

Coroner's Inquests into the London Bombings of 7 July 2005

Hearing transcripts - 29 October 2010 - Morning session

1 Friday, 29 October 2010

2 (10.00 am)

3 LADY JUSTICE HALLETT: Yes, Mr Keith?

4 MR KEITH: Good morning, my Lady. Mr Hay will call the
5 first witness, Mr Cumner, please.

6 MR HAY: My Lady, may I invite you to call Mr Cumner?

7 MR ANDREW ANTHONY CUMNER (sworn)

8 Questions by MR HAY

9 MR HAY: Good morning, Mr Cumner. Can you give your full
10 name for the court, please?

11 A. It's Andrew Anthony Cumner.

12 Q. You provided a statement to the police dated
13 30 November 2005 --

14 A. Yes, I did.

15 Q. -- regarding the events of 7 July 2005. You also
16 completed a debrief form after the event. Is that
17 correct?

18 A. That's correct.

19 Q. Do you remember when you completed that form, roughly?

20 A. I believe it was a few days after the incident.

21 Q. In 2005, you were a paramedic with some 22 years' worth
22 experience?

23 A. Yes, I was.

24 Q. You were on duty at the Waterloo ambulance station?

25 A. I was.

1 Q. You were crewed with an emergency medical technician,
2 Ms Ray?

3 A. Andrea Ray, yes.

4 Q. Your call sign for the vehicle, the ambulance, was N301
5 that day. Is that correct?

6 A. That's correct.

7 Q. I just want to turn first to when you were dispatched,
8 first of all, to Liverpool Street, and then to Aldgate,
9 and the timing of that. Can we have up on the screen,
10 please, [LAS565-4], please? At the top there, we can see
11 09.04.25, CAC, is that Central Ambulance Control?

12 A. Central Ambulance Control.

13 Q. Receiver of message N301, that's your ambulance,
14 dispatched to Liverpool Street?

15 A. That's right.

16 Q. Do you know why you were dispatched to Liverpool Street?
17 What were you told had happened?

18 A. The initial call was that people were coming from the
19 station covered in soot.

20 Q. Then a little bit further down, 09.06, we can see
21 Central Ambulance Control back to your ambulance:
22 "[There's been] just a slight change of plan, we are
23 getting also reports now of smoke and soot-covered
24 people coming out of Aldgate East. So if you go down to
25 probably one of the same incidents, if you could make

1 your way down to Aldgate Underground St Botolph Street
2 EC3 rather than ..."
3 Presumably it said "rather than Liverpool Street"?
4 A. It was very shortly after we were diverted, but it was
5 to Aldgate station.
6 Q. Rather than to Aldgate East?
7 A. Yes.
8 Q. Did you actually ever arrive at Liverpool Street?
9 A. No.
10 Q. The reason why I ask is -- can we have up on the screen,
11 please, LAS4 and then page 2 [LAS4-2], please? This is a summary
12 document. I'm not sure whether or not it was prepared
13 for the London Assembly report, but it certainly
14 featured in it. But there we can see on the left-hand
15 side a column and it says:
16 "First ambulance on scene: N301 at 09.03 at
17 Liverpool Street Underground station."
18 But that's incorrect?
19 A. That's incorrect.
20 Q. We can also see there that it has your time of arrival
21 at Aldgate Underground station at 09.14.
22 A. I arrived before that.
23 Q. That's what I wanted to come to in a moment. But before
24 I do that, before you arrived at Aldgate, were you made
25 aware that a major incident had been declared by either

1 the London Fire Brigade or by British Transport Police?

2 A. No, I wasn't.

3 Q. Moving now to the time of your arrival at Aldgate, you

4 say that you arrived a little bit before that, before

5 09.14. Can we have back up on the screen [LAS565-10],

6 please? Sorry, can we go back to page 7, perhaps,

7 actually. Then forward a page; [LAS565-8].

8 We can see there at 09.14 and then there are

9 a number of question marks, three question marks in the

10 column down the side. We can then see N301. That's

11 your ambulance. That appears to be a report which was

12 sent through, presumably after you had arrived and after

13 you had gathered information?

14 A. Yes, it would have been what we call a CHALET report

15 after I had done an initial reconnaissance at the scene.

16 Q. When you arrive on a scene, how do you notify

17 Ambulance Control that you're there?

18 A. On the mobile data terminal, there's a button that we

19 press to say that we've arrived at scene.

20 Q. In this instance, it's not quite clear whether or not

21 that actually happened, but we can certainly see that

22 the message was sent at about 09.14. Are you able to

23 say how much earlier you had arrived?

24 A. I estimate we arrived roughly 9.10.

25 Q. You think it took approximately 4 minutes for to you

1 gather information?

2 A. It could have -- yes, between 2 and 4 minutes.

3 Q. You then relayed that information yourself, or did

4 Ms Ray do it?

5 A. No, Ms Ray was in the cab of the vehicle. She had to

6 stay in contact with Control via the radio. I passed

7 the message to her and she relayed it to Central

8 Ambulance Control.

9 Q. I'm going to come back to that message. But what

10 I first want to do is just look at what your roles and

11 responsibilities were when you arrived at the scene, and

12 it's right, isn't it, that you were the first ambulance

13 at the scene at Aldgate?

14 A. Yes, when we arrived in Aldgate High Street, I realised

15 we were the first ambulance response there.

16 Q. Can I have up on the screen, please, [INQ9002-2]?

17 Mr Cumner, I don't know whether or not you're

18 familiar with this document. It's the London Ambulance

19 Service operational arrangements for civil emergencies

20 and part 1 is the major incident plan. Is that

21 something you're familiar with?

22 A. Yes, I am aware of the major incident plan.

23 Q. Can we turn to page 12, please, and then the top half of

24 that? Thank you.

25 This sets out what are the responsibilities of the

1 first ambulance on the scene. It's correct that you
2 weren't the driver, so 2.3 didn't apply to you.

3 A. No.

4 Q. That would apply to Ms Ray. 2.4 would have applied to
5 you, and it says:

6 "On arrival at the scene of a major incident, the
7 attendant will assume the role of the ambulance incident
8 officer. They will adopt the following procedures:

9 "Don high visibility clothing and safety helmet."

10 Did you do that?

11 A. I didn't put high visibility clothing on or a helmet at
12 that stage.

13 Q. "Carry out reconnaissance of the incident site and
14 report back to CAC (see CHALET/METHANE and we know that
15 you've done that because we've seen the report at 09.14.

16 Then:

17 "Declare a 'major incident' based on the criteria in
18 the definition."

19 Then, can we also now go to page 25, please, and
20 then the top part of that page, please?

21 Is it right that, as the first ambulance on the
22 scene, you were the acting ambulance incident officer?

23 A. That's correct.

24 Q. You would carry on to perform that role until a more
25 senior officer arrived and took over from you?

1 A. I did.

2 Q. Can we go back to LAS565, please, and then to page 13 [LAS565-13].

3 We know you arrived at about 09.10, and here I don't
4 know whether or not you're familiar with Mr Edmonson's
5 call sign, the emergency planning manager?

6 A. I wasn't aware of his call sign at the time.

7 Q. We can see "09.18, EP5", who we understand to be
8 Mr Edmonson. He arrived at the scene at Aldgate. Is it
9 right that he would have taken over from you --

10 A. Yes, he would.

11 Q. -- as being responsible for the incident?

12 A. Yes, he would.

13 Q. So for a period of about 8 minutes, you were effectively
14 the Silver in charge?

15 A. Yes.

16 Q. I want to turn now to ask you about the information you
17 gathered when you arrived. You told us you weren't
18 aware that a major incident had been declared by either
19 the Fire Brigade or the British Transport Police before
20 you arrived. When you got to the scene, what did you
21 do?

22 A. We parked the vehicle as close to the entrance to the
23 station as we could, adjacent a vacant bus station.

24 From the vehicle, and as I left the vehicle, I could see
25 a number of people outside the station, who, indeed, did

1 look like they were covered in soot. Some of these
2 people were standing, some were sitting and some were
3 lying down.

4 Q. Did you see any other members of the emergency services
5 there?

6 A. There was -- I was approached by a group of firefighters
7 who tried to direct me to one of the patients that was
8 lying on the floor and requesting that I take her to
9 hospital.

10 Q. I'm going to come back, to put it, I suppose, perhaps
11 not so neutrally, but there was a bit of tension,
12 I think, between you and the firefighters. I'm going to
13 come back to that.

14 But what did the firefighters tell you that had
15 happened?

16 A. There was no actual information from the firefighters
17 themselves. I did see a fire officer, I recognised
18 a senior fire officer, so I went to him to get
19 information, get a situation report from him.

20 Q. What did he tell you, do you remember?

21 A. He pointed out the casualties on the surface. He said
22 that there were fatalities underground. He didn't know
23 how many, and he believed it was either a train crash or
24 an explosion.

25 Q. Is it right that he was a little bit more precise about

1 the severity of some of the casualties in respect of
2 triage, whether or not they were priority 1, 2 or 3?
3 A. No, in my statement, I think it points out there's
4 priority 1s, 2s and 3s, but I think that was my
5 interpretation of the fact he was saying there was
6 walking wounded and there was others that were injured,
7 but not in a condition to walk.

8 Q. Perhaps if we look at your --

9 LADY JUSTICE HALLETT: Forgive me, could you speak up,
10 Mr Cumner? It's very difficult. I'm afraid we have
11 this strange buzzing sound and it's important that
12 people hear what you say, and I'm finding it a little
13 hard, so if you could raise your voice a little, I would
14 be grateful.

15 A. Yes, my Lady.

16 LADY JUSTICE HALLETT: Thank you.

17 MR HAY: Perhaps if we look at your debrief form, which
18 might more accurately record what you remember being
19 told. Can you have up on the screen LAS92, please?
20 Then page 2 [LAS92-2].

21 Then if we could go down to the bottom third,
22 please.

23 Just underneath, it says:

24 "Returned to vehicle with findings and asked Andrew
25 to give a CHALET report."

1 Underneath that, it says:
2 "Seven patients on surface. Unknown number below
3 surface. A number of fatalities. ? Train crash ..."
4 Is that "query train crash"?
5 A. Yes.
6 Q. And then "... [query] explosion."
7 A. That's correct.
8 Q. At any point, did that fire officer make it clear to you
9 that there were seriously injured people requiring
10 immediate care on the train?
11 A. For the fact that there were fatalities underground,
12 I tended to take that as there was, you know, a real
13 problem below ground.
14 Q. The reason why I ask is that we've heard evidence that,
15 at or about a similar time, there were a number of
16 reports from other people that there were very seriously
17 injured people on the train.
18 We've heard evidence from a City of London
19 policeman, a Mr Kemp, who, at about 9.10, radioed his
20 Control to request that ambulances or paramedics went
21 down to the tracks, down to the train. We know, at or
22 about 9.11, Inspector Munn, a British Transport Police
23 officer made a similar request and we know that
24 Mr Falayi, a London Underground transport employee, at
25 about 9.13, also made a similar request.

1 Did anyone expressly ever say to you, in those first
2 eight minutes or so, "We've got very seriously
3 critically injured people on the train. We need
4 paramedics down there"?

5 A. No.

6 Q. Just looking at the top part of that, that top third, if
7 you can keep it where it is, it says:

8 "I parked vehicle as above. Left blue lights on."

9 You leave the blue lights on so everyone knows that
10 you're the first ambulance on the scene, is that
11 correct?

12 A. That's correct, it's the control vehicle.

13 Q. You then go on to say:

14 "I went into field to gather information from
15 services already on scene (problematic)."

16 Can you explain what you meant by that?

17 A. This was the scenario where I was met by the fire
18 officers and they wanted me to take patients away in the
19 ambulance and I had to explain my role as the incident
20 officer, that I couldn't touch any patients, all I could
21 do was gather information at that stage.

22 Q. So they didn't seem to understand what your role was, as
23 the first ambulance on the scene?

24 A. That's correct, but they were very, very anxious,
25 obviously, to get this patient sorted out.

1 Q. I think, if we turn to page 4 of your debrief document [LAS92-4],
2 you'll see, although they were understandably anxious,
3 they were also quite hostile, would that be fair?

4 A. Yes, they were quite upset.

5 Q. There on the top part, we can see:

6 "Firefighters insisting that we take a number of
7 casualties at the station entrance. I declined
8 explaining that we were the first ambulance on and could
9 not convey any patients but had to evaluate the
10 situation, and I had to take on the role of incident
11 officer until relieved. This was met by some ..."

12 I think that probably goes on to say "hostility":

13 "... and panic from the firefighters with comments
14 such as give me the f***ing keys and I will drive the
15 f***ing ambulance."

16 Then you've put in brackets "not helpful". How much
17 time did that delay you in gathering information about
18 what had happened at the scene?

19 A. I'd say no more than 30 seconds or so.

20 Q. That tension, which I think, as you put it, is they were
21 understandably anxious, did that cause you to think that
22 there wasn't a clear understanding of what your role
23 was, but also that the firefighters didn't understand
24 the overall picture of what had happened?

25 A. I certainly think they wouldn't -- they weren't sure of

1 what the role of the first ambulance on the scene was.

2 Could you repeat the part about the --

3 Q. Whether they, themselves, weren't very sure about
4 exactly what had happened at the scene, because they
5 wanted you to take people away, rather than assessing,
6 itself, what had happened and understanding that
7 something more serious had happened down on the train.

8 A. There was no mention of anything that was going on down
9 at the train.

10 Q. So from that -- I appreciate this may be asking you to
11 speculate, but would it appear to you that they didn't
12 understand what had happened down on the train?

13 A. I couldn't say "yes" or "no" to that. I don't know what
14 information they actually had.

15 Q. I want to just look at the message which you sent back.
16 If we could go just back to page 2 of this document,
17 right at the bottom you say you returned to the station
18 entrance to get more information:

19 "Made ambulances five initially but more would be
20 needed."

21 So your initial assessment was that five ambulances
22 would be required but then more would be required
23 thereafter, is that correct?

24 A. That's correct.

25 Q. Can I ask you, how do you determine the number of

1 ambulances you require?

2 A. Well, I wasn't sure of the actual scale of the incident,
3 what was going on below ground. So I thought I'd just
4 get an initial group of ambulances running and I would
5 evaluate the situation further and ask for more, if need
6 be. I was also conscious of the fact of not getting too
7 many ambulances in the scene at the same time, in case
8 it clogged up the situation.

9 Q. So the message -- did you relay back to Ms Ray that five
10 ambulances would be required and then more thereafter?

11 A. I did.

12 Q. Would you have expected her to have then informed
13 Central Ambulance Control that five ambulances are
14 required now but more shortly after, is that --

15 A. Yes, she would have given the exact information.

16 Q. If we could just go back to LAS565-7 -- sorry, over the
17 page, please, [LAS565-8]. There at 09.14, and then the
18 second question mark, we can see the message which
19 Ms Ray sent back:

20 "N301: were on scene at Aldgate station. Can you
21 make ambulances 5? Possibly fatalities in the station.
22 There has been an explosion, over."

23 It doesn't appear from that that Ms Ray communicated
24 that more ambulances would be required other than five.
25 Is that correct?

1 A. From what's on the log, it seems that she didn't, but
2 that was the message that was passed to her.

3 Q. Did you, yourself, give any consideration as to whether
4 or not a major incident needed to be declared?

5 A. As soon as I knew there were fatalities below ground,
6 and having done an initial survey of the scene, decided
7 to declare a major incident.

8 Q. Did you relay that to Ms Ray?

9 A. That was the first thing to -- that I relayed to her.

10 Q. Again, looking at that entry, it doesn't appear from
11 this record that Ms Ray did make that declaration. Does
12 that appear to be correct?

13 A. According to this record, but I'm sure she would have
14 given every scrap of information I gave her.

15 Q. Do you remember whether or not you were standing by her
16 when she relayed the information?

17 A. I was outside the vehicle.

18 Q. Could you hear what she said?

19 A. No.

20 Q. I think, in any event, we know that, at 09.15 -- so very
21 shortly thereafter -- a major incident was declared by
22 Mr Edmonson on his way to the scene. You were joined,
23 I think, shortly after, by a number of colleagues. Is
24 that correct?

25 A. There were other responders turning up.

1 Q. We know that -- we've seen earlier, 09.18, Mr Edmonson
2 arrived.

3 A. Right.

4 Q. Do you recall whether or not Mr Edmonson came to you to
5 ask you what had happened at the situation, given that
6 you were the acting medical incident officer?

7 A. No, he didn't.

8 Q. Do you know whether or not he spoke to Ms Ray?

9 A. I believe he did speak to Ms Ray.

10 Q. She would have been able to communicate to him what you
11 had told her?

12 A. She would have passed over the information I'd given to
13 her.

14 Q. Thereafter, I think you spent your time triaging and
15 treating casualties. Is that correct?

16 A. Once I knew that the incident had been taken over by the
17 incident officer, Silver, I decided I was going to go
18 out and carry on treating and triaging.

19 Q. I think you remained doing that for quite a while.

20 A. Yes, I did, yes.

21 Q. But at no point, did you, yourself, make your way down
22 to the train. Is that right?

23 A. No, I didn't go down to the train because there was lots
24 to do on the surface.

25 Q. I think a time came when you and Ms Ray were then told

1 to go to King's Cross?

2 A. At the end of the incident, we was stood down at Aldgate
3 and sent to King's Cross incident.

4 Q. At the end of the day, you attended a debrief at
5 Millwall Football Stadium. Is that right?

6 A. Yes, we did.

7 Q. What was the purpose of that debrief?

8 A. It was to basically get everybody together as a matter
9 of -- for welfare issues, for people to tell us about
10 the situation at various incidents, vehicles to be
11 replenished and we were given something to eat as well.

12 Q. When you say "vehicles to be replenished", I suppose not
13 necessarily the right turn of phrase, but effectively
14 a stocktake of what equipment had been used up, what
15 needed to be put in for the next day?

