

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

Hearing transcripts - 2 November 2010 - Morning session

1 Tuesday, 2 November 2010

2 (10.00 am)

3 MR KEITH: Good morning, my Lady. May I invite you to call
4 Steven Sudbury?

5 MR STEVEN JONATHAN SUDBURY (sworn)

6 Questions by MR KEITH

7 MR KEITH: Good morning.

8 A. Good morning.

9 Q. Could you give the court your full name, please?

10 A. Steven Jonathan Sudbury.

11 Q. Mr Sudbury, on 7 July 2005, you were a leading
12 firefighter with blue watch at Shadwell. Is that right?

13 A. That's correct, yes. I was -- my rank was
14 a firefighter, but I was temporary leading acting up.

15 Q. So you were. The appliance to which you were assigned,
16 Foxtrot 251, was the appliance under the command of
17 Sub-Officer Curnick --

18 A. That's correct.

19 Q. -- who we heard from last week. I needn't trouble you,
20 therefore, with the times of your mobilisation and
21 arrival. Will you take it from me that you arrived at
22 Aldgate at 09.06.49 --

23 A. Yes.

24 Q. -- just about -- almost 7 minutes past 9. On the way,
25 did you hear any messages over the radio concerning the

1 declaration of the major incident?

2 A. Yes, it was quite near to the end of our journey.

3 I think we were practically there when we heard it.

4 Q. When you arrived, do you recall that one of the
5 Whitechapel appliances had got there before you and was
6 parked up?

7 A. Yes.

8 Q. Were there casualties already in the station area and
9 lying on the pavement at the entrance to the station?

10 A. Yes, there was both casualties on the pavement, lying on
11 the pavement, sitting up against the wall of the station
12 and also some casualties coming out of the station.

13 Q. Mr Sudbury, if you could keep your voice up --

14 A. Sorry.

15 Q. -- the microphone in front of you doesn't amplify your
16 voice, it's hard to hear, so I would be very grateful if
17 you would try to speak as loudly as you can.

18 We believe that you went over to the Whitechapel
19 appliance because that appliance had got there before
20 you to be briefed as to what you should do.

21 A. Yes, I originally went over with my sub-officer.

22 I think he was trying to gather some information from --

23 I think it was Leading Firefighter Edwards, and whilst

24 they were passing information, I decided that I should

25 make myself busy with a different task.

1 Q. What was that?

2 A. I started to lay out some hose, just in case it was
3 needed to go down into the station.

4 Q. Did you know anything about the nature of the incident
5 at this stage and whether, in fact, hoses would be
6 required?

7 A. In my statement, I believe I wrote that we were
8 mobilised to smoke issuing from train. I have in my
9 memory thinking en route that it was actually -- we were
10 actually told it was a power surge. I'm not sure where
11 that came from.

12 Q. But, sensibly, you decided that if there was smoke and
13 there may be a fire, then hoses would be needed?

14 A. Yes. I mean, it's our training that, at most incidents
15 we turn up to where there's smoke, then you get hose
16 ready should you need it.

17 Q. Is it the practice, when you're laying out hoses, to lay
18 out a number of hoses, not just one, but four or five
19 sections of hose?

20 A. Yes, I mean, you make that decision on where you think
21 the incident is, because obviously one length of hose
22 would not get you very far.

23 Q. Yes. Do you recall what task Firefighter Anderson
24 busied himself with?

25 A. Yes, he was -- he carried out first aid on casualties

1 outside the station.

2 Q. Do you recall anybody going back to the appliance to get
3 laerdal resuscitators and more first aid kits? You say
4 in your statement Mr Anderson went back to the appliance
5 at some stage after you had arrived to get some more.

6 A. He -- if that's what I wrote, I believe that would be
7 correct.

8 Q. All right. In any event, there came a time when you
9 were instructed to go downstairs to the track with
10 Sub-Officer Curnick and two other firefighters?

11 A. Correct, yes.

12 Q. We understand that you had your breathing apparatus on.

13 A. We did, yes.

14 Q. Do you recall that? Did you go straight onto the track
15 or did you wait for confirmation that the power was off?

16 A. We waited for confirmation that the power was turned
17 off.

18 Q. How long did you wait?

19 A. It was -- I'd say it felt like two to three minutes, was
20 what I wrote in my statement. It was very hard to judge
21 times and how long -- like, durations down there,
22 because it was chaos and we didn't really know what was
23 happening first of all.

24 Q. Was it not obvious that passengers were already walking
25 along the tracks?

1 A. It was obvious that passengers were walking along the
2 edge of the tunnel. As we were looking into the tunnel,
3 they were on the far left up against the wall. It's not
4 obvious that they were touching any tracks and our
5 training and our procedure is to get confirmation.

6 Q. Whom did you get confirmation from?

7 A. Sub-Officer Curnick approached a -- I believe it was
8 a London Underground member of staff, to get
9 confirmation. He didn't know the answer, first of all,
10 so he proceeded to get confirmation for us.

11 Q. Were you the first firefighters that you could see down
12 at that level in the station?

13 A. Yes.

14 Q. Do you recall an inspector from the British Transport
15 Police coming out of the tunnel and telling you that the
16 power was off?

17 A. No, I don't.

18 Q. Did anybody approach you while you were on the platform
19 and talk to you about the power or the absence of power?

20 A. Not of power. I have a memory of what I presumed was
21 a passenger -- he looked a little bit injured, maybe
22 a bit dazed -- approaching us and just in quite a casual
23 way saying "There's people down there that I think they
24 need help", and I told him that we would go down and
25 help them and that, if he carried on out of the station,

1 he could receive help outside.

2 Q. Was he on his own or accompanied by another passenger?

3 A. There was -- I mean, there was a stream of passengers
4 coming along the tunnel and I can't recall whether he
5 was -- anyone was standing next to him or walking with
6 him, but --

7 Q. All right. You then proceeded towards the carriage.

8 A. Yes.

9 Q. Did you go into the second carriage, the carriage that
10 contained the bomb?

11 A. I started to, because I approached it with
12 Sub-Officer Curnick and, as I was just climbing up into
13 the doorway, I was asked to carry out a different task,
14 I think someone needed help to move further along the
15 platform or to try to get out.

16 Q. Before you went off to carry out that task, do you
17 recall looking into the carriage and seeing injured
18 passengers inside the doorway?

19 A. I remember looking in to the carriage. I remember it
20 looking like a bomb had gone off, but I've -- I didn't
21 spend long in that doorway at all, and I don't remember
22 the whereabouts of anyone in there specifically.

23 Q. In your statement, you say there were bodies scattered
24 around the carriage and you remember the body of a man
25 lying on the floor of the carriage in front of you.

1 A. Right.

2 Q. "He was alive and moaning and groaning. He was lying
3 facing away from me. He had both of his legs blown
4 off."

5 A. Right.

6 Q. Do you recall, Mr Sudbury, that scene and seeing that
7 man, or are you now entirely reliant on what's in your
8 statement?

9 A. Reliant on what's in my statement, I'm afraid.

10 Q. Do you have any recognise now, independently of your
11 statement, of who was inside the carriage?

12 A. I'm afraid not, no. I've spent quite a while trying to
13 forget the whole thing and --

14 Q. Of course.

15 A. -- I wouldn't -- I'm not sure of specifics of inside
16 that carriage.

17 Q. All right. You go on in your statement to describe
18 a woman who was screaming about her back, and you recall
19 that you thought there may have been a body lying across
20 that lady. Do you recall anything of that?

21 A. That does ring a bell, yes. I think that that was
22 opposite, so she was in the seats looking out of the
23 train at us, I think.

24 Q. You are not very sure?

25 A. Again, I'm not 100 per cent sure.

1 Q. At any rate, was that the point at which
2 Sub-Officer Curnick asked you to return to the surface
3 and get more equipment and more staff, more medical
4 personnel?

5 A. Yes, that -- I think that bit happened very quickly
6 because I believe I helped -- I believe I helped
7 a casualty up and on their way out, and I think that
8 a member of the public then helped them out, took them,
9 and that was when Sub-Officer Curnick asked me to go to
10 the surface.

11 Q. Do you recall why he asked you to go up?

12 A. I don't recall him --

13 Q. If you can't remember, don't worry.

14 A. -- saying it, no. I can imagine why he would, but
15 I don't remember him telling -- giving me a reason.

16 Q. In your statement, you describe how he asked you to
17 return to the surface to request many more staff,
18 firefighters, medical staff and cutting equipment. Does
19 that ring a bell?

20 A. Yes.

21 Q. You then had to walk back up to ground level and, on the
22 way, do you remember passing another firefighting team,
23 firefighting crew, from Bethnal Green?

24 A. Yes, I think they were on the platform at the time
25 walking towards the tracks.

1 Q. Did the Bethnal Green crew consist of firefighters
2 Kevin Richards and Neil Walker and some others, do you
3 remember?

4 A. I know of them working at that station.

5 Q. Right.

6 A. I can imagine it would be, but I don't remember seeing
7 specific faces.

8 Q. When you got to the surface, do you recollect telling
9 somebody about the requests for more equipment, cutting
10 equipment, and more medical staff?

11 A. Yes.

12 Q. Do you remember whom you told?

13 A. I'm afraid I don't, no.

14 Q. What did you do after you'd relayed the message?

15 A. I was quite anxious to get back down to my crew, so
16 we -- I believe that it was already in the -- the crew
17 up -- the staff up top, were already in the process of
18 getting equipment to bring down, and I think I picked up
19 a short extension ladder, because we make use of those
20 as stretchers, and started to make my way back down to
21 the tracks.

22 Q. But what happened? Did you take the ladder down, in the
23 end, or not?

24 A. I took the ladder down onto the platform and then
25 I realised that there was quite a lot of Fire Brigade

1 staff, also with ladders, and each ladder has three
2 sections of it, so I believe there was four other
3 members of staff, so that results in quite a few
4 stretchers and I made the decision to take a different
5 piece of equipment.

6 Q. Was that a generator?

7 A. It was, yes.

8 Q. So you carried that down to the track?

9 A. Yes.

10 Q. Then, when you got back down, were you asked to carry
11 out a check or a search round the back of the train?

12 A. Yes, sir.

13 Q. How did you manage to do that?

14 A. I think I recall going back along the train towards the
15 platform on the open side of the tunnel, trying to look
16 under in any spaces that I could. I was also calling if
17 anyone could answer me, and then I got round the other
18 side of the train up against the tunnel wall and that
19 was a very tight space.

20 Q. It must indeed have been a very tight squeeze.

21 A. I made my way as far as I could along. I don't think
22 I managed to make it all the way around the train,
23 because I reached an obstruction, I think.

24 Q. But you satisfied yourself --

25 A. I did.

1 Q. -- that you could neither hear nor see anybody caught
2 between the train and the tunnel wall?

3 A. Yes.

4 Q. Having done that, were you then asked to go back to the
5 surface again to get more equipment, in particular
6 blankets for casualties?

7 A. Yes, I think that was a stage further along. I believe
8 I was asked to collect information of the number of
9 Fire Brigade staff and personnel actually down in the
10 tunnel at that time and their rank.

11 Q. Was that for the purposes of doing a headcount to ensure
12 that everybody was accounted for?

13 A. I believe so. I was asked by a senior officer, so ...
14 that was his reasoning and I just carried out the task.

15 Q. Once you did the headcount, was that when you went to
16 the surface and got some blankets?

17 A. Yes, I went -- before going to the surface, I went to --
18 I believe Firefighter Kelly was tending to a casualty on
19 the tracks, and I went over to him. It's all a bit
20 vague, but I think I went over to him to ask if he
21 needed help with anything.

22 Q. Yes.

23 A. I believe there may have been a paramedic or a member of
24 the London Ambulance Service there at the time, and that
25 was when I was asked to get some blankets from the

1 surface.

2 Q. Which you did?

3 A. Which I did.

4 Q. When you came down for the final time, do you recall
5 whether there were any live casualties still being
6 brought out of the carriage?

7 A. I know in my statement I said that there was a live
8 casualty coming -- being brought out of the train, but
9 my -- I -- at this time, I don't recall all the details,
10 I couldn't say who it was, even whether it was male or
11 female, because I went back to the casualty that was on
12 the tracks; that was my aim and my goal, to go back
13 there.

14 Q. Did you assist with the carrying of that casualty on
15 a stretcher up to the surface or did you leave with
16 other firefighters who weren't carrying the stretchers?

17 A. I think that, when I got back to that casualty, I think
18 that the paramedic gave us a sign that that casualty was
19 no longer alive, I think. It's, again, very vague.

20 Q. Could you be mistaken about that?

21 A. I could be, yes. I remember leaving -- carrying
22 a casualty on a stretcher, on a stretcher, there was
23 five Fire Brigade -- four, five Fire Brigade personnel,
24 and a paramedic, I believe.

25 Q. Was that a live casualty?

1 A. Yes. I believe that this casualty had an oxygen mask
2 on. We were carrying out the stretcher and I think the
3 paramedic was holding the mask.

4 Q. Was that person taken up to the ground level?

5 A. Yes.

6 Q. And you and others?

7 A. Yes.

8 Q. Did you go back down again after that?

9 A. No, sir.

10 Q. I think afterwards, you were told that you could go to
11 a nearby church for a cup of tea, and I think you were
12 then told to write some notes trying to set down, as
13 best you could, your recollections of what had occurred?

14 A. Yes, that's correct.

15 MR KEITH: Mr Sudbury, thank you very much. Will you stay
16 there? There may be some further questions for you.

17 LADY JUSTICE HALLETT: Mr Saunders?

18 Questions by MR SAUNDERS

19 MR SAUNDERS: Mr Sudbury, help us if you can. You've been
20 invited to consider by Mr Keith Firefighter Anderson.

21 Do you remember?

22 A. Yes.

23 Q. He reminded you that in your statement you had said
24 Anderson had gone back to the appliance and he got
25 a first aid kit and a laerdal resuscitator.

1 Do you remember him doing that now?

2 A. I don't have a mental image of him going back and
3 getting kit.

4 Q. From your appliance, were the medical supplies kept on
5 the surface or were they taken underground?

6 A. I couldn't say for certain where our medical equipment
7 ended up. I believe that we -- our crew, when we went
8 down to the tunnel, I believe that we took some first
9 aid equipment down with us, but I couldn't tell you
10 whether I picked that up from the pavement or from
11 a machine.

12 Q. Do we take from that, Mr Sudbury, that you can't
13 remember now what actual equipment it was that was taken
14 down?

15 A. I -- yes, I don't -- I couldn't tell you 100 per cent
16 certain what I had and what everyone else had. I could
17 only tell you what I would think to take down. Whether
18 that happened --

19 Q. I'm not going to press you. If you can't remember, in
20 fairness to you, Mr Sudbury, I'm not going to press you.
21 You then described that you had gone down with your
22 team and you got the breathing apparatus on and you
23 described a gentleman, a passenger, coming off and
24 obviously being evacuated outside.

25 A. Yes, sir.

1 Q. Her Ladyship has heard some evidence, in particular from
2 one gentleman called Mr Henning, who was with
3 a solicitor, Melanie O'Dell. They recalled seeing
4 a team on their way down, but they don't describe them
5 on the platform, they describe them up on the stairs or
6 the mezzanine level.

7 First of all, do you understand what I mean by that
8 description?

9 A. Yes, sir, yes.

10 Q. So they say that they spoke to a team of firefighters
11 there. Was that -- could that have been your team?

12 A. I -- possibly, it could have. I don't recall my team
13 stopping at that level at all. If they say that the
14 team was stationary, then I don't believe it was our
15 team.

16 Q. They describe them with breathing apparatus on their
17 backs.

18 A. Mm-hmm.

19 Q. It's not clear how many teams actually had that. You
20 definitely were one team?

21 A. We did, yes.

22 Q. Mr Curnick. But you remembered it being on the platform
23 not up on the mezzanine level?

24 A. Yes, it was -- and it was at the end of the platform
25 where the tracks begin, because, as we were walking

1 along, I actually said to Sub-Officer Curnick, "Is the
2 power off?" And I believe that jogged his memory and
3 started the steps of getting confirmation.

