

Coroner's Inquests into the London Bombings of 7 July 2005
Hearing transcripts - 4 November 2010 - Afternoon session

1 (2.00 pm)

2 MR KEITH: Mr Edmondson, could we have on the screen,
3 please, page 8 of exhibit 565, [LAS565-8]?

4 We know, Mr Edmondson, that at 09.14 -- we can see,
5 five rows from the bottom, "N301", which was the first
6 ambulance to arrive, a Mr Cumner and a Ms Ray -- that
7 one of them -- we know from evidence from Mr Cumner that
8 it was actually Ms Ray who made the call -- called CAC
9 to say:

10 "We are on scene at Aldgate. Can you make
11 ambulances 5? Possibly fatalities in the station.
12 There has been an explosion. Over."

13 If we then go over the page to page 9 [LAS565-9], and your call
14 at 09.15, you refer, EP5, just the fact you got that
15 message, do you think that you were referring back to
16 the previous message?

17 A. Yes, that's correct.

18 Q. Which made the references to fatalities and ambulances
19 five?

20 A. Yes, that's right.

21 Q. What I was asking you before the short adjournment was
22 this: is it not somewhat curious that Ms Ray and
23 Mr Cumner, who were the first on the scene, were able to
24 say they needed a number of ambulances but did not
25 seemingly have the power or perhaps inclination to

1 declare a major incident. It called for you, once you'd
2 heard that they needed ambulances, to suggest the
3 declaration of a major incident yourself?

4 A. Yes, the only thing that I can really put that down
5 to -- and this would be conjecture on my part -- was
6 just the fact that my experience as an emergency planner
7 is that 99 per cent of my job involves thinking
8 worst-case scenario in dealing with critical or major
9 incidents. An ambulance crew, 99 per cent of their job
10 is actually going to single patient 999 calls and not
11 dealing with major incidents.

12 So the experience and the exposure that they have is
13 going to be far limited compared to myself. So they
14 wouldn't necessarily automatically go into their major
15 incident mode and declare a major incident and go
16 through their protocols.

17 Q. But there is a divergence, as you told us, between the
18 declaration of a major incident, certainly in 2005, and
19 the issue of how many ambulances you actually are
20 requesting?

21 A. Yes.

22 Q. Now the system has been tightened up, so that, if you
23 declare a major incident, there is an automatic minimum
24 number of ambulances that will then attend?

25 A. Yes, that's correct. Immediately after the 7 July

1 incidents, one of the things that I requested that the
2 service put in was a predetermined attendance, which we
3 hadn't had before for major incidents. We had had them
4 for contingency plans. So, for example, an airport
5 incident, where you preplanned the numbers and the types
6 of ambulances resources that you need. But not for
7 a declared major incident.

8 Q. You suggested a declaration of a major incident. Do you
9 think that it made a difference the fact that you merely
10 suggested it, and then, only at 9.24, did you actually
11 formally declare it?

12 A. No, I don't believe so, because even if I had declared
13 a major incident, they would have -- I would suggest
14 that CAC -- so the ambulance Control -- would have then
15 come back to me and asked me, "How many ambulances do
16 you want us to send?" and I would not have been able to
17 answer that question.

18 LADY JUSTICE HALLETT: Who has the power within the
19 Ambulance Service to declare a major incident?

20 A. It's any ambulance crew or any ambulance officer or
21 Central Ambulance Control, my Lady.

22 MR KEITH: You, according to your witness statement, arrived
23 on scene at Aldgate about 9.18.

24 A. Yes, that's correct.

25 Q. When you arrived, you could see at least one ambulance

1 there?

2 A. That's what I can recall, yes. An ambulance, and
3 I think there was a fast response car there as well, and
4 a motorcycle.

5 Q. We know that an ambulance, N301, which was Mr Cumner and
6 Ms Ray, were the first to arrive and so that ambulance
7 may have been theirs.

8 A. Yes.

9 Q. And we know that a paramedic, Mr Cassidy, EC46, had
10 arrived around then as well. Do you think that that may
11 have been the Motorcycle Response Unit that you saw, or
12 was he in a car? I think he was in a fast-response
13 vehicle. Did you see a fast-response vehicle?

14 A. There was definitely another vehicle there. There may
15 well have been more than one vehicle. But what I can
16 recall was that there was most definitely an ambulance,
17 a car, and there was a motorcycle. There may well have
18 been more than that.

19 Q. You say in your statement there were no LAS staff
20 visible as they were all underground. Was that because
21 you couldn't see any LAS staff treating casualties in
22 the station area at the front of Aldgate?

23 A. I think it was because there was -- it was a fairly
24 chaotic scene at that point, because we're talking
25 moments after a potential explosion. So there were

1 significant numbers of people that were coming out of
2 Aldgate station. That was, to an extent, hampering some
3 of the view of the incident people that we actually had
4 on-site because there were so many of these casualties
5 and uninjured people that were coming out of the
6 station.

7 But it was literally moments later that Steve Jones,
8 who was one of the motorcycle response paramedics, and
9 Andrea Ray made themselves known to me.

10 Q. They hadn't been down to the track at the time that you
11 saw them, had they?

12 A. No.

13 Q. Ms Ray never went down, as far as we can understand, to
14 the track.

15 A. That's correct.

16 Q. But Mr Jones did subsequently?

17 A. He did, yes.

18 Q. Did you discuss with them what everybody's primary task
19 should be going forward from then?

20 A. Yes, I did.

21 Q. How long did that take?

22 A. Probably no more than about 30 seconds.

23 Q. Mr Jones was tasked as Bronze triage, was he not?

24 A. That's correct.

25 Q. Ms Ray stayed upstairs to treat casualties in the

1 entrance to Aldgate station?

2 A. No, that's not the task that I gave her.

3 Q. What task did you give her?

4 A. I actually gave her the parking role, and this is Bronze
5 parking.

6 Q. She became Bronze parking. Which other paramedics did
7 you speak to, if any, in order to determine who would go
8 downstairs and treat, immediately, casualties in the
9 train?

10 A. At that stage, there was nobody else. As far as I can
11 recall, they were the only two people that I initially
12 spoke to from the Ambulance Service. There were people
13 starting to arrive, but once again, I don't remember
14 actually speaking to any of those other people.

15 Q. Mr Jones says he went down with Mr Parnell, so
16 Mr Parnell must have been there as well, and we've heard
17 evidence from him, and Mr Jones went into the carriage
18 and he called out the number of possible fatalities and
19 the number of severely injured and P1s and P2s to
20 Mr Parnell, who took a note of what the position was in
21 the carriage.

22 Mr Parnell came back upstairs with the information,
23 but according to Mr Jones, Mr Jones followed him up
24 a little while later.

25 I want to try to examine if you know who else was

1 down in the carriage. Mr Cassidy went down. Do you
2 know when he went down?

3 A. No, I don't. As I said, when I arrived, I didn't see
4 him there, so only after the incident was I really made
5 aware that he was on the trackside dealing with
6 casualties, and that was the same with Tony Cumner from
7 the Waterloo ambulance. Obviously, I knew there was an
8 ambulance crew, but I only saw Andrea at the time.

9 Q. You've made reference in your statement to a duty
10 station officer being on scene call sign G199. I think
11 that's Mo Halawi.

12 A. I understand that to be true. Yes.

13 Q. In your statement, you believe that Mr Jones told you
14 that Mr Halawi had moved trackside and was treating
15 patients?

16 A. Yes.

17 Q. Do you know that for a fact?

18 A. Only from what I understand to -- that -- what
19 Steve Jones actually said to me. So it was clear to me
20 that Steve had already almost adopted a triage role
21 because he had belt packs around his body, and that's
22 why I said "You're quite clearly set up to be the triage
23 officer, so go underground", and he said that the duty
24 officer was also here and he'd already gone down to the
25 site to treat people.

1 Q. I'll be corrected if I'm mistaken, but our reading of
2 the LAS logs is that Mr Halawi, in fact, became Bronze
3 safety and, according to his incident log, he remained
4 surface-side. The question I want to ask you is this:
5 given that you were discussing with Mr Jones who was
6 going to go down with him alongside him to carry out
7 first aid as opposed to doing triage, might it have been
8 that the position was thrown into some confusion by
9 a misunderstanding as to whether or not Mr Halawi was
10 actually trackside or going to remain on the surface
11 and, if he remained on the surface, might it have been
12 that fewer paramedics went down to the track than you
13 had understood to be the position?

14 A. I don't recall Mo Halawi at any point being at street
15 level. The only thing that I can recall is -- as I said
16 before, is speaking to Steve Jones, and then him being
17 deployed as the triage officer, so to do -- at this
18 stage to do the primary triage and not anything to do
19 with secondary triage, just the primary triage, and then
20 to count the number of casualties and then come back to
21 me at street level.

22 I don't remember Mo Halawi actually being there in
23 the initial stages of that conversation or, indeed, at
24 street level at that point.

25 Q. Do you remember Mr Parnell, Tony Parnell coming back up

1 and giving you the information that Steve Jones had
2 provided him and then Mr Jones appearing himself to see
3 what had happened to Mr Parnell?

4 A. Yes, I do recall, I do recall that, and the reason
5 I recall that is because there was also a request for
6 some stretchers, and at this point the emergency support
7 tender had arrived and we were then starting to manage
8 the deployment of some additional equipment to the site.

9 LADY JUSTICE HALLETT: Can you just help me a little more on
10 the principle of the triaging, Mr Edmondson?

11 I understand the importance of triage, but I just have
12 this question: surely it's important to triage only if
13 you know there are treating paramedics or doctors coming
14 up behind?

15 In other words, what is the point of someone going
16 along saying, "This is a priority 1 casualty, that's
17 a priority 3", if there's not someone coming up behind
18 saying, "I can try to save the life of that priority 1"?

19 A. Yes, in fact, the triage system is, in this country,
20 a battlefield triage system. It's really designed to do
21 the most for the most. And actually, it's designed for
22 when you don't have any clinicians available to treat
23 people. So the concept, the primary triage, is
24 a snapshot of the numbers of casualties that you have.
25 The people that are potentially going to be viable for

1 survival, and it's, unfortunately, a very robotic way to
2 manage triage because it's done by an algorithm card and
3 it looks at the very, very baseline of airway, breathing
4 and circulation to determine whether or not that person
5 at that time will be viable, and that is based on the
6 fact that you have no clinical resources to respond to
7 the incident.