16 A. I understand that's what happened. I didn't actually
17 witness it myself.

18 Q. How many people attended that debrief?

19 A. I couldn't say. There was a large number.

20 Q. Can you give an approximate number?

21 A. There must have been over 100 people at that debrief.

22 Q. Have you, yourself, ever seen the minutes of that
23 debrief?

24 A. No, I haven't.

25 Q. I just want to look briefly at those minutes.

1 I appreciate that you've not seen them. Can we look at
2 LAS377, please, and then the next page, please [LAS377-2].
3 This appears to set out a list of complaints or
4 concerns which people had. At the very top, we can see:
5 "Communications - very difficult to get through."
6 A little bit further down:
7 "Not enough pain relief in packs."
8 It broadly appears that the general concerns were
9 communications and equipment and logistics. Is that
10 right, from your recollection?
11 A. Yes -- well, I can't remember too many things coming out
12 of that debrief. Certainly not that complete list.
13 Q. I wanted to ask you about the one which is starred, and
14 please say if you can't remember. First of all, what do
15 MRUs and CRUs stand for?
16 A. Motorcycle Response Unit, MRU, and the Cycle Response
17 Unit is the CRU.
18 Q. This says:
19 "No equipment for moving people out."
20 I assume that refers to some sort of stretcher or
21 carry item, something along those lines, is that right?
22 A. Yes, it would be, yes.
23 Q. "Some people died because of that. Tom Lynch suggested
24 the use of stretcher bags for MRUs and CRUs -
25 'Solo Midget'."

1 Do you recall that comment being made?

2 A. No, I don't.

3 Q. Do you know who Tom Lynch was?

4 A. I know Tom Lynch, yes.

5 Q. Can you help us with what scene he attended?

6 A. No, I couldn't.

7 Q. Is he part of the Waterloo ambulance station?

8 A. He's in charge of the Cycle Response Unit.

9 Q. In relation to that specific comment, do you recall any

10 discussion about people dying because of incorrect or

11 insufficient equipment?

12 A. No, I don't.

13 Q. You also attended, a little bit later, I think, on

14 27 July -- I say you also attended. Did you attend

15 a debrief at Waterloo ambulance station?

16 A. It was at the Pocock Street major -- Emergency Planning

17 Unit.

18 Q. That was for the Waterloo ambulance station as a whole?

19 A. It was for the complex, yes.

20 Q. Perhaps if we could have up on the screen LAS370, and

21 then the second page [LAS370-2], please. Again, this appears to be

22 a typed-up feedback of the response received. Have you

23 ever seen this? It may help if we could zoom in

24 a little, please?

25 A. I haven't seen that document, no.

1 Q. Just looking at where it says "The key themes that came
2 out of the meeting", number 1:
3 "There was still some misunderstanding about what
4 was expected from the first resource on scene."
5 Although it refers there to Aldgate East, does that
6 refer to the complaint that you had?
7 A. It does.
8 Q. Going down to "Communication difficulties":
9 "Having one radio channel for multiple major
10 incidents created some confusion."
11 Can you help us with what that means?
12 A. I presume it was because they were just using their
13 standard radio channel. Perhaps there wasn't
14 a dedicated channel.
15 Q. Did you, yourself, experience any communication
16 difficulties with the radio?
17 A. I didn't actually have any contact with the radio.
18 I didn't have a handheld radio.
19 Q. Did you have a mobile telephone with you?
20 A. No, I didn't.
21 Q. The next one "Difficulty in getting information from
22 track level to street level at Underground stations."
23 Was that something which you, yourself, were aware
24 of at Aldgate?
25 A. No, because I didn't go underground.

1 Q. The final bullet point under number 2:

2 "Many crews were held back when it was clear that
3 their assistance was required."

4 That may reflect -- I don't know whether or not you
5 can help us with this -- that there was some frustration
6 amongst the Waterloo ambulance station of some crew who
7 weren't assigned. Is that correct?

8 A. That's a possibility, but again, I didn't have any
9 experience of that.

10 Q. From your attendance at that meeting, do you recollect
11 there being that sort of frustration?

12 A. I can't remember that happening.

13 Q. At number 3:

14 "Lack of familiarity with the ESVs."

15 Does ESV stand for "equipment support vehicle"?

16 A. I think it does, yes.

17 Q. There it says:

18 "Drivers struggled to open doors and were unsure
19 what equipment was carried or where it was stored."

20 As someone who is treating and triaging patients at
21 the surface at Aldgate, was that a difficulty which you
22 were aware of?

23 A. I'm vaguely aware that there was a problem with doors on
24 the ESV.

25 Q. Were you at any point hindered with the equipment which

1 you needed to treat or triage people?
2 A. No, I wasn't.
3 Q. Then if we could just go on to the next page, please --
4 A. Could I just correct myself on a point there?
5 Q. Of course.
6 A. A problem I had equipment-wise with triaging patients
7 was that I didn't have any triage cards, there were none
8 on the vehicle, or they may have been taken from the
9 vehicle by another crew.
10 Q. When you first --
11 LADY JUSTICE HALLETT: Triage cards?
12 A. Triage labels.
13 LADY JUSTICE HALLETT: Labels?
14 A. Yes.
15 MR HAY: I think we actually have some here. I don't know
16 if my Lady would like to see them. Are those what
17 you're referring to?
18 A. They are, yes.
19 LADY JUSTICE HALLETT: Priority 1, 2 or 3?
20 A. Yes.
21 MR HAY: When you were conducting your initial triage when
22 you arrived, how did you then assess the patients as
23 being 1, 2 or 3 without the cards, how did you allow
24 people to be notified?
25 A. I used the sort of primary triage system.

1 Q. Can you explain to us how that works?

2 A. Yes. If, for instance, I have walking wounded, if they
3 were uninjured and -- they'd be sent to a survivor's
4 reception. If they were wounded, they would be
5 a priority 3. You then assess their breathing, if
6 they're breathing or if they're not breathing. Then you
7 go down to the respiration rate. If their respiration
8 rate was below 10 or over 30, they would be categorised
9 as priority 1. If it was a normal rate, they would be
10 priority 2.

11 Q. In the absence of the tags, how did you make it
12 noticeable for other ambulances and other paramedics who
13 were arriving whether someone was a priority 1,
14 a priority 2 or priority 3?

15 A. In one case, I remember writing down observations, I'm
16 not sure what on now, it wasn't an official form, and in
17 most cases, it was a verbal handover to attending crews.

18 Q. Then we can also see that a number of things also went
19 well, willingness of staff to be flexible, assistance
20 from medical staff, parking at Aldgate was done well,
21 and I think that was something that your colleague
22 Ms Ray was responsible for. Is that correct?

23 A. It certainly was, yes, she did a great job of it.

24 Q. Initial resources were deployed quickly, and we've seen
25 that you arrived on the scene within minutes of being

1 notified to attend?

2 A. Yes.

3 Q. One final question, if we could go back to [LAS92],
4 please, and then the second page [LAS92-2], and then the top
5 third, please, there we can see the second underlined
6 question:

7 "Have you attended an LAS major incident training
8 session?"

9 And you circled "No".

10 Despite having considerable experience in 22 years,
11 do you feel that you were in any way hindered by having
12 not attended that training?

13 A. I've marked "No" on there and, when I look back at it
14 now, I did actually receive some major incident
15 training, I think it was back in 1998.

16 Q. That's obviously a considerable time before the events
17 of 7 July 2005. Are you aware of whether or not the
18 training had moved on, whether there was different
19 training in that intervening period?

20 A. At certain intervals we were given different major
21 incident cards, so that we knew what the roles were of
22 people arriving on scene. But I can't remember any
23 formal training sessions.

24 Q. You were supplied with one of those cards?

25 A. Everybody -- all staff were supplied with these new

1 cards.

2 Q. I think we have seen from earlier on that, broadly, you
3 followed exactly what was required of you when you
4 arrived at the scene.

5 A. Yes.

6 MR HAY: Mr Cumner, thank you very much. I have no more
7 questions for you, but others may.

8 A. Thank you.

9 LADY JUSTICE HALLETT: Mr Coltart?

10 Questions by MR COLTART

11 MR COLTART: Good morning.

12 A. Good morning.

13 Q. I'd like to take you back to the debrief at Millwall, if
14 I may. Can we have document [LAS377-2] up, please? If we
15 could just enlarge those minutes a little.

16 Mr Cumner, I'm going to take you through this
17 document in a little more detail and ask you some
18 further questions about it.

19 LADY JUSTICE HALLETT: Only where it's relevant to his
20 experience.

21 MR COLTART: Of course, my Lady.

22 Are you able to tell us, please, who chaired this
23 particular meeting?

24 A. I'm afraid I can't remember.

25 Q. I wonder whether we might just be able to jog your

1 memory? Could we just get up momentarily, please,
2 document [LAS379-4]?
3 This was a separate debriefing meeting which took
4 place on the day for the managers, and I'm assuming that
5 you didn't attend this meeting.

6 A. No, I didn't.

7 Q. I'm not going to ask you any questions about what was
8 discussed at the meeting, but we can see a list of those
9 who attended the meeting.

10 LADY JUSTICE HALLETT: Can you put a name to him,
11 Mr Coltart? Would that help? Do we really need to go
12 through these other documents?

13 MR COLTART: My Lady, the difficulty is I don't know who
14 chaired the meeting at Millwall, so I can't put a name
15 to him. What I was proposing was that he looked at that
16 list and, if that assisted him in telling us who might
17 have chaired his meeting, then we would know who did
18 chair it and we can ask him some questions later.

19 Are you able to assist us with that, Mr Cumner, if
20 you look at that list?

21 A. I can't actually pick anybody out from that list.

22 Q. All right, thank you. Can we go back to your meeting,
23 then, please, which is at LAS377 [LAS377-2]?

24 The first item, as we've seen, is:

25 "Communications - very difficult to get through."

1 I think you told us that you, yourself, didn't
2 experience any difficulties on that day. Is that right?
3 A. I didn't, because I had no radio contact at all.
4 Q. What about when you were in the ambulance on your way
5 from Aldgate to King's Cross? Presumably the radio was
6 on in the ambulance?
7 A. Yes, it was.
8 Q. Did you notice any difficulty with people getting
9 through or transmissions being broken up?
10 A. Information was being sent via the mobile data
11 terminals, so there was no need for radio transmissions.
12 LADY JUSTICE HALLETT: Sorry, I couldn't hear.
13 MR COLTART: He said information was being sent by mobile
14 data terminals so there was no need.
15 LADY JUSTICE HALLETT: Thank you.
16 MR COLTART: Those are, as we understand it, like a little
17 computer terminal in the ambulance which sends through
18 messages. Is that right?
19 A. Yes, it's a computer screen, a touch screen.
20 Q. Does that mean that you didn't have the radio on in your
21 ambulance?
22 A. No, the radio was on.
23 Q. I think we'll hear from a number of other witnesses from
24 the London Ambulance Service that they experienced grave
25 difficulties with their radio communications that day.

1 You didn't experience those difficulties?

2 A. No, because I really didn't have much contact with
3 radios at all, apart from en route to Aldgate.

4 Q. The next item:

5 "When we were on scene at the first call, it started
6 badly but, as time went on, communications between
7 officers got better."

8 Are you able to assist us with who at the meeting
9 made that observation?

10 A. No, sorry, I can't.

11 Q. Okay, I'm not going to ask you every time we go through
12 one of these, but when we get to an item to which I draw
13 your attention, if you are able remember who made that
14 particular observation, would you let us know?

15 A. To be quite honest, although I was at that debrief,
16 I cannot remember items on this document.

17 Q. Have you looked at this document before you came into
18 the witness-box?

19 A. No, I haven't.

20 Q. I'd like to take you through it, then, please, if I may.
21 If you can't assist us with any of the items, then so be
22 it, but I'd like us to try. All right?

23 A. Certainly.

24 Q. The next entry is from a paramedic called Mr Cassidy,
25 he's coming to give evidence next week so there's no

1 need to ask you about that one and, equally, the next
2 one relates to what happened at King's Cross, so I'm not
3 going to ask you about that one either.

4 The next entry:

5 "Five different people telling you five different
6 things."

7 Was that a common complaint that was made that day
8 about people not knowing what they were supposed to be
9 doing?

10 A. I think there was a certain amount of confusion as to
11 people's roles to start with.

12 Q. Because there was -- I mean, you experienced this
13 yourself at Aldgate, didn't you? You assumed that the
14 first DSO who arrived -- just help with us the
15 terminology, DSO is?

16 A. Duty station officer.

17 Q. Duty station officer. Because one did arrive quite
18 quickly, didn't he, and he entered the station and you
19 assumed he would take over control from you; is that
20 right?

21 A. Well, I was aware that a DSO car had turned up.
22 I glimpsed a team leader coming out of it. I was still
23 talking to the Fire Service at the time, so we didn't
24 actually make any contact.

25 Q. Was this Mr Halawi? Do you know the name of the DSO who

1 turned up, was it Mo Halawi?

2 MS SIMCOCK: My Lady, perhaps I can assist, we think it's
3 Keith Sutherland.

4 MR COLTART: I'm very grateful for that.

5 LADY JUSTICE HALLETT: If at any stage you can provide the
6 name that would assist Mr Coltart, thank you,
7 Ms Simcock.

8 MR COLTART: I don't want to labour this point because it
9 might not be terribly important, but I think he turned
10 up, you assumed that he was going to take over
11 Silver Command from you, but, in fact, he went,
12 unbeknown to you, straight past you down to the train?

13 A. Yes.

14 Q. So for a while, it seems that there wasn't anyone who
15 was acting Silver for the London Ambulance Service on
16 arrival at Aldgate?

17 A. Well, I didn't actually give up acting as Silver as
18 such, it was more a confusion than anything else.

19 I did -- when I went -- when I returned to the
20 ambulance, I did find then that Silver had actually
21 taken over.

22 Q. That was Mr Edmonson?

23 A. I believe so, yes.

24 Q. Did he discuss with you on that day whilst you were both
25 there at Aldgate the communication difficulties that he

1 was experiencing?

2 A. I didn't actually have any contact with Mr Edmonson.

3 Q. You didn't speak to him whilst you were both at the
4 scene?

5 A. I was told that he was taking over as Silver. I didn't
6 make any contact with an officer until I spoke to
7 Mo Halawi.

8 Q. Was that much later during the course of the incident?

9 A. It was as the incident progressed, yes.

10 Q. "Not enough pain relief in packs", is the next item on
11 the minutes, as it were. Was that a complaint that you
12 were aware of at Aldgate? Was that something which
13 anyone mentioned to you?

14 A. No, it wasn't.

15 Q. "PPE", I think is probably "personal protective
16 equipment". Is that right?

17 A. That's right.

18 Q. "We went back to get supplies, had to."

19 Then you've had your attention drawn to the next
20 item already:

21 "Motorcycle Response Units/Cycle Response Units - no
22 equipment for moving people out - some people died
23 because of that."

24 Assist us from a paramedic perspective, if you
25 would, what is the importance of getting people onto

1 a stretcher, those who are seriously injured, onto
2 a stretcher and away from the scene of the incident?
3 What are the consequences if that isn't done quickly?

4 A. Well, the idea of using particularly an orthopaedic
5 stretcher is its ease of use, it's used where there's
6 a high mechanism of injury. So if you're possibly
7 suspecting spinal injuries, the idea is not to move the
8 patient too much.

9 So the idea of the orthopaedic stretcher is it can
10 be split, it's easily placed either side of the patient,
11 connected, it's lightweight, easy to carry, and it keeps
12 the patient spinally immobilised.

13 Q. This may be entirely obvious, but presumably, also, it's
14 important to get people into the ambulance where there
15 may be more sophisticated equipment, and equally then,
16 of course, to hospital where full treatment can be
17 provided?

18 A. That's right.

19 Q. Were you ever made aware yourself at Aldgate that there
20 was a shortage of stretchers at the bombed carriage?

21 A. No, I didn't find that out until speaking to colleagues
22 the following day.

23 Q. Who told you about the shortage?

24 A. I think it was just general conversation.

25 Q. What were the consequences, did they say, of that

1 shortage?

2 A. I cannot recall exactly what was said on that matter.

3 Q. In broad terms, what was the complaint made about the
4 fact that they didn't have enough stretchers? In what
5 way did it handicap them in their operation?

6 A. I think it was just the fact that they would have been
7 very useful in extricating people at a fast rate.

8 Q. The next item reads:

9 "Camden - we were watching on TV - West End,
10 King's Cross, Paddington area - we felt we were badly
11 deployed - we waited a long time before being deployed."

12 Do you know a paramedic called Rachel Harris?

13 A. No, I don't.

14 Q. We'll deal with that through her in due course.

15 "We were left on station for some time while
16 incident running - only when extra equipment and
17 vehicles required were we dispatched on scene."

18 Was this -- I mean, you must have talked to people
19 on the day at Millwall or the following day. Was this
20 a common complaint, that people felt as if they'd been
21 kept waiting before they were deployed?

22 A. I really don't recall any conversations about delays in
23 deployment.

24 Q. "Crews at Waterloo on standby ..."

25 That relates to the same issue.

1 The next item:
2 "Trying to run management on same channel as
3 ambulances - messages were being lost in the much longer
4 management conversations - needed two channels."
5 In fairness, there were, in fact, two channels
6 operating on that day. Were you aware of that?
7 A. No, because the only time that I had contact with the
8 radio, it was on our own channel.
9 Q. All right. I'll leave the radio. We'll deal with that
10 through someone else.
11 "Communications - rerouted from Aldgate to
12 King's Cross - traffic blocking route. Should have been
13 given some indication of recommended/alternative route
14 to take."
15 You were one of the crews that went from Aldgate to
16 King's Cross. Was this a problem that you, yourselves,
17 encountered?
18 A. There was a lot of traffic congestion.
19 Q. We can all understand why that might be so.
20 "... early deployment of PTS ..."
21 Is this a "patient transfer system", have I got that
22 right?
23 A. Patient transport system -- service, sorry, patient
24 transport service.
25 Q. Is that a sort of non -- it is an ambulance for

1 non-urgent patients, is that right, non-critical
2 patients?

3 A. Yes.

4 Q. P3s, as you might describe them. Is that right?

5 A. Yes, P3s.

6 Q. So it's a way of getting the walking wounded, as it
7 were, away from the scene in numbers, freeing up the
8 ambulances to take the critically injured to hospital?

9 A. That's correct.

10 Q. The biggest problem, it says, was the walking wounded:

11 "Early deployment of PTS vehicles - even before
12 emergency vehicles - would have been helpful ..."