4 Q. Because you've described in your statement that, in
5 fact, as you were approaching the track along the
6 platform, you saw London Underground staff and also two
7 men that you assumed had some authority, either police
8 in plainclothes or London Underground and you described
9 as being on the tracks.

10 A. Right.

11 Q. When you say that, do you mean they're off the platform
12 or do you mean they're literally on the tracks?

13 A. I -- when I say "on the tracks", I think I imagine in
14 the tunnel. So it could have been in the tunnel
15 entrance. Not on the platform.

16 Q. You go on to say that it's at that stage that
17 confirmation is sought that the power to the tracks is,
18 in fact, off. And that's the picture you have?

19 A. Yes, sir.

20 Q. Can I then ask you, please, about the carriage? You
21 describe that on the carriage -- you've mentioned the
22 gentleman who had lost his legs. Then you describe
23 seeing a woman to your left who was screaming, and
24 I think she had a body lying across her. Can I show
25 you, please, our plan? It's [INQ10280-8]

1 Have you seen this plan before, Mr Sudbury?
2 A. I was shown this, I think, midway through last week.
3 Q. Right. Well, can I try to help you to get your
4 bearings? The platform, as you're looking at it, is to
5 your right. So you would be approaching -- that's
6 right, you would be approaching from the right. The
7 track is on the bottom of that plan, as it were. That's
8 it. That's where the track runs underneath. All right?
9 A. Mm-hmm.
10 Q. We have all the doors, as you see, facing trackside
11 numbered evenly. Do you see D2, D4, D6 and D8?
12 A. Yes.
13 Q. Does it help you, this plan, as to which door you went
14 in with Mr Curnick?
15 A. It was either D -- door D6 or D8.
16 Q. Right. The lady you've described who was screaming and
17 may have had a body across her, we know that
18 number 20 -- do you see the seat number 20?
19 A. Yes, yes.
20 Q. -- is a female passenger, Crystal Main.
21 A. Right.
22 Q. Next to her is a male passenger, Bruce Lait.
23 A. Okay.
24 Q. Do you think that it's across there you saw this lady
25 lying?

1 A. It could be, yes. I was confused as to whether it was
2 passengers 16 and 19 or 18 and 20.

3 Q. At the moment, Mr Sudbury -- I don't want to confuse
4 you -- but at the moment, we've heard no evidence of
5 anybody lying across 16 and 18, the laps of the
6 passengers at 16 and 18.

7 A. 19.

8 Q. Forgive me, 16 and 19.

9 A. Okay.

10 Q. So if that helps you, we haven't heard anybody give an
11 explanation of a passenger being across those laps of
12 those two ladies. All right?

13 A. Okay.

14 Q. What we've heard is there's one and probably two
15 passengers lying across those people seated in 18 and
16 20.

17 A. Right. Okay.

18 Q. What I want to ask you, please, is whether or not you
19 recall one lady or two lying across or whether you
20 simply can't now remember, Mr Sudbury?

21 A. I couldn't say 100 per cent, but I believed it was one.

22 Q. Can you help me with this: do you think you and
23 Mr Curnick were the first of the firefighters to enter
24 the carriage, or were there already other firefighters
25 on there?

1 A. I believe we were the first.

2 Q. You believe you were the first. Can you help me with
3 this: were there any paramedics, so somebody from
4 outside coming on to the carriage, at this stage? Were
5 you aware of any other uniforms, is what I'm asking.

6 A. Not that I recall, no.

7 Q. So do you believe, Mr Sudbury, you're the first of the
8 uniformed emergency services?

9 A. I believe we were, yes.

10 Q. You described, when Mr Keith was asking you, the various
11 visits that you made back to the surface and back down
12 again and discussions about the radio.

13 Did I understand your evidence as this: that the
14 sub-officer from Bethnal Green -- did you know him, was
15 it Mr Robinson?

16 A. I do know Mr -- Sub-Officer Robinson.

17 Q. Is that the sub-officer you're talking about?

18 A. That I spoke to on the surface?

19 Q. That you spoke to on the surface and if I can just
20 remind you of what you were saying in your statement was
21 you'd gone for this extension ladder, the short
22 extension ladder, used as a stretcher, when you saw the
23 sub-officer from Bethnal Green who asked you to ask his
24 leading firefighter to change radio channels. All
25 right?

1 A. Yes.

2 Q. So that's the context and I wonder, first of all, was it
3 Mr Robinson?

4 A. If that's what I put in my statement, then I would be
5 sure that it was, because I know his face.

6 Q. You don't name him, that's why I'm saying.

7 A. Oh, excuse me.

8 Q. You don't name him. What you described him as was "the
9 sub-officer of Bethnal Green".

10 A. Then I couldn't tell you 100 per cent who it was.

11 I know to report to an officer with a white helmet,
12 they're easily identifiable, and that's who I went for.

13 Q. What I want to understand is this: how long do you think
14 it was -- your arrival, Mr Keith has mentioned, was at
15 09.06, about what time was it that you were being asked
16 to give this direction to change radio channels or for
17 another leading firefighter to change radio channels?

18 A. Maybe up to ten minutes. But that's a guess of how long
19 each task that I carried out took and taking into
20 account trying to run along in between train tracks, how
21 long that took me and to get upstairs.

22 Q. The reason I ask you that, Mr Sudbury, is her Ladyship
23 is going to hear other evidence in the next few days
24 about a concern of using radios with a potential
25 secondary device and, in fairness to you, it's something

1 you put in your statement. You say this:
2 "We had not been using our radios down in the tunnel
3 due to the risk that there might be a secondary device."
4 So was it a surprise to you when a sub-officer was
5 saying, "Get my leading firefighter to change channels"?

6 A. I don't recall being surprised by it. We're kind of
7 trained and you take it upon yourself that, when an
8 officer gives you an order to do something, you don't
9 question it, you do it, because time could be of the
10 essence.

11 Q. Do I understand by your statement, or should her
12 Ladyship understand, that your team weren't using radios
13 because of the concern of secondary devices?

14 A. That's a possibility, yes, of my evidence, yeah.

15 LADY JUSTICE HALLETT: Do you have any memory now of
16 actually trying to use a radio, or do you just not
17 remember?

18 A. I don't have a memory of using my radio, ma'am, no.

19 LADY JUSTICE HALLETT: So we don't know whether, even if you
20 would have tried it, it would have worked in the tunnel
21 anyway, because --

22 A. I'm afraid not, no. When our crew went down initially,
23 we were together and we were in talking distance of each
24 other and I had no need to use a radio myself. So I've
25 no memory --

1 LADY JUSTICE HALLETT: You were obviously being used, to
2 a certain extent, on some occasions, as a runner, to
3 take messages.

4 A. Yes, ma'am.

5 LADY JUSTICE HALLETT: Thank you.

6 MR SAUNDERS: To help you, Mr Sudbury, following on from her
7 Ladyship's question, your statement I think was
8 3 October. So albeit weeks, but it is weeks after this
9 incident, isn't it? Just to remind you what you say,
10 after that very passage about the sub-officer from
11 Bethnal Green, you say this, the very next sentence:
12 "We had not been using our radios down in the tunnel
13 due to the risk that there might be a secondary device."
14 Now, in fairness to you, does that help you -- her
15 Ladyship is asking: do you actually remember using them
16 or trying to use them? Does that part of your statement
17 help you as to whether you had made a conscious
18 decision, as a team, not to use them for the very reason
19 of secondary devices?

20 A. It helps me to confirm that that would be the procedure
21 that we would use. I have a memory of, when we were
22 first asked to get our breathing apparatus sets, we were
23 going down into the tunnel, Sub-Officer Curnick
24 explained that there was a possibility that it was an
25 explosion and, when you hear that -- and at that time,

1 you imagine and we're trained to think of secondary
2 devices, and in that instance, you don't use your
3 radios. So as I said, we were very close together, as
4 a crew, going down, we had no need to use our radios.
5 So I have no memory of using my radio.

6 Q. Can I then come on to this final passage where you're
7 describing, towards the very end of your time in the
8 tunnel, trying -- as it were, one lady who there was
9 some talk about being taken out of the carriage on
10 a stretcher.

11 Did that actually happen, do you remember?

12 A. I don't have a definite memory of it happening.

13 I can -- I would have to refer to my statement and what
14 I put at the time.

15 Q. What you said was:

16 "The woman with the bad back was taken out by a crew
17 on a stretcher and I also helped carry a man out on
18 a stretcher."

19 A. Right.

20 Q. Now, we know, towards the very end, there were three
21 people, who were, in fact, fortunate to survive, from
22 the far end of the carriage.

23 A. Right.

24 Q. But do you remember anybody from D6 being removed?

25 A. No, not that I could --

1 Q. Finally this, Mr Sudbury: you have mentioned that the
2 one person you recall assisting with had an oxygen mask
3 on.

4 A. I believe so, yes.

5 Q. Was that a male or female passenger?

6 A. A male, I believe.

7 Q. Do you recall how soon before that that oxygen had
8 arrived?

9 A. I don't know, no, because I wasn't dealing with that
10 casualty for a prolonged period of time.

11 Q. You were a carrier of the stretcher, were you?

12 A. Mostly, yes.

13 MR SAUNDERS: Mr Sudbury, I'm sorry to have to ask you to
14 remember all those things, thank you for your help.

15 LADY JUSTICE HALLETT: Ms Sheff?

16 Questions by MS SHEFF

17 MS SHEFF: Could we have the previous plan back up again,
18 please, and again, Mr Sudbury, I'm also going to
19 apologise for bringing back the clearly horrendous
20 memories of that carriage, but I just do want to ask you
21 about one particular aspect of it. You may not be able
22 to help. You've already said that you don't now have
23 any independent recollection. But there's just one
24 thing I want to suggest to you.

25 If you look at that plan, you can see that the

1 deceased are marked in red and you mentioned seeing, in
2 your statement, a body with legs blown off that was
3 moaning and groaning. You said:
4 "He was alive and moaning and groaning. He was
5 lying face away from me. He had both of his legs blown
6 off".

7 I represent the family of Lee Baisden, who did lose
8 part of his legs and died in that carriage, and you can
9 see where we believe his body to have been found around
10 6. Can you see that? That's between the double doors
11 D8.

12 A. Yes.

13 Q. There was another gentleman who also died in that area,
14 Richard Ellery, at number 11, also in that area of D6.
15 Mr Ellery survived after the bomb went off and we
16 believe that Mr Baisden died instantly. What I want to
17 ask you about is whether you think, in that devastating
18 scene of carnage, you may have allied the two bodies and
19 thought that the one body that was moaning and groaning
20 was actually the body which was missing the legs. Do
21 you think that's possible?

22 A. It's a big possibility, yes. I wasn't in the doorway
23 for a long time at all and I was trying to -- I was
24 trying to take in what had happened of the scene and
25 then I was called away and I don't have vivid memories

1 of that actual carriage, I'm afraid.

2 Q. No, indeed, it was probably all too vivid for you and
3 you didn't want to take in as much as was apparent to
4 you of the body parts and other things, which, no doubt,
5 you've now tried to forget.

6 A. Yes.

7 Q. But you think it is a possibility that you may have put
8 together what you saw of one man groaning and another
9 man missing his legs, and that that man without the legs
10 could, in fact, have been dead by the time you arrived?

11 A. That's a possibility, yes.

12 MS SHEFF: I'm very grateful for that. Thank you indeed,
13 Mr Sudbury. No further questions.

14 LADY JUSTICE HALLETT: Ms Boyd?

15 Questions by MS BOYD

16 MS BOYD: Mr Sudbury, can I just ask you a couple of
17 questions?

18 Sub-Officer Curnick, who gave evidence last week,
19 told us that you, as a crew, went down to the platform
20 and then on to the train within about five minutes of
21 arriving at Aldgate. Does that timing seem right to
22 you?

23 A. Yes, it does.

24 Q. I think you've already told us that your recollection is
25 that you went straight down to the platform and you

1 didn't hold back on the mezzanine or, indeed, on the
2 concourse?

3 A. I believe that's correct, yes.

4 Q. You were asked what equipment you took down and I think
5 you were having difficulty remembering that. I wonder
6 if I can try to prompt your memory?

7 Again, Mr Curnick told us that you took first aid
8 and a laerdal. Again, does that help you at all, or do
9 you really have no memory of it at all now?

10 A. That sounds like the type of equipment we would take
11 down initially, but my memory of what I was actually
12 carrying, I don't recall it.

13 Q. I understand. Having got down to the train, I think
14 Mr Curnick got into the carriage, didn't he?

15 A. Yes.

16 Q. Then, within a very short time, I think you say you were
17 assisting a passenger and then told to go up to the
18 surface --

19 A. Yes.

20 Q. -- to get some more equipment and further firefighters.
21 You described, however, on your way, you passed
22 certainly firefighters from Bethnal Green. Do you
23 recall passing other firefighters, because we've heard
24 a crew from Southwark was also deployed around about
25 that time?

1 A. Yes, I do recall passing other Brigade members.

2 Q. Does it appear from what you tell us that you took down
3 an extension ladder, but then decided to pick up
4 a generator because there was already an extension
5 ladder there, but the firefighters coming down were
6 already bringing equipment with them?

7 A. Yes, there was -- because I didn't bring the generator
8 down from the surface, I think I picked it up from the
9 platform.

10 Q. So somebody had already brought that down?

11 A. Someone would have already brought it down.

12 Q. From what you've told us, there was enough extension
13 ladders for makeshift stretchers and that's why you took
14 the generator?

15 A. You can never make the assumption that there was enough.
16 I -- there was a very large number of people walking out
17 of the tunnel. I made an on-the-spot decision that
18 there was an adequate amount of ladders and that the
19 tunnel was quite dark and there may be a need for
20 lighting, for us to get extra lighting down there, any
21 cutting equipment and, to use that, we would use
22 a generator.

23 Q. Presumably you also assumed the paramedics, although not
24 there at the moment, were on their way and they would,
25 of course, bring medical equipment and stretchers?

1 A. That's correct, yes. Parts of my brief when I went to
2 the surface initially was to also request additional
3 hands, personnel, to help. I had to relay that we
4 weren't using breathing apparatus because it had been
5 deemed safe enough to breathe without it, and that piece
6 of information is quite important, because crews that
7 get committed in breathing apparatus are hindered by the
8 weight of it and the procedures of -- the safety
9 procedures of monitoring them booking in. So I had to
10 tell that that wasn't needed.

11 MS BOYD: Thank you very much, Mr Sudbury.

12 A. Thank you.

13 LADY JUSTICE HALLETT: Any further questions? Thank you
14 very much, Mr Sudbury.

15 Just one question from me: do I correctly gain the
16 impression that, as a firefighter, certain things are
17 drilled into you until they become second nature?

18 A. Yes, ma'am, yes.

19 LADY JUSTICE HALLETT: Is it also right to assume that
20 that's really for two purposes: one, obviously safety,
21 but the other, to save time, to ensure that you do
22 things automatically so that you don't then waste time?

23 I was thinking about putting out your hoses, for
24 example. That sounds to be like something that's
25 drilled into you to do because the chances are, as

1 a firefighter, you're going to need it.

2 A. Yes, in the case of the hoses, any incident that we
3 arrive at that could include fire -- the first part of
4 an incident is always information-gathering, because you
5 need to know what you're dealing with, and
6 Sub-Officer Curnick was doing that by speaking to the
7 officer that was already there, and I had the idea of
8 just laying out hose, because if we -- if the
9 information came back that there was a fire down there,
10 then it would save time that hose was already laid out
11 and we could take it straight down.

12 LADY JUSTICE HALLETT: As far as your training in relation
13 to dealing with incidents in a Tube station and the
14 Underground and the power being off, what are you
15 actually taught, as far as the power is concerned?

16 A. You get confirmation. You wait for confirmation,
17 because the reason for that is, if you proceed onto the
18 track and the power is still on, then you become extra
19 casualties and you're not able to help anyone else.