8 LADY JUSTICE HALLETT: But it must surely depend on there
9 being people, even if they're not clinicians, that they
10 are at least either technicians or paramedics who are
11 going to save the lives of those who are saveable?

12 A. Yes, and the concept of the card system, so identifying
13 P1s, 2s, 3s and the deceased, is exactly that. It's to
14 recognise what their survivability is, attach a card and
15 then wait for resources to turn up, to hopefully save
16 those people that potentially are viable for life.

17 If you had enough ambulance resources attend an
18 incident anywhere across the country, all at once having
19 a hundred ambulances turn up for 50 casualties, you
20 wouldn't put a triage system in place because you
21 wouldn't need to. This is very much designed for we
22 only have two or three paramedics or technicians at that
23 stage, we need a snapshot of the numbers of casualties
24 so that we can make sure that we do the most for the
25 most.

1 It also recognises that, if you have 30 P1s, that
2 means you need 30 ambulances. If you have 50 P3s, it
3 probably means you don't need 50 ambulances, it means
4 that you need a bus. So it tries to determine the
5 requirements for transport and also the numbers of
6 hospitals as well.

7 MR KEITH: Mr Cumner had called in and said "Need
8 ambulances, five". He was there. Ms Ray was there.
9 Mr Jones had gone down to do triage, Mr Parnell was
10 doing triage. Mo Halawi was doing Bronze safety.
11 Messrs Treacy and Green I think turned up in a third
12 vehicle shortly thereafter.

13 Why could -- I'm sorry, I don't mean it to sound
14 simplistic -- why could not a decision have been taken,
15 knowing that there was -- it was a train incident and
16 there had been an explosion on a train, there were
17 therefore likely to be a number of extremely badly
18 injured, if not dying, casualties, to get paramedics as
19 soon as they arrived down to the train to start applying
20 first aid?

21 A. That decision was made because as soon as Andrea -- who
22 was the Bronze parking role that I appointed -- as soon
23 as she was appointed in that role, I advised her to send
24 all oncoming ambulance crew, of which I'd requested 30
25 ambulances, that all of them be deployed immediately to

1 the incident site.

2 If I'd known that there was a Bronze safety, which
3 I didn't know, I would have quickly turned that incident
4 role into a clinical role, because there are prime roles
5 that you have to put in place to manage an incident and
6 there are four prime roles, and that's all you need
7 initially to manage the incident.

8 Q. We're getting to the heart of it, if I may say so.

9 Do you have to appoint people to carry out roles
10 such as Bronze triage, Bronze safety, Bronze parking
11 when the information that you're actually receiving and
12 common sense may dictate: we don't have time to put into
13 place a Command structure that assigns these sorts of
14 roles to trained paramedics who could otherwise be
15 carrying out clinical functions with the dead and the
16 dying?

17 A. The Command structure, there's probably about seven or
18 eight different Bronze roles, so, yes, not all of them
19 would need to be put in place in the initial stages of
20 the incident. However, it's absolutely critical that
21 you put in the first four positions, that being the
22 incident officer, the Control person, so this is the
23 person that sits in the ambulance and maintains the
24 communication link with Control. So they're the initial
25 positions and they are providing a focal point for the

1 responsibility of the Ambulance Service to manage that
2 incident.

3 The triage position, that's critical, because if you
4 don't do triage, every ambulance crew that will turn up,
5 when they have a patient that's in cardiac arrest, they
6 will stop and start dealing with that cardiac arrest,
7 when actually there's another 30 or 40 casualties that
8 probably were going to survive but, unfortunately, we've
9 not got to any of those casualties because we've only
10 stopped at the very first one, and that's why we put the
11 triage system in place.

12 The parking role is because, uniquely, the Ambulance
13 Service turns up to the incident site and then they
14 leave again and then they come back again. The
15 Fire Service and the police don't do this. And it's so
16 important that we have what we call an ambulance
17 circuit, so we actually perform an ingress and egress
18 system. Otherwise, the Fire Service, as an example, may
19 well turn up with ten appliances and, because of the
20 muddle at the incident, perhaps they block us in, and
21 that's the four prime roles.

22 Q. But in this system, time is very much of the essence, is
23 it not, and it depends, of course, on communications.

24 You've identified how one important facet of the system
25 is having an ambulance technician remaining by the radio

1 in the ambulance to be able to relay messages to
2 Control. We've heard evidence how Mr Jones and
3 Mr Parnell had to come back up to ground level from the
4 track. It may be that Mr Cassidy had not yet gone down
5 there and he may only have gone down when Mr Jones went
6 back down, he went back down with him. Because they had
7 to come up to get messages to you and to the Control,
8 they necessarily deprived the train of the presence of
9 clinicians.

10 A. The communications quite clearly were a challenge and,
11 yes, Steve, who was the Bronze triage, was asked to come
12 back to me. But that was his role for the incident. So
13 while we were putting a triage system in place, he
14 wouldn't have converted to a paramedic to treat
15 casualties.

16 Q. If he had a radio that worked -- and, of course, all the
17 radios were affected by the fact that it was in
18 a tunnel -- could he not have passed the information
19 concerning the elementary triage numbers to Mr Parnell
20 or radioed them himself, and then started applying first
21 aid, assuming he had the equipment with him? In fact we
22 know that he didn't take any equipment with him, but
23 couldn't he have done that?

24 A. Yes, most definitely.

25 Q. Mr Parnell could have radioed the information, if his

1 radio had worked, and he could have applied clinical
2 assistance.

3 A. Yes. The short answer is, yes, if we had hand-portable
4 radios that worked underground or we had hand-portable
5 radios on the ambulances, then, yes.

6 Q. That no doubt was one of the features why senior
7 management subsequently, together with the other
8 emergency services, addressed the position of
9 communications in the London Ambulance Service --

10 A. Yes.

11 Q. -- to improve that, amongst others, but to improve and
12 alleviate that problem?

13 A. Yes, I understand, sir.

14 LADY JUSTICE HALLETT: Mr Edmondson, it sounds as if you've
15 done quite a lot of research into disaster planning.

16 Was it Mr Jones who described he had been involved in
17 the Soho bombs?

18 MR KEITH: I think it was Soho and Clapham.

19 LADY JUSTICE HALLETT: He said that the reason he didn't
20 take his paramedic equipment down with him and just took
21 the triage was that there had been some question of
22 paramedics being criticised at the Soho bombings for, as
23 it were, being distracted by one patient when there
24 might have been many more to save, which is the point
25 you were just making about the importance of triage, is

1 that right?

2 A. Yes, my Lady. It's, unfortunately, one of those
3 probably very, very difficult decisions that any
4 clinician has to make. A person that's been in the
5 Ambulance Service for 20 years, on the biggest incident
6 of their life, then they have an emergency planning
7 manager that's been trying to teach them this for the
8 last, you know, ten years, and at their one incident
9 then to turn around to them and say, "Don't treat
10 anybody".

11 I was very conscious of this with Andrea in
12 particular, because she wasn't even doing the triage
13 role, which has a direct patient connection. She was
14 actually doing parking of ambulances. But the fear that
15 we had was having 30 ambulances turn up and all 30
16 ambulance crews taking their keys into the incident to
17 go and treat patients and then the whole of the
18 structure would have started to fall apart.

19 But it is a common problem at a lot of incidents
20 that people see the Ambulance Service turn up, in the
21 very initial stages and, quite rightly, they think that
22 we are there to help them and help treat patients. The
23 reality is that we are doing that, but we're just doing
24 it in a slightly different way. But only in the initial
25 stages of the incident.

1 MR KEITH: Of course, in an incident such as this, the
2 initial stages may be the most vital in terms of
3 survivability of the persons caught up in the incident.
4 A. Yes, and that's exactly why we put the triage system in
5 place.
6 Q. At any rate, at 9.24 you formally declared Aldgate
7 a major incident. Could we have [LAS565-20]? EP5:
8 "Declared major incident declared. I can confirm
9 the exact location is Aldgate station."
10 You give a METHANE report, which is a mnemonic, is
11 it not, for a certain amount of information that has to
12 be imparted?
13 A. Yes, that's correct. I just correct myself. Earlier,
14 before the break, I actually said it was a CSCATT
15 report, which is actually the structure, the Command
16 structure that we put into place, but, yes, it is
17 a METHANE report that we provide.
18 Q. But you confirm an explosion, you don't think there were
19 CBRN connotations, standard explosive device:
20 "I have appointed some command roles to do a recce
21 downstairs in the Underground to confirm what the
22 situation is on hazards. The access is Aldgate, one-way
23 station. Park as appropriate. Confirmed explosion.
24 Multiple casualties. Ambulances 30, three zero. All
25 four emergency support vehicles."

1 So by this stage, you've appreciated the full scale
2 of the explosive incident and you know that you need
3 many more ambulances than that originally requested by,
4 in fact, Mr Cumner?

5 A. Yes, that's correct.

6 Q. When Mr Jones had reported back to you from his original
7 initial triage, we know he went back downstairs. Do you
8 recall him leaving to go back down to the track?

9 A. I don't. I think he did, but I don't actually recall
10 the exact detail.

11 Q. Can you specifically recall any other paramedics going
12 down to the track at that time?

13 A. There was a lot of activity when he arrived at the --
14 back on street level, we were starting to receive three
15 or four ambulances, and all of those ambulance crews
16 that were getting out of their ambulances were all being
17 deployed on to the Underground system.

18 Q. You describe in your statement how a tactical adviser,
19 Steve Wasp, appeared, and you asked him to check whether
20 it was a CBRN attack. Then you describe the appearance
21 of the HEMS doctor, Dr Gareth Davies. We know that he
22 arrived in a car with Dr Lockey, and a number of other
23 officers appeared with him, Mr Barrett, the duty station
24 officer, and Mr Huggins, the ambulance operations
25 manager. So by 9.30, there were a considerable number

1 of relatively senior officers on the scene?