13 LADY JUSTICE HALLETT: Do we know if that applies to
14 Aldgate?

15 MR COLTART: I don't. Can I ask, Mr Cumner, did you have
16 that problem at Aldgate with clearing the walking
17 wounded?

18 A. At one stage, when the station entrance was becoming
19 blocked, I asked fire officers, I believe, it may have
20 been police officers, to move walking wounded further
21 along the road. I think from there, many of them went
22 to London buses, so I believe that was not a problem for
23 us.

24 Q. You had the buses and we know -- we've heard from a lot
25 of our victims that they were put on to a bus and looked

1 after by a paramedic once they were there.

2 Top of the next page:

3 "Emergency vehicle arrived ..."

4 Now, is that a different vehicle from a standard

5 ambulance?

6 A. It could be any vehicle, an emergency vehicle.

7 Q. What's an ERV, is that different from an ambulance?

8 A. I'm not sure, to tell you the truth.

9 Q. All right. Anyway:

10 "An emergency vehicle arrived but was carrying

11 old-style oxygen cylinders, so could not use them."

12 That's an observation which seems to have been made

13 by a man called Mark Scott. Do you know Mr Scott?

14 A. No, I don't.

15 Q. Did you understand what he means by "old-style oxygen

16 cylinders"?

17 A. Yes, I do.

18 Q. What does it mean?

19 A. The latest oxygen cylinders are lightweight aluminium

20 cylinders. The older ones were steel cylinders, and

21 they required a key to turn them on. The later

22 cylinders don't need that key.

23 Q. Right. So when he says they couldn't be used,

24 I appreciate we're speculating here, but might that be

25 because no one had a key to open them?

1 A. That is probably what the problem was.

2 Q. We'll see, because we'll turn briefly in a moment to the
3 minutes of the meeting at Pocock Street, but a complaint
4 about a lack of oxygen was also made at that meeting.

5 From a paramedic, from a clinical perspective, what
6 are the implications of there being insufficient oxygen
7 to treat patients a scene?

8 A. If the patient's oxygen saturations are low, they need
9 to be boosted. So oxygen is essential.

10 Q. All right, let's leave that meeting and turn briefly, if
11 we may, to the subsequent meeting at Waterloo.

12 Mr Hay has already asked you some questions about
13 this. I think the first two observations relate to you
14 on this meeting, don't they? Sorry, this is document
15 [LAS370-2].

16 The first one you've looked at, that was the
17 difficulties with the fire crew. The second entry
18 I think is the incident you were telling us about with
19 Mr Sutherland who turned up. Does that look as if you
20 might have made that observation?

21 A. I didn't recognise the responder who turned up.

22 Q. "Communication difficulties", you've made your position
23 clear on that, I won't ask you any further questions
24 about that.

25 Under 5:

1 "Other difficulties", we've dealt with triage,
2 oxygen and stretchers. There's talk of plundering of
3 equipment, but I mean, plainly, that's not people
4 stealing equipment, this is crews presumably borrowing
5 from other ambulances for the purposes of treating
6 patients at the scene?

7 A. Yes, correct.

8 Q. Then under "What went well", I cannot recall if Mr Hay
9 dealt with that or not, but in any event, in case he
10 didn't:

11 "Willingness of staff to be flexible, assistance
12 from staff, parking done well", which was Andrea's job,
13 and "initial resources were deployed quickly".

14 Can we add to that list, of course, also great
15 bravery and commitment shown on the part of individual
16 members of your service?

17 A. Yes, there was.

18 MR COLTART: Thank you very much.

19 A. Thank you.

20 LADY JUSTICE HALLETT: Questions relevant to this witness's
21 evidence, Mr Saunders.

22 Questions by MR SAUNDERS

23 MR SAUNDERS: Of course, my Lady.

24 Can I ask you about this: you are on the scene at
25 the beginning and Mr Hay, the first gentleman that asked

1 you questions, put to you about the priorities. Do you
2 remember?

3 A. I do.

4 Q. He asked you this: no one said there was a need for
5 paramedics underground?

6 A. I was never told that, no.

7 Q. If you had been told there is either a doctor downstairs
8 who is asking for paramedic help or there are people
9 downstairs that need paramedics, would you have gone
10 down?

11 A. In the role I was in, no.

12 Q. Because, at that time, you were Silver control?

13 A. My hands are tied in that situation.

14 Q. If you had been told and you'd seen the duty officer's
15 car -- whether it's Mr Sutherland or not, I don't
16 mind -- but you see the duty officer's car arriving and
17 you were aware, would you have passed that information
18 on to him?

19 A. I would, yes.

20 Q. Why?

21 A. Well, I would -- if I was getting information from
22 underground that there were -- paramedics were needed,
23 I'd be passing that information on via my control so
24 that they were aware that we needed more resources.

25 Q. When you were aware the duty officer has turned up and

1 has assumed Silver control, you stayed above ground?

2 A. I stayed above ground. I had to make sure that the
3 Silver role had been taken over.

4 Q. You -- I don't think it's been dealt with -- were
5 actually dealing with somebody who was seriously
6 injured?

7 A. I was dealing with a large group of people now that had
8 been building up at the entrance to the station.

9 Q. Can we take it in this way, Mr Cumner, if you had been
10 told the need for a paramedic downstairs, once you were
11 relieved of Silver control, you'd have probably gone
12 down?

13 A. I would, if I was sent down, yes.

14 Q. One of the documents you've also been shown deals with
15 an ESV arriving. That's an "emergency service vehicle",
16 isn't it?

17 A. I believe it is, yes.

18 Q. That carries, does it not, additional medical supplies
19 to a major incident?

20 A. Yes.

21 Q. Can you help us -- and if you can't, please say so --
22 what sort of equipment that would be carrying?

23 A. I believe that carries drug supplies, oxygen supplies,
24 extra stretchers.

25 Q. It is specifically for a major incident, is it not?

1 A. It would normally be brought out in a major incident.

2 Q. Would it also have something such as a defibrillator?

3 A. Yes, I think it would.

4 Q. Again, help us if you can, Mr Cumner, was it right that,
5 when that vehicle arrived, there was a problem actually
6 opening it up?

7 A. I am aware that they had problems with the doors,
8 opening the doors.

9 Q. Did that mean the equipment could simply not be brought
10 out?

11 A. I'm not sure how long it actually delayed matters, but,
12 yes, it would have constituted a delay in getting
13 equipment.

14 Q. Can you help her Ladyship as to when you believe that
15 vehicle was present?

16 A. I believe it was present possibly halfway through the
17 incident.

18 Q. Forgive me, Mr Cumner, obviously different people have
19 a different timescale. Can you put a time on that for
20 us?

21 A. I'm afraid I couldn't.

22 MR SAUNDERS: You can't, all right. My Lady, they are the
23 only matters I have for Mr Cumner, thank you.

24 LADY JUSTICE HALLETT: Thank you, Mr Saunders. Ms Sheff?

25 Questions by MS SHEFF

1 MS SHEFF: My Lady.
2 I want to ask you about your specific debrief
3 document, [LAS92-2]. Just about the question in the
4 middle of the page:
5 "Were you able to communicate effectively with Gold
6 control?"
7 And you've put "N/A" which presumably stands for
8 "not applicable"?
9 A. That's correct.
10 Q. What did you mean by that?
11 A. In that I didn't actually have any radio contact with
12 control at all.
13 Q. Your role as Silver, when you arrive at the scene, is to
14 assess the situation and pass messages back about your
15 assessment, twofold presumably: one to Control, so that
16 various other supplies, ambulances, can be sent out; but
17 also to your senior officers so they can make their own
18 assessment. Would that be right?
19 A. That would be correct, yes.
20 Q. So you were hampered in that duty by your lack of radio
21 communication. Would that be fair?
22 A. Two things, really. One that I relayed any messages
23 that I needed through my crew mate, Andrea, as she was
24 essentially Silver control in that vehicle, and, two,
25 I didn't have a handset.

1 Q. Were you using Andrea, then, as a conduit back to
2 Control in order to get more ambulances on the scene?

3 A. That is the process of Silver speaking to the driver in
4 the ambulance who acts as Silver control.

5 Q. But was she also able to fulfil the other part of the
6 duties to communicate with Gold?

7 A. I wasn't aware that she was actually communicating with
8 Gold. That would have involved a channel change.

9 Q. Yes. So certainly she wasn't doing that on your
10 instructions?

11 A. No, while I was away from the vehicle, she may well have
12 been contacted to change channels, but I wasn't aware of
13 it.

14 Q. Although you were effectively only Silver for eight
15 minutes, in practice it was longer, wasn't it, because
16 you weren't aware that you were relieved and there was
17 no official handover?

18 A. I tried to find out if the -- if the role had been taken
19 over as early as possible, so I don't think it was even
20 as long as eight minutes.

21 Q. The person who relieved you didn't speak to you about
22 what you'd done so far?

23 A. No, but I think he would have got a briefing off of
24 Andrea.

25 Q. You can't be sure of that, though. There was no direct

1 handover from between the two of you, then?

2 A. No, there wasn't.

3 MS SHEFF: Thank you. That's all I have to ask.

4 LADY JUSTICE HALLETT: Any other questions? Ms Boyd?

5 Questions by MS BOYD

6 MS BOYD: Mr Cumner, can I just ask you a couple of

7 questions on behalf of the London Fire Brigade, and in

8 relation to the tension between you and the firemen on

9 your arrival? Can I make it clear I'm not seeking to

10 criticise anyone, you were clearly faced, all of you,

11 with a very difficult situation and, as we understand

12 it, a mass exodus of casualties coming out of the

13 station.

14 Now, the patient that the firemen were anxious

15 about, is that a lady we now know as Emma Brown?

16 A. Yes, it is.

17 Q. Did she have shrapnel wounds to her stomach?

18 A. She had what appeared to be blast injuries, yes.

19 Q. I think in your statement you describe:

20 "A large, open wound to the right side of her

21 abdomen running across the top of her pelvis and I could

22 see bone exposed."

23 A. That's correct.

24 Q. I think we've had another description given by

25 a passenger, Jordan Kemp, whose witness statement was

1 read, and he described her as having half her stomach
2 missing. That may be his perception as a layman, and
3 I'm not suggesting that's accurate in medical terms, but
4 it was clearly a very severe and looked a very severe
5 abdominal injury?

6 A. It was a severe wound, but nowhere near the scale of
7 what you've just described.

8 Q. The passenger's description.

9 A. Yes.

10 Q. Nevertheless, on your own description, it does seem, as
11 you say, quite severe.

12 A. It was a significant wound.

13 Q. I think the firemen were holding compression bandages
14 and giving her oxygen?

15 A. Yes, they were.

16 Q. They were, as you described, anxious, and understandably
17 so, perhaps. Do you think it's possible that their
18 reaction was more of a human reaction rather than any
19 lack of understanding of your role?

20 A. I think it may have been a combination of the two.

21 Q. But in any event, we're talking about a delay of
22 30 seconds --

23 A. Yes, no more than that.

24 Q. -- as you've fairly said?

25 Finally, Mr Cumner, when you spoke to the incident

1 commander, which I think was Sub-Officer Clarke -- you
2 may not know him by name.

3 A. No, I don't.

4 Q. He told you that there were a number of unknown
5 casualties down on the Tube train.

6 A. Yes, he did.

7 Q. And, as you fairly said, fatalities implies perhaps, not
8 only a serious incident, but maybe other injured people?

9 A. Yes.

10 Q. So leaving aside what other communications you may or
11 may not have had with anyone else, Sub-Officer Clarke
12 made it clear that there was a serious incident down on
13 the train?

14 A. The information he gave me suggested that there was
15 a very serious incident going on.

16 MS BOYD: Thank you.

17 LADY JUSTICE HALLETT: Ms Simcock?

18 Questions by MS SIMCOCK

19 MS SIMCOCK: Thank you, my Lady.

20 I just have three very brief topics, Mr Cumner.

21 First, you've been asked about your role as Silver
22 medic, and I don't want to go over that again. Once you
23 were no longer acting as Silver medic, you've talked
24 about how you stayed above ground and continued to
25 triage and treat casualties.

1 Why did you, at that point, stay above ground and
2 not go down to the train?
3 A. Because there was a significant build-up of casualties
4 and I had already started to set up a triage system and
5 start treating patients. I thought I was going to be of
6 more use dealing with the amount of casualties that were
7 coming up, because I knew a lot of my colleagues had
8 already gone underground, so I would have been excess to
9 requirements down there.

10 Q. Thank you. Second topic, then. You were asked about
11 defibrillators. Do ambulances carry defibrillators?

12 A. Yes, they do.

13 Q. We know that a paramedic, Alan Treacy, who was one of
14 the first paramedics on the scene, used one. Did your
15 ambulance have a defibrillator?

16 A. Yes, it did.

17 Q. Thank you. Third and final topic, then. You've been
18 asked about the debrief at Millwall. Was the primary
19 purpose of that debrief as a welfare issue with the
20 London Ambulance personnel?

21 A. Yes, it was.

22 Q. People were encouraged to talk about their experience,
23 their observations and their feelings about the day, is
24 that right?

25 A. Yes, I think I remember that.

1 Q. At that time, you didn't have any specific information
2 about individuals who had died and their cause of death,
3 did you?

4 A. No, I didn't.

5 Q. So the comment about not having equipment for moving
6 people and people dying, was that likely to have been an
7 expression of feeling rather than fact?

8 A. It's a possibility that was the case.

9 Q. The Motorcycle Response Units and Cycle Response Units,
10 are those individual responders as may be obvious?

11 A. Yes, they are.

12 Q. Of course, one can't carry a stretcher by oneself, so if
13 they were to carry stretchers, they would need
14 assistance from members of the public potentially or
15 other emergency services. Is that right?

16 A. Yes, I think they might need some assistance.

17 MS SIMCOCK: Thank you. I'm very grateful, my Lady.

18 LADY JUSTICE HALLETT: Thank you. Any other questions?

19 That sounds as if there are no more questions.

20 Mr Taylor, no questions from you?

21 MR TAYLOR: No.

22 LADY JUSTICE HALLETT: Thank you.

23 Thank you very much, Mr Cumner, you're free to go.

24 A. Thank you, my Lady.

25 MR HAY: My Lady, may I invite to you call Benjamin Cotton.

1 MR BENJAMIN DAVID COTTON (sworn)
2 Questions by MR HAY
3 MR HAY: Good morning.
4 A. Good morning.
5 Q. You're Benjamin David Cotton?
6 A. I am.
7 Q. Mr Cotton, I want to ask you some questions about your
8 recollection of events on 7 July 2005. On that day, you
9 had a meeting in the City of London?
10 A. Mm-hmm.
11 Q. You travelled in that morning from your home into
12 Marylebone station?
13 A. Yes.
14 Q. Although you initially intended to get the
15 Bakerloo Line, I believe there were delays on the
16 Piccadilly Line which caused delays on the
17 Bakerloo Line. Is that correct?
18 A. Yes, it was a complicated morning.
19 Q. Because of that, you took the short walk to Baker Street
20 where you boarded the Circle Line?
21 A. That's correct.
22 Q. Do you recall which carriage of the Circle Line,
23 eastbound Circle Line train you boarded?
24 A. Yes, it was the second carriage.
25 Q. Can we have up on the screen, having learnt

1 a technological trick from my learned friend Mr Gibbs,
2 first of all, [INQ8372-2], and if we could have that on
3 the top half of the screen, and then, underneath, can we
4 have [INQ10280-8]?

5 Just to help you, Mr Cotton, the bottom diagram is
6 a diagram put together by the Metropolitan Police based
7 on the witness statements they've received. The
8 left-hand side is the rear of the second carriage. The
9 right-hand side is the front of the carriage. The
10 tunnel wall, when the train came to rest, would have
11 been at the top of that diagram, and the tracks would
12 have been at the bottom.

13 A. Yes.

14 Q. Just starting with your diagram, you've written "entry
15 point" at the top.

16 A. Mm-hmm.

17 Q. Looking at the diagram below, would that be double doors
18 D3?

19 A. It would look like it, yes.

20 Q. I believe you stood in that area initially --

21 A. That's correct.

22 Q. -- before taking a seat at some point after
23 King's Cross?

24 A. Yes.

25 Q. There on your plan, you've marked an "X" in a little

1 square box?

2 A. That's correct, yes.

3 Q. Then, if we look at the diagram below, number 30 is the

4 point that the Metropolitan Police have allocated to

5 you. Is that correct?

6 A. It's quite difficult to tell, but, yes --

7 Q. Based upon --

8 A. Based upon my recollection, yes.

9 Q. Based upon where you were standing in double doors D3?

10 A. Yes.

11 Q. The train then left Liverpool Street.

12 A. Mm-hmm.

13 Q. I believe you were looking at your BlackBerry when the

14 explosion occurred. We've heard quite a lot of evidence

15 about the explosion, so I'm not going to ask you about

16 that, but I want to ask you some questions about what

17 happened thereafter.

18 A. Mm-hmm.

19 Q. I think, initially, it was very, very dark in the

20 carriage. Is that right? But you had with you a torch?

21 A. I did, yes.

22 Q. You got that torch out?

23 A. Yes.

24 Q. How did that help with the visibility?

25 A. Not a lot, really. It was very dark. There was an

1 enormous amount of dust and I guess what was shredded
2 paper or -- the air was very, very full. I took
3 a couple of photos at the time and you can see
4 absolutely nothing.

5 Q. Those were photographs which you took with your mobile
6 phone?

7 A. That's correct, yes.

8 Q. What was the general atmosphere like in the carriage
9 itself?

10 A. Immediately after the -- obviously time changes at that
11 point in time, but immediately after the explosion,
12 there was a sort of stunned silence. Then people
13 started screaming and, to my right, I heard a voice
14 saying "Keep calm, keep calm". Again, the exact order
15 of events I'm not entirely sure, but I dug out my torch
16 and turned it on, which seemed to make quite
17 a difference. I guess people who are -- I'm
18 speculating, but I guess people who were injured would
19 continue screaming, but people who were not injured
20 might have been calmed by the torch.

