18 the moment.

19 Q. Could you have, for example, therefore one person to
20 whom there would be allocated the task of assembling the
21 key critical information?

22 A. Yes, sir, or more than one.

23 Q. But that specific task could be allocated to one or more
24 persons --

25 A. Yes, sir.

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1 Q. -- within the control room? And would that person then
2 have a particular responsibility, for example for
3 ensuring that the Fire and Rescue Service had all that
4 information?

5 A. Yes, sir.

6 Q. When will this work be complete, do you think?

7 A. I think it's running alongside the development of
8 a modularised training course, which is due for
9 completion, I think, in July 2022. So the guidance may
10 be issued first, the consultation I think is for --
11 I think the consultation ends in September -- I could be
12 wrong with that -- and then there are some modularised
13 courses that are being -- training packs that are being
14 developed that can be issued out to the various Fire
15 Service control rooms.

16 Q. That's the broad timescale?

17 A. Yes, sir.

18 Q. Okay. Moving on from there to the strategic steering
19 group, I'll ask you about that next, please. You've
20 explained some of this already to the inquiry and that
21 that group is now collectively accountable to the board;
22 is that correct?

23 A. That's correct, sir.

24 Q. As far as the proposed partnership manager is concerned,
25 how do you see that person's role in terms of trying to

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1 deal with the communication issues which the inquiry is
2 particularly concerned with, by way of example? How
3 is that person going to assist the control room to
4 manage an issue such as that in the future?

5 A. The idea is that the partnership manager will be
6 a coordinating role and will identify the work that
7 needs to be done and then link directly into the Fire
8 and Rescue Services and the strategic steering group to
9 secure the resources to be able to do that and, where
10 necessary, any funding that's required alongside that.
11 But the idea is that it strengthens the operational
12 links between the two organisations by bringing North
13 West Fire Control and the operational side more
14 collaboratively together and in a much more consultative
15 way around how ways of working are implemented and
16 training takes place and the information that is
17 contained within the national guidance as and when it's
18 released is addressed in a collective regional way
19 rather than it being released and then four individual
20 fire services go away and look at it and then come back
21 with four different ways of implementing it. So there
22 is a change control process in place now that they will
23 be responsible for managing.

24 Q. Is this strengthening your relationship with the Fire
25 and Rescue Services?

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1 A. That is the intention, sir, yes. Yes. And also to
 2 assist the control room in identifying more with the
 3 Fire Service rather than a third party service provider.
 4 I think the staff in North West Fire Control feel that
 5 they have become distant from the Fire and Rescue
 6 Service and this is an attempt to draw those two closer
 7 together more back into the spirit of the partnership
 8 working that was originally intended rather than the
 9 separate company third party service provider that
 10 appears to have developed.
 11 Q. Is it correct this is a 2 to 3-year plan? Have
 12 I understood that correctly?
 13 A. Yes. The business case to which we've been operating
 14 against is about to draw to an end and within that
 15 business case it sets out the financial obligations for
 16 each of the four Fire and Rescue Services, it set them
 17 out on a yearly basis throughout the course of the
 18 business case. That business case is now coming to an
 19 end, it needs to be replaced by something else, which is
 20 going to be a 3 to 5-year business plan. In order to
 21 develop the 3 to 5-year business plan, we need to
 22 understand what it is -- the services that the fire
 23 services are going to be expecting to want in the next 3
 24 to 5 years, plus an agreed annual delivery plan against
 25 which my performance and the performance of North West

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1 Fire Control would be measured in the delivery of that.
 2 Q. There's clearly a lot of information in the background
 3 here; is that correct?
 4 A. There is, yes.
 5 Q. Would you be willing to incorporate that together with
 6 the mobilising group that you're a member of within your
 7 further statement for the assistance of the inquiry?
 8 A. Of course, sir, yes.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR SMITH: So finally, I just want to ask you a little bit
 11 more about the advantages of the current control room
 12 system.
 13 A. Yes, sir.
 14 Q. I sincerely mean this with the greatest of respect to
 15 Mr O'Reilly, who must be treated with respect, if I may
 16 say so.
 17 A. Absolutely, sir.
 18 Q. He spoke about a map or a large scale map that he
 19 remembered in the control room at one time. Do you
 20 remember that type of map?
 21 A. I do, sir, yes.
 22 Q. How does that situation bear comparison with what is
 23 currently available within the technology at North West
 24 Fire Control?
 25 A. It was useful to control room personnel, but I think it