2 A. Yes, that's correct.

3 Q. There was a discussion about which hospital the walking
4 wounded should go to and I don't think I need trouble
5 you with that, there was a debate as to which hospital
6 was the appropriate one. There was a call to CAC, in
7 order to find out what the best hospital was, and it was
8 determined to be the Royal London.

9 A. Yes.

10 Q. Do you recall there being a time when the HEMS -- one of
11 the HEMS doctors went downstairs?

12 A. Yes, I do.

13 Q. Do you know when that was?

14 A. I don't know the time but I know that the HEMS team at
15 some point said that they were going to go down to the
16 actual site to start treating casualties.

17 Q. Were you content, by the time that your fellow officers
18 arrived -- for example, Mr Huggins and the like -- that
19 you had enough paramedics by that stage downstairs in
20 the track treating people?

21 A. I was content with the fact that I'd made the request
22 for a number of ambulances. At that stage, I hadn't
23 received my full complement of ambulances that I'd
24 requested. So the advent of having three or four
25 officers turning up, the decision was made between us

1 that there was a multi-sited and very complex incident
2 across London that was taking place and they would
3 perhaps be better placed reporting back to Control and
4 going to those other incidents, if they were needed.

5 So I was waiting for further ambulances to arrive,
6 and they were arriving over a period of time.

7 Q. There appears to be a very clear indication from the log
8 of how resources were divided between Aldgate and then
9 other incidents subsequently and how resources were
10 tasked to come to Aldgate. Mr Cumner, firstly, with
11 ambulances five, and then, you say, ambulances 30.

12 Do we have an equally clear audit trail of the
13 division of responsibilities between station level and
14 track level, between the walking wounded who necessarily
15 had been able to get up to station level under their own
16 steam, and those who were in the carriage who couldn't?
17 Is there any log or any way of ascertaining who was sent
18 down as opposed to who was tasked to stay up?

19 A. I don't believe there is. On the log that you've shown
20 already, the control room asked for the numbers of
21 ambulances that were on-site at one point, I think that
22 was around about 940. So there was a log there of all
23 of the ambulance crews that we had and they were all
24 deployed underground.

25 Q. That's at Aldgate. What we don't know is who went down

1 to the track when.

2 A. No.

3 Q. That's not something -- and perhaps it may be
4 understandable in the frenetic nature of dealing with an
5 incident of this magnitude, it's impossible to keep
6 a track of where everybody is, but that was
7 a significant feature of this incident, wasn't it?

8 A. Yes, that --

9 Q. There was a clear distinction between the walking
10 wounded and those who needed more immediate, more
11 serious intervention?

12 A. Yes, the walking wounded were being mixed up with
13 uninjured people and they were all in the bus stand, and
14 I allocated an officer to manage those people. They
15 were -- to an extent, they were being corralled by local
16 police who were starting to take witness statements and
17 that was the point we tried to distinguish between,
18 walking wounded and uninjured, because they were all
19 grouped together, so that we could get the walking
20 wounded off to hospital.

21 So that was being managed by one person.

22 Underground, as I said before, all of the ambulance
23 crews that were turning up were being deployed
24 underground, but we didn't keep a record of those staff
25 that were being deployed underground. It was the

1 parking officer that was keeping a record of the
2 ambulance crews turning up and she was telling them to
3 go downstairs.

4 What would usually happen, and one of the systems
5 that usually goes into place, is that, as soon as the
6 Fire Service turn up, they manage the inner cordon for
7 all of the services and they do an excellent job on
8 incidents that I've attended before --

9 Q. Where they're keeping a log of who's going in and out?

10 A. Yes, and actually, to an extent, if someone didn't have
11 the correct PPE on, the personal protective equipment,
12 they wouldn't give access to that person if it was
13 hazardous.

14 Q. Finally, I just want to register the fact, but it's
15 something that we'll address in the course of your
16 evidence when you return next year, that you were the
17 gentleman who requested ACCOLC, the access overload
18 control, to be applied to the O2 network for mobile
19 phones in the area of Aldgate.

20 A. I requested ACCOLC for all networks. It wasn't just the
21 one network.

22 Q. In fact, it only was triggered -- it was only applied to
23 one network subsequently. No doubt you can explain,
24 when asked, what the reasoning was at the time in your
25 mind for the making of that request --

1 A. Yes, I can.

2 Q. -- and what the problems were? But just to trail it, do
3 we presume that you asked for ACCOLC because you were
4 encountering substantial communications difficulties:
5 radios weren't working, perhaps they were overloaded,
6 and the mobile phone system was beginning to
7 disintegrate?

8 A. The radio system was working. It was congested, and
9 that was because of the numbers of resources that were
10 on the radio channel. So it was working perfectly from
11 street level to control, and I think that's reflected in
12 the logs that the messages were getting through. It was
13 just that I was competing with other incident sites
14 because of the way the system was set up.

15 The backup system is the mobile phone system. It
16 was quite clear that the mobile phones were getting
17 congested as well. So if I couldn't get through on the
18 radio, I would attempt to use the mobile phone, and
19 I was getting engaged -- the engaged tone, or I might
20 ring again and then, suddenly, you would get a line and
21 you would be able to speak to someone. So that was the
22 reason for putting that request in.

23 Q. The request wasn't made until about 10.00. Was it
24 triggered by your attempts to try to deal, not with the
25 application of first aid in the train, but with the

1 dispersal of casualties to hospitals around London, it
2 was the onward provision of care, was it, that gave rise
3 to the problem about the phones?

4 A. It was the -- I suppose the trigger point was the fact
5 that it was fairly clear on the radio system that the
6 radio traffic was still very, very busy with all of the
7 incidents that we were now faced with, activity was
8 occurring at those incident sites that were making the
9 radios very busy.

10 It was also clear that, if you needed to speak to
11 a critically important senior officer within the
12 Ambulance Service, that was hampered by the fact that
13 the phone system was congested.

14 Q. To what end? What was it that you were trying to do,
15 trying to achieve at that time, around 10.00, in
16 relation to which you were being hampered by the lack of
17 proper communications?

18 A. For example, towards that time I had an indication from
19 ambulance crew staff that the incident would be coming
20 to a close within the next 15 minutes. So I wanted to
21 get a critical message to the control room and let them
22 know the incident site at Aldgate is about to be clear,
23 you have a whole set of ambulance resources that will be
24 here, an emergency support vehicle, myself and a couple
25 of other officers that could be deployed to other

1 incident sites, we need to think -- start thinking about
2 that decision, where are we going to deploy. And that
3 was the reason for making the request of ACCOLC.

4 Q. Did you encounter difficulties in relation to making
5 appropriate arrangements for the dispersal of casualties
6 to the hospitals?

7 A. No, I didn't. We used the local hospitals. The
8 procedure was the fact that ambulance crews, when they
9 get into their ambulance, what they should do is call up
10 the control room and say "We have a priority 1, 2 or 3
11 patient, which hospital would you like us to go to?"
12 I didn't experience anything personally because I wasn't
13 conveying casualties.

14 Q. But you did ask the police, I think, if they could
15 provide drivers to assist in the driving of ambulances
16 to hospital?

17 A. Yes, that was based on the fact that there was a number
18 of police officers arrived in a police carrier, and they
19 presented themselves to myself and said "What would you
20 like us to do?", and I said, "Ideally, just drive
21 ambulances for us. When we get patients come upstairs,
22 it means the clinical staff, the paramedics and
23 technicians can deal with the patients, and you can help
24 us get those patients to hospital."

25 MR KEITH: Thank you very much. Will you stay there? There

1 may be some further questions for you.

2 LADY JUSTICE HALLETT: Mr Coltart?

3 Questions by MR COLTART

4 MR COLTART: Only a few for the time being, thank you,

5 Mr Edmondson. Just going back to the access overload

6 request, I just want to clarify one or two things, if I

7 may.

8 I think Mr Keith suggested that it might have been

9 a request in relation to the O2 network. Am I right in

10 thinking, in fact, that the London Ambulance Service was

11 on Vodafone at that time?

12 A. Yes, that's correct.

13 LADY JUSTICE HALLETT: The witness said it was all the

14 networks he asked.

15 MR COLTART: I was going to go on to clarify that, if I may.

16 We know that, in due course, the City Police made

17 a request in relation to the O2 network, but -- and this

18 is my Lady's point -- is it the case that you were able

19 to make a request that would cover all of the networks?

20 A. No, the request would be for ACCOLC, so it's a broad

21 heading procedural request that says, as a service, or

22 as an organisation, we request ACCOLC to be made.

23 To be frank, the protocol is and was at the time,

24 just slightly grey in terms of how that happens, because

25 we were aware in the Ambulance Service that all of our

1 phones had ACCOLC SIM cards, so by putting that request
2 in, that would have got faxed over or sent to the police
3 at -- Metropolitan Police, and then they would be able
4 to make the decision. That's what was agreed with the
5 ACCOLC system.

6 The technical side of how they would decide whether
7 that's one network versus another or whether it's just
8 all of the networks, I'm not aware of.

9 Q. Just pausing there and taking it in stages a bit, you
10 say that all of your phones had SIM cards which were
11 ACCOLC-effective or registered, however you want to
12 describe it. Who do you mean by that? Do you mean all
13 the ambulance staff there that day, the crews and
14 everybody?

15 A. No, all ambulance officers had ACCOLC SIM cards.

16 Q. Assist with us the terminology, is an officer different
17 from a paramedic?

18 A. Yes, so paramedics and technicians are the technicians,
19 so they're the people that work on the ambulances.

20 Q. Yes.

21 A. Then the officers are generally the two-starred officers
22 and above and they are the managers of the organisation.

23 Q. So they would be the beneficiaries of any request that
24 was accepted? It would assist the officers, it would
25 enable them to use their mobile phones in that

1 particular area?

2 But just going back to the networks for a minute,
3 I mean, are you telling us that if you -- if your
4 request had been accepted, it might have had
5 implications for the networks other than those used by
6 the London Ambulance Service?

7 A. It may well have done. As I said, I don't understand
8 the full technical side of how they would have
9 implemented it. But my impression was the fact that, if
10 you had an ACCOLC SIM card, with the Police, Fire,
11 Ambulance Service, and that is instigated, then the
12 mobile phone companies, or the coordinator of the mobile
13 phone companies, would enact that on all of those SIM
14 cards.