21 Q. I want to ask you some questions about what happened
22 after the explosion, but just to put a timeframe on it,
23 we know that the explosion was about 08.49 in the
24 morning and, if we could have up on the screen INQ8371 [INQ8371-1],
25 this is your itemised mobile phone bill.

1 A. Yes.

2 Q. If we could just go down to the bottom of 7 July, and
3 there's a call at 09.03.59. If we could highlight that,
4 please.

5 There came a point when you were evacuated from the
6 carriage, and I believe you made your way up to the
7 station. Is it right that you phoned your wife?

8 A. Yes, I did.

9 Q. Was that from the station foyer?

10 A. No, it wasn't, it was going up the steps. As soon as
11 I got a signal -- I had quite a lot of colleagues who
12 were involved in 9/11 and I remembered that the mobile
13 phone system went off, so my first priority was to ring
14 my wife and let her know.

15 Q. We can see that call, is it right, was at 09.03.59?

16 A. Yes.

17 Q. So from the point of the explosion to the point that you
18 were making your way up the stairs, a period of about
19 14 minutes.

20 A. Yes.

21 Q. There came a point whilst you were on the carriage after
22 the explosion that you, I believe, heard screaming from
23 your left. Is that right?

24 A. I wandered around a bit, it didn't feel like 14 minutes,
25 as you can imagine, but I wandered to the right and

1 helped people get out of the compartment and sorted out
2 personal belongings for people, all the stupid things
3 one does in those circumstances, and then I moved down
4 to the left, and the lady who had been sitting next to
5 me, a doctor, as it subsequently transpired, had found
6 a girl who was basically lying across some other
7 passengers. She had obviously been blown through the
8 glass partition to a greater or lesser extent, and the
9 doctor was screaming "Get me a paramedic, get me
10 a paramedic".

11 Q. Just pausing there, can we have back up on the screen
12 [INQ8372-2]? Again, below that, [INQ10280-8].

13 Looking at your diagram, to the left of where you
14 were sitting, you've drawn what appears to be a stick
15 figure lying across the seats.

16 A. Yes, that's her.

17 Q. Is that the lady you're referring to?

18 A. That's correct.

19 Q. Then, looking at the plan below that, would that lady be
20 somewhere between the numbers 12 and 20?

21 A. Yes, she would have been lying on 18 and 20 with her
22 head hanging off the edge of the seat 20 between 20 and
23 21.

24 Q. How long after the explosion -- I know it's difficult to
25 say -- was it when you first saw that lady?

1 A. Probably a lot sooner than I thought. Obviously, one's
2 recollection sits with being in the area where you've
3 got number 29 and helping people with passports or shoes
4 or getting out of the compartment, and then dealing with
5 people in the area sort of 25 to 27.

6 But once that was clear, I then moved down towards
7 sort of the area 14, 17, and it wasn't a particularly
8 nice place to be, so I stopped with the doctor who was
9 positioned at 21.

10 Given that I got out in 14/15 minutes, it can't have
11 been very long.

12 Q. When you saw that young lady lying across the seats, can
13 you just describe whether or not she appeared to be
14 alive at that point?

15 A. I think probably the first time that we shone the torch
16 on her face, it's possible that she might still have
17 been vaguely alive.

18 Q. Was there any verbalising or any noise coming from her?

19 A. Not that I was aware of.

20 Q. You refer to the fact that a doctor was holding her.

21 A. I think that's unfair. I think she was sitting with
22 her. Whether she was holding her or not, she was there,
23 and she was calling for someone to go and get
24 a paramedic.

25 Q. Can you recall exactly what she said or the type of

1 words she used?

2 A. It's five years ago. "Can someone get me a paramedic,
3 this girl's dying".

4 Q. You've referred to her as a doctor. I think we know her
5 to be Dr Gerardine Quaghebeur?

6 A. I believe so, yes.

7 Q. What did you say back to her?

8 A. I said to her, "I think, if she is dying, then she
9 doesn't want someone screaming in her ear, but let's see
10 if we can get someone to go and find a doctor", or
11 something like that.

12 Q. You then mention that you made your way towards the area
13 14, 17. I think you said it wasn't very nice, I think
14 that's the words you used.

15 A. Yes.

16 Q. Can you just describe to us what you saw there?

17 A. It's quite difficult to see. It's still quite dusty,
18 although some of the dust had cleared.

19 There were people just sitting sort of robotic-like
20 in the seats, which I guess would be 13, 16, 19. Around
21 the area sort of 9 and 10, and further on, more around
22 the 6, 7 area, there was just a great pile of stuff and
23 the human mind is extremely good at blocking stuff out,
24 I didn't want to speculate too much on what that was,
25 but, as I described to the police, it looked like a pile

1 of laundry.

2 Q. Anywhere in that area, were you able to clearly make out
3 any particular person?

4 A. Again, I think your mind tends to try to sort of blank
5 that a bit. As I said, certainly in 16 and 19, there
6 were people -- appeared to be people sitting there,
7 staring forward, but that could equally well have been
8 13.

9 Q. But on the floor area between the two banks of seating,
10 were you able to make anyone out in particular?

11 A. No.

12 Q. In that area, was there anyone who exhibited any signs
13 of life, as far as you could tell?

14 A. No, it was just like literally the piles of laundry
15 analogy, unfortunately, is how I saw it.

16 Q. Going back to the young lady who was lying across the
17 seats -- something, sorry, I should have asked you --
18 did she have an injury to her neck?

19 A. Yes, she did.

20 Q. Can you just describe that injury?

21 A. It was a gash, a big gash, I described it in my witness
22 statement as being two centimetres long. I haven't
23 bothered to think about it much since, I'm afraid.

24 Q. When the doctor called for paramedics and there was an
25 exchange between you and her, do you recall whether or

1 not any paramedics arrived or whether anyone came to
2 assist at that point or shortly afterwards?

3 A. No, I mean, it would have been very soon after the
4 blast. What I do remember is, around that time, what
5 appeared to be station staff came running along the
6 track and very insistent that people who could walk
7 should leave the train.

8 Q. I think at that point, you decided to leave the train,
9 is that correct?

10 A. Yes, I looked around, I mean, there was nothing we could
11 do with the girl and I felt that moving any of the
12 people who were on the floor or sitting in the seats was
13 more likely to cause them damage than -- and, not being
14 qualified, I couldn't see any value.

15 Q. Which doors did you leave through?

16 A. I would say where it says 21, 23.

17 Q. So double doors D6?

18 A. Yes.

19 Q. You still had your torch with you at that point?

20 A. I left it with the doctor. We had an exchange, we
21 talked about whether we'd meet up later, and I'd take
22 her briefcase and all the silly things you say at that
23 time.

24 Q. Then you made your way out from the train, down the
25 tracks, to the platform?

1 A. I didn't actually. What I did was I -- we found
2 a briefcase and we basically helped people down out of
3 the carriage, because these trains are incredibly high
4 when you actually get out of them, when there's not
5 a platform there. So we helped a few people.
6 Basically, what we tried to do when -- just after
7 the bomb went, was that anyone who looked to be
8 basically uninjured, we just posted them out of the
9 windows or the doors, or wherever we could get them out.
10 We'd found people who were more seriously injured and
11 basically I sat them down, probably in the sort of 25,
12 27 area, and then -- so we went back, and got those
13 people out, and I walked with them.

14 There was one guy who was blind or partially
15 sighted, so I took him with me as we went.

16 Q. When you were going along the tracks to the station,
17 were there London Underground employees directing you
18 where to go?

19 A. I would imagine so. It wasn't something I recollected.
20 Again, I stopped and took a photo because I wasn't sure
21 that my wife would believe that I'd been there.

22 Q. At any point, did you see any members of the emergency
23 services before you left the station?

24 A. No, we saw emergency -- lots of emergency staff.

25 Actually, that's not true, sorry, that's not correct.

1 When we got up to the platform to the street level at
2 Aldgate, we were directed, I presume by police, into the
3 London Transport police offices where we were sat down
4 for a while. So my recollection is when, half an hour
5 later, we were let out from there, there was a lot of
6 police and ambulance and so on.

7 Q. The British Transport Police, did they ask you what had
8 happened?

9 A. No, I think what you have to realise is that there were
10 lots and lots of people milling around, and, amazingly,
11 most people went back towards Liverpool Street,
12 I believe, very few of us went towards Aldgate
13 initially, but there were a lot of people around, and
14 I honestly don't know how anyone could have worked out
15 which of us was compos enough to say anything
16 meaningful.

17 MR HAY: Thank you very much, Mr Cotter, I have no more
18 questions for you, but others might.

19 LADY JUSTICE HALLETT: Mr Coltart any questions?

20 MR COLTART: No thank you.

21 LADY JUSTICE HALLETT: Mr Saunders?

22 Questions by MR SAUNDERS

23 MR SAUNDERS: I think the position is this: when you
24 described the lady, as you have done, who was across the
25 laps of those seated at 18 and 20, your recollection is

1 of only one lady, isn't it?

2 A. There were two people seated and the lady was blown
3 across them. Whether there were more people seated
4 further on, I don't know.

5 Q. So you don't have any recollection or picture of another
6 lady also being across somebody's lap at seat 18?

7 A. Not that I can remember, no.

8 MR SAUNDERS: Thank you very much indeed.

9 LADY JUSTICE HALLETT: Ms Sheff?

10 MS SHEFF: No thank you.

11 LADY JUSTICE HALLETT: Any other questions, yes?

12 Questions by MS CANBY

13 MS CANBY: Mr Cotton, just one question on behalf of
14 Transport for London.

15 As you were being detained, as is the technical
16 phrase, from the bombed-out carriage back to Aldgate
17 station, did you notice that the tunnel lighting was on?

18 A. In my witness statement, yes, but I can't remember it
19 now.

20 MS CANBY: Thank you.

21 LADY JUSTICE HALLETT: Any other questions?

22 A. Actually, sorry, can I just add something there?

23 LADY JUSTICE HALLETT: Of course, Mr Cotton.

24 A. In the photo that I took looking back at the train, the
25 tunnel lighting was on, so it must have been, sorry.

1 MS CANBY: It was on?

2 A. Yes.

3 MS CANBY: Thank you.

4 LADY JUSTICE HALLETT: It looks as if that's all the
5 questions we have for you, Mr Cotton, I am very sorry we
6 had to ask you to go through your ordeal of that day and
7 thank you for coming along to help us.

8 Mr Coltart, could I just say this? For the
9 avoidance of doubt, my comment to Mr Saunders was not
10 intended to imply that you had asked questions that
11 weren't relevant. I just wanted to ensure that
12 everybody focused on what that witness could help us
13 with.

14 MR COLTART: My Lady, of course, no. Thank you for the
15 clarification.

16 MR KEITH: My Lady, we have plenty more witnesses, but
17 I don't know whether that's a convenient point for
18 a break.

19 LADY JUSTICE HALLETT: Very well. I'll come back at 11.30.

20 (11.20 am)

21 (A short break)

22 (11.30 am)

23 MR KEITH: My Lady, may I invite you to call PC Aveling,
24 please?

25

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1 MR JAMES AVELING (affirmed)
2 Questions by MR KEITH
3 MR KEITH: Good morning, Officer.
4 A. Good morning.
5 Q. Would you give the court your full name, please?
6 A. It's James Aveling.
7 Q. Mr Aveling, it's quite hard sometimes to hear in this
8 courtroom, particularly now that is fuller. Could you
9 just remember to keep your voice up at all times so we
10 can hear you?
11 A. Okay.
12 Q. In 2005, you were a police constable with the City of
13 London Police Bishopsgate cycle patrol team?
14 A. That's correct.
15 Q. This may seem a curious question, Officer. Your dress.
16 What were you wearing that day?
17 A. It's basically cycle patrol kit, which encompasses
18 shorts and it will be a black top of some description
19 with "Police" insignia down the arms. Then you've got
20 a body armour, which is actually a fluorescent-like
21 tabard with all your appointments on the body armour.
22 Q. That morning, you were in that uniform and you were,
23 I think, together with the rest of your team, or some
24 members of your team, when you heard over the radio that
25 there he had a been an incident at Liverpool Street?

1 A. Yes, that's correct.

2 Q. So with the rest of your team, did you go straight
3 there?

4 A. Yes, we did.

5 Q. How long did that take you?

6 A. Probably a couple of -- a few minutes, because it was
7 just travelling from the Barbican to Liverpool Street.

8 Q. Presumably, you could receive radio messages en route.

9 A. That's correct, yes.

10 Q. Did you gather that there had been some sort of incident
11 concerning a train, a crash or a power surge of some
12 sort?

13 A. Yes, it was more either a track fire or a power surge.

14 Q. When you got to Liverpool Street, it was quickly
15 apparent, was it not, that there was no such incident or
16 sign of an incident there?

17 A. Yes, there was no one, it was just basically emergency
18 services turning up and no one was there, as in no
19 casualties coming out of Liverpool Street.

20 Q. So where did you go?

21 A. It was -- we actually saw Inspector Paul Barnard, and
22 obviously he was the most senior on scene, and he was
23 relaying information through his radio, and it was
24 a colleague, Kevin Eyles, who basically got tasked
25 through Inspector Barnard to go to Aldgate, and

1 obviously I was with Kevin, just really to recce
2 Aldgate, because there was mixed messages coming through
3 that there were some people coming out of Aldgate or
4 people trying to get in to Aldgate.

5 Q. So you went there with your colleague?

6 A. That's correct.

7 Q. Presumably, that took no more than a couple of minutes?

8 A. Probably not even that.

9 Q. Not even that. When you arrived, did you immediately
10 see that there were members of the public milling around
11 the station entrance, some of whom had been injured?

12 A. Yes, there was a few coming out, covered in debris and
13 soot.

14 Q. Was your first task to try to clear the immediate area
15 to the station?

16 A. Yes, I mean, it was because you had some of the
17 Underground staff trying to push people back, because
18 you had people still trying to get in, and they were --
19 they had tape and they were trying to put a cordon in,
20 we just basically took the tape off them and implemented
21 a quick cordon, just around the initial entrance to the
22 station.

23 Q. Can you help us roughly with what time it was that you
24 might have arrived at Aldgate?

25 A. I don't know, to be honest. Without referring to my

1 statement, I wouldn't be able to --

2 Q. You can certainly refer to your statement because it was
3 made much nearer the time, indeed on 13 July. It
4 doesn't record a time, in fact, for the arrival in your
5 statement, which is why I'm asking you.

6 A. Okay.

7 Q. Can I ask you this instead: when you arrived, do you
8 recall a firefighter being around the front entrance?

9 A. Yes, something that would probably be able to narrow
10 down my time is I remember, when we turned up, we were
11 initially pulling up on the scene as the first fire
12 engine was pulling up. That was the only vehicle,
13 emergency vehicle, that we saw, or I saw, pulling up.

14 LADY JUSTICE HALLETT: Just before we go on, Mr Eyles, was
15 he dressed in the same way as you were, Mr Aveling?

16 A. Yes, my Lady, yes.

17 LADY JUSTICE HALLETT: So two of you in shorts?

18 A. Yes, two of us in shorts.

19 MR KEITH: Having used the cordon tape to cordon off the
20 front of the station and to keep members of the public
21 from entering, did you then appreciate that your
22 colleague, Mr Eyles, had gone and I think the fireman
23 had gone inside the station as well?

24 A. No, the firefighters hadn't, it was only, I remember,
25 one getting out, I think it was the passenger, they

1 hadn't gone into the station and I -- basically I'd had
2 my back to the entrance initially because I was putting
3 the tape, turned around and my colleague was nowhere to
4 be seen. So I walked back to the entrance thinking he'd
5 gone in, and it was at that point I was just greeted by
6 people coming out saying "There's people trapped", and
7 obviously identifying I was a police officer, words to
8 the effect "Oh, great, police, there's people trapped
9 down the train".

10 Q. Did you see where the firefighter had gone?

11 A. No, I don't remember, I didn't see any firefighters in
12 front of me going into the station.

13 Q. All right. Did you then go further down into the
14 station?

15 A. Yes, I did, yes.

16 Q. Straightaway or after a while?

17 A. No, straightaway.

18 Q. Why was that?

19 A. Just people's responses, saying "There's people trapped
20 on the train".

21 Q. So the people coming out had told you that there were
22 people trapped on the train, so you immediately went to
23 see whether you could help?

24 A. Yes, that's correct.

25 Q. As you got down to the platform level, did you come

1 across a colleague from City of London Police, another
2 police officer?

3 A. Yes, I did, yes.

4 Q. I think that was PC Cochrane, he was part of a team with
5 Sergeant Kemp, who you saw a little bit later?

6 A. Yes.

7 Q. As you got to the platform, did you speak to your
8 colleague, your fellow officer, and ascertain whether or
9 not, firstly, the power was off and, secondly, whether
10 anybody had radioed in to Control?

11 A. No, I spoke to Matt, and it was clear -- I mean,
12 I knew -- I do know Matt and he's only been in a few
13 years and it was clear he was probably in a little bit
14 of shock just by the way he sort of garbled his message
15 to me, because obviously it was at that point, as I was
16 descending the stairs, there was more people coming out
17 with the walking wounded. So you had quite, you know,
18 sort of nasty injuries, and I didn't really pay too much
19 attention to Matt, because it was quite garbled what he
20 said, because it was clear he was in a bit of shock and
21 I had a -- I was joined, as I descended the stairs, by
22 a member of the Underground staff and it was him that
23 I asked about it. Because it seems a bit strange,
24 because you've got people coming off the tracks on to
25 the platform, I actually asked him before I got down --

1 I suppose the training kicking in -- was the power off.
2 Q. It was obvious, they were walking on the rails.
3 A. Yes, it was obvious the power was off, but I suppose
4 it's the training kicking in.
5 Q. You were told that the power was off?
6 A. I was, yes.
7 Q. That presumably took no time at all to be confirmed --
8 A. No, he --
9 Q. He told you straightaway?
10 A. Yes, I think he was on a radio, the member of staff.
11 Q. Did either of you, that's to say either you or
12 Mr Cochrane, speak to the control room, your own control
13 room, City of London control room at that stage?
14 A. No, not at all.
15 Q. Thank you. You went along the track yourself towards
16 the train. I want to ask you whether you were able to
17 form a view quickly as to what the possible cause of the
18 evident explosion was?
19 A. Yes, as soon as I caught sight of the train and the way
20 the train was positioned, it was on an arc, so within
21 probably about a good 400, maybe 400 to 600 yards of
22 getting close to the train where you could actually see
23 it, I could see that the middle -- one of the centre
24 carriages was a result of a bomb blast.
25 Q. You have, in the past, military experience, and so it

1 was something that you recognised?