20 LADY JUSTICE HALLETT: So you get in the way rather than
21 help?

22 A. Yes, ma'am.

23 LADY JUSTICE HALLETT: Apart from obviously causing
24 desperate injuries. As far as using radios is
25 concerned, obviously, if there's an explosion, sadly, we

1 know that these days emergency response teams are very
2 often the targets of secondary devices, so you are
3 taught about that, that secondary devices are sometimes
4 planted specially targeted at you?

5 A. Yes.

6 LADY JUSTICE HALLETT: What are you taught about radios in
7 relation to secondary devices?

8 A. We have distance radiuses that we don't use each of our
9 radios in. So a fire appliance has a main scheme radio.
10 That's not used within a certain radius, and our
11 handheld radios are not used within another radius of
12 where we expect or suppose a secondary device to be,
13 because we are told that it could trigger the next
14 explosion.

15 LADY JUSTICE HALLETT: Thank you very much indeed,
16 Mr Sudbury. It's human nature to try to block out
17 experiences of the kind you went through, so thank you
18 for coming along to try to help us. I'm sorry that we
19 had to ask you to go through it again and thank you for
20 all you tried to do on that day.

21 A. Thank you.

22 LADY JUSTICE HALLETT: Thank you.

23 MR KEITH: My Lady, may I invite you to call David Parnell?

24 MR DAVID ANTHONY PARNELL (sworn)

25 Questions by MR KEITH

1 MR KEITH: Good morning.

2 A. Good morning.

3 Q. Could you give the court your full name, please?

4 A. David Anthony Parnell.

5 Q. Mr Parnell, in 2005, you had been, I think, with the

6 London Ambulance Service for some 15 years?

7 A. That's correct.

8 Q. Had you been a paramedic for some nine years?

9 A. Yes.

10 Q. Were you operating out of Islington, London Ambulance

11 station?

12 A. That's correct.

13 Q. I'm going to start by asking you a fairly obvious

14 question. I'm sure you'll know the answer, but we may

15 not. What is a paramedic and how does he or she differ

16 from a doctor?

17 A. A paramedic -- the training states that you could --

18 it's advanced training from technician, where you could

19 use intravenous drugs and intubation, and from a doctor,

20 where a doctor could -- is more advanced.

21 Q. So you're on the intermediate rank, if you like.

22 A technician can apply first aid, but you, as

23 a paramedic, can use intravenous drugs and intubate

24 patients; a doctor has got perhaps wider experience and

25 can do more?

1 A. That's correct.

2 Q. In July of 2005, were you part of what's called

3 a Physician Response Unit that operates from

4 Royal London?

5 A. That's correct.

6 Q. Is that a Fast Response Unit that normally has a doctor

7 and a paramedic in it?

8 A. That's correct.

9 Q. On that morning, were you in that vehicle?

10 A. Yes.

11 Q. On your own or with a doctor?

12 A. On my own.

13 Q. Can you recall why that was so, why there was no doctor

14 with you?

15 A. The doctor didn't start until 9.00.

16 Q. But you had started work at 7.00 that morning?

17 A. That's correct.

18 Q. Was it normal for you to have to do two hours on your

19 own without the doctor?

20 A. Yes.

21 Q. Do you know why?

22 A. I believe it's just contract.

23 LADY JUSTICE HALLETT: What kind of vehicle is it,

24 Mr Parnell?

25 A. On the day, it was a Subaru Impreza.

1 LADY JUSTICE HALLETT: A Subaru?

2 A. Yes, that's correct, my Lady.

3 MR KEITH: We know from your statement that it had blues and
4 twos, blue lights or some sort of lights and a tone,
5 a siren?

6 A. That's correct.

7 Q. Can you recall what you were wearing?

8 A. In my statement, I said I was wearing an orange
9 jumpsuit, but further recollection, the PRU, we are red
10 jumpsuit, to distinguish ourselves from the ones who
11 normally go on the helicopter.

12 Q. On top of your red suit, is there any writing?

13 A. On the front, there is small Velcro that says -- that
14 you can put "Paramedic" or "Doctor", so it's -- and
15 also, on the back, you've got the same, but in larger
16 writings, with "Paramedic".

17 Q. So on the back of your red suit, there was the wording
18 "Paramedic"?

19 A. That's correct.

20 Q. So plainly visible to anybody who saw you?

21 A. That's correct.

22 Q. Did you have any kind of tabard on top, a vest, a high
23 visibility jacket or a slip of any kind?

24 A. Yes, we carry an ambulance jacket and a tabard.

25 Q. That morning, do you recall whether you were wearing

1 either the ambulance jacket on top of your orange suit
2 or the tabard?

3 A. I wasn't wearing either.

4 Q. You weren't wearing either. From your statement, it
5 appears that that morning you were on the way to
6 Islington in your Fast Response Subaru to collect some
7 paperwork from the ambulance station there?

8 A. That's correct.

9 Q. As you approached Islington, you saw the duty station
10 officer there, a Mr Halawi, drive off rapidly in the
11 other direction?

12 A. That's correct.

13 Q. So you quickly gathered that something was up?

14 A. Yes.

15 Q. Did you receive a message over the radio to similar
16 effect?

17 A. No, he called me on the mobile phone stating that there
18 was an incident at Liverpool Street and asked if I was
19 attending.

20 Q. So what did you do?

21 A. I then rang the HEMS desk in the control room to find
22 out what was going on, and the information, and I was
23 then tasked to attend.

24 Q. Although you are a paramedic with the Physician Response
25 Unit at the Royal London and not, in fact, a helicopter

1 medical technician, you are controlled by the HEMS desk
2 at the Royal London. Is that right?
3 A. That's correct.
4 Q. How did you contact the HEMS desk?
5 A. By phone.
6 Q. By your mobile phone?
7 A. Yes.
8 Q. Is there not a radio in the car?
9 A. There is a radio in the car, but it was busy at the
10 time.
11 Q. Do you recollect whether it had -- how many channels do
12 you recollect it having?
13 A. The radio system it contacts any of the sectors in the
14 control room but only have one channel to contact the
15 HEMS desk.
16 Q. So if more than one person is calling in at any one
17 time, other people just have to wait or they can't get
18 through?
19 A. That's correct.
20 Q. You couldn't get through on your radio?
21 A. No.
22 Q. So you had to use your own mobile phone?
23 A. The mobile phone comes with the car, a service mobile
24 phone.
25 Q. Does it connect directly to the HEMS desk or is it

1 a phone from which you can make a call to anybody?

2 A. It's a phone that you can make a call to anyone.

3 Q. Having spoken to the HEMS desk, were you directed to

4 Liverpool Street?

5 A. That's correct.

6 Q. Did you go straight there, or did you continue to the

7 ambulance station quickly to pick up something?

8 A. I was virtually at the ambulance station, and the

9 paperwork that was required was in the mess room, which

10 is literally four, five seconds away, which I grabbed.

11 Q. Was it an easy journey to Liverpool Street?

12 A. It was until I got close to Liverpool Street.

13 Q. Then what happened?

14 A. There was a backlog of traffic.

15 Q. Did you see a BTP van, British Transport Police van in

16 front of you?

17 A. That's correct.

18 Q. What did they do to get through the traffic?

19 A. Initially, they had their blue lights and sirens on.

20 Q. What did they do? Do you recollect some officers

21 getting out of the van and clearing traffic for you?

22 A. Yes, as they couldn't get through the traffic, some of

23 the officers ran ahead of the vehicle to get to the

24 traffic lights to usher people to the side to get

25 through.

1 Q. Did that delay you much, or not?

2 A. Not much.

3 Q. In your statement, you say you arrived at Aldgate at
4 around 09.05, 09.10. Was that because you had, in fact,
5 been diverted to Aldgate on the way to Liverpool Street?

6 A. That's correct. As I was pulling up close to
7 Liverpool Street, I then got a message from the desk to
8 divert to Aldgate.

9 Q. Did you actually have a call sign that day?

10 A. I believe it was Echo Charlie 61.

11 Q. Do you know how you were able to say in your statement
12 that you think you had arrived around 5 minutes past 9,
13 10 minutes past 9? Did you have a log of what time you
14 arrived?

15 A. Normal procedure is that, when you arrive at a scene,
16 that you will call up to log -- call up the control room
17 to log that you're actually on scene and they know where
18 you are.

19 Q. You recollect in your statement how, when you arrived,
20 you saw some British Transport Police officers and some
21 fire engines, fire appliances, but also, importantly,
22 that there were some ambulances there already.

23 A. Yes.

24 Q. Do you recollect how many ambulances were there?

25 A. No.

1 Q. If we could have up on the screen [LAS4-2], we know that
2 the first ambulance that actually reached Aldgate in the
3 middle of the page, the first ambulance on scene was
4 N301 at 09.14. If we could then have on the screen
5 [LAS135-4], there is a message at the bottom from N301,
6 which is that ambulance:
7 "Were on the scene at Aldgate station."
8 They must presumably have arrived a few moments
9 before in order to be able to see what was happening
10 before sending a message.
11 If you had arrived at a time when ambulances were
12 already there, might it be that you didn't arrive about
13 9.05, but you must have arrived after 9.14 or
14 thereabouts because that's when the first ambulance
15 arrived?
16 A. That's correct.
17 Q. All right. We may, in fact, now we've got your call
18 sign, be able to see what time your call sign was
19 registered as having arrived. Could we have [LAS565-8] ?
20 Third from the bottom, 09.14, EC61, is that you,
21 Echo Charlie 61, three entries from the bottom, three
22 rows in?
23 A. That's correct, yes.
24 Q. We can see the message text consists of "Red at scene."
25 Does "Red at scene" indicate that you must have

1 pressed a button to tell the Control that you were
2 there?

3 A. "Red at scene" is calling up -- in the PRU, there wasn't
4 a screen or a button to press "Red at scene". You'd
5 have to call up manually.

6 Q. Do you recollect calling up manually, as we can see, and
7 telling them?

8 A. Yes.

9 Q. All right. Now, were there a large number of people on
10 the pavement and around about the entrance to the
11 station?

12 A. That's correct.

13 Q. What state, in general terms, were they in?

14 A. They were -- some were in a collapsed state with various
15 injuries.

16 Q. What was the first thing you did when you arrived?

17 A. I had a look at what was going on and our training
18 always states that, on arrival, try to give a windscreen
19 view to Control so they know what's going on and they
20 can then send the appropriate resources.

21 Q. If we could have [LAS135-5] on the screen, at 09.18 right
22 at the bottom, we can see "PRU", is that Physician
23 Response Unit?

24 A. That's correct.

25 Q. So that's you. 09.18:

1 "I'm declaring this a major incident ... Aldgate
2 station."
3 It doesn't, in fact, show your call sign,
4 Echo Charlie 61, but may we presume that was you sending
5 in a message that you thought this should be a declared
6 a major incident?
7 A. That's correct.
8 Q. Could we have a look, please, at the major incident plan
9 for the London Ambulance Service which is [INQ9002-12] ?
10 Do you recognise this document is an extract from the
11 major incident plan for the London Ambulance Service
12 and, if you look at the middle of the page, you can see:
13 "First ambulance or response - attendant or single
14 person response.
15 "On arrival at the scene of a major incident, the
16 attendant will assume the role of the ambulance incident
17 officer; they will adopt the following procedures:
18 "Don high visibility clothing ...
19 "Carry out reconnaissance ... and report back to
20 Central Ambulance Control (see CHALET/METHANE)."
21 Which is the mnemonic for the information that you
22 must pass over.
23 "Declare a 'major incident' based on the criteria in
24 the definition."
25 Is this broadly what you were attempting to follow?

1 A. That's correct.

2 Q. Were you able to get through to the Central Ambulance
3 Control room straightaway to declare what you considered
4 to be a major incident?

5 A. Yes, I believe so.

6 Q. There were no troubles communicating?

7 A. Not as far as I can remember.

8 Q. We've heard evidence, Mr Parnell, of a debrief of London
9 Ambulance Service crews at Millwall, which took place
10 later in the day, and there was quite a considerable
11 debate about the difficulties in communicating from
12 scenes to Central Ambulance Control. Do you recollect
13 whether that was a problem that you encountered at all?

14 A. I wasn't at Millwall.

15 Q. You weren't at Millwall?

16 A. Because the vehicle I was on is attached to Helicopter
17 Emergency Medical Service, there was a separate debrief
18 at the Royal London Hospital.

19 Q. Right. You attempted to declare a major incident at
20 09.18. Did you know that Mr Edmonson had attempted to
21 declare a major incident a few minutes before?

22 A. No.

23 Q. Did you speak to him or see him before you got on the
24 radio to CAC?

25 A. No.

1 Q. Having left your message, do you know whether or not
2 a major incident was again declared subsequently by
3 somebody else?

4 A. No.

5 Q. If we could have a look, please, at, [LAS135-7], at 09.24,
6 EP5, who was Mr Edmonson -- just to remind ourselves, do
7 you know Mr Edmonson, do you know who he was?

8 A. Yes, I do.

9 Q. Who was he?

10 A. He was a member of the Emergency Planning Unit.

11 Q. So he was, in essence, the senior officer there, in
12 terms of planning for London Ambulance Service?

13 A. That's correct.

14 Q. So he declares a major incident at 09.24 and his call
15 sign is EP5. So it seems as if, despite your attempt to
16 declare one at 09.18, he had to do it again or perhaps
17 repeated a declaration of a major incident six minutes
18 later. Were you aware of that?

19 A. No.

20 Q. If a major incident is declared, would you expect to
21 receive notification of that fact over your radio or on
22 your mobile?

23 A. Yes.

24 Q. But you don't recollect receiving this?

25 A. No.

1 LADY JUSTICE HALLETT: Who has the power to declare a major
2 incident, as far as the London Ambulance Service are
3 concerned, Mr Parnell?

4 A. Any trained member of the London Ambulance Service who
5 arrives on scene and deems that an incident is worthy of
6 declaring a major incident can do that, my Lady.

7 LADY JUSTICE HALLETT: I have heard some evidence about what
8 happens if you're the first ambulance on the scene and
9 what responsibility you have. When you arrive, there is
10 an ambulance there, you say, already, or ambulances.
11 You're the first paramedic from HEMS there. What is the
12 protocol as to who does what, when there are ambulances
13 there already and then you arrive with your extra
14 training?

15 A. It's -- normal procedure is that you would liaise with
16 each other.

17 LADY JUSTICE HALLETT: It's just that there was some
18 suggestion of a criticism of a colleague who was
19 concerned because he was -- as he understood it -- the
20 first there and he was busily trying to ascertain the
21 situation, which, as you say, is very much your
22 training.

23 I'm just wondering, if you weren't careful, you
24 would find everybody arriving would be trying to
25 ascertain the situation and there wouldn't be people

1 attending to casualties. So what is the protocol for
2 who does what when they arrive?
3 A. The protocol is that the first ambulance on the scene
4 leave their blue lights on, everybody else that comes
5 after will switch their blue lights off, so that
6 ambulance becomes the focal point.
7 The driver of that vehicle stays with the vehicle
8 and becomes the radio operator. The attendant would
9 then go and do reconnaissance and come back and give
10 information to Control so that they can pass a message
11 to the other vehicles -- or oncoming vehicles. That
12 attendant becomes the senior person on scene and would
13 start giving out roles.
14 LADY JUSTICE HALLETT: Thank you.
15 MR KEITH: In your statement to the Metropolitan Police,
16 because you provided a statement to them dated
17 21 December 2005, you used these words:
18 "I then tried to give a situation report to our
19 Control via the vehicle radio. I eventually got through
20 and gave the report."
21 That seems to give the impression that you did, in
22 fact, have some difficulties in trying to get through to
23 CAC. Do you recollect?
24 A. No, I don't.
25 Q. You also say that, when you did get through, they told

1 you that a major incident had already been declared,
2 that is the one a few minutes earlier, the first one
3 I brought to your attention. You had no recollection of
4 that one either, did you, then, because if you'd known
5 about the first declaration, you wouldn't have made the
6 sit rep yourself?