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1 was more useful to officers attending and walking in the
 2 control room. The map -- it was a very simple display
 3 of a map of the county of the brigade where the map was
 4 located, divided up into station areas, and each station
 5 roughly geographically located. There were no streets
 6 on the map, it was just a plain map. Then there were
 7 bulb indicators on the map to show whether the resources
 8 located at that station were mobile and available,
 9 mobile to an attendance, in attendance at an incident or
 10 at a home station.
 11 Q. Where does that stand or sit with the modern processes
 12 that are in operation at North West Fire Control?
 13 A. Now the mapping systems are located on each operator's
 14 position, so they have a key map that can show them
 15 where the stations are located and they can also drill
 16 down to different layers on that map to look at
 17 individual resources and they can plot those resources'
 18 progress to an incident using the automatic vehicle
 19 locating system.
 20 Q. As far as the speed of access to information is
 21 concerned, how does that compare with the systems that
 22 were operating when you were in a control room?
 23 A. I think the speeds that you can access the information
 24 are probably similar, but the amount of information that
 25 you have access to through your mobilising position is

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1 considerably more than it was in the old control rooms.
 2 Q. Do you have a view about whether the level of service
 3 currently provided by North West Fire Control is in
 4 fact, as has been said, inferior to the level of service
 5 that was provided by the old Fire and Rescue Service
 6 control room at GMFRS?
 7 A. Day to day, sir, no, sir, I don't agree with that.
 8 Q. Could you state briefly your reasons before we end your
 9 evidence?
 10 A. Yes, sir. We report quarterly to the board on call
 11 handling times, call answer times. We have a complaints
 12 process in place. We've continuously improved, month on
 13 month and year on year, on the speeds at which we
 14 process calls. We've streamlined our procedures
 15 considerably, and there are occasions where we get
 16 things wrong, we employ human beings and we have
 17 trainees and people who are less experienced, and
 18 occasionally we get things wrong. But for the majority
 19 of the time, we get those things right.
 20 I've certainly never been advised, through the
 21 reporting procedures that we have to the board, the
 22 board meetings at which the chiefs attend and are given
 23 access to that reporting information, that the
 24 performance of the control room is inferior to what they
 25 previously had. It is different and I can understand

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1 why a Fire and Rescue Service would feel that in
 2 a command support situation that relationship is
 3 inferior because the control rooms and the command
 4 support rooms were generally located very close to each
 5 other.
 6 We have been discussing the possibility -- we had
 7 actually had some plans drawn up to build
 8 a purpose-built command support area within our control
 9 room, which for the likes of Cumbria possibly is not
 10 that accessible, but for other Fire and Rescue Services
 11 would be, not to replace their existing command support
 12 rooms, but to assist where we had large-scale regional
 13 and national deployments, so for example things like the
 14 moorland fires that we had a couple of years ago, the
 15 Boxing Day floods that we had, where we can locate
 16 officers in the control room in an area designated for
 17 that command support and supply them with operators to
 18 deal with those situations.
 19 We had the plans drawn up, but unfortunately because
 20 of the COVID situation we had to alter the layout of the
 21 control room to accommodate social distancing, so
 22 we haven't been able to progress those plans yet.
 23 MR SMITH: Sir, that's all I have to ask.
 24 SIR JOHN SAUNDERS: Thank you very much.
 25 MR DE LA POER: Sir, unless you have any further questions

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1 for Ms Wilson, that concludes her evidence for today.
 2 SIR JOHN SAUNDERS: Thank you very much for the attention
 3 you have given to the details of this case and the way
 4 you have looked into it and for coming to give evidence
 5 today. I'm sure it's been a long day for you.
 6 A. It's been fine, thank you, sir.
 7 MR DE LA POER: Sir, on behalf of the inquiry legal team,
 8 can I thank everybody for the cooperation in ensuring we
 9 completed this witness today. Tomorrow we are expecting
 10 to hear from Ms Fallon who was a control room operator
 11 at North West Fire Control and the two firearms officers
 12 who were involved or connected to the incident that
 13 Dr Daley told us about.
 14 SIR JOHN SAUNDERS: And there should be no difficulty in
 15 finishing them comfortably within the day?
 16 MR DE LA POER: We are expecting a lighter than usual day,
 17 which is necessary by reason of the difficulties that
 18 we have with the witnesses later in the week; that's no
 19 criticism of them. Yes, we're hopeful that it will be
 20 a straightforward day from a listing point of view.
 21 SIR JOHN SAUNDERS: Okay, thank you.
 22 (4.23 pm)
 23 (The inquiry adjourned until 9.30 am
 24 on Tuesday, 20 July 2021)
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