2 A. Yes, I was in the Gulf, the first time round, in
3 1990/1991.

4 Q. On the track, adjacent to the carriage, did you see
5 a number of bodies?

6 A. Yes, there was three.

7 Q. There were three. Could you describe them, please, for
8 us, in the order in which you remember seeing them?

9 A. I distinctly remember -- and I've referred to him in my
10 statement -- I probably was not too kind -- but
11 I remember seeing just, to me, he looked like a black
12 Buddha, because he was a large, large gentleman, I'd say
13 at least 20 plus stone, and he was just covered in soot
14 and initially he would look like a black male, and he
15 was sat in the position of a Buddha, sort of sat
16 upright, and then there was another two people near
17 enough underneath the train, two directly underneath the
18 train, either side of the doors.

19 Q. The first gentleman, the man you described as a "black
20 Buddha", was, as you told us, covered in soot, and blood
21 as well, one presumes?

22 A. Yes, it was a mess, yes, it wasn't evident there was --
23 you know, walking up to him you wouldn't have said,
24 like, he's covered in blood, it was more soot, but
25 obviously, when you got closer ...

1 Q. From the way in which he was seated, which was sitting
2 up, did you ascertain that he was alive?

3 A. No, he was slumped forward, and the three of them all
4 looked dead.

5 Q. Subsequently, that is the man whom you describe, do you
6 not, coming to life apparently, because he was able to
7 get up and was taken out and we'll come a little later
8 to that?

9 A. I wouldn't say "coming to life", and he didn't get up.
10 It's when I initially came back at the end, we
11 started -- you know, it's evident he was still alive
12 because you had -- you heard gurgling, and it was myself
13 and five firefighters carried him out, yes.

14 Q. We'll come to the detail of that in a moment. That was
15 the first person. The second person who you saw, can
16 you remember anything more of them?

17 A. Not particularly. I didn't -- it was just a very sort
18 of -- it was, as I was approaching, it was just
19 a cursory glance. Probably, when I came back, one of
20 the people I'm more sort of aware of where they were
21 and, you know, what they looked like.

22 Q. The third person of that initial encounter, could you
23 tell whether they were male or female?

24 A. No.

25 Q. Could you say anything of the injuries that he or she

1 had suffered?

2 A. They looked fairly horrific.

3 Q. So you were able to tell it wasn't just a question of
4 that person not moving, there appeared to be very severe
5 injuries suffered as well?

6 A. That's correct, yes.

7 Q. Were there any other members of the emergency services
8 there at the time that you first encountered the three
9 people next to the train?

10 A. No, there wasn't, no.

11 Q. Did you go into the carriage?

12 A. I tried, probably it seemed like an age, it might have
13 been only, I don't know, 30 seconds, a minute, a minute
14 and a half, trying to climb, because obviously the floor
15 of the carriage is about just above chest height, and
16 I was trying to get myself up, and I managed eventually
17 to get -- sort of get purchase and climb up onto it, but
18 it was just -- it was a complete mess.

19 Q. Do you recall which set of doors you used?

20 A. Looking at -- because I was obviously privy to the
21 pivotal evidence before on the train, I think it was
22 referred to as D3, I think.

23 Q. You have me there, Officer. I think we'll have on the
24 screen INQ10280. I think D6 and D8 are the two relevant
25 doors in the bottom of the carriage.

1 A. Sorry, yes, D6.
2 Q. D8 and D6?
3 A. D6.
4 Q. So the second set of doors. But you were able to pull
5 yourself up into the door?
6 A. Yes, I just basically just got to the threshold.
7 Q. Could you hear anybody inside the carriage?
8 A. No, it was quite -- I think I've put into my statement
9 "eerily quiet", but it was quiet.
10 Q. You do describe in your statement that, after you pulled
11 yourself up, you were able see a number of people
12 unrecognisable and obviously severely injured in the
13 middle of the carriage.
14 A. Yes, that's correct. A lot of that is -- I'd say it's
15 the mind, a lot of that's been blocked out, it's
16 difficult to remember that.
17 Q. I understand. In your statement, you do also say you
18 did become aware of two voices?
19 A. No, it's just -- I don't know if I've -- I remember just
20 one voice, and it was very faint, but it was saying the
21 words "Help me".
22 Q. Could you tell whether it was a male or female voice?
23 A. It sounded like a female.
24 Q. Were you able to tell from where the voice was coming?
25 A. It was off to my left. I mean, from the diagram, it

1 would have been towards like the 1, 3, 5 area.

2 Q. So the far end of the carriage?

3 A. Yes, that far corner.

4 Q. Towards the rear. You then describe that, at this time,
5 passengers were beginning to come down the track.

6 A. Yes, I mean the whole process, as I entered the tunnel,
7 it was like a dripfeed of people coming past. It was
8 like a constant, you know, flow of people coming past
9 the train.

10 Q. Did you stay in the carriage or did you get back out?

11 A. No, I got back down. It's a decision that doesn't
12 particularly sit easy with me, because I suppose I'd
13 made a conscious decision to get off the train because,
14 as passengers were coming past, they obviously
15 identified me being in uniform, they're saying "There's
16 people trapped in the carriage behind", and so it didn't
17 sit well leaving someone in the train calling for help.

18 Q. Did you consider that there was nothing that you could
19 do inside the carriage at that point?

20 A. Yes, I mean, it was just -- it was -- I mean, it's easy
21 to look back in hindsight and say, "Yes, you know,
22 I made a conscious decision there was nothing I could
23 do". I suppose I was met with that, you know, sort of
24 precedent, I didn't have anything with me, and there
25 wasn't -- I mean, yeah, in hindsight, there was nothing

1 I could have done, but ...

2 Q. I want us to understand the predicament that you were
3 in. You had no medical equipment, did you?

4 A. No.

5 Q. Did you have any equipment with which you could tend or
6 care to the people who were obviously extremely badly
7 injured inside the carriage?

8 A. No.

9 Q. Did you have anybody with you whom you could assist in
10 directing that medical attention be brought to bear on
11 those people in the carriage?

12 A. No.

13 Q. So you were on your own as well. So you got back out of
14 the carriage. Did you then appreciate that one of the
15 things you could do was to try to get the walking
16 wounded, and other passengers, out of the rest of the
17 train?

18 A. Yes, I mean, at that stage, I went to the carriage
19 adjacent to this one, so it would have been the next
20 one, I think it's to the rear of the train, I'm not too
21 sure of the direction of travel even.

22 Q. Carriages 3, 4, 5, 6.

23 A. Yes, that one, there was movement in that carriage, and
24 you couldn't see in because it was -- someone has
25 described it actually in the past as like Bonfire Night

1 with the fireworks going off, that sort of haze with the
2 sort of smoke, it was like that in the carriage. You
3 could definitely see there was life, there was movement
4 in there and I tried to try to force the doors open,
5 because the doors were all shut.

6 Q. You describe how you initially used a piece of train
7 track as a jemmy?

8 A. Yes, a bit of debris on the floor.

9 Q. Were the passengers inside trying to assist as well by
10 kicking open the doors?

11 A. Yes, I don't know if they were kicking or trying to pull
12 it open as well, I managed to get it open maybe, I don't
13 know, 3 or 6 inches, because at that point as well I was
14 joined by definitely one, if not two, BTP officers who
15 initially, when I went down into the station, I remember
16 them joining me at the ticket barrier.

17 Q. Was one of them a gentleman called Tony, Tony Silvestro?

18 A. I've got no idea. I just remember they were in uniform
19 and, just from their sort of demeanour, I would say they
20 were very young in service.

21 Q. Were you also joined by a member of the
22 London Underground staff, do you recall?

23 A. What, when I was opening the doors?

24 Q. Yes, trying to open the doors?

25 A. I don't recall that, no. I mean it's not to say it's

1 not true, it could well have been.

2 Q. When it became apparent that you couldn't open the doors
3 because they were buckled, did you then try to encourage
4 passengers inside the train to go towards the rear and
5 to move along to try to find another way out?

6 A. To be fair, it was someone inside saying "Don't worry,
7 we've found a way out, we can get out the other door",
8 so that's why I've left trying to force the door,
9 because you can -- then you can see -- or not see, but
10 you can hear them actually moving towards back of the
11 carriage.

12 Q. At the end of the carriage, were they able detrain, to
13 use the expression?

14 A. As I say, I couldn't see them exiting that carriage, but
15 I've made my way all the way along to the end of the
16 train, which is probably about another three carriages,
17 or it felt like it, along the back of the train, or the
18 front.

19 Q. Was there a member of London Underground there?

20 A. Yes, there was a black gentleman, I think his name was
21 Olu or --

22 Q. Ola Falayi?

23 A. I just remember Ola, because I do remember asking him
24 his first name.

25 Q. Did you then see passengers coming off the end of the

1 train?

2 A. Yes, because Ola was actually helping people -- because
3 again, you've still got -- you know, you've got
4 a good -- it's getting on for about a 5-foot drop, and
5 he was helping people down, basically because it made it
6 quicker, with the two of us helping, because we would
7 just grab an arm each of a passenger and take them down
8 off the train.

9 Q. You helped in that process?

10 A. Yes.

11 Q. Then, when it became apparent that most of the
12 passengers, if not all the passengers, were off, did you
13 then assess whether or not the train should be checked
14 to make sure everybody had got off?

15 A. Yes, when everyone had got off, I actually got on
16 myself.

17 Q. What did you do?

18 A. I went back through the train to check it was empty, at
19 which point I was challenged by -- I believed it was
20 a member of the Underground staff, because they had an
21 Underground fluorescent on saying "Don't worry, I've
22 already checked the train". Obviously -- I found out,
23 obviously in hindsight, that was a BTP officer, although
24 initially -- it was only today I found out it was a BTP
25 officer, it was actually -- I thought it was a Met DC;

1 it was a BTP.

2 LADY JUSTICE HALLETT: Why were you so anxious to get
3 everybody off the train, Mr Aveling?

4 A. I was just conscious, my Lady, of obviously a fire or
5 a secondary device or something else happening.

6 MR KEITH: That took you a bit of time, I expect.

7 A. Yes, it did, yes.

8 Q. Then did you go back off the train by exiting through
9 the driver's cab at the end?

10 A. That's correct, yes.

11 Q. Did you go back to the part of the track where you had
12 seen the three bodies earlier?

13 A. Yes, I went back to the bombed carriage.

14 Q. Was that when you appreciated that the first person
15 you'd seen earlier, the male you described as being of
16 the appearance of a black Buddha, was groaning and
17 making -- showing signs of life?

18 A. My attention was drawn, first of all, to -- and, like
19 I said, when I first attended, I wasn't conscious of the
20 two people lying next to the train, but my attention was
21 drawn this time to -- it was a female, obviously these
22 two were lying down, because there was a member of the
23 public stood over her, kept picking up her arm and
24 dropping it.

25 Q. That caused you to wonder whether or not they knew each

1 other or whether they were connected?

2 A. Yes, my massive concern was, I was thinking, you know,
3 I'm just dreading the fact -- I thought it was either
4 his partner or girlfriend or boyfriend.

5 Q. It transpired that that passenger was just a passenger
6 in shock and no connection?

7 A. Yes, it sounds awful, I was actually relieved that he
8 didn't know her, and it just appeared it was shock.

9 Q. Did you ensure that somebody took control of him and
10 tried to get him away and upstairs?

11 A. Yes, there were people passing, I think it was two
12 members of the public that I've managed to sort of tell
13 them to take him away.

14 Q. The lady who was lying on the ground turned out to be --
15 I think you were told Thelma. Was that her name, do you
16 recall?

17 A. I've not been told.

18 Q. You've not been told. We know that she was taken
19 upstairs. Did you assist in stretchering her out?

20 A. No, it wasn't her, it was the gentleman I referred to
21 first of all.

22 Q. Tell us, please, about him.

23 A. Well, when I went back, obviously I dealt with the
24 member of the public, and then, that was my first
25 contact, I actually saw Neil Kemp, obviously a work

1 colleague, and initially, for a split second, I thought
2 he was actually -- had been on the train himself,
3 because he was actually in plainclothes, he wasn't in
4 uniform, and then I say it was a split second it became
5 apparent he obviously wasn't because he had a radio in
6 his hand.

7 Q. He was in jeans and a T-shirt but had a radio?

8 A. I just remember he was just not in uniform, and he was
9 in the carriage with a few other people, emergency
10 staff, and I remember there was a lady with him as well.
11 And there was emergency services. And I can't -- I've
12 got a recollection there was ladders up into the
13 carriage and there was the paramedics going up into it,
14 and I, at one point, handed -- it must have been
15 paramedic -- their first aid kits, or defibrillators, or
16 whatever, handing that up to them.

17 Q. Because they would put their bags on the ground, climb
18 up into the carriage and need help to put them back?

19 A. Yes, yes, they'd climb up and I'd hand at least one or
20 two of the bags up.

21 Q. Right. Did there come a time when you helped assisting
22 then in stretchering the male who you described as being
23 of the appearance of a black Buddha, up to ground level?

24 A. Yes, because, as I say, it was a totally different
25 scenario on reattending the scene, because it was, like,

1 quite a hive of activity.

2 Q. Because there were emergency services all around you by
3 then?

4 A. Yes, and I -- definitely five other fire officers,
5 because the gentleman was so large, we -- they got one
6 of the ladders and a couple of them, because I went to
7 take off my body armour, but their jackets were --
8 obviously, my body armour is not particularly
9 well-padded, it's not going to be comfortable, they took
10 off a couple of their jackets and padded the ladder
11 round and we put the gentleman on the ladder and took
12 him out.

13 Q. There's been some evidence that the ground underfoot was
14 so precarious and difficult, and because you didn't have
15 a stretcher, but you were using an improvised ladder
16 with firemen's coats, it was extremely difficult to
17 carry that gentleman along the track to the platform.

18 A. Yes, it wasn't particularly easy. It was made even
19 harder by going up the stairs at Aldgate. Yes, it
20 wasn't very good underfoot. It was like walking on
21 coal.

22 Q. And so difficult that was there a time when you all fell
23 to the ground whilst trying to carry him along the
24 track?

25 A. No, we didn't fall to the ground. I think there was

1 a couple of times where people tripped.

2 Q. But you were able to keep hold of the man?

3 A. Yes, because there were six of us on.

4 MR KEITH: Mr Aveling, thank you very much indeed. Will you
5 stay there? There may be some further questions for
6 you.

7 LADY JUSTICE HALLETT: Mr Saunders?

8 Questions by MR SAUNDERS

9 MR SAUNDERS: Officer, just one matter. You've mentioned in
10 your evidence before her Ladyship that you handed up
11 some first aid kits and, you thought, possibly
12 a defibrillator?

13 A. All I remember is, because it was a bag, and going
14 through my statements, actually, before actually coming
15 here to give my evidence, it could only have been
16 a first aid kit, it couldn't have been fire equipment,
17 so I can't recall, it was definitely a first aid kit or
18 a defibrillator, I don't know.

19 Q. So you can't recall and won't be able to help us any
20 more?

21 A. No, I just remember handing up baggage, and sort of,
22 like -- trying to remember what that was, it must have
23 been some sort of first aid kit.

24 Q. Can you help us with the time this would have been?

25 A. I wouldn't -- as I say, I lost concept of time when

1 I was down there, to be perfectly honest.

2 MR SAUNDERS: Then I won't ask you anything further, thank
3 you.

4 Questions by MS CANBY

5 MS CANBY: Officer, just a couple of matters on behalf of
6 Transport for London. You've described your uniform for
7 us. Could you tell us, are your shorts above or below
8 the knee?

9 A. About on the knee.

10 Q. On the knee.

11 LADY JUSTICE HALLETT: I'm sure you're going to tell me the
12 relevance of that question.

13 MS CANBY: My Lady, you may recall Celia Harrison saying she
14 had a conversation with the man in shorts. Her
15 conversation was with a man wearing shorts below the
16 knee and they were green. Could you tell us what colour
17 your shorts were?

18 A. No, they're black with a police insignia down the side.

19 Q. Yours are black?

20 A. Yes.

21 Q. At about 9.15, would you still have been down by the
22 track by the bomb carriage?

23 A. Yes, because I say, looking at everything, I probably
24 went down around about 9.00, so I wouldn't have been
25 upstairs at 9.15, no.

1 MS CANBY: Thank you very much. That's all I need to ask.

2 LADY JUSTICE HALLETT: Any other questions?

3 Mr Taylor? No. No other questions?

4 Mr Aveling, thank you very much indeed. You

5 probably thought or prayed that you had left incidents

6 like that when you left the army?

7 A. To be honest, ma'am, yes.

8 LADY JUSTICE HALLETT: It's very reassuring to the rest of

9 us to know that there are brave officers like you

10 prepared to go down into that situation giving no

11 thought to your own safety. You did everything you

12 could to help people down there. You couldn't have done

13 any more, and you couldn't help everybody. Thank you

14 very much.

15 Yes, Mr Keith?

16 MR KEITH: My Lady, Mr Hay will call the next witness.

17 MR HAY: My Lady, may I invite you to call Daniel Tilley,

18 please?

19 MR DANIEL TILLEY (sworn)

20 Questions by MR HAY

21 A. Good morning, my Lady, Daniel Tilley, Police

22 Constable 5252, uniform.

23 MR HAY: You've told us you're Daniel Tilley, and on

24 7 July 2005, you were part of a level 2 public order

25 Serial 112B?

1 A. Yes, that's correct.

2 Q. That was posted to the Commissioners Reserves?

3 A. We were, yes.

4 Q. And --

5 LADY JUSTICE HALLETT: Are you going to explain that curious
6 phrase to me, Mr Hay? Some of the phrases that these
7 organisations use ...