7 A. That's correct.

8 Q. So for whatever reason, you were unaware both of the
9 declaration before yours and the one after?

10 A. That's correct.

11 Q. Just in relation to my Lady's question, or one of her
12 questions, in relation to the protocol for major
13 incident plans, can we have [INQ9002-12] back on the
14 screen? Does the major incident plan, in fact, have
15 a protocol -- if you could enlarge the middle of the
16 page, please -- setting out what is required for a major
17 incident to be declared:

18 "In Health Service terms, a major incident is any
19 event whose impact cannot be handled within routine
20 service arrangements.

21 "Think about number or type of casualties
22 overwhelming the NHS; the threat to overwhelm normal
23 services; serious threat to the health of the community;
24 where special arrangements are needed to deal with them;
25 internal disruption to the health service."

1 Are those the sorts of factors that you deemed to be
2 relevant to your decision to declare a major incident?

3 A. That's correct.

4 Q. In your statement, you go on to describe how, when you
5 arrived, despite the fact there were ambulances there,
6 you considered yourself to be the senior ranking
7 ambulance officer. What does that mean?

8 A. As a -- I was a trained team leader at the time.

9 Q. So did that mean that you were the person who should
10 give orders to other ambulance staff and other
11 paramedics as to what they should do and try to take
12 control of the position?

13 A. If the first ambulance crew on scene which is in charge,
14 if they're doing a good job, then they wouldn't --
15 I shouldn't have to take over or intervene.

16 Q. Do you recall giving any directions to the other London
17 Ambulance Service staff when you arrived?

18 A. No.

19 Q. In your statement, you do seem to recollect telling
20 other crew to attend to the injured that were outside
21 the station and to leaving their keys in the vehicles so
22 that drivers could readily get access to the ambulance
23 appliances and drive them off if they had to. Do you
24 recollect that?

25 A. That's correct, that was a later stage.

1 Q. That was a later stage in this, was it?

2 A. Yes, when I -- I believe, when I came back up from the
3 platform, I spoke to a couple of the crews.

4 Q. So we can get our bearings right, you also go on to
5 describe a group meeting when you were made Bronze medic
6 and it was a meeting attended by the DSO Mr Halawi and
7 also Mr Edmonson, of whom you've spoken. Was that also
8 later or was that on your arrival at the station?

9 A. That's virtually on arrival.

10 Q. What sort of meeting was that, then?

11 A. It's standard procedure that a group meeting should be
12 held, which is very brief, for roles and
13 responsibilities to be passed out so there is
14 a structured approach to whether -- rescue or treatment
15 of patients.

16 Q. Am I right to suggest that the people who were there was
17 yourself, Mr Edmonson from emergency planning, and
18 Mr Halawi, who was also based at Islington and was one
19 of the senior officers there?

20 A. That's correct.

21 Q. Was that a meeting at which you were then made Bronze
22 medic?

23 A. That's correct.

24 Q. Could we have please on the screen [INQ9002-24] ?

25 Have you seen this before?

1 A. Yes, I have.

2 Q. Could you just tell us something, please, about where
3 you fitted into this general scheme of command in your
4 position as Bronze medic?

5 A. Bronze medic is on the same par with all other Bronzes,
6 parking, clearing and triage, and my role is, at the
7 incident site, to coordinate and to liaise with all of
8 the emergency services to make sure that as many lives
9 are saved.

10 Q. Does that, therefore, mean that you are not expected to
11 treat casualties yourself?

12 A. That's correct.

13 Q. Over the page to the following page, page 25, do we see
14 right at the bottom:

15 "Forward incident officers: call sign 'Bronze
16 medic'.

17 " The role of the forward incident officer is to
18 manage the scene under the direction of the Silver
19 incident officer. The duties ... include:

20 "Management and coordination ...

21 "Ensuring that the liaison is ongoing."

22 So it doesn't include treating casualties yourself?

23 A. That's correct.

24 Q. Is that what you understood your role to be?

25 A. That's correct.

1 Q. Can you recollect what time this meeting was?
2 A. No, I can't, but it was soon after arriving.
3 Q. We know from Central Ambulance Control logs that, at
4 09.24 -- so about 8 minutes after you arrived --
5 Mr Edmonson declares that major incident, the one we
6 looked at a moment ago on the screen. Do you recollect
7 whether that declaration was made before or after the
8 meeting? Was there any discussion in the meeting of
9 that declaration or an intention to declare?
10 A. No.
11 Q. Do you recollect there being any discussion of a request
12 from medical technicians in the tunnel for more
13 carry-seats, for more paramedics with carry-seats?
14 A. No.
15 Q. All right. Following this meeting, in any event, did
16 you then go down to the track?
17 A. That's correct.
18 Q. Did you go with a paramedic Steve Jones?
19 A. That's correct.
20 Q. Did you take anything with you such as a paramedic bag
21 or a triage pack?
22 A. As Bronze medic, if you take medical kit with you, you
23 start treating people. So my experience is, from
24 listening to other medical personnel who have done major
25 incident and have actually done the role of Bronze

1 medic, the best thing to do is take a pen and a pad.
2 Q. In your statement, you used these words:
3 "DSO Mo Halawi then gave me a triage pack."
4 A. Yes.
5 Q. So you didn't just have a pen and a pad; you had
6 a triage pack as well.
7 A. Yes.
8 Q. Or is that what the pack is, a pen and a pad?
9 A. No, it's -- a triage pack is a --
10 Q. This?
11 A. That's correct.
12 Q. It's one I prepared earlier.
13 We can see that it has priority labels in it and
14 we've heard some evidence about it, labels, there's one
15 that's been taken out earlier. Is this what you had in
16 mind?
17 A. Yes.
18 Q. Does it contain any medical equipment at all?
19 A. No.
20 Q. Do you actually recollect going down with Mr Jones?
21 A. Yes, I do.
22 Q. Was there another paramedic with you, a man called
23 Craig Cassidy?
24 A. I can't remember seeing him.
25 Q. Might -- do you know Mr Cassidy?

1 A. Yes, I do.

2 Q. Might he have been with you? Because he recollects in
3 his witness statement -- we'll hear his evidence
4 later -- that he goes down with Steve Jones, so we
5 presume he must have gone with you as well. Might he
6 have been there?

7 A. He might have been, but I didn't see him. I can't
8 recall seeing him.

9 Q. When you got down, were the Fire Brigade already there?

10 A. Yes, there was.

11 Q. Do you recollect them doing anything on the track
12 concerning lighting or anything of that sort?

13 A. There was quite a lot of movement of firefighters doing
14 different things. I can't recall what all of them were
15 doing.

16 Q. When you approached the train, did you and Mr Jones
17 divide up your tasks?

18 A. Yes.

19 Q. What was the respective division of responsibility?

20 A. As Steve was doing Bronze triage, he actually got on to
21 the train and I stayed on trackside and wrote down the
22 information that was passed from Steve.

23 Q. Do you recollect whether he went into the bombed
24 carriage or into a carriage next door to the bombed
25 carriage and then worked his way through the

1 interconnecting door?

2 A. I believe he went in -- into the carriage that was

3 bombed and worked his way.

4 Q. When he was inside, what did he do?

5 A. He was carrying out effective triage.

6 Q. How long did that take?

7 A. Triage could take up to ten seconds, depending on the

8 severity of the injuries.

9 Q. How long do you recollect, if you can, it took Mr Jones

10 on that occasion to work his way through the carriage

11 and give you the information that you were expecting?

12 A. I can't remember.

13 Q. Did he shout out to you or in some way communicate to

14 you what he found?

15 A. Yes.

16 Q. What did he do?

17 A. Sorry?

18 Q. How did he do that?

19 A. As he triaged each patient, he would tell me whether or

20 not they were P1s, P2s or P3s -- sorry, P2s.

21 Q. Priorities 1, 2 and 3, is that right?

22 A. Yes.

23 Q. Did he shout out the information as he walked through

24 the carriage, or did he complete his triage assessment

25 and then come out and tell you?

1 A. He shouted out as he was walking through the carriage.
2 Q. Did he also tell you that he had found a number of dead
3 passengers?
4 A. Yes.
5 Q. Do you recollect how many deceased casualties he found?
6 A. No.
7 Q. In your statement, you say you believe that he had said
8 there were six fatal and seven or eight P1s.
9 A. That's correct.
10 Q. Do you recollect that?
11 A. Yes.
12 Q. Whilst you were waiting for him to shout out the
13 information, could you see into the carriage yourself?
14 A. Not entirely.
15 Q. Tell us what you can remember seeing.
16 A. From what I could see from trackside, there was a mangle
17 of bodies.
18 Q. Do you recollect seeing anybody in particular or any
19 identifiable people inside the carriage?
20 A. I can't remember from my -- unless I -- it's in my
21 statement.
22 Q. All right. Once he gave the information, what did you
23 do then?
24 A. At that particular time, I tried to use a radio to pass
25 the information to Silver, who was topside, but

1 unfortunately, the radio wasn't working, so I then
2 manually ran up onto the platform, up the stairs, and
3 gave the information manually.

4 Q. Was Silver Mr Edmonson?

5 A. It was, I believe, Mo Halawi at the time.

6 Q. What was the purpose, as far as you understand it, of
7 relaying that information? With that information, what
8 were you expecting Silver to do?

9 A. To send the appropriate resources down to trackside and
10 on to the train.

11 Q. What sort of resources?

12 A. Medical teams.

13 Q. More paramedics?

14 A. More paramedics and doctors.

15 Q. More equipment?

16 A. And equipment.

17 Q. Was that because you and Mr Jones immediately
18 appreciated that there were an insufficient number of
19 paramedics and an insufficient amount of equipment to
20 deal with the number of casualties in the carriage?

21 A. Yes.

22 Q. Do we take it, then, that, when you ran up, you and
23 Mr Jones, and possibly Mr Cassidy, were still, then, the
24 only paramedics in the vicinity of carriage 2?

25 A. I believe that's correct.

1 Q. Whom did you speak to when you got back up to the
2 surface level?

3 A. I spoke to Mo Halawi and I believe more senior officers
4 had arrived.

5 Q. Do you recollect any paramedics or doctors from HEMS as
6 having arrived?

7 A. Yes. There were doctors on the scene.

8 Q. In your statement, you make reference to
9 a Dr Gareth Davies, who was a senior HEMS doctor. Do
10 you recollect him being there?

11 A. Yes.

12 Q. Do you remember a Dr Lockey being there?

13 A. I can't remember seeing Dr Lockey, no.

14 Q. Is he another HEMS doctor?

15 A. That's correct.

16 Q. While you were speaking to them, did Mr Jones come up
17 from the tracks, Steve Jones come up, and ask you where
18 the medical team was, where the further personnel and
19 equipment that he'd asked for were?

20 A. Yes.

21 Q. Do we take it from that that quite a lot of time must
22 have passed for him to have to come up from the track
23 and find out what was going on?

24 A. I don't know. So much was going on from the time for me
25 to come up and speak to Silver, and there was medical

1 teams that was already assembled and was ready to go
2 down.
3 Q. They were up at station level?
4 A. Yes.
5 Q. You had gone back up to station level to speak to
6 Silver --
7 A. Yes.
8 Q. -- because you couldn't get on the radio. So you had
9 left the train area?
10 A. That's correct.
11 Q. Mr Jones had come after you because he was wanting to
12 see where the extra paramedics and equipment was. So
13 he'd left the train area. So who was left in carriage 2
14 tending to the severely injured and, we now know, the
15 deceased?
16 A. Well, according to records that I -- I now know that
17 Mr Cassidy was there.
18 Q. So he was the only paramedic who was down there in
19 carriage 2 at this time?
20 A. I believe so.
21 Q. How many severely injured were there in the carriage?
22 A. According to my statement, there were a number of P1s
23 and P2s which I had written down on my sheet, which
24 I then conveyed to Silver.
25 Q. After Mr Jones arrived, was a team then assembled to go

1 down with him?

2 A. No, I took the medical team down.

3 Q. You took the medical team down. Do you recall how many
4 people went down with you?

5 A. I believe there must have been about four or five
6 medical teams.

7 Q. Did they include the HEMS doctors?

8 A. That's correct.

9 Q. One or both of them?

10 A. Gareth Davies became the senior doctor on the scene, so
11 he stayed topside with the management team to
12 coordinate.

13 Q. So do we presume that there must have been another HEMS
14 doctor, then, who went down with you?

15 A. I believe there was more.

16 Q. Do you recall Dr Lockey being one of them?

17 A. I can't remember who actually came down, but I recall
18 that there was a doctor.

19 LADY JUSTICE HALLETT: Before we get to the stage of the
20 doctors going down and the teams going down, do we know,
21 Mr Parnell, why the medical teams weren't immediately
22 behind you? You go down to triage. Do we know why the
23 teams weren't immediately there behind you?

24 A. At this stage, we didn't know what we was dealing with
25 and it's standard procedures that a Bronze medic would

1 give a full report and state what's required and what
2 kind of equipment is required before a medical team is
3 committed.

4 LADY JUSTICE HALLETT: If the medical teams wait for you, as
5 it were, to come back, in some situations you would be
6 just radioing back, wouldn't you, but here you were
7 going to have to run back; if you're waiting for that,
8 isn't there the possibility that precious time could be
9 wasted?

10 A. That is a possibility.

11 LADY JUSTICE HALLETT: But the protocols presumably deal
12 with a situation -- they wouldn't be dealing with
13 a situation where your radio wouldn't work, because if
14 your radio worked, you could have stayed down there,
15 couldn't you?

16 A. That's correct, my Lady.

17 MR KEITH: Despite the protocol, if Mr Jones in the carriage
18 had said, "Tony, I know that you're the Bronze medic and
19 you're not really supposed to get involved, but I've got
20 to get oxygen for this casualty here and there's nobody
21 else around I've got eight P1s", could you have helped?

22 A. Once I've passed the message through and Silver is fully
23 aware of what's happening at trackside or on the train,
24 and my role is no -- has been accomplished, then I could
25 get involved and --

1 Q. But as my Lady has observed, you couldn't do that
2 because had you to actually go up to station level
3 physically and that, therefore, took you away from the
4 carriage and, once you'd fulfilled the task of telling
5 Silver, you were no longer on the scene, you were up at
6 ground level?

7 A. That's correct.

8 Q. You went back down with the paramedics and possibly
9 a HEMS doctor and you maintained your role of Bronze
10 medic, which means you didn't get on to the carriage
11 itself. You assisted in relaying further requests for
12 equipment, didn't you?

13 A. That's correct.

14 Q. Was one of them a request for more oxygen?

15 A. That's correct.

16 Q. So you went back up to the surface again, got some
17 oxygen from the ambulances and went back down again?

18 A. That's correct.

19 Q. Then, having got back down again, were you told that
20 a P1 casualty, a priority 1 severely injured casualty,
21 was about to be brought out?

22 A. Yes.

23 Q. If they're brought out of the carriage, what needs to be
24 done at the surface to ensure that everything is ready
25 for that casualty?

1 A. Information from the train to the surface needed to be
2 passed, so yet again --

3 Q. For what purpose?

4 A. To make sure that everyone is aware and is ready for
5 that patient.

6 Q. Including the availability of an ambulance to take the
7 casualty to hospital?

8 A. That's correct.

9 Q. So you had to go back upstairs to see whether there was
10 an ambulance ready?

11 A. Yes.

12 Q. You couldn't radio up?

13 A. No.

14 Q. So you went back for a third time, back to the
15 surface --

16 A. Yes.

17 Q. -- and checked whether there was an ambulance ready.
18 Then, when you went back down, were there further P1s
19 coming out of the carriage?

20 A. Yes, I believe so.

21 Q. Did they also have to be -- did their exit from the
22 carriage also mean that you had to go and check whether
23 their ambulances were ready?

24 A. No, because, at this stage, ambulances were in the
25 position with paramedic crews waiting, I believe.

1 Q. You do say in your statement that for a second time you
2 couldn't get through on the radio, so you went back to
3 the surface to -- "I started to run back up towards the
4 top to make sure another ambulance was ready". Do you
5 recall that?

