

Coroner's Inquests into the London Bombings of 7 July 2005
Hearing transcripts - 20 December 2010 - Afternoon session

1 (2.10 pm)

2 LADY JUSTICE HALLETT: Yes, Mr Keith?

3 MR KEITH: Inspector, may I raise six short matters with
4 you. The first is this: could you look at INQ9450-10,
5 please? You'll see there's a reference there to a HEMS
6 doctor, Mackenzie, 09.47, briefed by EK1.

7 Do you recall that conversation?

8 A. Not the exact words, no.

9 Q. He had just arrived. Would you have given him, in terms
10 of the briefing, as much information as you had
11 available?

12 A. Only about what I knew was -- what was occurring
13 downstairs, not about sealing off the scene or anything
14 like that. It was more about my understanding that
15 there was either a collision or an explosion downstairs
16 in the tunnel, and officers have been gone down and I'm
17 waiting for reports back.

18 Q. Point 2: when Chief Superintendent McCafferty arrived
19 and you briefed him, did you request that the buses
20 which you had, together with London Ambulance Service
21 and British Transport Police, directed be available to
22 take the casualties away, be searched to ensure that
23 there were no secondary devices on the buses?

24 A. I -- to be honest, I cannot remember. I very much doubt
25 I would have asked him to direct on that, because nobody

1 would have been aware I was going to use buses, so it
2 would have to be -- someone who was going to plant
3 something on that, would have actually had to have known
4 that was going to be a decision and which buses were
5 going to be used, so I very much doubt I would have at
6 that point directed that.

7 Q. It's very much a point in your favour, Inspector. Your
8 statement, in fact, records that you did request that
9 the casualty buses be thoroughly searched for any type
10 of advice?

11 A. Then, naturally, that's what I did.

12 Q. There's no surprise there, then. Point 3. Do you
13 recall being informed or rather being requested to try
14 to find blankets for casualties and also for lighting to
15 assist underground?

16 A. Yes, I was. At some point during the incident, I was
17 asked for that.

18 Q. Could we have INQ9450-13? You'll see right at the
19 bottom:

20 "Lighting requested - seek and search."

21 And above it:

22 "Blankets requested from local hotels."

23 My Lady's heard evidence that blankets were used for
24 the purposes of carrying casualties out of the tunnel.
25 Were blankets also used for wrapping round some of the

1 injured at street level?

2 A. Yes, that's correct.

3 Q. The lighting, do you recall whether or not you were able
4 to locate and use lighting?

5 A. That I can't remember. I tasked officers who were there
6 to go and see if they can find some lighting.

7 Initially, it would be through police vehicles, if
8 anyone had any torches in the vehicle, but I can't
9 remember the result.

10 Q. Point 4, you attended the Silver meeting at 10.30,
11 chaired by Chief Superintendent McCafferty, did you not?

12 A. Yes, that's correct.

13 Q. It's the following page, INQ9450-14. There we go, the
14 Silver meeting in the British Transport Police office.

15 At the end of that meeting -- we've heard evidence
16 about it so I needn't trouble you with it -- on page 15,
17 there is a reference to a strategy for the next hour.

18 "Protection of life. Rescue of casualties."

19 In essence, at 10.30, although a number of
20 casualties had been brought out of the carriage, you had
21 not yet received confirmation that all the walking
22 wounded and the severely injured were out or that the
23 number of fatalities had been ascertained, so was it
24 very much as before, preservation of life, rescue?

25 A. Yes, that's correct.

1 Q. During that process, point 5, you became aware that one
2 particular casualty had been brought up to the surface
3 and had died on the pavement outside King's Cross where
4 she was treated.

5 Did you direct that that person be taken to
6 a sterile, insofar as you were able to make it sterile,
7 area but that all the other deceased who had died in the
8 train and on the tracks should remain where they were?

9 A. Yes, that's correct.

10 Q. It was obviously a difficult and delicate decision to
11 make, but did you feel that the removal of the deceased,
12 when there were such large numbers, up to the surface
13 would cause and pose greater problems and difficulties
14 than a decision to leave where they were?

15 A. My understanding is that, when someone's died, they
16 become the -- probably not the right word -- the
17 property of the coroner to decide how they are removed.
18 For myself, because she was brought up where she was
19 on the forecourt in view of everyone else, with people
20 all still coming -- going down there, officers coming
21 up, people coming to the scene having to visualise that,
22 I thought it was better placed to put her in a more
23 secure and comfortable environment.

24 Q. Lastly, in terms of the documents, INQ9450-16. You will
25 see a reference at the bottom to the inspector from one

1 of the Serials, Serial 111, confirming that "all live
2 casualties outside". Over the page, we know that this
3 is a note made in the log just before 10.55, because the
4 next entry is for 10.55. It was formally confirmed at
5 the 11.30 Silver meeting which you attended that all the
6 casualties, living casualties, had been removed from the
7 train and only the dead remained. But you had, in fact,
8 received, as we can see there, an informal indication,
9 about half an hour before, that all the living
10 casualties had been brought out?

11 A. Yes, that's correct.

12 Q. At that stage, did the operation begin to alter in terms
13 of a shift in the priorities away from rescue of the
14 living and confirmation of the dead to the declaration
15 of the area as a crime scene?

16 A. Yes, that's correct.

17 Q. The decisions you took thereafter were more focused
18 towards that end, they not?

19 A. That's correct.

20 Q. You attended, I think, the Silver meeting at 11.30. You
21 carried out a number of taskings. You attended the
22 12.35 Silver meeting. You instructed officers to leave
23 the scene at 12.45 and your statement records how you
24 then attended the Silver meetings also in the afternoon,
25 and your tour concluded at 8.30 that evening.