8 MR HAY: I'm going to ask Mr Tilley to explain it.
9 You were under the supervision of Inspector Wheeler?

10 A. We were, yes.

11 Q. Just going back a step, level 2 public order Serial, can
12 you just explain what that is, please?

13 A. We are -- a level 1 public order Serial is a territorial
14 support group, and then a level 2 Serial is normal
15 borough police officers who are given some riot training
16 and they'll go and deal with incidents at football
17 matches or crowd control.

18 Q. The Serials, am I right in thinking they are formed for
19 particular instances, for particular days?

20 A. Yes, they're aid Serials. It's an inspector in charge
21 of three Serials, and a sergeant will be in charge of
22 each of those three Serials.

23 Q. How many officers are there in a Serial?

24 A. One sergeant and normally six or seven officers.

25 Q. On 7 July, the Serial you were in had been particularly

1 formed for the G8 conference. Is that correct?

2 A. No, the territorial support group were in Scotland for
3 the G8, and we were covering Central London in case of
4 any other demonstrations regarding the --

5 Q. Arising from the G8.

6 A. Yes.

7 Q. There came a point when you were aware of an incident at
8 Liverpool Street?

9 A. Yes. That's true.

10 Q. What were you told?

11 A. We were told that, originally, I believe, a train crash
12 had occurred, and then, on the way to Aldgate, we were
13 then told there had been an explosion.

14 Q. I think you said "to Aldgate", but I think originally it
15 was Liverpool Street.

16 A. Originally, the call was to Liverpool Street.

17 Q. That communication came from GT?

18 A. Yes.

19 Q. Can you just explain to us what GT is?

20 A. GT is the Command Control Centre of the
21 Metropolitan Police when there's an aid -- when there's
22 aid in Central London.

23 Q. Was that up and running on that day also because of the
24 G8 conference?

25 A. Yes.

1 Q. Do you recall what time roughly you became aware of an
2 incident at Liverpool Street?

3 A. I believe it was about 8.50.

4 Q. You believe it was about 8.50. 8.50 or shortly before
5 9.00, was it closer to 9.00 or you can't say?

6 A. I couldn't say. If I just refer to my statement.
7 Shortly before, sorry, shortly before 9.00.

8 Q. You made your way to Liverpool Street?

9 A. Yes.

10 Q. Are you able to say roughly what time you arrived at
11 Liverpool Street? I don't believe it's in your
12 statement so, if not, and you can't recollect --

13 A. I wouldn't be able to say, sorry.

14 Q. When you arrived at Liverpool Street, what were you told
15 had happened?

16 A. We were then directed to Aldgate. We hadn't -- we
17 didn't actually arrive at Liverpool Street. En route we
18 were changed to Aldgate. We were redirected to the bus
19 station opposite the Aldgate station.

20 Q. Just looking at your statement again, you referred in
21 your statement to the fact that you were to go to the
22 rendezvous point at Liverpool Street junction with
23 Great Broad Street:

24 "We made our way in convoy to the rendezvous point.

25 On arrival, shortly after 9.00, we were redirected to

1 the bus station opposite Aldgate station."
2 Did you actually get to Liverpool Street?
3 A. No, not to Liverpool Street station, no.
4 Q. Where was the rendezvous point for Liverpool Street? It
5 may be that I'm misreading your statement. Your
6 statement seems to suggest that you had arrived at the
7 rendezvous point for Liverpool Street.
8 A. No, from my recollection, we hadn't, we didn't get to
9 Liverpool Street. It was on the way there we were
10 redirected.
11 Q. You were redirected to Aldgate. Do you recollect
12 whatever what time you arrived at Aldgate?
13 A. I couldn't say, I'm sorry.
14 Q. When you arrived, are you able to say whether or not the
15 Fire Brigade were there, whether or not the paramedics,
16 the Ambulance Service were there?
17 A. Yes, they were all there.
18 Q. Were there a number of paramedics there at that point,
19 a number of ambulances?
20 A. Yes, and fire engines as well.
21 Q. I believe you are also medically trained, is that
22 correct?
23 A. I am, yes, I am a public order medic as well. It's a --
24 Q. Sorry, carry on?
25 A. I was just given extra training in first aid and in

1 public order situations as well.

2 Q. Because of that, your priority was to treat and triage
3 injured passengers. Is that right?

4 A. Yes, that's correct. Also, I have a medic's vest with
5 me as well, which is a vest with many compartments with
6 bandages and collars and first aid equipment.

7 Q. Where were those passengers congregating?

8 A. Outside the front of the Aldgate station.

9 Q. In your statement, you say this:

10 "The whole scene with the emergency services still
11 arriving was completely shocking and chaotic but
12 organised."

13 A. Yes.

14 Q. I want to ask you about that last bit. Obviously there
15 is the term "organised chaos", but can you just explain
16 to us what you meant by "chaotic but organised"?

17 A. It was like a Hollywood action scene or a Hollywood
18 action movie. Ambulances were everywhere, the lights
19 were all flashing, it was many people injured and
20 with -- it was just very shocking, not something you see
21 every day.

22 Q. But there obviously appeared to you to be a level of
23 organisation about what was happening and what to do?

24 A. Yes, yes.

25 Q. Can you just help us with what that was: what was the

1 structure which appeared to be in place?

2 A. We were directed to the people outside the front of the
3 station, and I could see people, the walking wounded,
4 were coming away from the station. It appeared that
5 everybody was given a task and had their task to do.

6 Q. There came a point when you were asked to go down to the
7 train.

8 A. Yes.

9 Q. Who asked you to do that?

10 A. Sergeant Nanasi.

11 Q. Why did he tell you you were required to go down to the
12 train?

13 A. Because I'm a medic-trained officer and I had my medic's
14 kit with me.

15 Q. Did he explain to you what had happened on the train?

16 A. I don't recall.

17 Q. When were you first aware of what had happened on the
18 train?

19 A. I imagine when we arrived there and you could see people
20 coming out with -- covered in soot and injuries.

21 I think it was then fairly obvious that an explosion had
22 occurred.

23 Q. We know then from your statement that you made your way
24 down to the train and you approached the train. Which
25 carriage appeared to you to be the bombed carriage?

1 A. The one with the great big hole in it.

2 Q. That's probably a badly put question by myself. Which

3 number carriage was it?

4 A. I couldn't recall. It was two or three carriages down.

5 I'm sorry.

6 Q. Were there emergency services on the carriage?

7 A. The firemen inside the carriage -- when we arrived,

8 there appeared to be only two people left that I could

9 see were alive. There was a lady on board the train,

10 she was screaming, I could tell it was a lady by -- it

11 was a female voice screaming. There was firemen on

12 board the carriage, they were treating her, and then

13 there was the lady sort of underneath the carriage, who

14 I now know is Thelma.

15 Q. I'm being to come back to Thelma in a moment. Could we

16 have up on the screen please [INQ10280-8]? You've

17 referred to firemen. Were you aware of any paramedics

18 being inside the carriage?

19 A. No, I could only see firemen there, their uniform.

20 Q. This is a plan of the carriage. The left-hand side is

21 the rear of the carriage, the right-hand side is the

22 front of the carriage. Can you help us with where the

23 firemen were located?

24 A. I would say about 14 and 17.

25 Q. Sorry, you're saying 14 and 17?

1 A. Yes.

2 Q. Perhaps it may be that I'm not quite following. Can
3 you, just by reference perhaps to where the double door
4 numbers are --

5 A. Sorry, between D8 and D6.

6 Q. The people they were helping, where were they located?
7 Are you able to say?

8 A. No, I couldn't say. I presume that that's where they
9 were, by 14 and 17.

10 Q. There came a point when you looked, I think, inside the
11 carriage.

12 A. Yes.

13 Q. Which doors did you look through?

14 A. I believe it was D6.

15 Q. Can you tell us what you saw?

16 A. Yes, there was the lower torso -- would you just excuse
17 me?

18 Q. You refer, if it helps, at page 3 of your statement --

19 A. I could see it was the naked bottom half of a body
20 through the inside the carriage, through the doors.

21 Q. Were you able to see the top half of that body?

22 A. No, I couldn't see the top half. The skin on the bottom
23 half of the legs was all -- it was missing, it was all
24 charred off, burnt off, it was all charred.

25 Q. You've referred to that being in the area by double door

1 D6. We've heard some evidence to suggest that there was
2 the lower half of a male visible through double doors
3 D8. Is it possible that you may be wrong about that?
4 A. Absolutely, yes, it could have been D8.
5 Q. I'm assuming that that male showed no signs of life at
6 all, would that be correct?
7 A. Correct.
8 Q. Were you able to see anybody else in that area?
9 A. In the carriage?
10 Q. In the carriage?
11 A. No, no.
12 Q. Do you recall at all seeing a young male, maybe aged in
13 his early 20s?
14 A. Inside the carriage?
15 Q. Inside the carriage.
16 A. No.
17 Q. Perhaps to the right of the legs that you saw?
18 A. No.
19 Q. I think you then mentioned Thelma.
20 A. Yes.
21 Q. But was there also another body on the tracks as well?
22 A. There was another body on the track. As I was standing
23 just to the left of me, there was a large male, the
24 clothes that I imagine he would have been wearing would
25 have been blown off, or burnt away. He was left lying

1 in blue underpants.

2 Q. Was he lying on his front or on his back?

3 A. I believe he was on his side.

4 Q. I believe in your statement you do refer to him as being

5 lying on his right side?

6 A. Lying on his right side facing away from the train.

7 Thank you.

8 Q. Did he exhibit any signs of life?

9 A. No, not at all.

10 Q. Was it plain to you that he was dead?

11 A. Yes, indeed.

12 Q. You've mentioned Thelma --

13 A. Yes.

14 Q. -- who I think we now know to be Thelma Stober. Where

15 was she located?

16 A. She was lying on her back underneath -- almost

17 underneath the train by D8 and D6, just in that area

18 there.

19 Q. Were there any paramedics with her?

20 A. No, there was a gentleman with her by the name of Tony.

21 I've written in my statement he had a London Underground

22 uniform on. He was with her by her side constantly

23 reassuring her that she was going to be all right and

24 she was going to -- we were going to get her out of

25 here.

1 Q. Was he wearing a -- was Tony wearing a high visibility
2 orange vest?

3 A. At this stage, I don't recall. At the time I was aware,
4 he was in a London Underground uniform. I presumed he
5 was the driver. I've been told that's a different
6 matter.

7 Q. You've referred to the fact that he was reassuring her?

8 A. Yes.

9 Q. Was he also holding her hand?

10 A. Yes.

11 Q. I think we know him to be Tony Counihan. I don't know
12 if you are aware of that?

13 A. No.

14 Q. Because of the fact that you were medically trained, is
15 it right that you went to assist her?

16 A. Yes, yes.

17 Q. What did you do?

18 A. I went to her to where her head is, introduced myself as
19 a police medic, and then cradled her head in order to
20 keep her -- her spine in alignment. It was obvious that
21 we would have to evacuate her and I then -- I moved --
22 I tried to fit a stiff neck collar, but that was quite
23 impossible for her scrunched-up clothing and the way she
24 was lying. So I dispensed with that and then we --
25 I got out my stretcher, which is in my medic's vest, and

1 with the help of my other colleagues we put the
2 stretcher underneath Thelma and then we lifted her up.

3 Q. At any point before doing that, were you joined by
4 either a doctor or a paramedic?

5 A. Yes, there was a doctor from the HEMS ambulance,
6 I think.

7 Q. How did you know he was from HEMS?

8 A. He was emblazoned with "HEMS" all over his uniform,
9 I believe.

10 Q. Was he wearing a bright orange jumpsuit?

11 A. Yes.

12 Q. At the point that you were assisting Thelma and
13 preparing to put her on a stretcher and take her out,
14 were you at any point made aware of the possibility of
15 secondary devices?

16 A. I don't -- I think someone did mention that that was the
17 reason we'd have to go anyway, because there's a fear of
18 a secondary device. I don't recall who that was,
19 though.

20 Q. I think, whilst you were stretching Thelma out and
21 carrying her out, is it right that Tony remained with
22 her the entire time?

23 A. Yes, the whole time, reassuring her.

24 Q. We've heard how difficult it is to walk along the
25 tracks.

1 A. Yes.

2 Q. How difficult was it from your point of view?

3 A. It was very difficult. It was quite hard to see. You
4 didn't really know where the lines were, the tracks
5 were, and there was debris still -- or there was debris
6 on the tracks. It was awkward, but we -- it's still
7 do-able.

8 Q. You've mentioned it was hard to see, but is it right
9 that the emergency lighting was on in the tunnel, or you
10 can't remember?

11 A. I couldn't recall.

12 Q. Eventually, you managed to take Thelma up and out and
13 I think she was taken -- put in an ambulance, is that
14 correct?

15 A. We put her down outside the front of the station where
16 more paramedics dealt with her.

17 Q. After that, what did you want to do?

18 A. Go back inside and help the firemen get the other lady
19 off the carriage, but we were stopped by a BTP sergeant
20 who said we couldn't go down because it hadn't been
21 checked for secondary devices.

22 MR HAY: Mr Tilley, thank you very much. I have no more
23 questions for you, but there may be some more.

24 LADY JUSTICE HALLETT: Mr Saunders?

25 MR SAUNDERS: Not from me, my Lady.

1 LADY JUSTICE HALLETT: Ms Sheff?

2 Questions by MS SHEFF

3 MS SHEFF: Just one from me, Officer. When you went into
4 the carriage you were asked about what you saw inside
5 and you told us about the naked bottom half of a body
6 which you at first thought was at D6 but could well have
7 been at D8 --

8 A. Yes.

9 Q. -- at the double doors, which showed no signs of life.
10 Can I just ask you this: rather than it being
11 a detached lower part of a body, could you tell if the
12 top part of the body was covered in debris from the
13 train or from the explosion?

14 A. It could have been. I don't think they were detached
15 because I think that would have stuck in my mind a lot
16 more.

17 Q. Yes, so it was just that the top part was hidden because
18 of the effects of the explosion in the carriage and the
19 devastation that had caused?

20 A. Yes, I would say so.

21 MS SHEFF: That's helpful, thank you very much, Officer.

22 LADY JUSTICE HALLETT: Any questions? Mr Hill?

23 Questions by MR HILL

24 MR HILL: Officer, just to start with the duty that you were
25 detailed to undertake that day before you were called

1 first to Liverpool Street and then on to Aldgate, there
2 were three vehicles, I think you told us, that were
3 carrying the different officers contained within the
4 Serials.

5 A. Yes.

6 Q. Those three vehicles, and therefore including you, were
7 all under the command of an inspector,
8 Inspector Wheeler?

9 A. Inspector Wheeler, yes.

10 Q. Inspector Wheeler I think was in your vehicle as well?

11 A. Yes, I believe he was, I think.

12 Q. So the instruction to go to Liverpool Street, can we
13 just understand, was that an instruction that came to
14 all of you, or did it come to the inspector and then he
15 gave the command to move?

16 A. It would come to the inspector and he would cascade that
17 down.

18 Q. All right, and for communications with GT, which you
19 referred to, were they principally also being, as it
20 were, channelled through Inspector Wheeler?

21 A. Yes, everything would have gone through the inspector.

22 Q. My Lady, we're hearing from him, he's giving evidence in
23 due course. You're called to Liverpool Street and then
24 on to Aldgate and, by the time you got to Aldgate, would
25 it be accurate to say the road was blocked, it was full

1 of ambulances, fire engines, emergency response units?

2 A. Yes, we couldn't get to the front of Aldgate station
3 itself. We had to debus probably about 100 metres away,
4 and ran the rest of the way on foot.

5 Q. In terms of police presence at the scene, there were BTP
6 officers already there, is that right?

7 A. Yes, that's correct.

8 Q. Do you recollect there being a British Transport Police
9 constable who was effectively at the door of the
10 station?

11 A. I don't recall that at the moment, I'm afraid.

12 Q. The driver of your carrier was a PC Barclay.

13 A. Yes.

14 Q. We're going to hear his statement read. And there were
15 still further emergency services arriving as you ran to
16 the scene itself.

17 Now, the instruction to go below ground came to you
18 through Sergeant Nanasi?

19 A. Yes.

20 Q. Each of the three carrier vehicles would have a sergeant
21 on board, is that right?

22 A. Yes.

23 Q. So he was one of the three sergeants. Was he your
24 sergeant on your vehicle for the day?

25 A. No, he wasn't. I was on 112B Bravo which was

1 Sergeant ...

2 Q. Don't worry about the names. The fact is, is this

3 right, that you were called across to take part in the

4 Underground detail because of your level 2 training?

5 A. Yes.

6 Q. So it's right, is it, that in terms of first aid

7 training provided to police officers, level 3 is the

8 first level.

9 A. Yes.

10 Q. The bottom level. You'd undertaken that training some

11 years before 2005.

12 A. Yes.

13 Q. You were then level 2 trained, and level 2 training

14 involves training over a period of some days, if not

15 a couple of weeks?

16 A. It's a ten-day course.

17 Q. A ten-day course, and that ten-day course is then itself

18 refreshed, is that right, once every few years?

19 A. Yes, it should be once a year or once every 18 months.

20 Q. Right. I think your level 2 refresher course, the most

21 recent one, was October 2004?

22 A. October 2004, yes, that's a two-day refresher.

23 Q. Thank you. It follows, does it, that you had a public

24 order medic officer's first aid kit with you?

25 A. Yes.

1 Q. I'm not going to labour the point, but it's the first
2 time, my Lady, that we've referred to this. Could I try
3 an INQ reference? [INQ10180-55]. It's the middle part of
4 that page, the "Public order medic officer's first aid
5 kit". This, my Lady, is evidence that we'll come back
6 to. It's exhibited by Susan Warner, the senior adviser
7 for first aid policy assurance and training for the
8 Metropolitan Police.

9 Just for you, Officer, can you identify that that is
10 the equipment in that table that you would have had in
11 your first aid kit that day?

12 A. Yes, that's correct.

13 Q. I'm not going to ask specific questions about the
14 contents, but we can see that set out.

15 You also had, is this right, something that you've
16 referred to as a stretcher. That's something akin to
17 a mat, isn't it?

18 A. Yes, it's a carry-mat.

19 Q. A carry-mat. Is it listed on the first aid kit?

20 A. It's not, no.

21 Q. So it's something that you had additionally?

22 A. It's something extra, yes.

23 Q. So it's a foldout mat that you carry somewhere in your
24 uniform or in your medic vest?

25 A. It's a canvas carry-mat with straps, handles along the

1 sides, and that's kept in the bottom part of our medic's
2 vest.