6 A. Yes.

7 Q. So you may have started certainly to go back up again to
8 check for another ambulance for one of the later P1s --

9 A. Yes.

10 Q. -- but, as you got to the platform, did one of your
11 colleagues take over the role of Bronze medic from you?

12 A. Yes, Steve Wasp, who was my CBRN boss.

13 Q. Was that because you had been now forced, by this stage,
14 to run up to the top, down up, down up, down again?

15 A. That's correct.

16 LADY JUSTICE HALLETT: How many times in all do you think
17 you had to run up and down?

18 A. I believe three or four times, my Lady.

19 MR KEITH: Having been relieved of that function, did you
20 then go to ground level and speak to some of the
21 ambulance crews, check that ambulances were running
22 smoothly, and did you remain there whilst the P1s and
23 then the P2s, priority 1s and then priority 2s, were
24 removed from the scene by ambulance?

25 A. I was instructed to go topside and liaise with Silver,

1 and I believe I was retasked.

2 Q. To King's Cross?

3 A. No, I was just to help out where it's required.

4 Q. But I think you were there when you saw certainly the
5 majority, if not all, of the P1s leaving by ambulance?

6 A. That's correct.

7 Q. In total, were you at Aldgate for about two, two and
8 a half hours?

9 A. I believe so.

10 Q. Then were you retasked to go to King's Cross?

11 A. Yes, I was.

12 Q. On your arrival there, we'll hear from evidence in due
13 course in December, but did you arrive just as a female
14 was brought up on a stretcher at King's Cross?

15 A. That's correct.

16 Q. She died, in fact, at the scene?

17 A. I believe so.

18 Q. Did you play any role or take part in the provision of
19 medical care to casualties at King's Cross?

20 A. No.

21 Q. Indeed, when you arrived, I think you were told that
22 there was no one else who could be saved?

23 A. I believe so.

24 MR KEITH: My Lady, just in relation to that point, we've
25 considered whether or not Mr Parnell is in a position to

1 assist with the events at King's Cross, but we've
2 assessed that there are, in fact, a number of equally
3 good witnesses who can deal with the events surrounding
4 that casualty who was, in fact, Sam Badham.

5 Would you stay there, please, Mr Parnell? There may
6 be some further questions for you.

7 LADY JUSTICE HALLETT: Mr Coltart?

8 MR COLTART: My Lady, I do have a few. May I seek some
9 guidance from you before I embark upon that questioning?
10 My Lady, understandably, if I may say so, expressed
11 some concern at the end of last week about matters which
12 have been raised by other people in the course of
13 debriefs being put to witnesses in the witness-box. The
14 difficulty which we have is that some of those who made
15 the most significant observations at the debrief are not
16 necessarily coming as witnesses, and so, unsatisfactory
17 as it may be, we are, at present at least, in the
18 position of having to deal with it through others who
19 attended the same meetings.

20 Now, I've discussed the position with Mr Keith and
21 it may be that the best way forward is for us to draw up
22 a list of those people who might potentially give direct
23 evidence of the matters in question and they might be
24 able to come later.

25 But I don't know whether, for present purposes,

1 you're happy for me to explore, albeit very briefly,
2 matters which were raised at the HEMS debrief at the
3 Royal London Hospital with Mr Parnell, who attended that
4 debrief, or whether you would rather wait and deal with
5 it directly in due course.

6 LADY JUSTICE HALLETT: One of my concerns, Mr Coltart, is
7 really to ensure fairness to all.

8 MR COLTART: Yes.

9 LADY JUSTICE HALLETT: The minute a document goes up on the
10 screen and it's then put on the website, it does get
11 reported.

12 MR COLTART: Yes.

13 LADY JUSTICE HALLETT: Sometimes, when the evidence is
14 actually given, it may be the brief summary doesn't
15 accurately reflect the sentiments certainly now
16 expressed by the witnesses, and so I am concerned that
17 we don't get -- not deliberately so, of course -- unfair
18 reporting merely because assertions on a screen have not
19 yet been tested or given by the witness who provided
20 that assertion.

21 Mr Keith, any thoughts as to how best we can deal
22 with this? I don't want to inhibit Mr Coltart's
23 questioning, obviously, but I also want to be fair to
24 others.

25 MR KEITH: My Lady, yes. There is quite an important

1 document relating to the debrief at Millwall, which we
2 had sight of last week, and it may be that some of the
3 witnesses this morning can deal with that. In
4 particular, the document itself refers expressly to
5 comments attributed to Mr Cassidy from whom we'll be
6 hearing in a moment and possibly Mr Jones. Although his
7 name doesn't appear, it seems that he must have been
8 there.

9 In relation to the HEMS debrief, I readily accept
10 that Mr Parnell may be the only person other than
11 Dr Lockey who can deal with that, but perhaps I can
12 invite my learned friend to put the document to each
13 witness when he considers that they might have been
14 there and might be in a position to comment upon it.
15 But if they can't, then that would be the end of the
16 matter and we'll then try to identify a more suitable
17 witness, if one is available.

18 LADY JUSTICE HALLETT: It sounds as if this is going to take
19 a little while. Why don't I take the break now to see
20 whether you and Mr Coltart can come to some satisfactory
21 arrangement? It may well apply to others as well.

22 MR KEITH: My Lady, yes.

23 (11.33 am)

24 (A short break)

25 (11.46 am)

1 MR COLTART: My Lady, can I briefly explain? The position
2 we've agreed, for the time being at least, is that we
3 will seek, wherever possible, to deal with the actual
4 person who made the observation at these meetings.

5 If, at the end of that process, there are other
6 observations which it's been impossible to deal with,
7 then we will deal with some sort of sweep-up -- for the
8 want of a more elegant phrase -- at the end, through an
9 identified witness who will be able to deal with some of
10 the unattributed comments.

11 LADY JUSTICE HALLETT: Thank you.

12 Questions by MR COLTART

13 MR COLTART: In those circumstances, I don't propose to put
14 the minutes of the HEMS meeting to Mr Parnell.

15 I am just going to ask you in broad terms -- good
16 morning --

17 A. Good morning.

18 Q. -- if I may, do you recall discussion at your debrief at
19 the Royal London about communication difficulties which
20 other people had experienced on that day?

21 A. I believe so.

22 Q. Was that in relation to mobile phones or to radios or
23 both?

24 A. I believe to radios.

25 Q. Did you, yourself, experience difficulties on the

1 journey between Aldgate and King's Cross with your own
2 radio or mobile phone equipment?

3 A. As I was driving, I wasn't using either of them.

4 Q. I think it's right -- we can have a brief look at your
5 statement if we need to -- that, when you arrived at the
6 vicinity of King's Cross, you needed to seek directions
7 from a member of the public as to where you could go in
8 order to park your vehicle. Do you remember that?

9 A. I believe it was a police officer.

10 Q. It was a police officer. But by the time you arrived at
11 King's Cross, can you recall now, did you make any
12 attempt to contact your Control Centre or speak to them?

13 A. I personally didn't.

14 Q. Right. I needn't trouble you further with that issue in
15 that case.

16 Can we just return briefly to the issue of timing?

17 Now, from the moment that you first went down to the
18 platform and into the tunnel, how long -- estimate, if
19 you wouldn't mind -- how long did it take to get from
20 the surface to the actual carriage itself?

21 A. A matter of minutes.

22 Q. Two minutes, three minutes, four minutes, can you say?

23 A. It's difficult to say. If you were running, it could be
24 two minutes. If you were walking, it could be three to
25 four minutes.

1 Q. This is probably obvious, the next question, but were
2 you walking or running?

3 A. I think a bit of both.

4 Q. All right. Say perhaps two to three minutes, something
5 of that order. How long were you at the carriage the
6 first time round when Mr Jones was carrying out the
7 triage process inside the carriage?

8 A. That I can't recall.

9 Q. Are you able to give us an estimate of any description?

10 A. Unless it's in my statement, no.

11 Q. And then same time, roughly, back up to the surface. Is
12 that right?

13 A. Yes.

14 Q. By the time you arrive back at the top, Dr Davies and
15 Dr Lockey were there by that stage. Is that right?

16 A. That's correct.

17 Q. We know, and only for my Lady's note, that they arrived
18 at 9.34 at Aldgate.

19 When you were at the carriage with Mr Jones the
20 first time round, as he was carrying out the triage, you
21 made reference to having a pen and a pad of paper with
22 you, writing notes or instructions which he was shouting
23 out presumably from the carriage. Do you happen to know
24 what happened to that pad?

25 A. No, I don't. It was handed over to, I believe,

1 Steve Wasp.

2 Q. Just assist us with Steve Wasp. I think -- is he
3 another paramedic?

4 A. Steve Wasp was the coordinator for CBRN at Deptford.

5 Q. CBRN coordinator on behalf of the London Ambulance
6 Service?

7 A. That's correct.

8 Q. As far as you recall, it was to him that you gave those
9 notes?

10 A. That's correct.

11 Q. All right. Well I'm sure we can look into that. Just
12 two further short issues, then, if I may.
13 Firstly, oxygen cylinders. Are those carried on
14 every London Ambulance Service ambulance?

15 A. Yes.

16 Q. Did you have one in your vehicle?

17 A. Yes.

18 Q. As far as you can assist us with this next issue, what
19 is the clinical purpose of administering oxygen to
20 a critically injured patient?

21 A. It's to assist giving -- oxygenating the brain and the
22 rest of the vital organs under -- which is, if they are
23 injured, it will assist progression of rebuilding cells.

24 Q. If oxygen is available, would it, as a matter of
25 routine, be administered to a critically ill patient?

1 A. After assessing.

2 Q. In what circumstances might that assessment lead oxygen
3 not to be administered?

4 A. Where there is danger that the oxygen might cause
5 explosion or -- and -- also where it's detrimental to
6 the patient.

7 Q. Was there any discussion that you can recall at the
8 carriage about not administering oxygen to patients?

9 A. No.

10 Q. Do you recall any discussion about more oxygen being
11 required?

12 A. I believe so.

13 Q. Who communicated that message to you?

14 A. I believe Steve Jones did.

15 Q. As far as you can recall, was that when he first got on
16 to the carriage or was it at some point on one of your
17 subsequent visits?

18 A. At some point on one of the visits.

19 Q. Did he give any indication as to a specific patient for
20 whom it was required or was it generally required on the
21 carriage?

22 A. Generally required.

23 LADY JUSTICE HALLETT: Does administering oxygen relieve
24 a patient's distress in any way or is it merely an aid
25 to recovery?

1 A. It can be a bit of both.

2 LADY JUSTICE HALLETT: So it can help relieve distress.

3 Would it help relieve pain?

4 A. No, it's not a pain relief.

5 LADY JUSTICE HALLETT: Would that be because you can

6 sometimes get distressed because you feel you can't

7 breathe and, therefore, just being given the oxygen may

8 calm you down; is that what you mean by relieving the

9 distress?

10 A. That could well be the case, my Lady.

11 MR COLTART: As we understand matters, some London Ambulance

12 Service crews on that day may have experienced

13 difficulties with having old-fashioned types of oxygen

14 cylinders. Were you aware of any such difficulties at

15 Aldgate?

16 A. Not as far as I know.

17 Q. Final topic. Stretchers. Does every ambulance carry

18 a portable stretcher?

19 A. I believe so.

20 Q. Can you assist us with this: are there different types

21 of stretchers?

22 A. There are different types of stretchers.

23 Q. What are the different types?

24 A. There are Ferno stretchers, which are portable and

25 carried on emergency service vehicles. Also -- I can't

1 remember the other make, but these are also carried on
2 emergency service vehicles.

3 Q. Just pausing there for a moment. Does that mean that
4 most emergency service vehicles will carry two different
5 types of stretcher?

6 A. I believe we were in the transformation of one was
7 coming out of service and the other one was coming in.

8 Q. Is an emergency service vehicle something different from
9 an ambulance?

10 A. That's correct.

11 Q. So what is the difference between the two?

12 A. The emergency service vehicle is a larger vehicle that
13 carries mainly equipment for major incident and large
14 incidents.

15 Q. Do you happen to know, then, how many stretchers, for
16 example, would be carried on an emergency service
17 vehicle?

18 A. No, I don't.

19 Q. Would we get the same answer in relation to oxygen
20 cylinders?

21 A. That's correct.

22 Q. I'm sure we can deal with that through somebody else.
23 What's a Furley bed, are you able to assist us with
24 that?

25 A. No.

1 Q. Again, as far as you know, is an EEV different from an
2 emergency service vehicle? Is EEV a term that you're
3 familiar with?

4 A. If you could specify what EEV is?

5 Q. Unfortunately, I don't know. Don't worry. Again,
6 I suspect we can resolve that issue later this morning.

7 LADY JUSTICE HALLETT: On our list of acronyms, I think,
8 Mr Coltart.

9 MR COLTART: It is, which is forever growing, I'm afraid,
10 my Lady.

11 In those circumstances, I think that's everything,
12 thank you.

13 Questions by MR SAUNDERS

14 MR SAUNDERS: Mr Parnell, you were solely crewing the PRU,
15 the Physician Response Unit. How many of these such
16 units are there?

17 A. At Royal London, one.

18 Q. For an incident in London, are there other units at
19 other hospitals?

20 A. Not that I know of.

21 Q. So there is only one, as far as you are aware?

22 A. As far as I'm aware.

23 Q. What area did you cover?

24 A. Predominantly Tower Hamlets, but if there is an
25 incident, or a large incident, that a doctor is

1 required, then I will be tasked to it with my doctor.

2 Q. It's Tower Hamlets, because I think it's funded by that
3 authority, isn't it?

4 A. That's correct.

5 Q. When you attended at Aldgate, you recalled that a police
6 officer, you thought a British Transport Police officer,
7 had come up to you and given you some information.

8 A. That's correct.

9 Q. That included the possibility of:

10 "... possibly four fatalities and six or seven
11 seriously injured people who were trapped, with loads
12 more injured."

13 A. Yes.

14 Q. That I've quoted, as you will recollect, I'm sure,
15 Mr Parnell, from your statement. So that was the first
16 information you'd been given as to what the position was
17 underground.

18 A. That's correct.

19 Q. You then describe that you reported to Control to tell
20 them you were now on-site and that you felt we should
21 declare a major incident.

22 A. Yes.

23 Q. Do we take it that it's because of what you've been told
24 you felt it was appropriate to declare the major
25 incident?

1 A. With the information that I was receiving and with what
2 I can see at the station, that would deem that we would
3 be overwhelmed with casualties.

4 Q. I think you've summed it up there, you would be
5 overwhelmed with casualties and, therefore, a greater
6 response was going to be necessary than would be the
7 norm?

8 A. That's correct.

9 Q. Can I just understand this, though: if Mr Cumner has
10 already issued a major incident because he is first on
11 the scene, and then you've done it at 09.18, why was it
12 that Mr Edmonson is, for a third time, within a short
13 space of time, doing it again? Do you have any idea how
14 that's happened?

15 A. I don't know, but one possible solution is that we work
16 on different channels.

17 Q. Her Ladyship was asking you a question earlier and I'd
18 like to follow that up.

19 If, in fact, first on scene has dealt with the major
20 incident report, do others who are attending not get
21 told that?

22 A. They should.

23 Q. Because, of course, it would save you, and then
24 Mr Edmonson later, spending time trying to ensure that
25 gets through to Control.

1 A. Yes.

2 Q. Please don't think I'm being critical when I put this
3 next matter to you.

4 In your statement, you say that you had instructed
5 the ambulances that were there to leave their keys with
6 the vehicles. I think we all understand that. If an
7 ambulance needs to be moved and the driver isn't
8 available, somebody else can drive that vehicle or, if
9 it's causing an obstruction, it can be easily moved.
10 But after that, you go on to say that at that time
11 you instructed that nobody else should go down to the
12 train. Do you remember saying that in your statement?

13 A. Sorry, could you ...

14 Q. Of course I will. I can put it in context for you. You
15 say this.

16 "I also told them to leave all the keys in the
17 vehicles and not to go down to the train at that time."

18 So if it helps you, you then say:

19 "I was then joined by DSO Halawi and Edmonson."

20 A. That's correct.

21 Q. So why, when you know there are seriously injured who
22 need help, are you giving the instruction not to go
23 down?

24 A. It is also a service policy that all decisions and
25 medical personnel must be accounted for and must report

1 to Silver. It's standard procedure that Silver knows
2 exactly how many -- who have gone down to the incident
3 site and, should there be a secondary device, he or she
4 would know how many resources that's at that site.