15 But, as I said, I don't know the full technicalities
16 of it.

17 Q. All right, we'll come back to it, I think, later, when
18 we might be slightly better sited in relation to that
19 issue.

20 Can I ask you just one other thing about your
21 attempts on that day in relation to Aldgate to
22 communicate with Central Ambulance Control. You say in
23 your witness statement -- I don't know whether you have
24 a copy of it in front of you, but I'm sure one could be
25 provided, if necessary. This is page 5:

1 "At 10.16 Aldgate was cleared of casualties. There
2 were approximately ten ambulances involved on scene and
3 seven London Ambulance Service officers. Between 10.16
4 and 10.30, I attempted to liaise with Central Ambulance
5 Control about where they wanted the resources on scene
6 deployed to."

7 So this is you trying to get hold of the
8 Control Centre to say, "I've got spare capacity, where
9 do you want them to go?", is that right?

10 A. Yes, that's correct.

11 Q. Then you say:

12 "At 10.48 hours, Central Ambulance Control
13 instructed me to send six ambulances to King's Cross and
14 the remaining four to Russell Square."

15 Then you and Mr Wasp were asked to go to
16 Russell Square. So is it the case that it took between
17 10.16 and 10.48 for Central Ambulance Control to get
18 a message through to you that a further six ambulances
19 were required at King's Cross?

20 A. Yes, that's correct.

21 LADY JUSTICE HALLETT: How are you trying to communicate
22 that? Was that radio?

23 A. As far as I can recall, it was -- I'm sure there was
24 a radio message that went through at some point, but if
25 it was radio, it would be on the log. But I certainly

1 remember ringing up Central Ambulance Control, probably
2 on two occasions, to say "We have these resources, just
3 advise me where you want me to deploy them to."

4 LADY JUSTICE HALLETT: So you did get through?

5 A. Eventually, yes.

6 LADY JUSTICE HALLETT: So what was the problem before?

7 A. It was problematic just from the fact of trying to get
8 a line again available to speak to them and, if I did
9 get a line, then I was getting the engaged tone in
10 Central Ambulance Control because the lines there were
11 busy. So it was a continual circle of just keep trying
12 until such time I can get through.

13 And I did manage to have, I think, about two
14 conversations with them around "We've got these
15 resources", and then I think the second message was,
16 "Yes, we now know where you're needed."

17 MR COLTART: But in the meantime, the six ambulances that
18 did go to King's Cross at 10.48 were parked at Aldgate,
19 were they, with no one knowing where they should go?

20 A. Yes, we were still at Aldgate, there were still jobs
21 that we were doing. As an example, we had our emergency
22 support vehicle that we were attempting to recover
23 equipment and stretchers and other bits and pieces that
24 were at street level. So while we were waiting for that
25 decision to be made, they were actively engaged in

1 making sure that their vehicles were restocked and that
2 big vehicle was restocked as well.

3 Q. Finally this, because you've kindly agreed to come back,
4 and we'll deal with the debrief process at the beginning
5 of next year, but you collated all of the feedback which
6 was provided in the various different forums, didn't
7 you, so whether it was meetings, people filling out
8 debrief forms, whatever it may be, it was your
9 responsibility, as we understand it, to put all of that
10 together?

11 A. Yes, that's correct.

12 Q. It was obviously important that that information and
13 that feedback was conveyed to the senior management at
14 the London Ambulance Service because they were the
15 people who would consider what steps should be taken as
16 a result of it?

17 A. Yes, that's correct.

18 Q. How was the information conveyed to them? Was it done
19 through meetings? Did you write a report? Were
20 there -- I mean, tell us, how was it done?

21 A. There was a Gold debrief which effectively means all the
22 senior -- the very most senior managers. So they were
23 involved in that debrief and that quite clearly raised
24 some of the issues that we'd already discovered were
25 lessons identified.

1 Q. Sorry to interrupt you, but did you attend that
2 yourself?

3 A. Yes, I did. And then there was a report that was done
4 by Peter Horne, which we looked at at the beginning of
5 this before the break.

6 Q. His draft debrief report?

7 A. Yes.

8 Q. I think September 2005.

9 A. Yes. That report was done. There was also an action
10 plan which had a number of actions in it. There was,
11 I think, about 40 or 50 pages' worth of actions, and
12 there was also regular meetings, there was a meeting
13 that was almost a multidepartment meeting, and there
14 were a number of individual meetings that went to
15 individual departments if they had a specific task they
16 had to enact on.

17 Q. Do you know, can you recall -- and say if you can't --
18 was that process completed, in terms of information
19 being conveyed to the senior management in advance of
20 the London Assembly review which started
21 in November 2005, or I think that's at least when people
22 attended the London Assembly, to explain to them what
23 had happened and what was being done about it?

24 A. I can't recall the exact timings. The action plan,
25 which was the main document, was passed over to

1 management and we were actively working on those lessons
2 identified, to the point that even, I would suggest,
3 within a week to ten days, we had already started with
4 management consent, started acting on certain critical
5 bits of lessons learnt. So the advent of having pagers
6 back into the Ambulance Service or putting the
7 predetermined attendance into place for declared major
8 incidents, and also incident officer management teams,
9 because we knew that the threat level, terrorist threat
10 level, had also increased and that there was a potential
11 for, you know, more incidents.
12 So all of those things happened literally within
13 days of these action plans starting to come alive.
14 MR COLTART: Thank you very much, and we can return to that
15 later.
16 MR SAUNDERS: Nothing thank you, my Lady.
17 MS SHEFF: Nothing, thank you.
18 LADY JUSTICE HALLETT: Ms Boyd?
19 Questions by MS BOYD
20 MS BOYD: Mr Edmondson, just one question. I think in your
21 statement you've estimated that there were 200
22 casualties, of which 30 to 40 were seriously or very
23 seriously injured and 160 walking wounded.
24 A. Yes, that's correct.
25 Q. We've heard evidence that the first fire crews to arrive

1 were engulfed by casualties emerging from the station,
2 this was at about 9.00. So were firefighters able to
3 supplement the paramedics by providing basic first aid
4 to those walking casualties?

5 A. Yes, they were. The only challenge I think that we had
6 was the firefighters understanding the triage system,
7 but in terms of providing supplementary first aid,
8 I know, after the incident, paramedics and technicians
9 were telling me immediately that people were assisting
10 with first aid. But it was the understanding of the
11 triage system that I think was a bit of a difficulty for
12 people.

13 MS BOYD: Thank you.

14 LADY JUSTICE HALLETT: Ms Simcock?

15 Questions by MS SIMCOCK

16 MS SIMCOCK: Thank you, my Lady. Mr Edmondson, could you
17 explain what the role of an emergency planning manager
18 is?

19 A. Yes. An emergency planner is -- or my day job is
20 basically writing high risk contingency plans. So, for
21 example, I have the portfolio for London Underground,
22 Network Rail and airports. Training members of staff,
23 whether it be control staff, paramedics or officers in
24 mass casualty incident management, event planning, and
25 then incident response. So this was providing tactical

1 advice to everybody from paramedics through to Control
2 and officers.

3 Q. Thank you. What was your experience of major incidents
4 by July 2005?

5 A. Well, I started in the Ambulance Service in 1990. 1999
6 I started as an emergency planner, and within the first
7 month of being an emergency planner I was faced with
8 assisting to manage the David Copeland bombs, so that
9 was the Brixton, the Brick Lane and the Soho bomb, along
10 with a mass casualty incident that we had at Peckham
11 swimming pool.

12 Then, from that point onwards, up to the point where
13 I left the Ambulance Service, I attended and have been
14 involved in several -- several major incidents from
15 train crashes to airport incidents.

16 Q. Thank you. We know that the bomb at Aldgate exploded at
17 8.49 am and that the scene was clear of live casualties
18 by 10.16. In your experience of major incidents, is
19 that sort of timing for clearance of this type of
20 incident unusual?

21 A. Yes, very much so. It's actually very quick. My
22 experience of major incidents, not just in this country
23 but abroad -- I do work in Sweden, and other areas -- it
24 takes a lot longer to manage that number of casualties
25 and get them extricated to hospital, and I have to say

1 I would put that down to the ambulance staff that were
2 there on the day. Some of them had attended main
3 incident training a few weeks earlier and some of them
4 attended an Underground exercise that we had as well.
5 So I put it down to the fact they knew what they had to
6 do.

7 Q. Thank you. Do you know, by 10.16, how many ambulances
8 had attended Aldgate in total?

9 A. The total -- I think the total number of ambulances that
10 we had on-site to assist us was 17 ambulances.

11 Q. You redeployed the ten you had left, once the scene had
12 been cleared to King's Cross and Russell Square?

13 A. Yes, that's right.

14 Q. Thank you. Her Ladyship asked some questions this
15 morning of Mr Rigby about identification of those in
16 command from the other emergency services. Were there
17 London Ambulance Service tabards identifying those in
18 command at Aldgate?

19 A. Yes, there were.

20 Q. What were those?

21 A. The Bronze roles have a yellow top and then a green and
22 white chequered bottom to them with the role that that
23 person takes, so whether it's primary triage, secondary
24 triage, parking.

25 The Silver has a silver tabard and the technical

1 adviser has a half-silver, half-chequered tabard.

2 Q. So the actual colour silver is on the tabard, either
3 fully or in half?

4 A. Yes.

5 Q. Were you wearing one of those?

6 A. Yes, I was.

7 Q. Which one?

8 A. I was wearing the half version, so I had silver on the
9 top and then chequers on the bottom.

10 Q. Who was wearing the full silver one, if anyone?

11 A. An ambulance operations manager called Dave Campbell,
12 and Dave was one of the officers that was deployed to
13 the incident, probably -- I think probably about quarter
14 to 10, something like that, and he presented himself to
15 me and said that he'd been sent to act as the incident
16 officer and he actually asked me "You've been doing this
17 for a period of time, what would you like me to do?"

18 Q. Mr Rigby spoke about speaking to a senior London
19 Ambulance Service officer. Do you think that was you or
20 Mr Campbell?