3 Q. On going down to the track, you were part of what became
4 Sergeant Nanasi's detail?

5 A. Yes.

6 Q. Inspector Wheeler stayed at the surface, I think, and
7 you were told -- is this right -- on going down by a BTP
8 inspector, for example, that the power was off?

9 A. The power was off, yes.

10 Q. This is a Metropolitan police officer's party. Were you
11 guided to the train or did you make your own way along
12 the track?

13 A. I don't recall. I think I was -- we numbered off, and
14 I was probably at the back of the queue and we just
15 followed everybody down, I followed my officers down.
16 I don't know if we were led there by another person.

17 Q. On reaching the damaged carriage, you have told us that
18 there were only two live survivors left on board the
19 carriage, or left on board or around the carriage,
20 forgive me.

21 A. Yes.

22 Q. A lady on the carriage whose name did you ever discover?

23 A. No.

24 Q. All right. So a lady on the carriage and then another
25 whose name you did discover, Thelma, that is Mrs Stober,

1 who was near the carriage. It was Mrs Stober whom you
2 in particular assisted?

3 A. Yes.

4 Q. You used your carry-mat, or at least you took your
5 carry-mat out?

6 A. Yes.

7 Q. Was it actually used to physically move that lady
8 a short distance?

9 A. Yes, it was a short distance and then she was put onto
10 a proper plastic stretcher which -- I don't know how
11 that appeared. I presume it was from the paramedic that
12 came down.

13 Q. Whom you referred to as being there?

14 A. Yes.

15 MR HILL: All right. Thank you, that's all I want to ask.

16 LADY JUSTICE HALLETT: Any other questions?

17 It looks as if that's all the questions that we have
18 for you, Mr Tilley.

19 I'm not sure from what you've said whether
20 Sergeant Nanasi gave you much choice about going down
21 into that tunnel.

22 A. It wouldn't have made a difference, my Lady.

23 LADY JUSTICE HALLETT: Whether you were given a choice or
24 not, you were fearless in what you did and you went down
25 to see if your medical training could help the

1 desperately injured and I'm sure they're all extremely
2 grateful for the help that you gave them. Thank you
3 very much.

4 MR HAY: My Lady, may I invite to you call Ian Bartley?

5 MR IAN BARTLEY (sworn)

6 Questions by MR HAY

7 A. PC Bartley, 2334.

8 MR HAY: Mr Bartley, on 7 July 2005, you were also a member
9 of the public order Serials, is that correct?

10 A. That's correct.

11 Q. You were also under the supervision of
12 Inspector Wheeler?

13 A. I was, yes.

14 Q. Did Inspector Wheeler also inform you of an incident at
15 Liverpool Street?

16 A. He did, yes.

17 Q. Can you recall roughly what time that was?

18 A. I believe we got the call via the radios at about 9.00
19 or shortly after.

20 Q. Did you make your way to Liverpool Street and actually
21 arrive there?

22 A. We arrived there briefly. We didn't depart the police
23 carriers. We pulled up and immediately were informed
24 that it was at Aldgate rather than Liverpool Street.

25 Q. Were you in the same carrier as Mr Tilley, or were you

1 in a different carrier?

2 A. I was in the A carrier with the inspector.

3 Q. Was Mr Tilley in that carrier or not?

4 A. He was in the second carrier, the B carrier.

5 Q. You didn't depart the vehicle, but then the message came

6 through for you to go to Aldgate. Is that correct?

7 A. I think we -- as we were about to depart the vehicle,

8 two BTP officers told us that it was at Aldgate and,

9 simultaneously, the radio informed us the same thing.

10 Q. What did you think at that point had happened at

11 Aldgate?

12 A. The message for Liverpool Street initially was an

13 accident of some type, and, as we travelled round to

14 Aldgate, I think we were still under the impression it

15 was at Aldgate, albeit more serious than we initially

16 thought.

17 Q. Are you able to say what time you arrived at Aldgate?

18 A. I think I put in my notes about 9.20 we arrived.

19 Q. When you arrived, what was the scene?

20 A. It was extremely busy, lots of vehicles. We were backed

21 up, we couldn't get to the front, we were backed up by

22 about 100 metres away from the front entrance to

23 Aldgate. There were lots of emergency service staff

24 and, also, as you got closer to the entrance, lots of

25 walking wounded.

1 Q. On arrival, did Inspector Wheeler -- and I think, were
2 you also under the supervision of Sergeant Nanasi?

3 A. I was, yes.

4 Q. Did they go out to establish what had happened?

5 A. Yes, the inspector and the three sergeants went forward
6 to ascertain what was going on and to come back and give
7 us our briefings as to what to do.

8 Q. Who came back to brief you?

9 A. I believe the Sergeant came back to inform us and
10 I think the other two sergeants went to their respective
11 units to tell them what to do.

12 Q. What did the sergeant tell you had happened?

13 A. I believe at that stage he said he believed it to be an
14 explosion. Whether or not he said a bomb or not,
15 I don't know. I think I put in my notes he did, but
16 I can't remember exactly now.

17 Q. Once you were told of that, what were you instructed to
18 do?

19 A. The A Serial went to the front of the station and
20 assisted the walking wounded to walk across to the
21 adjacent bus depot, whereby the other two Serials were
22 taking details and passing people on to be triaged and
23 into the buses where first aid could be given.

24 Q. You mentioned the walking wounded. Who was dealing with
25 the seriously injured at that point?

1 A. They also -- just outside the Aldgate station, there
2 seemed to be a reception committee of all the other
3 emergency services and paramedics and Fire Service
4 people were there to assist as well.

5 Q. I think there then came a point when you were instructed
6 to go down to the train. Is that right?

7 A. That's correct.

8 Q. Who asked you to do that?

9 A. I think the -- it came via Sergeant Nanasi.

10 Q. Why did he tell you you were required to go down to the
11 train?

12 A. To assist in evacuating the remaining survivors of the
13 carriage.

14 Q. How long after you'd arrived at Aldgate did that
15 instruction happen?

16 A. I can't say. Not -- five, ten minutes.

17 Q. You made your way down to the train, and I think, were
18 there other emergency services already down there?

19 A. There were. There was certainly the Fire Brigade were
20 down there and I'm not sure if they were already there
21 or not, or came after we were there. I believe HEMS
22 doctors were on scene.

23 Q. Were you aware of any paramedics being on the train at
24 that point?

25 A. I couldn't see on to the train to tell. I knew there

1 was emergency service staff on there. I couldn't tell
2 you from what service they were.

3 Q. What were the Fire Brigade doing?

4 A. I believe they were trying to free or assist someone
5 inside the carriage, and I think they -- as we went down
6 the line, I believe they were carrying someone back up
7 as well.

8 Q. Were you aware of any bodies on the track?

9 A. There were certainly two bodies I could see, I refer to
10 in my notes.

11 Q. Can you describe the first body you recollect seeing?

12 A. Yes. The first body I saw was a male laying face down
13 to the left of me as I was looking at the carriage. His
14 clothes had been removed by the blast, I assume, wearing
15 blue underpants.

16 Q. Was that male alive or dead?

17 A. Dead.

18 Q. And the second body you recall seeing?

19 A. Off in the distance I think I saw it more as I was
20 approaching the carriage, it was a half-covered-up --
21 the top half was covered and the lower half was showing.

22 Q. What was the top half covered with?

23 A. I can't recall, to be honest, unless I refer to my
24 notes.

25 Q. Do you recall whether or not that body was lying on the

1 tracks, on a stretcher?

2 A. I believe it was laying on a ladder or what was --
3 appeared to be a ladder.

4 Q. Were you able to tell whether or not that body was male
5 or female?

6 A. I wouldn't -- I couldn't tell you.

7 Q. But you were able to see the lower half?

8 A. Yes.

9 Q. Were there any injuries to the legs?

10 A. I've put in my notes that a leg -- I think I believe
11 I say the left leg was missing. At what point it was
12 missing from, I can't tell you.

13 Q. There then came a point, I think, when you were made
14 aware of the possibility of secondary devices.

15 A. That's correct. I was -- the Sergeant made me aware
16 that he'd had a message -- I'm not sure how that message
17 got to him, but I think it was believed to be a BTP
18 inspector -- that there was a possibility of a secondary
19 device and, for that reason, non-essential, unless you
20 were dealing with someone, at that point, he wanted the
21 emergency staff to start retreating back to the surface.

22 Q. Did you then start to make your way out of the tunnel
23 and towards the platform?

24 A. At that stage, I was only several of the officers that
25 went down, the medics primarily were dealing with --

1 were assisting with the casualty that was down there,
2 that we were able to get to. I was nearer the sergeant
3 and the sergeant informed me it was time to go and
4 I began to walk with him.

5 Q. I think there came a point when you were aware that the
6 other members of your Serial hadn't started to leave.

7 A. That's correct, it was a bit disjointed because of the
8 nature of the incident, and I was aware that we were not
9 all together to rectify that.

10 Q. Despite the possibility of secondary devices and without
11 regard for your own safety, you went back into the
12 tunnel, is that right?

13 A. That's correct, yes.

14 Q. When you went back into the tunnel, what did you do?

15 A. I could see that some of my colleagues were assisting
16 with a female that was just outside the carriage, and
17 I informed them that we needed to go once we'd finished
18 achieving what we needed to with this lady.

19 Q. Was that lady the same lady that Mr Tilley was treating?

20 A. I wasn't aware at the time, but I believe her name is
21 Thelma, yes.

22 Q. I think you, too, then helped with carrying her out, is
23 that correct?

24 A. That's right, I helped with moving her on the
25 carry-sheet on to a more rigid stretcher and then out of

1 the tunnels.

2 Q. Then you made your way carrying her out of the station?

3 A. That's correct, yes.

4 Q. When you regrouped, was it clear that your inspector was
5 in communications with other officers and other
6 organisations?

7 A. I believe so. Obviously I can't be aware what he was
8 doing while we were down the tunnels, but he certainly
9 liaised with the sergeant on our arrival back to the
10 surface.

11 MR HAY: Mr Bartley, thank you very much. I have no more
12 questions for you.

13 A. Thank you.

14 LADY JUSTICE HALLETT: When you left, Mr Bartley, what were
15 the London Fire Brigade who remained there doing?

16 A. They were still on-site, inside the carriage. What they
17 were doing inside I can't tell. I can only speculate
18 that they were trying to free a lady that was in there.

19 LADY JUSTICE HALLETT: Thank you. Mr Saunders?

20 MR SAUNDERS: Nothing from me, my Lady.

21 LADY JUSTICE HALLETT: Ms Sheff?

22 MS SHEFF: No, thank you.

23 LADY JUSTICE HALLETT: Yes, Ms Canby?

24 Questions by MS CANBY

25 MS CANBY: Mr Bartley, just one question on behalf of

1 Transport for London. Prior to setting foot on the
2 tracks, were you told by a BTP inspector that the power
3 in the rails had been turned off?

4 A. That's correct, we were reassured by him.

5 MS CANBY: Thank you.

6 LADY JUSTICE HALLETT: Any other questions for Mr Bartley?

7 Thank you very much indeed, Mr Bartley. I think
8 you're another officer where I'm not sure whether
9 Sergeant Nanasi gave you very much choice about going
10 into the tunnel, but you certainly had a choice about
11 going back and you put your own life at risk to make
12 sure your colleagues were safe, so thank you for all
13 that you did that day.

14 A. Thank you.

15 MR KEITH: My Lady, may I invite to you call Sean Clarke?

16 MR SEAN CLARKE (sworn)

17 Questions by MR KEITH

18 MR KEITH: Good morning. Could you give the court your full
19 name, please?

20 A. My name is Sean Clarke.

21 Q. Mr Clarke, I believe you're retired now, but in 2005,
22 you would have been known as Sub-Officer Clarke?

23 A. Temporary Sub-Officer Clarke, yes.

24 Q. You were a firefighter?

25 A. Leading fireman at the time. The Fire Brigade were

1 going through a transition in rank structure, so I was
2 Crew Manager, Acting Sub-Officer.
3 Q. A crew manager, a leading fireman, and a sub-officer.
4 You were employed then at the Stoke Newington fire
5 station?
6 A. No, I was based at Clerkenwell fire station.
7 Q. Oh, you were Clerkenwell, right.
8 A. And I was sent to Whitechapel for the shift.
9 Q. Let's have a look at this in a little more detail.
10 Where were you based on a daily basis at that time?
11 A. On a daily basis at Clerkenwell fire station.
12 Q. What does it mean to say that you were sent to
13 Whitechapel for a shift?
14 A. Whitechapel needed an officer in charge for the night
15 duty, and I was sent there the previous night.
16 Q. So you were the officer in charge over that preceding
17 night, the night of 6 July?
18 A. Correct.
19 Q. Is that what you mean when you say in your statement
20 that you were the watch commander, it's because you were
21 the officer in charge at that time?
22 A. Yes, that's correct.
23 Q. As a firefighter, leading fireman, were you designated
24 to a particular piece of equipment, a particular
25 Fire Brigade appliance?

1 A. Yes, I would have ridden on the front of the -- of
2 Whitechapel's pump ladder.

3 Q. When you were assigned to Clerkenwell for the night as
4 the officer in charge, did your appliance, the pump
5 ladder, go with you, or would you then be assigned
6 temporarily to another appliance?

7 A. If there were enough staff, I would be on the back of
8 the pump ladder or the front of the pump, it depended.

9 Q. Right, and what's a pump ladder, or what was a pump
10 ladder? Maybe the terminology has changed.

11 A. On two appliance stations, there's two fire engines, one
12 carries a long extension ladder on the back, which the
13 officer in charge rides, or the officer in charge of the
14 station rides. The other is the pump which goes more
15 often or not on more menial tasks, which the crew
16 manager would normally ride.

17 Q. So that's a pump ladder as distinguished to a pump?

18 A. Yes.

19 Q. On that occasion, on 7 July, there was a call-out that
20 morning.

21 A. Yes.

22 Q. We know that you were assigned the call F331.

23 A. Correct.

24 Q. Each appliance gets assigned to it a different call
25 sign?

1 A. Yes, the other appliance would be Foxtrot 332.

2 Q. What was F331 that morning?

3 A. Pump ladder.

4 Q. It was a pump ladder, right. Could we have, please, on
5 the screen [LFB23-1]? My Lady, this is a MOBIS document
6 of which there was some discussion in the course of the
7 opening.

8 We can see there at the top of the list of
9 firefighters and Fire Brigade personnel who were
10 involved in the events of 7/7 from Aldgate your name,
11 "F331, Sub-Officer Clarke, Sean Raymond". So that's
12 you?

13 A. That's correct.

14 Q. If we go over the page [LFB23-2], towards the bottom, the bottom
15 half, we can see that this log was opened at 08.56.09.
16 At 08.56.49, there is a reference to an address,
17 St Botolph Street, and then, just under that, 08.57.36
18 "F331". Was that your call sign?

19 A. Yes.

20 Q. We know from the material, Mr Clarke, that "commit"
21 means that the controller electronically committed your
22 appliance F331 as one of the appliances to respond to
23 this emergency call.

24 A. Correct.

25 Q. Over the page [LFB23-3], did there come a time at 08.57.39 when

1 you received a "mobilise" message? And we know that you
2 were one of the appliances to receive that message
3 because F331 is listed as one of the appliances in that
4 same box under the address.

5 A. Yes.

6 Q. Right. So you received the call to attend at 08.57.39?

7 A. Yes, that's correct.

8 Q. When you arrived at that address, St Botolph, which is
9 just by Aldgate, were you, because you were the leading
10 fireman and you were the officer in charge of that
11 station overnight, as well as the officer in charge of
12 the pump ladder, the incident commander when you
13 arrived?

14 A. Yes.

15 Q. When you arrived, we know from your statement you saw
16 a substantial number of members of the public, some of
17 them were injured.

18 A. Yes.

19 Q. What did you do, what was the first thing you did when
20 you arrived?

21 A. My crews were committed to initial first aid.

22 Q. Just pause there, who was with you, how many crew can
23 you recall you had on the pump ladder?

24 A. How it conspired is we were called to St Botolph's
25 Street which, as you face Aldgate station, is the road

1 to the left-hand side of Aldgate station. So we drove
2 past Aldgate station to St Botolph's Street where we
3 were called to on the pump ladder.

4 As we drove past the station, which is now on our
5 right-hand side, I could see some smoke rising from the
6 station, which is an open station. We continued round
7 the block and then pulled up outside the station. Our
8 pump had already pulled up prior to that, they had
9 pulled up in front of us.

10 Q. Do you recall which pump that was?

11 A. Foxtrot 332.

12 Q. That was F332?

13 A. Yes.

14 Q. Was F332 an appliance that included on board
15 Firefighter McPartland, do you recall?

16 A. I don't recall.

17 Q. You don't recall the names and who was assigned to it?

18 A. No, because it's not my normal watch.

19 Q. All right. So there were two appliances there, yours
20 and F332?

21 A. Correct, yes.

22 Q. Where did you go?

23 A. I went into the station, tried to ascertain who was
24 actually in charge of the station.

25 Q. Were there some London Underground staff there?

1 A. Yes.

2 Q. Did you speak to them?

3 A. I spoke to one member of the London Underground staff.

4 I didn't see any other emergency service or any other

5 person in uniform at the time.

6 Q. Any police officers in uniform?

7 A. I didn't see anybody, no. I asked him what had happened

8 and he said he thinks there had been an explosion on

9 one -- on a train. I then asked him to show me where it

10 was, and we proceeded down the stairs and along the

11 track towards the train.

12 Q. Later, we will see how steps were taken to assign

13 particular tasks to particular members of your watch and

14 how equipment dumps were established and certain other

15 steps were taken, but at this early stage, it appears

16 you went straight down, pausing only to speak to

17 a member of London Underground staff to find out where

18 the train was?

19 A. No, the London Underground staff, I followed him down.

20 So he was with me and we were talking on the way down.

21 Q. Yes, but you didn't wait, as soon as you found out that

22 there was a train, you went straight down to have

23 a look?