5 Q. Mr Cumner, we know, was originally Silver, if only for
6 a few minutes until a senior officer arrived. Had you
7 then taken over, as it were, and stopped anybody else
8 going down?

9 A. I can't remember taking over as such. I remember that
10 Mo Halawi and Jon Edmonson was on scene fairly quickly
11 and I believe that Mo Halawi had taken charge.

12 Q. At this time you're having this conversation with
13 Mo Halawi and Jon Edmonson, wasn't it part of that
14 discussion that somebody said, either this should be or
15 it has been declared a major incident?

16 A. By that time, I already knew that a major incident had
17 been declared.

18 Q. Because you declared it at 09.18?

19 A. No, because Control -- I believe Control had said that
20 the major incident was already declared.

21 Q. So it's then decided that you will go down for one of
22 your four trips back and forth and act as Bronze medic?

23 A. That's correct.

24 Q. So you, with Mr Jones, and if Mr Cassidy is with you,
25 are the first London Ambulance brigade, as far as you

1 are aware, going down?

2 A. That is correct.

3 Q. When Mr Jones is on the carriage, would he have actually
4 been calling out how many he believed had already passed
5 away, how many fatalities there were, or is it possible
6 it's something that, by the time you've come to write
7 your statement, you are aware that there were actually
8 six fatalities on the Tube itself and obviously Mr Gray
9 who had been blown off?

10 A. I believe when it came to writing my statement, I was
11 aware of the fatalities.

12 Q. At that initial stage, Mr Jones' belief was seven or
13 eight priority 1s?

14 A. I believe so.

15 Q. So depending on whether Mr Cassidy is with him, it's
16 Mr Jones who is there when you have to go back up on the
17 next occasion, he's the only London Ambulance Service
18 person that you're aware of being on the carriage?

19 A. That's correct.

20 Q. We're going to hear from Mr Cassidy this afternoon. It
21 may well be that he was also present. But apart from
22 that, you can't help with anybody else being there?

23 A. That's correct.

24 Q. Were you aware, when you arrived, that Mr Cumner was
25 Silver control?

1 A. No, I wasn't.

2 Q. But I think you're aware of his ambulance or the
3 ambulance he was technician for as being the Control,
4 because, as you've described to her Ladyship, of the
5 lights still being left on so that everybody is
6 attracted to the one vehicle rather than trying to work
7 out whose it is.

8 A. That's correct.

9 Q. He's already told us how short a period he was Silver
10 for. Who else were you aware was in Silver control?

11 A. Mo Halawi and, later on -- I've forgotten the officer's
12 name, but it's in my statement.

13 Q. Was it Jon Edmonson?

14 A. No, Jon Edmonson is there as a tactical adviser to
15 Silver.

16 Q. He never assumed Silver, but he was there as a senior
17 person?

18 A. That's correct.

19 Q. Is the name that you're looking for one of the area
20 commanders, Trevor Hubbard?

21 A. That's correct.

22 Q. So over the course of this period, there are different
23 Silver controls?

24 A. That's correct.

25 Q. Did that cause any confusion, as far as you were

1 concerned?

2 A. No, because they were wearing tabards, and the tabards
3 were utilised.

4 Q. Help us: it's a tabard, is it, with "Silver" on it?

5 A. That's correct.

6 Q. You then describe that there's a team of paramedics that
7 are brought together, but Mr Jones in the meantime has
8 come back up --

9 A. Yes.

10 Q. -- because he's saying "Where's the team I've asked
11 for?" So who was left in the carriage when Mr Jones was
12 up?

13 A. I believe Mr Cassidy was left.

14 Q. It's at that stage that -- is it Mr Murphy -- is it
15 Ken Murphy?

16 A. Yes.

17 Q. Who's he?

18 A. Ken Murphy is another team leader. I believe at the
19 time he was working out of Waterloo.

20 Q. So you ask Mr Murphy to find a team that can go
21 downstairs. Can I just remind you -- I don't think
22 you've covered this -- you, in fact, found five or six
23 paramedics and their crew mates?

24 A. There was teams already assembled at top. Looking at my
25 report that I had brought to the surface, I quickly

1 realised that the team was insufficient, the numbers
2 were insufficient, and more was required. I then
3 relayed that message to Silver.

4 Q. You did?

5 A. Yes.

6 Q. Was it in your mind, Mr Parnell, that there are six or
7 seven priority 1s and, therefore, it was best to try to
8 help with six or seven teams? Is that what you were
9 doing in your mind, as it were?

10 A. Well as many teams as possible was required to deal with
11 the patients.

12 Q. So Mr Murphy finds you five or six paramedics and their
13 crew mates. What's the crew mate there? You've already
14 told us what the difference between a paramedic and
15 a doctor is?

16 A. It all depends on that particular vehicle, whether it's
17 crewed by a double paramedics, double technicians, or
18 technicians and paramedics.

19 Q. You go on to say that, as well as this, which took about
20 three or four minutes to assemble, they were taken down
21 and you recall that, on reaching the train, a HEMS team
22 had followed you down?

23 A. That's correct.

24 Q. So it's the five or six paramedics and crew mates, plus
25 the HEMS team?

1 A. That's correct.

2 Q. Can you help us as to when this would be, in terms of
3 after your arrival?

4 A. I'm afraid I can't.

5 LADY JUSTICE HALLETT: After you'd gone back up to say that
6 they desperately needed these teams down on the train,
7 did you say it took three to four minutes from then to
8 assemble these teams?

9 A. No, the teams were assembled, it was three to four
10 minutes to go back down from the moment I came topside.

11 MR SAUNDERS: Can I remind you, Mr Parnell, and we all
12 appreciate how many years ago you wrote this statement,
13 can I remind you how it appears here? You've gone back
14 up, you've requested a medical team, Ken Murphy, one of
15 the team leaders, then arrived:

16 "I then saw Steve Jones had come back up and he
17 asked me where the medical team was, as it was needed
18 urgently. I then asked Ken Murphy to find me five or
19 six paramedics and their crew mates and to gather them
20 together. Three or four minutes later, the team was
21 assembled."

22 A. Those particular teams that Ken Murphy assembled, but
23 there was an additional medical team that was with HEMS
24 and they are the ones that came down with the team that
25 Ken Murphy assembled.

1 Q. Forgive me, in answer to her Ladyship's question, there
2 was this delay of some three or four minutes from the
3 time you're asking Murphy to assemble the teams for them
4 to be assembled and then to go back down?

5 A. That's correct.

6 Q. And it's after those teams have gone down with you, that
7 the HEMS team you are aware of following you?

8 A. Yes.

9 MR SAUNDERS: For your Ladyship's note, it's page 3 of that
10 statement is that passage.

11 I have nothing else. Thank you very much,
12 Mr Parnell.

13 MS SHEFF: No, thank you, my Lady.

14 Questions by MS SIMCOCK

15 MS SIMCOCK: Just very briefly, Mr Parnell, you've been
16 asked about communications. I just wanted to ask you,
17 in terms of radio channels we know you were broadcasting
18 on radio channel 7, is that right?

19 A. That's correct.

20 Q. We also know that Jonathan Edmonson was broadcasting on
21 radio channel 10. Is that likely to be the reason why
22 you weren't aware of his communications and him not of
23 yours?

24 A. That's correct.

25 Q. There are separate controllers for each of those

1 channels sitting in Central Ambulance Control in
2 Waterloo. Do you know that to be the case?

3 A. Yes, I do.

4 Q. Were you then aware, at some stage slightly later, that
5 everyone was switched to a dedicated radio channel,
6 radio channel 9?

7 A. Yes.

8 Q. Thank you. Moving on, then, in terms of the timing of
9 allocation of roles being handed out, Bronze medic to
10 you, you stated that was very soon after your arrival on
11 scene and that was by Mo Halawi and Jonathan Edmonson,
12 is that right?

13 A. That's correct.

14 Q. We know Jonathan Edmonson reported he had handed out
15 command roles in his report to Central Ambulance Control
16 at 9.24. So can we assume from that timing that it's
17 before then that you spoke to him?

18 A. Yes.

19 Q. Thank you. Just lastly, then, in relation to equipment
20 and stretchers, are you aware that an ambulance carries
21 three different stretchers?

22 A. Yes.

23 Q. One of those is a large one that people may be familiar
24 with that's on wheels. Is that right?

25 A. That's correct.

1 Q. One of them is a scoop stretcher or orthopaedic
2 stretcher, is that right?

3 A. That's correct.

4 Q. And one is a spinal board or sometimes referred to as
5 a rescue stretcher, is that right?

6 A. That's correct.

7 Q. Could we have on screen, please, [LAS-CAP-40] . Does the
8 top picture show an orthopaedic stretcher or scoop
9 stretcher?

10 A. Yes.

11 Q. Does the bottom show two different examples of a spinal
12 board or a rescue stretcher?

13 A. That is correct.

14 MS SIMCOCK: Yes, thank you very much.

15 LADY JUSTICE HALLETT: Just in relation to communications,
16 you said that you hadn't heard any messages as you drove
17 to the scene because you were driving.

18 Do I take it that meant that you didn't want to use
19 a mobile phone by hand or a radio in hand, that there
20 wasn't a hands-free radio facility or a hands-free
21 mobile facility?

22 A. There was a hands-free mobile facility for the radio and
23 both the phone, but as I was driving, I would have to
24 stop to actually look for whatever number I'm looking to
25 dial and, if somebody is contacting me by radio, I would

1 use the hands-free, but I would slow down as much as
2 possible where it's safe to do so.

3 LADY JUSTICE HALLETT: I was just wondering, would it have
4 been possible for Control to send a message to you that
5 you would have been able to receive lawfully without
6 having to stop or slow down?

7 A. Yes, they can.

8 LADY JUSTICE HALLETT: So they could have sent out a message
9 which you would have heard?

10 A. Yes, a message was sent to me to divert to Aldgate.

11 LADY JUSTICE HALLETT: Right, Mr Taylor?

12 Questions by MR TAYLOR

13 MR TAYLOR: Good morning, Mr Parnell. I don't wish to go
14 over the ground that's already been fully covered. But
15 I want to talk to you about the general role of
16 a paramedic.

17 Now, as I understand, a paramedic has extensive
18 training above the normal ambulance response teams and
19 that allows you to use things -- drugs, you're allowed
20 to administer drugs?

21 A. That's correct.

22 Q. IVs, intravenous?

23 A. That's correct.

24 Q. Are you allowed to give pain-relieving drugs?

25 A. Yes.

1 Q. Just before I go on to this, how would a paramedic
2 define a person who has actually died? Is it your job
3 to define it, or is it a doctor's job?
4 A. We can do recognition of life extinct.
5 Q. How would you make that assumption?
6 A. It's -- in a multicasualty situation, we would use the
7 triage system.
8 Q. But how would you determine that that person's life has
9 expired?
10 A. By checking pulse and opening the airway to see if
11 a person is breathing or can restart breathing.
12 Q. Do you use heart monitors?
13 A. Yes, we do.
14 Q. Defibrillation machines?
15 A. That's correct.
16 Q. So if you attached a heart monitor -- is the heart
17 monitor attached to the skin?
18 A. Yes, it is.
19 Q. Of course, a defib is attached to the skin as well.
20 A. Yes.
21 Q. If you attached the heart monitor to the skin and it
22 showed basically a flatline, you would assume that the
23 person has died?
24 A. You can assume so, yes.
25 Q. After that happens, what do you do then? Do you try

1 CPR? Do you try defibrillation?

2 A. In a multicasualty situation, using the triage system,
3 it's -- if you've got a flatline, then I believe that
4 person is deemed deceased and you move on to the next.

5 Q. So you move on to the next person. But in normal
6 circumstances, say someone has had a heart attack and
7 it's a single person, you try again to revive that
8 person. Is that correct?

9 A. That is correct.

10 Q. You do that by administering CPR, defibrillation. For
11 how long?

12 A. Counting a round of five, CPR, checking for a pulse and,
13 once that's been completed, then, according to London
14 Ambulance Service protocol, that's the most you can do
15 for that person.

16 Q. What about the use of adrenalin or atropine? Would you
17 give that?

18 A. If it's required.

19 Q. How would you decide that it was required, then?

20 A. It's -- you've got -- if it's -- the patient
21 asystolically -- which is flatline -- then adrenaline is
22 given.

23 Q. I'm led to understand that, to revive someone after
24 they've flatlined is very unusual, but it can be done,
25 and I was told personally that the percentage is about

1 8 per cent of people that have actually died can be
2 revived. Would you agree with that?

3 A. Sorry, could you repeat the question, please?

4 Q. I was under the impression that, if anybody had died and
5 flatlined, that those people can be revived given
6 atropine and adrenaline, with CPR, and it's roughly
7 about 8 per cent of those people that die can be
8 revived. Would you agree with that?

9 A. Yes, they can be revived using cardiac drugs and
10 defibrillation.

11 Q. Finally, do you know if any pain-killing drugs were
12 administered in carriage 2?

13 A. I don't know.

14 Q. Do you think there were enough drugs available to you at
15 the time to treat those people that were suffering in
16 carriage 2?

17 A. I don't know. I know that each vehicle carries -- each
18 paramedic crew carries the paramedic drugs pack. So
19 each paramedic crew would have a drugs pack with them.

20 Q. In this case, the amount of seriously injured people
21 certainly would have required a lot more drugs than you
22 had at the beginning?

23 A. There is sufficient drugs pack, I believe, on the
24 emergency service vehicles in addition to paramedics'
25 drug packs.

1 MR TAYLOR: Okay, thank you.

2 MS SIMCOCK: My Lady, may I ask one or two questions arising
3 out of that?

4 LADY JUSTICE HALLETT: Certainly.

5 Further questions by MS SIMCOCK

6 MS SIMCOCK: I'm very grateful. Can we have on screen,
7 please, [LAS-CAP-42].

8 Mr Parnell, do you recognise there at the top
9 a defibrillator?

10 A. Yes, I do.

11 Q. Is that the type of defibrillator that you and other
12 paramedics were carrying in 2005?

13 A. That is correct.

14 Q. You weren't actually on the train treating, so you
15 didn't use a defibrillator on 7 July, is that right?

16 A. That is correct.

17 Q. Perhaps I can just ask you a couple of questions about
18 this machine, though.

19 We see there that there are two pads, is that right,
20 with leads coming to them to a monitor? Is that right?

21 A. That's correct.

22 Q. The pads are attached directly to the skin and then
23 a reading is given which is shown on the monitor. Is
24 that right?

25 A. That is correct.

1 Q. The machine then, as we can perhaps see very faintly
2 there, will give you instructions as to what to do. Is
3 that right?

4 A. That's right.

5 Q. If there is an asystolic rhythm, that's the flatline
6 that we've heard about, what does that indicate in terms
7 of electrical activity in the heart?

8 A. That there is no electrical activity.

9 Q. When there is no electrical activity in the heart, what
10 does that machine generally tell you to do?

11 A. Rounds of CPR.

12 Q. When there's an asystolic rhythm, is that an unshockable
13 rhythm?

14 A. That is an unshockable rhythm.

15 Q. So the defibrillator would either tell you not to shock
16 or to tell you nothing at all?

17 A. Nothing at all.

18 MS SIMCOCK: I'm very grateful. Yes, thank you.

19 MR COLTART: My Lady, I'm sorry to bob up as well.

20 LADY JUSTICE HALLETT: It's all right, Mr Coltart, these
21 things happen.

22 MR COLTART: Can I ask one or two further questions arising
23 out Ms Simcock's first questions?

24 Further questions by MR COLTART

25 MR COLTART: I just want to clarify the position as far as

1 different radio channels is concerned. It's been
2 suggested to you that, through different radio channels,
3 you were able to communicate with different operators at
4 the other end.

5 Were you in contact with Central Ambulance Control
6 through your radio or were you in contact through the
7 HEMS Control or are they one and the same thing?