21 A. It would have been Mr Campbell, because I actually
22 didn't have the opportunity to speak to any
23 Fire Brigade. I only spoke to City, a City police
24 officer in the initial stages of the incident.

25 Q. Thank you. My Lady, there is a photograph provided by

1 Mr Edmondson of the scene at Aldgate that day that shows
2 the tabards on the day, which I think will be on
3 Lextranet in due course.

4 LADY JUSTICE HALLETT: Thank you very much.

5 MS SIMCOCK: Thank you very much, I'm very grateful.

6 LADY JUSTICE HALLETT: Any other questions for Mr Edmondson?
7 That's it. Thank you very much, Mr Edmondson. By
8 the sounds of it we may have to ask you to come back in
9 the new year, but thank you for the time being.

10 A. Thank you, my Lady.

11 MR KEITH: Mr Hay will call the next witness, my Lady.

12 MR HAY: My Lady, may I invite you to call David Roney?

13 SUPERINTENDENT DAVID JOHN RONEY (sworn)

14 Questions by MR HAY

15 MR HAY: Can I ask you to give your full name to the court,
16 please?

17 A. David John Roney.

18 Q. Superintendent Roney, isn't it?

19 A. Yes.

20 Q. May I first start with an apology? I gather we asked
21 you at very short notice yesterday evening to come to
22 court this morning. We were rather over-optimistic?

23 A. That's okay, no problem.

24 Q. You're currently a superintendent with the British
25 Transport Police?

1 A. Yes, I am, yes.

2 Q. But in July 2005, you were a chief inspector with the
3 City of London Police?

4 A. Yes, that's correct.

5 Q. On 7 July, you were an acting superintendent?

6 A. Yes, I was.

7 Q. On that morning, you actually came into London by train
8 into King's Cross?

9 A. Yes.

10 Q. What time did you arrive at King's Cross?

11 A. I arrived at King's Cross at about 9.00.

12 Q. When you were at King's Cross, did you notice anything
13 in particular going on there?

14 A. There were crowds of people, but that's normal. Whilst
15 I was there, I received a phone call from one of my
16 colleagues explaining that there had been, as he
17 thought, an explosion at Liverpool Street and that he
18 was coming to collect me.

19 Q. On that particular day, your intended duties were to act
20 as ground commander in respect of the G8 conference?

21 A. That's correct, yes.

22 Q. That's because there were potentially going to be
23 demonstrations in London at about midday?

24 A. Yes, a number of protests were anticipated in London
25 that day.

1 Q. But events obviously overtook matters?
2 A. Yes.
3 Q. You were told that there had been an explosion at
4 Liverpool Street.
5 A. Yes.
6 Q. I think you then asked to be collected from
7 King's Cross?
8 A. Yes, that's correct.
9 Q. Do you recall approximately what time you were collected
10 from King's Cross?
11 A. It was just after 9.00.
12 Q. If you can't, don't worry.
13 A. I can't recall, but it was just after 9.00 that I would
14 have been collected.
15 Q. You then made your way to Snow Hill police station?
16 A. That's correct, yes.
17 Q. On your way there, did you hear anything further as to
18 what had happened at Liverpool Street, as you understood
19 it?
20 A. Yes, there was a radio message that I heard which
21 explained that there had been an explosion at Aldgate
22 and I also received -- I telephoned
23 Chief Inspector Fallows, who was my opposite number at
24 Bishopsgate police station, who explained to me further
25 that he was going to the scene, which we then understood

1 to be Aldgate, and asked if I could go with him, once
2 I had got to Snow Hill, to give him some assistance.

3 Q. Can we have up on the screen please [COLP18-4]? Down at
4 the bottom, 09.10.32, this is a message from a police
5 officer City of London Police officer, Mr Kemp.

6 A. Yes.

7 Q. It says:

8 "This is a bomb in one carriage 100 yards into the
9 tunnel. I have multiple casualties, some poss fatal.
10 Need a police liaison officer here at the Aldgate end.
11 LAS also required, as well as more police officers to
12 take witness statements."

13 A. Yes.

14 Q. Do you recall actually being aware of that particular
15 message?

16 A. Yes, I was in the car having been collected in the
17 Gray's Inn Road area at the time that call was made, so
18 I heard it in the car whilst in the car on the way to
19 Snow Hill.

20 Q. Do you recall whether, at that point,
21 Police Officer Kemp declared a major incident?

22 A. I believe that he did, yes.

23 Q. But it's not recorded on that message?

24 A. No, but I believe that he did.

25 Q. You say you believe he did. Do you recollect that or is

1 it --

2 A. My recollection, although it isn't in my statement, was
3 that he had declared it as a major incident and
4 I understood, when I redeployed from Snow Hill to
5 Aldgate, that I was going to deal with a major incident.

6 Q. What are the consequences of declaring a major incident
7 with respect to the City of London Police?

8 A. It would mean that resources are deployed to that
9 incident, resources that may otherwise be engaged on
10 other duties, back office duties, or officers were
11 deployed -- would be deployed from the other division to
12 the division where the major incident had occurred.

13 Q. You went to Snow Hill --

14 A. Yes.

15 Q. -- and I think there you briefed Chief
16 Superintendent Sharp?

17 A. Yes, I did.

18 Q. What did he understand to be the position at that time?

19 A. As I explained it to him, that I had spoken to
20 Chief Inspector Fallows, that they believed there had
21 been an explosion on a train at Aldgate. At that time,
22 it was a little bit unclear exactly what the position
23 was, but that I had had a request to go and assist
24 Chief Inspector Fallows and that he was going to take
25 over as running the western side of the City.

1 Q. Was there any awareness, as far as you were aware at
2 that point, that there had been other incidents in
3 London?
4 A. I wasn't aware at the time myself, no.
5 Q. Was Chief Superintendent Sharp aware?
6 A. No, I don't believe he was.
7 Q. You then made your way to Aldgate?
8 A. Yes.
9 Q. What time do you believe you arrived there?
10 A. At around about 9.30.
11 Q. Can we have up on the screen [INQ9754-4]?
12 This is an extract from your log?
13 A. Yes.
14 Q. Who is your loggist?
15 A. It was PC James Lyon, PC712.
16 Q. When you arrived, what was your impression of the scene?
17 A. A number of casualties in the entrance to the
18 Underground station and outside the Underground station,
19 a number of walking wounded milling around outside the
20 station, a large number of emergency vehicles, and it
21 was obvious that there had been a major incident within
22 the station.
23 Q. You met with Chief Inspector Fallows.
24 A. Yes.
25 Q. We can see, looking at your log, "09.35,

1 Chief Inspector Fallows, Silver."

2 A. Yes.

3 Q. You were made Bronze control. Is that correct?

4 A. Yes, the decision was that he would be Silver, because
5 it was within Bishopsgate's area of responsibility and
6 that I would be the Bronze commander responsible for
7 everything outside of the station within the outer
8 cordon.

9 Q. What does that mean in terms of Bronze itself, what are
10 the responsibilities?

11 A. A Bronze is the ground commander responsible for
12 operational decisions and deployment. In my case, in
13 this particular role, for everything within the outer
14 cordon area, which was from the outer cordon up to the
15 inner cordon which was basically the Underground station
16 itself.

17 Q. Looking at your log, it appears that you then took steps
18 at the 9.42 to extend the Command structure.

19 A. Yes. I designated Inspector Burgess to be Bronze
20 search. Obviously, concerned about secondary devices
21 and also to ensure a safe working area for emergency
22 services. And Bronze cordon is Inspector Barnard, to
23 have responsibility for setting up and maintaining the
24 integrity of cordons for the outer cordon and also the
25 inner cordon.

1 Q. Once you had appointed those roles, was that the first
2 time you would say that there was a coordinated Command
3 structure in place?

4 A. Yes, obviously the first officers at scene would have
5 been in command and control, and certainly
6 Sergeant Kemp, from what I'd heard on the radio, was in
7 control and in command of what was going on from
8 a City Police point of view.

9 But when I arrived there, it was the first
10 opportunity really that Chief Inspector Fallows,
11 Chief Inspector Pacey from the BTP and myself had had to
12 actually get together and to put a proper structured
13 Command team in place.

14 Q. Was that your immediate priority on arrival?

15 A. Yes, it was.

16 Q. Continuing to look at your log, 09.45, it says "cancel
17 Israeli event", and that's because there was a Middle
18 East conference, was there?

19 A. There was a conference in Liverpool Street and, in order
20 to -- because of the close proximity to the explosion,
21 and because of the sensitivities around the event,
22 I think it made sense to cancel that event to stop the
23 relevant dignitaries attending, and also it enabled us
24 to move resources from that event to assist with this
25 major incident.

1 Q. How many resources were at that event, do you know?

2 A. I'm unable to say at the moment, I have no record of
3 that.

4 Q. "09.45, Silver control to The Minorities". Why was
5 the decision made to move Silver control?

6 A. To a place where it was easily accessible for other
7 emergency services or our own staff to get to that
8 needed to -- far enough away from the actual seat of the
9 incident, so as it then not to be -- it not to be in the
10 way, and also experience learnt as well, if there had
11 been secondary devices or whatever, that again, it's far
12 enough away so as not to be in danger from those sort of
13 devices.

14 Q. You then go on to say, still at 09.46, looking at the
15 bottom, it says:

16 "Request working channels 1 to 3."

17 Then:

18 "Unable."

19 Can you just explain to us what that means?

20 A. I requested the City of London Police control room to
21 set up a designated working channel for the incident at
22 Aldgate, which would have enabled all the officers
23 working on that incident to have worked on a dedicated
24 radio channel so that they could just concentrate on
25 that particular incident, that there wouldn't be other

1 radio traffic interfering.

2 Q. That suggests that there was other radio traffic
3 interfering with the channel you were using.

4 A. I was concerned that, as our incident became larger and
5 more resources were deployed to it, there could be the
6 possibility of too much traffic for one channel.

7 Q. But it says "unable".

8 A. Yes.

9 Q. Was that request actioned?

10 A. The request -- they were unable -- the Control inspector
11 was unable to provide a separate working channel because
12 of lack of staff in the control room at that time.