24 A. Yes.

25 Q. Right. How did you know the power was off?

1 A. I asked the LUL rep and, if memory serves me correctly,
2 he was unsure, and I remember just straddling the
3 tracks, and he said "Straddle the tracks, you'll be
4 fine". So at the time, I wasn't 100 per cent sure. He
5 thought it was off, but he wasn't 100 per cent sure.

6 Q. But you proceeded anyway?

7 A. We did, yes.

8 Q. You didn't, therefore, stop on the platform and wait for
9 anybody to run off and get confirmation?

10 A. No.

11 Q. By this stage, you hadn't phoned in to Control, had you?

12 A. I'm pretty sure we'd booked status 3 which tells Control
13 that we're actually there --

14 Q. But you hadn't sent a substantial message?

15 A. -- but I hadn't done anything else with Control.

16 Q. Right. How far did you go into the tunnel to see what
17 had happened?

18 A. It's difficult to say. It felt like we were walking for
19 ages. In reality, no more than, I'd say, 100 yards,
20 perhaps, perhaps 100 to 200 yards, I'm not even sure, to
21 be honest with you.

22 Q. You saw the train?

23 A. Yes.

24 Q. But you didn't go into it at that stage?

25 A. No.

1 Q. Did you go alongside it to alongside the bombed carriage
2 or did you stop once you'd simply seen that there was
3 a train and plainly there had been an explosion?

4 A. It's difficult, because your instinct is to get on the
5 train and assist and at least tell people that help's on
6 the way, but on the way down, the LUL rep said he thinks
7 some bodies had been blown onto the track. That,
8 judging with the casualties that I'd seen coming out and
9 that met us at the station, I just realised that time
10 was of the essence and I turned back -- right or wrong,
11 I turned back and decided to get more resources.

12 Q. Could we have [LFB23-3] on the screen, please? This is
13 further down the page at 09.05.19, a record of
14 a message, we can see 09.05.19, F331, so that's your
15 call sign:

16 "Incoming message. Sub-Officer Clarke at Aldgate
17 station London Underground. Instigate major incident
18 procedure."

19 Two questions, firstly: did you make the call or did
20 you ask another firefighter to make the call on your
21 behalf?

22 A. I came up to instruct my driver to make the call on my
23 behalf.

24 Q. What did you mean by your direction that he tell them to
25 instigate a major incident procedure?

1 A. Well, it ticked the boxes for what I needed. We needed
2 many ambulances, we needed plenty of firefighters and we
3 needed police control, and it ticked every box.

4 Q. Because that was the quickest way of getting the message
5 disseminated that you needed all emergency services to
6 get there?

7 A. Yes.

8 Q. Do you know where he made the call from, your driver?
9 Would he have had to go back to the appliance, or could
10 he have made the call over a radio inside the station?

11 A. No, I did actually go back to the appliance to --
12 because it's quite a big step for a -- someone of
13 sub-officer rank to make, I think, and I wanted to make
14 sure that he did it properly, went back to the appliance
15 and asked him to send the message.

16 Q. It appears, therefore, Sub-Officer Clarke, that you, in
17 fact, arrived at Aldgate relatively very quickly after
18 the bomb, because we know that was at 8.50, and you got
19 the message out that there should be a major incident --
20 procedure very swiftly after that.

21 A. Okay.

22 Q. You must have proceeded at some speed down to the track
23 and back up to your appliance.

24 A. If the distance covered is -- was less, I'm not sure of
25 the distance covered, but, yes, I agree with you. It

1 was fairly quickly.

2 Q. What means of communication did you have? You obviously
3 had the means of communicating through the driver's cab
4 in the appliance. Did you have a handheld radio?

5 A. I had a handheld radio, yes.

6 Q. Who would that have connected you to?

7 A. Pardon?

8 Q. Who would that have connected you to?

9 A. To my driver and to the other crew members who had
10 handheld radios as well.

11 Q. But not back to the control room?

12 A. No.

13 Q. If anybody wanted to speak to the control room, they
14 would have to go back to the appliance?

15 A. Correct, yes.

16 Q. Do you recall any discussion in that first stage with
17 any member of the London Ambulance Service?

18 A. I don't, I don't recall anything, no.

19 Q. After you'd made the call, what did you do, or after
20 you'd asked your driver to make the call, what did you
21 do?

22 A. Very -- as far as I remember, within a very short space
23 of time, I think Foxtrot 25, which is Shadwell's
24 appliance, turned up. On talking to the LUL staff,
25 I was made aware, as we walked down to the track, that

1 there were probably about 12 people in the carriage
2 still. I did try -- I was aware that there was still
3 a risk and I wanted to herd people away from the
4 entrance, just -- even if they just parted and left the
5 entrance clear, I wanted to herd them away from the
6 entrance.

7 Q. Because of a possibility of a secondary device?

8 A. A secondary device, which is -- it's in the back of your
9 mind, but it's -- yes, that was my main reason.

10 Q. Did you know what the cause of the explosion might have
11 been?

12 A. I didn't know. You have a good idea that it was
13 possibly, at that time in the morning, a terrorist
14 attack and what have you.

15 Q. Because it was in the rush hour, it was on a Tube train?

16 A. Yes, and there was -- when we arrived, there was some
17 talk about a surge in power, but that kind of got
18 dispelled very quickly, and it was quite apparent many
19 people with -- it seemed like a lot of people had lower
20 limb injuries, that was my main recollection of the day.

21 Q. Because you wouldn't have known the exact nature of the
22 bomb, whether it was a dirty bomb, CBRN-related, did you
23 have to instruct your colleagues and your crew to put on
24 personal detection equipment, EPD?

25 A. Just to make -- that would not give us any protection

1 against biological or chemical, but for radiation it
2 would give us an early warning. So I did actually make
3 the call to make sure they had them with them -- we are
4 supposed to carry them -- just to make 100 per cent sure
5 they did have them with them.

6 Q. On account of the fact that you were concerned to clear
7 the area to get people away, did you start any kind of
8 evacuation process or try to get your crews to help get
9 people away?

10 A. I didn't have any crews to help with at the time, they
11 were engulfed with casualty handling. I was trying --
12 I think, if memory serves me right, there were some LUL
13 staff that I was trying to ask move people away from the
14 station.

15 Q. Where were the rest of your crew at this stage? Were
16 they helping with the casualties at ground level?

17 A. The only two people I saw were working on -- as we faced
18 the station, a lady who was laying down on the floor
19 with stomach injuries, two crew were working on -- or
20 working with her, shall I say.

21 I don't recollect where the other crew were,
22 I really don't.

23 Q. Did you tell your crew at any stage to go down and help
24 on the train?

25 A. Not my own crew. When Foxtrot 25 turned up, their

1 officer in charge found me and said "What's going on?"

2 I explained there had been an explosion on the train.

3 I was aware there was casualties still on the train, and

4 asked him if he would go on to the train and sort it

5 out. He didn't seem to think that that was a problem.

6 He said "Leave it with me, I'll get it done".

7 Q. Did you see your fellow firefighters go down there? Did

8 you actually see them go down there?

9 A. No, I didn't. The next thing I heard was I think

10 a runner came up to say they needed some more ladders,

11 some more three-piece ladders. That inspired me to try

12 and get, like, an equipment dump set up nearer to them,

13 of anything that they might need, be it crowbars or

14 rapid intervention sets and things like this.

15 Q. So to save time, a forward equipment dump was

16 established?

17 A. Yes.

18 Q. You'd get equipment from the appliances, bring it into

19 the station, put it nearer the train, or somewhere on

20 the platform so they could come back and get it?

21 A. The platform is where I decided, yes.

22 Q. There came a time we know, 09.13, when another

23 firefighter, Station Officer Cook, appeared.

24 A. Yes.

25 Q. There was some discussion as to whether or not he would

1 then take over the command responsibility that you'd had
2 up to that point of incident commander. Do you
3 recollect that?

4 A. I don't.

5 Q. At 09.15.38, two minutes later, or thereabouts, [LFB23-5],
6 a call was made, 09.15.38, F331 again, your call sign:
7 "Incoming message. Sub-Officer Clarke at Aldgate
8 station London Underground. Explosion and fire on
9 Circle Line train approximately 100 metres from platform
10 area, unknown number of persons involved, Fire Brigade
11 and police evacuating area."

12 It seems that that call was obviously made by you or
13 on your direction around the time that you were
14 endeavouring to clear the area at the top.

15 A. Yes.

16 Q. Do you recollect, however, whether you made that call
17 before or after you had that conversation with
18 a colleague firefighter about sending people downstairs
19 to help?

20 A. I don't remember the timing of it.

21 Q. You don't remember, all right. Your colleagues and your
22 watch crew, as firefighters, are they trained to assist
23 medically as well as to address, in the most basic lay
24 terms, fires?

25 A. Basic first aid training, yes.

1 Q. They do. Did you have with you, yourself, any sort of
2 first aid equipment?
3 A. When I walked onto the track?
4 Q. Yes, with you on your body as you arrived at Aldgate?
5 A. No, not on me personally.
6 Q. Is it kept in the appliance?
7 A. It's kept on the appliance.
8 Q. Do you remember that first aid equipment being broken
9 out?
10 A. Yes.
11 Q. Did some of your colleagues take it, or did the first
12 aid equipment go into the forward equipment dump?
13 A. I think it was just taken as and when people -- I think
14 people were coming and just taking from it what they
15 needed. The appliance was parked fairly close to the
16 front of the station.
17 Q. Do you recall -- you told us you don't remember
18 Station Officer Cook appearing, but do you recall the
19 divisional officer, Mr Rigby, appearing?
20 A. No.
21 Q. There then came at 09.20.47 another call:
22 "Incoming message", F331. "Sub-Officer Clarke
23 unable to confirm at this time."
24 Do you know what that is a reference to?
25 A. No.

1 Q. You stayed in the Aldgate station area assisting --

2 A. Yes.

3 Q. -- for a long time after that, didn't you?

4 A. It felt like a long time, yes. It felt like quite
5 a long time.

6 Q. Was there a problem with a second train, a train that
7 needed detraining, to use the technical expression,
8 somewhere near Aldgate East? Do you recollect that?

9 A. I hadn't remembered it until you've suggested it now,
10 and I remember having a conversation with, I think,
11 DO Smith regarding detraining a train somewhere else.
12 I wasn't aware and I wasn't involved with it.

13 Q. You left the scene, according to your statement, around
14 about 12.30 or 1.00 --

15 A. Yes.

16 Q. -- and you had to leave your appliance behind and leave
17 on foot.

18 A. Yes.

19 Q. Why was that?

20 A. It was -- it had -- well, I'm pretty sure we were just
21 told to do so.

22 Q. Do you recollect a reason being given as to why?

23 A. There was a fair amount of equipment that was taken from
24 our appliance and I presumed it was easier to leave the
25 appliance there and walk back to Whitechapel fire

1 station.

2 Q. Might it have been because the area had been designated
3 a crime scene and there were questions of, for
4 continuity of evidence, and of -- to prevent
5 contamination, that you had to leave your equipment
6 behind? Does that ring a bell?

7 A. I can't say, I'm not aware of that.

8 Q. Finally, may I ask you to look at a document [LFB21-2]?
9 This is a summary, a document prepared after the event
10 of points which have gone well or aspects of the
11 attendance at an incident that has gone well and, by
12 contrast, points that one can learn from and
13 identification of things that might perhaps not have
14 gone as well as they might have done.

15 Do you recognise this document?

16 A. No, it's the first time I've seen it.

17 Q. You didn't have any hand in its preparation, then, we
18 may take it?

19 A. Shortly after, I can't remember what date it was, I was
20 called up to Stratford fire station to meet with the
21 Assistant Commissioner and there were two other senior
22 officers in the room as well as DO Smith.

23 Q. Was the purpose of that meeting to discuss lessons that
24 could have been learnt and to identify what went well
25 and perhaps what went less well?

1 A. I'm not really sure because, shortly afterwards, I was
2 told that I would receive a full PRC from them, but that
3 didn't happen, so --

4 Q. I should have asked you, what is a PRC?

5 A. I believe it's like a proper debrief summary to debrief
6 you properly from the incident and to go through your
7 learning points, what you'd failed to do, what you did.

8 Q. I was hoping you'd help me by remembering the actual
9 acronym, Mr Clarke, because I'm afraid I don't know it.

10 MR COLTART: My Lady, if it helps, it's performance reviews
11 of the command function.

12 MR KEITH: There we go, I'm very grateful to Mr Coltart --

13 LADY JUSTICE HALLETT: Thank you.

14 MR KEITH: -- several brownie points.

15 The third -- if we go back one page, please, to
16 page 1, we can see that it's Aldgate station at the top,
17 and station ground F33.

18 Does that give you some assistance as to whether or
19 not this related to something that you were concerned
20 with?

21 A. Yes.

22 Q. All right. Over the page, then, back to the first page,
23 the third entry indicates that there was a learning
24 point:

25 "The IC [incident commander] should consider

1 establishing liaison with MPS and LAS as soon as
2 practical at incidents where all emergency and essential
3 services are likely to have a protracted input."

4 Using that to jog your memory, did you encounter
5 difficulties communicating or liaising with your fellow
6 emergency services whilst you were at the scene in those
7 initial early stages as incident commander?

8 A. Yes, it was difficult to know who the incident
9 commanders of the police were and who the incident
10 commanders of the LAS were. I had no idea.

11 Q. Why does that matter, Officer?

12 A. So that they can instruct their crews and -- it's the
13 chain of command, really. So it can go down the chain
14 of command from myself being the Fire Brigade incident
15 commander to talk to the LAS incident commander. I had
16 no idea who --

17 Q. You had your own crews, of course. As you've told us,
18 you went down straightaway to investigate and to get
19 a message back to London Fire Brigade control almost
20 immediately setting out what had happened by way of
21 directing the major incident procedure.

22 A. Yes.

23 Q. Your own crew also went off to do other jobs and you
24 instructed the creation of a forward equipment dump.
25 Why does it matter when you know what you're meant to

1 do, and you've directed your own crews to do what
2 they're meant to do, that you can communicate with other
3 command officers?

4 A. So they know what we're doing, what we're up to in my
5 opinion. That -- you know, that they just know what
6 we're at and where we're at, and why we're doing it.

7 Q. Give us a practical example. If there had been perhaps
8 better communication or better liaison and you had known
9 who your fellow command officers were in the other
10 emergency services, what might you have found out or
11 what might you have asked them to do that might have
12 made a difference?

13 A. Just judging from the evidence given earlier, we would
14 have perhaps been aware that the first ambulance to
15 attend was to assess the situation and not start
16 ferrying people away. So as far as we're concerned, we
17 want to -- we're always taught about the golden hour,
18 how to get people out of a situation and get them care
19 as quickly as possible within the first hour, and
20 naively, perhaps, we think that the Ambulance Service
21 are there to do that, to ferry them off and get them
22 away from the situation.

23 Q. As it happened, when you went down, you didn't know,
24 until you asked for confirmation, that the power was
25 off. If there had been better communication of that

1 fact, would it actually have saved much time, or did it
2 not delay you for more than a second or two?

3 A. On every other Underground incident I've been on, we
4 normally get a confirmation that the power is off from
5 our own Control. That would have taken considerably
6 more time, I think. I'm not saying a long time, but
7 perhaps another five minutes or so.

8 Q. If you'd had to wait for that confirmation?

9 A. If we'd have to wait for our own Control to tell us that
10 we have confirmation that power is off. From what I --

11 LADY JUSTICE HALLETT: Are you instructed to wait for your
12 own control?

13 A. I can't remember, if I'm honest. I think that --

14 LADY JUSTICE HALLETT: Sorry, were you instructed?

15 A. Quite possibly that we should be waiting for our own
16 controls to tell us or to confirm that power is off.

17 LADY JUSTICE HALLETT: That sounds like a bit of a dog-leg
18 because if you're there at the scene, and
19 London Underground are telling you the power is off, it
20 seems odd that somebody else has got to ring your
21 Control and your Control then tell you.

22 A. That's how I've always worked -- or it's always seemed
23 to have been in the past. Bearing in mind that, you
24 know, as much as people can tell you the power is off,
25 until it comes from London Underground themselves, the

1 train can actually bridge their power and reenergise the
2 rail. So it's something to be careful of.

3 MR KEITH: If you'd waited for confirmation from Control
4 that would have delayed you. Alternatively, if the fact
5 that the power was off had been communicated more widely
6 round all the emergency services before you got there,
7 it wouldn't have delayed you?

8 A. Absolutely, yes. Correct.

9 Q. You actually received no wider information, you had to
10 ask the man on the spot "Is the power off?"

11 A. Yes.

12 Q. Secondly, there was obviously an issue as to what sort
13 of bomb it was.

14 A. Yes.

15 Q. Did it actually delay you to put on, to the extent that
16 you were able, the personal detection equipment and to
17 ascertain what sort of bomb, if you knew what it was, or
18 did you just, frankly, pile in downstairs anyway?

19 A. The training we receive does give you some indications
20 if there are chemicals, the number of people who would
21 be actually collapsed without any apparent signs of
22 injury. With regards radiation, our EPDs would give us
23 early warning of that. Biological, no, we don't know,
24 I guess we just take a chance on the biological side.

25 Q. Looking back, can you think of any more information or

1 any more assistance that you could have got over
2 a command net or from the other emergency services that
3 would have speeded up, if it could have been speeded up
4 at all, your activities and your actions in Aldgate once
5 you'd arrived?

6 A. In the very early stages, I don't think it could have
7 been speeded up. I'm happy that things went as they
8 should have done in the very early stages.

9 Q. Those were the early stages at the initial part of the
10 golden hour?

11 A. As far as I'm concerned, yes --

12 MR KEITH: Thank you very much, will you stay there, please,
13 Mr Clarke? There may be some further questions from
14 you.

15 LADY JUSTICE HALLETT: Can I get some idea of how long it's
16 going to take to question this witness?

17 MR COLTART: I suspect I will be about 15 or 20 minutes.

18 LADY JUSTICE HALLETT: In which case, Mr Coltart, I think
19 we'll break there and we'll come back at 2.00.

20 MR COLTART: Thank you.

21 (1.05 pm)

22 (The short adjournment)

23

24