8 A. I was contacting the HEMS Control, which is a different
9 desk.

10 Q. Through your radio, did you have any access to Central
11 Ambulance Control?

12 A. Yes.

13 Q. At the start of the day, which channel were you
14 operating on?

15 A. I can't remember what channel it was at the time, but
16 whatever the channel that was designated for the PRU,
17 I was on that channel.

18 Q. Did you become aware, during the course of the day, of
19 a separate, dedicated channel being opened for the
20 purposes of this incident?

21 A. Yes.

22 Q. Were you aware that that original channel and the new
23 dedicated channel in fact fed through to the same radio
24 screen at Central Ambulance Control?

25 A. Sorry, could you ask that again, please?

1 Q. Yes. Were you aware -- did you ever experience yourself
2 the fact that both of those channels -- the original
3 channel and the new dedicated channel -- fed through to
4 the same operator at Central Ambulance Control?
5 A. No, because I didn't use the radio again.
6 Q. Oh, I see. So you can't assist us in relation to that?
7 A. No.
8 MR COLTART: All right, thank you very much.
9 LADY JUSTICE HALLETT: Right, Mr Parnell, that looks as if
10 it's all the questions for you, thank you very much for
11 coming along to help us.
12 A. Thank you, my Lady.
13 MR KEITH: May I invite you to call Steven Jones?
14 MR STEVEN JONES (sworn)
15 Questions by MR KEITH
16 MR KEITH: Could you give the court your full name, please?
17 A. Steven Thomas Jones, sir.
18 Q. Mr Jones, on 7 July 2005, were you a paramedic based at
19 Waterloo ambulance station?
20 A. Yes, sir.
21 Q. Was your role a motorcycle paramedic?
22 A. That's correct, sir.
23 Q. Do you differ, other than in the mode of transport,
24 from, for example Mr Parnell, who had a car?
25 A. No, sir.

1 Q. So you get the motorcycle rather than the Subaru?
2 A. Sometimes, sir.
3 Q. Do you change around?
4 A. I'm sorry, sir?
5 Q. Do you change vehicles around?
6 A. Yes, sir.
7 Q. Do you normally get the motorcycle or was that --
8 A. At the time, I was assigned to the Motorcycle Unit, but
9 I also worked on ambulances and cars.
10 Q. Right. On that day, was your working shift 7.00 in the
11 morning to 7.00 in the evening?
12 A. Correct, sir.
13 Q. Did you have a call sign Charlie Sierra 42?
14 A. Yes, sir.
15 Q. Could you please tell us if you can recollect what
16 clothes were wearing?
17 A. On the day, sir?
18 Q. On the day.
19 A. It would have been motorcycle leathers with motorcycle
20 boots, possibly a motorcycle leather jacket, over the
21 top of that, a London Ambulance Service high visibility
22 jacket.
23 Q. Is that green?
24 A. Green and yellow, sir.
25 Q. So a green and yellow LAS high visibility jacket?

1 A. Yes, sir.

2 Q. You weren't wearing an orange or a red jumpsuit of any
3 kind.

4 A. No.

5 Q. Did you have a tabard on of any kind?

6 A. At that -- when I first arrived, sir?

7 Q. At any stage?

8 A. I may have had a Bronze triage, but I can't recollect if
9 I changed that, but it was always -- I always had high
10 visibility on.

11 Q. Your high visibility green and yellow?

12 A. Yes, sir.

13 Q. You were originally sent to Liverpool Street because
14 there had been a report that there was smoke coming from
15 the station, but when you arrived, you were told by
16 colleagues or by other emergency personnel who were
17 there that there was nothing happening. Did you then go
18 on to Aldgate?

19 A. Yes, sir.

20 Q. In your statement, you describe how, when you arrived,
21 the first ambulance, which we know was driven by
22 Tony Cumner and Andrea Ray, was arriving. Do you
23 recollect that ambulance parking up or was it already
24 there and stationary?

25 A. I can't recollect. My statement says that it had just

1 arrived. It had only -- I was only moments behind.

2 Q. We know that they sent a message at 09.14, having
3 presumably carried out a short reconnaissance of the
4 station to do the sit rep. Does it sound to you as if
5 you must have arrived around about the same time? Does
6 that sound right to you, 09.14, quarter past 9?

7 A. Quite possibly, maybe a little bit earlier than that.

8 Q. Did you, having seen what was going on at the station,
9 call the HEMS line?

10 A. I did, sir.

11 Q. What did you tell them?

12 A. The HEMS line was the desk I was working underneath that
13 day. I rang up and confirmed -- I believe I had already
14 been told it was a serious incident, to give a report.
15 I confirmed it was multiple casualties and the HEMS team
16 were required.

17 Q. Could we have on the screen [LAS19-2]? Can we see halfway
18 down the page:

19 "LFB were on [the] scene assisting walking wounded
20 to a makeshift triage point. I reported via mobile
21 phone to the HEMS desk that we had approximately
22 20 patients roadside with various blast/burn injuries
23 and would require a HEMS team to become MIO."

24 Is that the acronym for medical incident officer?

25 A. It is, sir.

1 Q. So what, in essence, were you looking for?
2 A. I'm sorry, sir?
3 Q. What, in essence, were you hoping the HEMS desk would
4 do, what did you think you needed at the scene?
5 A. Mobilise a doctor/paramedic team who specialise in major
6 trauma.
7 Q. Did you have any means of knowing whether or not such
8 a team had already been ordered to attend Aldgate?
9 A. No, sir.
10 Q. If so, were you just doing it out of caution?
11 A. I was doing it out of caution, sir. I'm a flight
12 paramedic as well, so I know how the system works.
13 Q. Having made that call and informed the HEMS desk, did
14 you then start carrying out triage yourself at the
15 station level?
16 A. Initially, sir, there was fire officers already
17 attending some of the casualties and I assisted them
18 with our equipment.
19 Q. With some of the casualties?
20 A. Yes, sir.
21 Q. How long did you do that for?
22 A. I've -- I've no idea, sir, I don't recollect.
23 Q. Did there come a time when a London Ambulance Service
24 officer, Mr Halawi, arrived?
25 A. Yes, sir.

1 Q. What did you discuss with him?

2 A. What initially we had seen. It was very shortly
3 after -- from what I can recollect, it was a very short
4 time between when I first arrived and he arrived, that
5 we had multiple casualties and I think I may have said
6 we'd already activated the HEMS team.

7 LADY JUSTICE HALLETT: I couldn't hear that.

8 MR KEITH: Nor could I. Could you keep your voice up,
9 please, Mr Jones? It's very hard to hear in this
10 courtroom. The microphone in front of you doesn't
11 amplify your voice; it merely relays it to an annex.
12 You recollect how, very shortly after you arrived,
13 Mr Halawi arrived?

14 A. It seemed so, sir.

15 Q. You discussed with him what should be done, and you told
16 him that you'd already called in to the HEMS desk --

17 A. I believe so, sir.

18 Q. -- what you had seen?

19 A. Yes, sir.

20 Q. Was there a discussion between you as to your respective
21 roles?

22 A. Yes, sir. Mr Halawi, he asked me to become the triage
23 officer.

24 Q. What does that mean?

25 A. It is to go forward into the scene to prioritise

1 patients as to their severity of how they're moved to
2 a clearing area to be transported to hospital, or
3 treated on scene.

4 Q. What was Mr Halawi's role, then?

5 A. He was the incident officer at that time, he would have
6 been Silver.

7 Q. He was the ...?

8 A. He would have been classed as Silver.

9 Q. So he was Silver?

10 A. Yes, sir.

11 Q. You were going to be Bronze triage, which meant that you
12 would assess initially the medical state of everybody
13 you found in the carriage?

14 A. That's correct, sir.

15 Q. And prioritise them?

16 A. As to their severity of need.

17 Q. What about Mr Parnell, what was he going to do?

18 A. He was Bronze medic. So he would go with me to the
19 scene and organise medical treatment.

20 LADY JUSTICE HALLETT: I'm sorry to interrupt, just pausing
21 there, when you arrived, you attended to some of the
22 casualties who -- the walking wounded who had made their
23 way to the top.

24 A. Yes, my Lady.

25 LADY JUSTICE HALLETT: I'm just wondering, at what stage did

1 anybody from the London Ambulance Service say, "Well,
2 wait a minute, we shouldn't be so much attending to the
3 people able to make their way up, as the people who
4 might be stuck down on the train"?

5 A. I should explain, my Lady. We weren't actually
6 treating, we were -- what I was doing, I was handing
7 medical equipment to fire officers that were there, such
8 as oxygen and bandages, that I had, so we weren't
9 actually treating at that point. We were, if you like,
10 triaging on topside.

11 LADY JUSTICE HALLETT: So the fire officers were actually
12 doing the basic first aid with equipment that you could
13 give them?

14 A. Yes, my Lady.

15 LADY JUSTICE HALLETT: Right. But was anything said at that
16 stage about what might be happening down below?

17 A. Not that I can recollect, my Lady.

18 MR KEITH: How did it come about, then, that you were tasked
19 to go underground with, as we'll discover, Mr Parnell?

20 A. Because patients were coming out with injuries, it was
21 logical to assume there were patients below ground.

22 I wasn't personally told there was more patients, but
23 logically, there -- it would be. So we'd need someone
24 to go below ground to investigate that.

25 Q. Who took that decision to send you underground?

1 A. Mr Halawi.

2 Q. So he was Silver, you were Bronze triage, and Mr Parnell
3 was Bronze medic?

4 A. Yes, sir.

5 Q. Did you take any equipment downstairs that would allow
6 you to carry out any first aid?

7 A. No. I took triage cards which are packs of triage cards
8 which will show priority to other people.

9 I deliberately didn't take any medical equipment,
10 otherwise I would be drawn into treating patients.

11 Q. You knew that the train was in a track, in a tunnel, one
12 presumes, from your knowledge that there were passengers
13 coming up from something below ground?

14 A. I knew that it was on a track, sir, but where they were
15 on the track, I wasn't told at that time.

16 Q. You knew there was a possibility that there would be
17 more seriously injured passengers down in the bottom of
18 the station?

19 A. I would assume so, sir.

20 Q. You knew Mr Halawi was going to stay up and be Silver at
21 the top. You took kit down but didn't include first aid
22 because you didn't want to be drawn into providing first
23 aid. You presumably knew that Mr Parnell was taking
24 a triage pack, because he was Bronze medic, and he
25 wouldn't be providing first aid. In this plan, whom did

1 you envisage would provide first aid, if any, to the
2 people in the train?

3 A. I understand it may seem strange for us not to take
4 medical equipment when that is what we are trained to
5 do. The time -- the short time it takes for us to
6 triage will actually benefit in the long-term by finding
7 out what injuries are needed and what equipment is
8 needed on the train. I'm not sure if this is part of
9 our training, but I've learnt this from attending major
10 incidents before.

11 LADY JUSTICE HALLETT: Doesn't that depend on how soon
12 afterwards those who are going to be in a position to
13 treat, as it were, follow you down? I mean, presumably,
14 if you're triaging in an emergency situation, you assume
15 there's going to be somebody right behind you --

16 A. Yes, my Lady.

17 LADY JUSTICE HALLETT: -- to pick up on your priorities?

18 A. Yes, my Lady.

19 MR KEITH: If I may follow up on my Lady's question, you
20 didn't know, when you went downstairs without first aid,
21 that in reality, and as it happened, the radio didn't
22 work in the tunnel and, therefore, to arrange for other
23 paramedics to follow you into the carriage to provide
24 first aid, it was necessary for someone to have to run
25 back to ground level?

1 A. Yes, sir. I assumed -- I can only assume, that some
2 medical teams would follow us down to provide some sort
3 of treatment. But my role at that time was not to treat
4 anyone.

5 Q. Could you see any other medical technicians or
6 paramedics at ground level who might have followed you
7 down?

8 A. I don't honestly remember, sir. I'm sure there were.

9 Q. If you could cast your mind back, do you recollect
10 specifically any other paramedics being there who could
11 have followed you down?

12 A. I don't remember, sir.

13 Q. Presumably there was the ambulance crew who had first
14 arrived --

15 A. Yes, sir.

16 Q. -- Mr Cumner and Andrea Ray. They could have followed
17 you down, but they were treating casualties at ground
18 level, were they not?

19 A. Yes, sir.

20 Q. So the assumption that somebody would follow you down in
21 fact had to be followed through by either you or
22 Mr Parnell going back up to ground level to find
23 somebody to follow you down?

24 A. Because on the initial report we are given severity, we
25 knew extra vehicles would be sent anyway. We wouldn't

1 have to ask for more vehicles, because we knew there
2 were vehicles arriving. But once we got on the track,
3 yes, I had to go topside to give a report.

4 Q. Do you know a paramedic called Mr Craig Cassidy?

5 A. I do, sir.

6 Q. Did he go down with you?

7 A. I don't remember that at all, sir.

8 Q. Is it possible that he did? Are you saying that nobody
9 else went down with you and Mr Parnell, or somebody
10 might have done but you just can't remember?

11 A. It's possible, sir, but at the time -- well, now I don't
12 remember.

13 Q. Did you go straight down onto the track, or did you have
14 to pause on the platform to see if the power was off?

15 A. I believe at the initial -- when Mr Halawi told us our
16 roles, he had been informed that the power was off and
17 the rolling stock had stopped. When we got down to
18 trackside, we confirmed this again with the train -- was
19 it Railtrack or London Underground?

20 Q. London Underground.

21 A. London Underground, sir, we confirmed it with them and
22 we visualised the short-circuiting device was down on to
23 the track before we got on to the track.

24 Q. You could see a short-circuiting device on the track?

25 A. From recollection, sir, yes.

1 Q. Presumably there were people coming along the track as
2 well?

3 A. There were, sir.

4 Q. You went to the carriage and subsequently you prepared
5 a map, did you, or a plan, [INQ8381-1], of what you can
6 recollect from the second carriage? I'd like to ask
7 you, please, about what you can recollect.

8 Was the division of responsibility that you would go
9 into the carriage and rapidly assess who was inside and
10 in what state they were in, and Mr Parnell would stay
11 outside and you would relay information to him?

12 A. I don't remember what we actually discussed, but
13 I believe that was what we done, or what we did.

14 Q. Inside the carriage, door D8, we can see that you've
15 marked "A".

16 A. Yes, sir.

17 Q. Do you recollect who "A" was?

18 A. I'm sorry, sir, I don't understand the question.

19 Q. Yes. What does your note "A" signify? Did you see
20 somebody at position A?

21 A. It would look so, yes, sir.

22 Q. In your statement, you do describe somebody at
23 position A. Do you have any independent recollection of
24 what you saw?

25 A. That was what I saw, sir.

1 Q. Right. Who did you see at A, who was at A?

2 A. Without looking at my statement, sir, I would assume it
3 was a male.

4 Q. All right. In your statement, you describe how there
5 was a male with a significant head injury who was
6 moving, and then you say you wouldn't have thought, or
7 you didn't think, that he was conscious. Can you
8 recollect anything more of that male?

9 A. No, sir, I don't actually remember making my statement,
10 sir.

11 Q. All right. Presumably, when you made your statement, it
12 was as accurate as you could recall at the time?

13 A. Yes, sir.

14 Q. You described how you think he was wearing a white
15 shirt. Does that ring any bells?

16 A. I'm sorry, sir. It doesn't.

17 Q. All right. If I were to ask you any questions about the
18 nature of the injuries suffered by that male, would you
19 have any recollection at all, can you assist us at all?

20 A. Only from reading my statement.

21 Q. All right. Well, then, we'll follow your statement.

22 At B, so that's to say on the other side of the
23 carriage nearer the location of the bomb, there was
24 a male on the floor, he was face down, you can recall
25 that he had massive injuries and he was obviously dead.