13 Q. Now, I'm sure every day in the City of London there are
14 many events going on.

15 A. Yes.

16 Q. But on this particular day, you had the Middle Eastern
17 event?

18 A. Yes.

19 Q. You also had the G8 conference and the potential for
20 demonstrations?

21 A. Yes.

22 Q. Did that lack of staff in any way surprise you?

23 A. Not really. Certainly, the Israeli event will have been
24 controlled from the normal working channel and the G20
25 events across London were being run under

1 Operation Benbow protocols as a pan-London event which
2 would have been controlled from Metropolitan Police GT.

3 Q. Just clarify, Operation Benbow, that's when more than
4 one of the police, either Metropolitan Police, City of
5 London Police or British Transport Police are involved,
6 but one of you takes priority in running the incident?

7 A. It's a set of command protocols for large major events
8 in London where the three police forces in London --
9 BTP, the Metropolitan Police and the City of London
10 Police -- will work to a single Command structure and
11 resources from all three forces will work together, and
12 that's what we had in place for G20 that day.

13 Q. We know that was the Special Operations Room at the
14 Metropolitan Police --

15 A. Yes, yes.

16 Q. -- known as GT.

17 A. Yes.

18 Q. Can we turn over the page [INQ9754-5], please? 09.50 reports of
19 explosion at Tavistock place on bus/Edgware Tube."

20 A. Yes.

21 Q. Was that the first time you were aware of other
22 incidents happening in London?

23 A. Yes, it was.

24 Q. Do you know whether or not -- I was going to ask you
25 whether or not you if you knew if

1 Chief Inspector Fallows -- but we can ask him that next.

2 Looking further down:

3 "10.02, Mr Robertson appraised on phone."

4 Who's he?

5 A. Chief Superintendent Alex Robertson was the chief
6 superintendent in charge of the anti-terrorism and
7 public order department, which is the Specialist
8 Operations Department of the City of London Police, who
9 was the -- at that time, the City Gold Commander for
10 this event, had taken on that role.

11 Q. That was the first time he was made aware of the scale
12 of the incident?

13 A. He contacted me by phone to get an update of what was
14 going on, and I gave him an update, as I understood it
15 at the time.

16 Q. So did he obviously have some awareness of what was
17 happening?

18 A. Yes, he did.

19 Q. Then it appears to be -- right at the bottom, it appears
20 to be maybe 10.04 or 10.07:

21 "Strategy."

22 A. Yes, when he telephoned me, the telephone call was
23 partly to get an update of what the situation was, but
24 also to relay to me the Gold strategy for the policing
25 of the incident at Aldgate.

1 Q. The strategy he put in place was, firstly, prevent loss
2 of life?

3 A. Yes, to prevent loss of life, to maximise the
4 opportunities to gather evidence of offences, to
5 reassure the public and to hasten a return to normality.

6 Q. If we could just go over the page [INQ9754-6], please, 10.10,
7 there's a message saying train was cleared by EXPO.

8 A. Yes.

9 Q. That's the Metropolitan Police Service explosive
10 officers?

11 A. Yes.

12 Q. Then "to be treated as crime scene"?

13 A. Yes.

14 Q. Does that mean, at that point, all live casualties had
15 been removed?

16 A. Yes, that is the case.

17 MR HAY: Superintendent, thank you very much, I have no more
18 questions for you, but others might.

19 LADY JUSTICE HALLETT: Does anybody else have any questions?

20 Well, thank you very much indeed and I am very sorry

21 if we didn't give you much notice. Thank you.

22 MR KEITH: My Lady, may I invite you to call

23 Geoffrey Fallows.

24 LADY JUSTICE HALLETT: Did we give Mr Fallows enough notice?

25 MR KEITH: My Lady, I'm afraid Mr Fallows had the same

1 degree of notice and I will extend the same apology to
2 him as well. I'm entirely responsible, Superintendent.

3 THE WITNESS: No problem, my Lady.

4 MR GEOFFREY FALLOWS (sworn)

5 Questions by MR KEITH

6 MR KEITH: Could you give the court your full name, please?

7 A. Yes, Geoffrey Fallows, Superintendent, City of London
8 Police stationed at Wood Street.

9 Q. Superintendent, may I formally apologise to you for the
10 fact that you were brought to court this morning? We
11 hoped to speed up the process of having your evidence
12 received by her Ladyship, but my expectations were not
13 met this morning and, as a result, you have been made to
14 wait. I do apologise.

15 In 2005, you were not a superintendent; you were
16 a chief inspector?

17 A. That's correct.

18 Q. I think that morning, you were on duty at Bishopsgate
19 police station?

20 A. That's correct.

21 Q. You had a particular function that you were carrying out
22 that morning?

23 A. Yes, I was the overall responsibility for the Israeli
24 Opportunities Conference at the Great Eastern Hotel in
25 Liverpool Street.

1 Q. When you say you had overall responsibility, does that
2 mean that you were, in essence, Gold Commander for that
3 event?

4 A. That's correct.

5 Q. I won't take you in detail to your very extensive
6 operational experience, but part of your experience has
7 included, or did include, then, being trained with Gold
8 and Silver accreditation for the command of firearms
9 incidents and other operational aspects in City of
10 London Policing?

11 A. That's correct.

12 Q. But in relation to 7/7, you subsequently became
13 a Silver Commander, did you not?

14 A. I did.

15 Q. That is what I want to ask you about, please, if I may.
16 Did you receive a report about 8.50 of a sound of an
17 explosion being recorded in Liverpool Street?

18 A. That is correct.

19 Q. As a result of that report, did you do anything?

20 A. Yes, I left the office and walked over to
21 Liverpool Street to see what I could do, because I was
22 obviously aware that we had dignitaries about to arrive
23 at Liverpool Street and I was concerned about the
24 operation.

25 Q. Did you take any steps concerning whether or not further

1 dignitaries should arrive at the conference or whether
2 or not it should be delayed or adjourned or stopped
3 altogether?

4 A. I put a halt on the conference, I stopped any further
5 dignitaries coming into the area and spoke to the
6 firearms officer in charge of the operation, from the
7 firearms perspective, to await any further update with
8 a view to cancelling it completely.

9 Q. It was immediately apparent to you that the sound of an
10 explosion could potentially be the indicator of a major
11 incident, and did you therefore ask one of your officers
12 to start keeping a log for that time?

13 A. I did. That was PC Delia Heath.

14 Q. Could we please have on the screen [INQ9794-6]. At 09.06
15 do we see there:

16 "Great Eastern on hold until confirmation. Cordon
17 off. Liverpool Street station."

18 A. That's correct.

19 Q. Was that a log reflecting the decision to put the
20 Great Eastern Hotel, which is where the event was taking
21 place, on hold?

22 A. That's correct.

23 Q. Did you have a call sign that morning CPC3?

24 A. That's correct, yes.

25 Q. You did. All right. A few moments later, we know that

1 Police Sergeant Kemp informed the control room that an
2 incident had occurred on a train at Aldgate. Did you
3 take any further steps as a result of that additional
4 piece of information?

5 A. Yes, we were still unclear of what was happening at
6 Liverpool Street, so I have some officers there, because
7 a rendezvous point had already been set up in
8 Liverpool Street, with the BTP and some of our officers,
9 and with the information that I had, I moved to Aldgate
10 with Inspector Barnard, who was the early turn duty
11 officer, and his driver.

12 Q. I think Inspector Barnard had been police Silver for the
13 conference.

14 A. That's correct.

15 Q. If recollection serves me right, did he become
16 subsequently Silver cordons at Aldgate?

17 A. Bronze cordons.

18 Q. Bronze cordons at Aldgate. So you took a certain number
19 of your senior officers with you?

20 A. Just Paul Barnard and myself, and a driver and my
21 loggist.

22 Q. Right. What did you see when you arrived at Aldgate?

23 A. I've seen a confusion. There were injured people out of
24 the front of the station. Some blackened by injuries
25 and soot. There was a fire engine already on scene and

1 people, officers, moving into the station.

2 Q. What was the first priority as you saw it?

3 A. I was still thinking potential terrorist activity, and
4 setting up a rendezvous point for that area to receive
5 the other emergency services that were coming in, and to
6 make sure that was cleared by EXPLOR detection dogs.

7 Q. Just tell us something about the importance of
8 establishing an RVP in this sort of incident?

9 A. It's an area where people can be coordinated on their
10 arrival. It also has somewhere where you can have
11 vehicles put aside, put casualties back to that area, we
12 had an area set aside for that adjacent to that. But
13 it's important that we have one point for everybody to
14 turn up to, so we can have an idea of who we have and
15 what tasks may be.

16 Q. Is it also important that, when you've identified an
17 RVP, that means of entry and access, in essence, to an
18 incident are carefully controlled to allow other
19 emergency services to attend?

20 A. That is correct, and that also assists with putting the
21 cordons in place as well.

22 Q. Can we have on the screen [INQ9794-8]? This is an entry
23 timed at 09.09:

24 "LFB Underground/Liverpool Street. LAS liaised",

25 I think?

1 A. Yes.

2 Q. "BTP - Munn ..."

3 Inspector Munn possibly?

4 A. Inspector Munn, I believe.

5 Q. Yes:

6 "... liaised casualty ..."

7 Then I'm afraid we can't read the last word. But

8 does this indicate that, fairly shortly after your

9 arrival, you had to commence liaising with members of

10 the other emergency services?

11 A. That's correct. Inspector Munn obviously was BTP, but

12 that's correct, yes.

13 Q. Did you take any steps, as far as you can recall, to

14 contact the London Fire Brigade to ask them to send more

15 appliances or to attend or to give them further

16 information?

17 A. No, as far as I was aware, the Fire Brigade were already

18 on the tracks or in the station because the -- I believe

19 the engine was outside. One of my officers spoke to

20 somebody in the engine, but as it was vacated, I assumed

21 they were downstairs on the track, because I knew that

22 Neil Kemp was already down there.

23 Q. I only ask because, in your statement which you've most

24 recently prepared for my Lady's assistance, you do say

25 you asked for a supervisor from the LFB to attend?

1 A. I did, I put that over the radio, yes.

2 Q. Why was that?

3 A. Because it was clear we were going to need -- it was
4 a major incident and it was clear we were going to need
5 further resources and some form of Command structure
6 later in the day. So I asked for an LFB supervisor,
7 I believe, I can't remember the exact words.

8 Q. Why later in the day? As we'll come to in a moment,
9 with the establishment of your own police Command
10 structure, is it vital to have a Command structure in
11 place at the beginning, or can one afford to have
12 a short time lag whilst the situation becomes
13 sufficiently robust?

14 A. Correct. As anything like this would unfold, the first
15 thing you do is you go on there and you deal with the
16 scene as you see it. You don't think about a Command
17 structure and briefings, et cetera. When you have the
18 resources to do that -- which is why I asked for
19 Dave Roney to come over, Chief Inspector Roney -- that
20 gave us the resilience then, but that was after 9.30.
21 Leading up to that, as you see, areas have to be
22 cleared. It's everybody does what they can at the time.
23 It's responding with a hands-on approach to start off
24 with.

25 Q. Is that why, as we've just heard from

1 Superintendent Roney, there wasn't a Silver meeting
2 formally declared until 9.30 or, rather, you didn't
3 declare yourself Silver until 9.30?

4 A. Absolutely right, absolutely right.

5 Q. So what was actually going on in the first 20 minutes of
6 your arrival at the scene in terms of the City of London
7 Police, as far as you could tell?

8 A. Right, we were clearing the area, putting in cordons,
9 which is obviously very important, trying to clarify
10 what was happening, if this was the only incident that
11 we had, or if it was connected still to
12 Liverpool Street, because I still had a contingency
13 officer at Liverpool Street, because one of the manhole
14 covers had been dislodged through the blast, and it was
15 still unclear.

16 So I was considering the conference, cordons, RVP,
17 ensuring everything was clear, and getting the area
18 prepared for other emergency services to come in,
19 ambulances and Fire Brigade.

20 Q. Did that include making the first steps to ensure that
21 the walking wounded could be taken away from the scene
22 to go to hospital?

23 A. That's correct, sir, I identified the buses would be
24 used for that.

25 Q. From what you've said, it's plain that you were

1 concentrating on putting into place all the necessary
2 steps for arranging this: cordons, RVPs, removal of
3 casualties from the scene, means of access from the
4 other emergency services.

5 What steps, if any, were you able to take to direct
6 resources towards the train itself, or was that
7 something that was already in hand?

8 A. That was already in hand. I had PS Kemp, who I know
9 well, I know his experience and his abilities. He had
10 been reporting back with a small team of officers that
11 he'd had on plainclothes operations that morning. He
12 had made his way to the actual carriage and he was
13 trying to get messages back to our control room, the
14 best that he could. So I knew we had people on the
15 track. It wouldn't have been something that you would
16 normally deploy to, because you've got to think about
17 safety, you've got to think about BTP, but I knew I had
18 people down there to get messages back and I left them
19 to do that.

20 Any other officers that did turn up, I didn't stop
21 them from going in.

22 Q. Who would have directed them in, though?

23 A. They would have -- most of them would have gone in off
24 their own bat when they actually turned up at the very
25 initial stages, they normally make their way to the

1 scene.

2 Q. We know that you heard Police Sergeant Kemp's report on
3 the radio that the incident was as a result of a bomb,
4 it was the report as we've just seen a moment ago of
5 Superintendent Roney at 09.10.32. Did hearing his
6 report trigger any consideration of whether or not he
7 had sufficient resources? You knew that he was down on
8 the track?

9 A. Yes.

10 Q. He was, in fact, inside the carriage?

11 A. Yes.

12 Q. Who, in terms of City of London Police Command, had the
13 responsibility of asking whether Sergeant Kemp had
14 enough officers with him or were you expecting him to
15 ask for more resources if he needed it?

16 A. He did ask for more resources over the radio. He said
17 he wanted London Fire Brigade, he wanted London
18 Ambulance Service. He already had, I believe, BTP, or
19 BTP were around the area, because we saw that when
20 I turned up.

21 Q. They were, yes.

22 A. And he also requested a police liaison officer for the
23 front, I think to take witness details.

24 Q. Indeed, to start talking to witnesses and taking their
25 details.

1 A. Yes.

2 Q. So again, as you were saying earlier, about the need to
3 ensure that the structure was sufficiently resilient
4 before you impose a Command structure, do you delegate
5 to officers on the scene quite a wide degree of
6 responsibility?

7 A. Absolutely.

8 Q. Get on with what they need to do before you start
9 directing further steps to be taken?

10 A. Absolutely right. I had a very good team on that day,
11 whom I knew well, Inspector Barnard I had known for
12 a long while, he was tasked with cordons, which he did
13 very swiftly and efficiently, with a rendezvous point,
14 and it's just seeing where the gaps are and trying to
15 fill them the best you can at the time.

16 Q. One other gap was dealing with the attendance of the
17 MI -- the Multi-agency Initial Assessment Team, the
18 MAIAT?

19 A. That's correct.

20 Q. And also, I think, that you were concerned with checking
21 that the scene was clear of potential secondary
22 devices --

23 A. That's correct.

24 Q. -- and ensuring that EXPO dogs were sent in to check?

25 A. That's correct. The RVP had been checked, secured by

1 the dogs and, when the team leader of the MAIAT team
2 turned up, we had a discussion, the issue of CBRN had
3 been raised, I was satisfied that it didn't appear to be
4 a CBRN incident because we have a step 1, 2 and 3
5 protocol which didn't appear to be (inaudible) at that
6 time. He agreed with me with that. I called him over
7 to the front of Aldgate station to discuss that matter
8 and then we moved over to Aldgate rendezvous point by
9 the bus station, and I discussed with him the need to
10 search the station and I wanted the track south of the
11 station ideally searched because I was concerned where
12 the track actually run underneath the rendezvous point,
13 and we had two dog handlers that were on standby.
14 They came over and they volunteered to do that,
15 despite them being told that they hadn't cleared it for
16 CBRN, they deployed on their own.

17 Q. We've heard a considerable amount of evidence about the
18 distinction between Gold and Silver and Bronze in terms
19 of tactical, strategic, operational functions.
20 As shortly to become Silver Commander for City of
21 London Police at 9.30, what was the role of Silver City
22 of London Police in contradistinction to the other
23 emergency services? Were you providing support to them
24 or was it -- in terms of dealing with the casualties and
25 the medical emergency that had arisen, or was your

1 function primarily concerned with detection and
2 investigation? You've mentioned, of course, that
3 witness details were already something that you were
4 considering.

5 A. Yes, I was concerned that people were just going to walk
6 off without obtaining their details, but it's a dual
7 role, really. As far as the police are concerned, we're
8 looking at saving of life, clearly, that's the most
9 paramount thing at the start, and then, after that,
10 scene protection. We also look at making sure that the
11 investigation, the scene, is suitable for an
12 investigation later on, so we have -- we preserve the
13 evidence, if you like.

14 Also, we coordinate the other emergency services
15 where required, so we're responsible for ensuring those
16 three areas: coordination, saving of life and --

17 Q. Investigation?

18 A. Investigation.

19 Q. Those three strands were already evident, even before
20 you declared yourself Silver Commander at 9.30?

21 A. That's correct.

22 Q. At 9.35 we know from your statement and from the log,
23 [INQ9794-12], please, sit rep, two fatalities, nine
24 critical, and then we can see "C4 Bronze cordon, C3
25 Silver, B4 Bronze", which appears to be the setting out

1 of a Command structure?

2 A. That's my discussion with Dave Roney, that's correct.

3 Q. Did this reflect you taking the role of Silver Commander

4 and thereupon you liaised with your fellow

5 Silver Commanders and the other emergency services?

6 A. It did.

7 Q. We know -- and we've just heard from

8 Superintendent Roney -- that an operational strategy was

9 set by the City of London Police Gold Commander to

10 prevent loss of life, maximise opportunity for

11 evidence-gathering, reassure the public, minimise

12 disruption and so on.

13 A. Yes.

14 Q. That operational strategy wasn't set until 10.04. Did

15 it in truth have any bearing upon the immediate

16 provision of aid to the persons in the train or the

17 removal of casualties from the track?

18 A. None whatsoever.

19 Q. Was it, therefore, a system, and is it a system, that's

20 designed to give an overall broad direction to events as

21 they unfold over a matter of hours in a major incident?

22 A. That is correct.

23 Q. Indeed, only a few moments after that strategy was

24 declared, at 10.09, or I think maybe 10.06, you were

25 informed that there was only one more casualty to be

1 removed from the train, and that we have at our page 18
2 on INQ9794 [INQ9794-18]?
3 A. Yes.
4 Q. 10.06 at the top, but then, halfway down:
5 "EXPLO 10.09 one more casualty to be removed."
6 A. That's right.
7 Q. So at the time that the overall operational strategy was
8 set, the initial part of the incident was already over,
9 in the sense that those who could be removed had almost
10 all been removed and those, of course, who were dead
11 were already dead?
12 A. That is not unusual to take that long to put a strategy
13 in place. If you had a preplanned operation you'd have
14 one before the day started. But as time moves on, of
15 course, that's an hour after the first emergency
16 services got there.
17 Q. Yes, I wasn't suggesting it in any critical sense. It's
18 important for us to realise that the setting of an
19 operational strategy in no way hindered the getting on
20 of the initial task that had to be done by the various
21 emergency services?
22 A. Absolutely right, sir, yes.
23 Q. You also were then, I think, party to a request to ask
24 police officers to drive ambulances?
25 A. I was.

1 Q. From your statement, we know that the first formal
2 Silver meeting with the other emergency services was at
3 10.25, which was, I think, preceded by a Silver meeting
4 with members of the police alone?

5 A. That's correct.

6 Q. One further question, if I may. In your statement, you
7 do record that the main problem encountered on the day
8 related to communications. Can you just tell us
9 something about the difficulties that you encountered?

10 A. It's -- as far as the ground level radios were
11 concerned, that didn't cause a huge problem. Certainly,
12 radio transmissions from underground were problematic.
13 There was a huge demand for airtime on the radio, so
14 messages were kept brief.