1 That's what your statement records. Can you add
2 anything to that description?
3 A. I can't add anything to that statement, sir.
4 Q. Between seats 19 and 20, at C, you describe how there
5 were three people, two of them were obviously dead, one
6 of them didn't have -- then you go on to describe the
7 very severe head injuries that person had, and the other
8 had suffered massive injuries. Do you recall anything
9 more of the injuries that they had suffered?
10 A. I don't, sir.
11 Q. To the left of D8 at 17 and 18, your statement describes
12 a male and a female. The male and the female were
13 leaning against each other. We know one to be
14 Martine Wright, one to be Andrew Brown, and opposite,
15 near 15, there was a woman who you recollect was being
16 tended to by a British Transport Police officer,
17 Kira Mason. Do you recollect anything of those three
18 people?
19 A. Vaguely, sir, but only reminded from my statement.
20 LADY JUSTICE HALLETT: Sorry, Mr Keith, just before you go
21 on, in the statement, Mr Jones deals with:
22 "On the floor of the carriage in front of seats 19
23 and 20 were three people."
24 You dealt with two of them but you didn't then,
25 I don't think --

1 MR KEITH: My Lady is quite right, I didn't deal with the
2 third one. You recall or you make reference to a man
3 being among the bodies who was alive and you recollect
4 how you had to move bodies to get to him. Can you help
5 us at all with that part of your evidence? Do you
6 recollect anything at all about moving somebody who was
7 on the floor near seats 19 and 20?

8 A. I do remember moving people, sir.

9 Q. Do you recollect how many people you had to move for the
10 purposes of carrying out this triage?

11 A. Maybe two, maybe three. I can't give an exact amount.

12 Q. Were they all in the vicinity of C, seats 19 and 20, or
13 do you not know?

14 A. I don't know, sir.

15 Q. We are unaware of there being a male who was severely
16 injured and possibly dying at the location of C on the
17 floor, so may I ask you this: can you recollect, if you
18 had to move somebody, where you might have put him?

19 A. I'd only be surmising, sir, but looking at the diagram,
20 I would suggest back towards the back of the train,
21 towards A, where there would be more room, but I can't
22 remember.

23 Q. At D --

24 LADY JUSTICE HALLETT: Sorry, before we get to D, I don't
25 think we've also dealt with the next paragraph after

1 "I've marked this location C on the drawing".

2 MR KEITH: C, my Lady, is the location of all of the --

3 LADY JUSTICE HALLETT: I know, but after that, if you look

4 at his statement, there was a man sitting in seat 22.

5 MR KEITH: Yes, my Lady, I was just about to come to that.

6 LADY JUSTICE HALLETT: Right.

7 MR KEITH: The next person you recollect in your statement

8 is a man sitting at 22:

9 "... who was pinned into his seat by a young girl

10 who was wrapped around the pole at the side of his seat.

11 The man said, if we could move the girl, he might be

12 able to get off the train, so I do not think he was too

13 badly injured."

14 A. That's correct, sir.

15 Q. Do you have any other recollection?

16 A. I do remember that, sir.

17 Q. Can you tell us anything more about the young girl who

18 was wrapped around the pole?

19 A. She was a young girl, blond hair.

20 Q. Do you recollect anything about the nature of her

21 injuries?

22 A. No, sir.

23 Q. Do you recollect anything about whether she was moving

24 or whether she was showing signs of consciousness?

25 A. She wasn't moving. I remember checking and she was

1 dead, sir.

2 Q. Was that on your initial exploration of the carriage?

3 When you went down --

4 A. Oh, yes, sir, yes, sir.

5 Q. -- with Mr Parnell and you were carrying out this

6 initial assessment of the carriage, was that when you

7 checked her and found that she was dead?

8 A. Yes, sir.

9 Q. How did you do that? What checks did you carry out to

10 see whether she was alive or dead?

11 A. I checked her carotid pulse, which is in her neck, for

12 an amount of time -- I can't give the amount of time --

13 she wasn't breathing, she had no life signs.

14 Q. We've heard evidence from other witnesses about how

15 there was a young lady wrapped around a pole at that

16 spot and she was being cared for by a lady doctor,

17 Dr Quaghebeur.

18 Do you recollect there being anybody in the near

19 vicinity of that young lady comforting her or supporting

20 her?

21 A. I don't, sir.

22 Q. Do you recollect any firemen being there, because we've

23 heard other evidence to suggest that a fireman came into

24 the carriage and assisted the lady doctor?

25 A. There was lots of fire officers there, sir.

1 Q. There were lots of fire officers. What were they doing?

2 A. They were assisting us and treating the patients to
3 their ability.

4 Q. After you assessed the young lady and established that
5 she was dead, did you see her being moved?

6 A. Yes, sir.

7 Q. Where was she moved to?

8 A. I believe, sir, looking at the diagram, towards the
9 floor between -- near the door of D6 in the middle of
10 the carriage, I believe.

11 Q. Was she placed on a stretcher or a ladder of any kind?

12 A. From recollection, I believe it was a ladder.

13 Q. Do you recollect whether she was then passed out of the
14 carriage by the firemen?

15 A. I don't remember that at all. I wasn't there at the
16 time, sir.

17 Q. Was there another lady, in the near vicinity of seats 21
18 and 22, lying across the laps of any of the people
19 seated in those seats?

20 A. Not from what I can remember, sir.

21 Q. We know from the evidence of Mr Parnell, who was outside
22 the carriage, that you called out the number of people
23 whom you believed to be dead and the number of people
24 whom you had assessed to be priority 1s, as being
25 severely injured requiring immediate attention.

1 Do we take it from that that those persons whom you
2 thought were dead were all checked by you and verified
3 as being dead?

4 A. Yes, sir.

5 Q. From the numbers that he gave -- namely, I think, from
6 recollection, five fatalities -- do we take it, then,
7 that, in addition to the young lady whom you checked by
8 seats 21 and 22 at D, you must therefore also have
9 checked for signs of life the bodies near C?

10 A. That would make sense, sir, yes.

11 Q. Do you recollect specifically checking those bodies and
12 can you recollect at all how you checked?

13 A. In the same way I would have dealt with the first lady,
14 but I don't recollect that at all.

15 Q. Were there any other paramedics with you by this stage?
16 We know Mr Parnell was outside, Mr Halawi was still
17 upstairs, was anybody in the carriage with you?

18 A. Yes, sir, there was four, five, possibly six ambulance
19 crews, people there, that I can recollect, there might
20 have been more than that. But we weren't alone on the
21 train.

22 Q. How do you know they were paramedics?

23 A. They were wearing uniform, sir.

24 Q. They were in LAS uniform?

25 A. Yes, sir.

1 Q. Do you know Craig Cassidy?

2 A. I do now, sir.

3 Q. Can you help us with whether he might have been one of
4 the paramedics on the train at that stage?

5 A. In my statement, it says that he was. As I said at the
6 beginning, I don't remember him coming to the train with
7 us, but I did see him on the train.

8 Q. What about Alan Treacy?

9 A. Yes, sir, he was there.

10 Q. So these paramedics were in the train when you were
11 carrying out your initial assessment and calling out the
12 information to Mr Parnell?

13 A. Yes, sir.

14 LADY JUSTICE HALLETT: It was six fatalities, according to
15 Mr Sudbury.

16 MR KEITH: Thank you, my Lady.

17 Did you see anything of the treatment that they were
18 giving to casualties in the carriage?

19 A. I would have done, sir, but I don't recollect what it
20 was.

21 Q. The first person whom you've identified in your plan at

22 A -- and I read out the part of your statement dealing

23 with that person -- do you recollect any of your

24 paramedic colleagues applying any sort of treatment to

25 that person, whether by way of the application of a mask

1 to supply oxygen ...

2 A. It was a very confusing scene, sir. I don't know who or
3 what emergency services were providing care at that
4 time.

5 Q. You, yourself, didn't apply any first aid or medical
6 treatment to --

7 A. No, as I said, sir, that wasn't my role.

8 Q. Having carried out this assessment, did you then leave
9 the carriage?

10 A. Yes, sir.

11 Q. Did you go back upstairs to Mr Parnell, or had he
12 already gone up to report?

13 A. I don't remember whether we went up together or
14 separately, but I did go topside, sir.

15 Q. If there were a number of other paramedics in the
16 carriage -- and you have described for us how you
17 thought there were --

18 A. Possibly six, sir.

19 Q. -- possibly six -- why was it necessary for anybody to
20 go upstairs and say more paramedics were required?

21 A. We didn't need -- I didn't need more paramedics down
22 there, sir. I needed stretchers. That's what I needed
23 to get the information to the Silver, was that we needed
24 to move the patients. We had medical treatment but they
25 needed optimal care in topside so that we could actually

1 see how -- what injuries they had and how to treat them
2 appropriately. So I went topside to say we needed
3 stretchers.

4 Q. Mr Parnell has told us he went upstairs, he thought
5 first, before you, and was speaking to his colleagues,
6 Mr Edmonson and Mr Halawi and a couple of other
7 gentlemen, and you came up and said you needed medical
8 teams downstairs. Do you recollect that?

9 A. I may have said that, sir. On reflection -- let me
10 start again. I think I did say that. On reflection,
11 I didn't need any medical teams downstairs. What
12 I needed was equipment to move the patients. But
13 I quite possibly did actually say we need -- I needed
14 more medical teams, which I was incorrect in doing so.

15 LADY JUSTICE HALLETT: I think Mr Parnell suggested there
16 was only one paramedic left down in the carriage once
17 you and he were up topside as you put it.

18 A. No, my Lady, there were more.

19 MR KEITH: I must ask you this: might you be mistaken about
20 that? There is some material to suggest that
21 Mr Cassidy, for example, may have gone downstairs with
22 the HEMS doctors who arrived a little later, and it's
23 a little unclear as to when Mr Treacy went down.

24 Can you help us with whether you can recollect the
25 identities of any of the paramedics other than the two

1 men you mentioned, Treacy and Cassidy?

2 A. No, sir, I only read my statement this year. I had no
3 recollection of the majority of stuff that went on

4 during the day. It states in my statement that I saw

5 Mr Treacy, but up until reading my statement a matter of
6 weeks ago, I don't actually remember him being there.

7 But what I do know, I would not have left the train

8 without medical -- without ambulance crews on scene.

9 Q. Why, though, because your role, as you've told us, was
10 to assess. You had no first aid equipment with you.

11 A. Yes, sir.

12 Q. Even if you were the only person down there, there was
13 nothing that you could have done practically for those

14 persons in the carriage.

15 A. I couldn't have done, but what I could have done was --

16 is get what we needed to the scene. There were crews

17 there, treating patients. What I needed to speak to

18 my -- to the Silver, to give an accurate description of

19 what was going on downstairs and what we required.

20 Q. When you went back upstairs and reported, do you

21 recollect that the HEMS doctors had arrived?

22 A. Yes, sir.

23 Q. We know that they were Drs Lockey and Davies and we'll

24 be hearing from Dr Lockey later. Did you go back down

25 after that?

1 A. Yes, sir.

2 Q. Did you go down with them or on your own?

3 A. I didn't go with them. They went downstairs and I went
4 to get some equipment to move the patients.

5 Q. Was that the stretchers of which you've spoken?

6 A. Yes, sir.

7 Q. When you went back down, how far had things progressed?
8 What was going on in the carriage?

9 A. It was very organised, sir. All we -- there was -- the
10 patients that were trapped were obviously being treated
11 by that time, and people were being moved topside.

12 Q. There is a BTP inspector, Inspector Munn, who sends
13 a message at about 09.31 to ask for more scoops for
14 paramedics. Do you have any recollection of such
15 a request being made when you were topside?

16 A. That may have come from me, sir.

17 Q. Do you recall asking a police inspector for more scoops
18 or more equipment?

19 A. I don't recall that, but it's terminology that ambulance
20 crews would use, would be a "scoop", so that would -- it
21 would -- if that's the statement -- if that's what he
22 said, it would have probably come from me.

23 Q. Was there an issue about the provision of supplies from
24 an EEV?

25 A. There was, sir.

1 Q. What is an EEV?
2 A. It's an emergency equipment vehicle.
3 Q. Where was it?
4 A. It was outside the station.
5 Q. When you were topside, what were you trying to get out
6 from it?
7 A. Firstly, I wanted to get into it, but I needed
8 stretchers so we could move the patients. That was --
9 as I said, that was what we needed.
10 Q. What was the problem?
11 A. The person driving it didn't know how to open the door,
12 or was having problems opening the door and wasn't
13 entirely sure what equipment was on board.
14 Q. Were you able to get into it in the end and get out what
15 you wanted?
16 A. Yes, sir.
17 Q. How long did that delay matters?
18 A. In reality, I don't think it did delay things very long,
19 but it's something I do recollect.
20 Q. Having got what was needed out of the EEV, the HEMS
21 doctors had gone back down, did you go back down after
22 that?
23 A. Yes, sir.
24 Q. What did you do then?
25 A. I don't actually remember what I done until the end of

1 the incident where myself and Mr Cassidy went through
2 the train checking.

3 Q. Was that checking to see whether or not the train was
4 empty and whether or not any live casualties had been
5 left behind?

6 A. That had already been done by Dr Lockey, and he asked us
7 to reaffirm that which -- so there were -- we actually
8 had three people who could actually say these people
9 were correctly alive or correctly -- or dead.

10 Q. You prepared, I think, an incident report very shortly
11 after the incident. It was an incident report for the
12 London Ambulance Service. In it, you make reference to
13 the fact that:

14 "Due to lack of communications, Bronze forward
15 should have had one person as a runner reporting to
16 Silver and back to Bronze. This was done ad hoc at both
17 locations and seemed to work."

18 A. Yes, sir, that's correct.

19 Q. We've heard evidence from Mr Parnell, in particular, how
20 he had to run up and down perhaps three or four times
21 and you plainly went back up to get equipment to look
22 for stretchers and then to go to the EEV.

23 Would matters not have been hugely simplified if you
24 had been able to pass such messages up by radio?

25 A. Yes, sir.

1 Q. What effect, if any, did the absence of a working radio
2 have?

3 A. The information was delayed because I had to go and pass
4 it up. My suggestion was that, by having a runner,
5 I could pass messages to that person, they could then
6 run topside and brief Silver.

7 Q. If you'd had a runner, you wouldn't have had to go up?

8 A. No, sir.

9 Q. What could you then have done if you'd been able to stay
10 down by the track?

11 A. Continued triaging, go back over and wait for the teams
12 to come down.

13 Q. We may be hearing evidence shortly that there was a gap
14 between you carrying out the initial triage and
15 paramedics being able to apply oxygen and to apply
16 priority cards.

17 If you had been able to stay down there, what more
18 would you have done in relation to the live casualties?
19 Could you, as you reassessed their triage state, have
20 kept a better eye perhaps on their state and whether or
21 not they were still conscious, or whether or not they
22 would respond to whatever you were doing?

23 A. I had already done that, sir, and all the patients that
24 were conscious, they were all left with either a fire
25 officer or an ambulance crew.

1 Q. So every patient whom you saw was left with somebody
2 else when you left the carriage?
3 A. Who was alive, sir, yes.
4 Q. Did you apply any sort of priority cards yourself?
5 A. I believe so, yes, sir. Definitely --
6 Q. To all of the people whom you triaged or just some of
7 them?
8 A. I recollect one, but I don't know anymore. It's very
9 hazy.
10 Q. Do you recollect who that was?
11 A. That was the gentleman who I first saw.
12 Q. The first person at B?
13 A. Yes, at A.
14 Q. At A?
15 A. At A, sir.
16 Q. Just within the door of the carriage?
17 A. Yes, sir.
18 Q. You applied the priority card?
19 A. I believe so, sir.
20 Q. Was that a P1 card?
21 A. Yes, sir.
22 Q. Did you apply oxygen?
23 A. No, sir. As I said, I had no medical --
24 Q. You had no equipment.
25 Who was that person left with, do you recall, when

1 you left the carriage, having applied a P1 card?

2 A. I don't recollect sir, sir.

3 LADY JUSTICE HALLETT: Shall we break there, Mr Keith?

4 MR KEITH: My Lady, I have one more question, if I may.

5 We've discussed equipment, stretchers. Was there any

6 issue, as far as you recall, in relation to a lack of

7 proper supplies of pain relief?

8 A. No, sir.

9 MR KEITH: My Lady, those are all the questions that I have.

10 LADY JUSTICE HALLETT: I'm sorry we're going to have to ask

11 you to come back this afternoon, Mr Jones, but it's now

12 1.05. 2.05, please.

13 (1.05 pm)

14 (The short adjournment)

15