15 Q. Sorry, can we pause you there? We've heard already from
16 other witnesses that, if a large number of radio calls
17 are made, that can lead to disruption.

18 A. Yes.

19 Q. For those of us who are not technically gifted, is it
20 simply this: if too many people are trying to make radio
21 calls, the radio carrier wave cannot accommodate more
22 than a number of calls, and so the calls cannot be made?

23 A. That's right. You know, you have to give somebody time
24 to put their message over and you try to make that as
25 quickly as possible, when that's answered and logged on

1 the CAD, with somebody typing it before the next message
2 comes on. There's a high demand for the radio. The
3 mobile phone network was overloaded. I personally
4 didn't have an ACCOLC SIM card, and some phones worked,
5 some didn't, throughout the whole day.

6 Q. Pause there, the ACCOLC system allows, if it's
7 triggered, only those people with a special SIM card to
8 continue to use their mobile phone?

9 A. That's correct, but even before that system was brought
10 into play, my phone was very, very intermittent indeed.

11 Q. Can you help us, please, with what effect the
12 difficulties in communications had on the operational
13 decisions that you made after your arrival at Aldgate?

14 A. From my point of view, it wasn't too bad because, being
15 a smallish area which we had cordoned off very
16 successfully, you could use it by word of mouth, or by
17 phone when it worked, or radio on ground level. It was
18 the messages from down below, which was more the
19 responsibility of the British Transport Police and the
20 Fire Service as regards the rescue was concerned, but
21 from the gates of the actual station to the ground
22 level, which was my responsibility, it didn't cause too
23 many problems within the Aldgate area.

24 Certainly messages to Liverpool Street were
25 sometimes longer in getting through, but in the

1 immediate area, just by word of mouth worked adequately
2 well.

3 Q. Were there not difficulties in ascertaining which
4 hospitals were going to take casualties and how to
5 disperse the walking wounded and so on during the hour
6 or so that you were trying to get them away from the
7 scene?

8 A. From my point of view, no. The Royal London Hospital
9 was identified very early on. The buses were
10 commandeered and identified very early on. It was
11 mainly getting people from the doorway across the road
12 to the bus area and deciding who was going to get on the
13 buses.

14 As regards communications, that from my point --
15 I know other people did have problems, but from my
16 personal point of view, it wasn't too bad.

17 Q. All right. We'll hear evidence next year from the
18 Gold Commanders and we'll investigate at greater length
19 the position of communications, but from your viewpoint,
20 are you aware that, subsequent to 7/7, indeed part of
21 a process that was already instigated but not complete,
22 there was a further rollout of the Airwave radio system
23 through City of London Police?

24 A. That's correct. City of London Police at that time,
25 Airwave was in its infancy from our force's point of

1 view, we had radios, we had been trained in them, but
2 there was no facility for the control room to receive.
3 So we were working on the old analogue radios at that
4 time. The Airwave radios were brought into play
5 in October of 2005 for our force, and we are about to go
6 for a further upgrade in the next two months for an even
7 better Airwave system.

8 Q. A modification of --

9 A. Absolutely, yes.

10 Q. -- the new one?

11 A. Yes.

12 Q. But not an entirely different one?

13 A. Correct.

14 Q. Does that new system permit you, not only greater ease
15 of access to the control room and amongst your own
16 officers, but does it provide for intra-operability with
17 other emergency services?

18 A. It does, and underground.

19 Q. In your position, as a very senior officer, have you
20 seen that new radio system in operation in major
21 incidents in the City of London?

22 A. The current one, yes, but not the --

23 Q. Not the remodified one?

24 A. -- one that we're about to bring in.

25 Q. Does the current one allow for greater ease of access

1 with the other emergency services?

2 A. It does.

3 Q. What about underground?

4 A. Underground, it does work. I haven't used it

5 personally, but it does work.

6 Q. You're aware of that from your own enquiries?

7 A. I'm aware of that. I believe BTP also use the new

8 Airwave system underground also.

9 Q. That is the new TETRA radio?

10 A. E-TETRA or N-TETRA, I believe it's E-TETRA, I'm not

11 sure.

12 MR KEITH: Superintendent, thank you very much. Will you

13 stay there, there will be some further questions for

14 you.

15 LADY JUSTICE HALLETT: Are there any further questions for

16 Superintendent Fallows? There you are, Mr Keith was

17 wrong, Superintendent Fallows, there are no further

18 questions for you. Thank you very much indeed.

19 THE WITNESS: Thank you, my Lady.

20 MR KEITH: My Lady, I have been repeatedly wrong today,

21 therefore.

22 My Lady, I'm happy to report that that brings us to

23 the end of the evidence in relation to Aldgate, but of

24 course we will return next year to deal with the generic

25 issues based upon the facts elicited in the last three

1 weeks.

2 Housekeeping

3 MR KEITH: My Lady, may I raise one matter of housekeeping?

4 It is this: we have been troubled on a number of
5 occasions in the last few weeks by the late disclosure
6 from certain organisations of material which has
7 subsequently turned out to be relevant to witness
8 evidence given either the next day or a couple of days
9 after the discovery of this material.

10 There is no suggestion that the interested persons
11 are doing anything other than faithfully complying with
12 my Lady's direction to disclose relevant material to us,
13 and it may just be that further searches have brought to
14 light further relevant material. But we would invite
15 through you, please, the interested persons to ensure
16 that they really have checked through potentially
17 relevant material to ensure that any further relevant
18 material that might be relevant to witnesses who are
19 about to give evidence is complete as soon as possible.
20 It makes it very difficult if documents are
21 disclosed the night before a witness gives evidence
22 because the material must be uploaded on to Lextranet
23 and then provided to the Trial Director system.
24 Sometimes we've had to make do with handing out hard
25 copies to ensure that all the IPs have proper disclosure

1 of all the relevant material in accordance with
2 my Lady's direction.
3 So could I ask everybody to bear that in mind?
4 As my Lady knows, consideration has been given
5 during the course of the day to a directions hearing, an
6 open directions hearing, next week, in relation to PII.
7 I think the email traffic shows that there is some
8 debate still as to whether or not the hearing will be on
9 Wednesday morning or Wednesday afternoon, but I know
10 that Mr Suter will be informing people shortly of the
11 exact time for that hearing before my Lady next week.

12 LADY JUSTICE HALLETT: Thank you.

13 Mr Coltart, you looked as if you wanted to say
14 something.

15 MR COLTART: My Lady, may I only for a minute or two, partly
16 to expand a little on the observations which Mr Keith
17 has just made about disclosure, but also to provide,
18 I hope, some reassurance to the court about the subject
19 matter of that disclosure, which is debrief material,
20 and what it is proposed to do with that material in due
21 course?

22 There is now a considerable volume of that
23 documentation. Inevitably, some aspects of it are more
24 important than others and it will be important that we
25 collectively are discerning in due course as to how that

1 material is deployed in evidence, and we bear that very
2 much in mind.

3 But the position is that some of the material which
4 we will be considering later is very significant indeed,
5 particularly because it hasn't been considered before.

6 The London Assembly requested debrief material. My
7 understanding is that it wasn't provided because a duty
8 of confidentiality was asserted over it at that stage,
9 and so summaries of what it contained were provided
10 instead.

11 But again, as we shall see, I suspect, there's no
12 substitute for looking at the raw material itself. So
13 it is significant in relation to the issues which have
14 been identified.

15 The requests for disclosure of that material have
16 been ongoing in correspondence for some considerable
17 time now and I know that my solicitors have frequently
18 been in touch with Mr Smith and he faithfully, in turn,
19 has been passing those requests on. But the fact of the
20 matter is it is coming in in dribs and drabs at a very
21 late stage. I raise the complaint only very lightly
22 because we all know how difficult it is with this huge
23 volume of material. But it has got to be resolved as
24 soon as possible. I don't seek any order at this stage
25 but any gentle encouragement that could be given to the

1 various institutions to complete that exercise swiftly
2 would be welcome, and for our part, we will compile an
3 audit, perhaps, of what we think there should be which
4 may assist in those who are looking for the material.

5 I don't think there's anything more I need to say
6 about it at this stage but I've made the point and
7 hopefully it can now be resolved quickly.

8 LADY JUSTICE HALLETT: And our timing, Mr Coltart --
9 I appreciate the sooner you see the material the
10 better -- our timing, this is all to do with an issue
11 upon which you are leading?

12 MR COLTART: Yes, delay is one of my issues, communications
13 is another one of my issues, and those are two of the
14 most significant factors, and of course I have
15 survivability issues in relation to the clients,
16 Mr Ellery at Aldgate, Susan Levy at King's Cross. So
17 these are germane to matters which I need to explore
18 with the witnesses, and it would be unfortunate for the
19 material to appear after they've been and gone,
20 particularly how traumatic it is for a lot of the
21 witnesses, even the professional witnesses, to come to
22 court and give their evidence, we don't want people to
23 have to come back more than once, if it can be avoided.

24 LADY JUSTICE HALLETT: It's not merely the distress of the
25 witnesses, which I agree with you, it's not surprising

1 if even professional witnesses suffer a certain amount
2 of distress. It is, I'm afraid -- I go back to it and
3 say it again, it's the timetable.

4 MR COLTART: Yes.

5 LADY JUSTICE HALLETT: We just do not have the time, I'm
6 afraid, to have witnesses come and go. So all
7 interested persons must appreciate, as I'm sure they do,
8 that this material has to be in your hands at a time
9 when a witness is called --

10 MR COLTART: Thank you.

11 LADY JUSTICE HALLETT: -- or before a witness is called, in
12 time for you to prepare for the witness to be called.

13 MR COLTART: Yes, thank you.

14 LADY JUSTICE HALLETT: So I'm sure that everybody is doing
15 their very best, but if words of gentle encouragement
16 are required, you have them.

17 MR COLTART: Thank you.

18 LADY JUSTICE HALLETT: Are there any other matters which we
19 need to raise this afternoon?

20 MR KEITH: No, thank you, my Lady.

21 LADY JUSTICE HALLETT: So it's 10.00 on Monday. Thank you
22 all very much.

23 (3.40 pm)

24 (The inquests adjourned until 10.00 am on Monday,

25 8 November 2010)