1 A. Yes, that's correct.

2 Q. In fact, on the way back to the Renaissance Hotel, where
3 an initial debrief was held in the early evening, about
4 5.30, things were made more complex by the fact that you
5 came across, together with some colleagues, a suspect
6 parcel, and another emergency was declared at that time?

7 A. Yes, that's correct. Just to clarify, going back to the
8 Renaissance Hotel, it was more of a sort of occupational
9 health debrief rather than a specific debrief per se.

10 MR KEITH: All right. If anybody wants to ask you about
11 that, I'm sure they will.

12 Inspector, thank you very much indeed.

13 A. Thank you, sir.

14 MR COLTART: No, thank you.

15 MR SAUNDERS: Nothing, thank you, my Lady.

16 LADY JUSTICE HALLETT: Ms Gallagher?

17 Questions by MS GALLAGHER

18 MS GALLAGHER: Just one very brief matter for clarification,
19 Inspector. You've described in detail the very limited
20 information you had on arrival and the confusion. So
21 initially being told about a collision and then later
22 a possible explosion.

23 In your statement, you refer to being told at that
24 initial stage, not only that there was a collision, but
25 also that there were fatalities. It's on page 1 of the

1 statement, my Lady. Do you recall being told that there
2 were fatalities at that early stage or is that
3 information you got later?

4 A. I believe that was information I got later.

5 MS GALLAGHER: Thank you very much.

6 MS ORMOND-WALSH: If I may, my Lady.

7 LADY JUSTICE HALLETT: Yes, of course.

8 Questions by MS ORMOND-WALSH

9 MS ORMOND-WALSH: Just one question. I am representing
10 Barts and the London NHS Trust and they employ the HEMS
11 doctors.

12 Can I ask you to cast your mind back to the time you
13 met Dr Mackenzie, the HEMS doctor? Because your
14 evidence so far is that you gave him a briefing. His
15 firm recollection is that that was the time that the
16 Tavistock Square disaster had come about your notice and
17 you told him, and all you told him, is that had just
18 happened and you couldn't assist him.

19 Can you have a think whether he could be right over
20 that?

21 A. I think it was around the time that we all heard the
22 explosion and we heard over the radio that the bus had
23 exploded in Tavistock Square. I would have mentioned
24 that, but I wouldn't have been able to tell him any
25 further about that, because I wouldn't have known at

1 that point in time.

2 Q. Could it have meant, with the timing of things, that
3 then, at that moment, you didn't give him a briefing?

4 A. I would have told him everything that I knew, which
5 wasn't as much for the detail of what happened down at
6 King's Cross in the tunnels at King's Cross, I didn't
7 have all that detail myself.

8 Q. It's just the case that he doesn't remember any briefing
9 at all, Officer, that's all.

10 A. We had a brief discussion. Briefing, discussion, it was
11 what I knew at the time he was told.

12 MS ORMOND-WALSH: Many thanks. Thank you, my Lady.

13 LADY JUSTICE HALLETT: Thank you, Ms Ormond-Walsh. Yes,
14 Mr Hill?

15 Questions by MR HILL

16 MR HILL: I'm sure the record can be checked, but,
17 Inspector, you weren't here, of course, when
18 Dr Mackenzie gave his evidence on 13 December. His
19 evidence was that he spoke to a Metropolitan police
20 officer. He doesn't remember your name, didn't recall
21 speaking to anyone of your rank. So to clarify any
22 confusion that may have crept into your mind, if I may,
23 with my Lady's leave, it is not the case that
24 Dr Mackenzie gave evidence to the effect that he did
25 speak to you, his evidence was that he spoke to an

1 officer who gave him no information.

2 A. Yes.

3 Q. Now, that was his evidence. What you have recorded,
4 because you've made an entry --

5 LADY JUSTICE HALLETT: Sorry, just before -- didn't he go
6 further? The officer was going off to Tavistock Square?
7 I thought that the officer he spoke to -- have
8 I misremembered that?

9 MR HILL: I think my Lady is right.

10 LADY JUSTICE HALLETT: So it couldn't have been this --

11 MR HILL: There was no information given, but there was some
12 reference to Tavistock Square, that's right.

13 What is recorded in your incident management log --
14 let's come to the records that you made or caused to be
15 made, so this is INQ9450-10. The timing of this entry
16 is, in fact, the time almost precisely of the detonation
17 of the bus bomb in Tavistock Square. So it had either
18 just happened or was just about to happen, at 9.47, when
19 an entry is made, we assume -- is this right -- by the
20 Sergeant who was your loggist?

21 A. Yes, that's correct.

22 Q. "Briefed by EK1", 09.47, "HEMS Dr Mackenzie". So given
23 that you did cause an entry to be made in your incident
24 management log, is there anything further that you can
25 recollect that will assist my Lady in understanding what

1 you may have conveyed to Dr Mackenzie?

2 A. It would be exactly what I knew at the time, and
3 there's -- I can't add any more because, unfortunately,
4 I can't recall exactly what was said.

5 Q. All right. In terms of the pages of this log, just
6 three discrete points, if I may. Page 4, if we could go
7 back to that. Can we just understand when we're looking
8 here at the action/decision sheet, that is the first of
9 the sheets in the log which has the heading
10 "action/decision", and all of the following pages also
11 have that heading.

12 Does that mean that it is page 4 which records the
13 first action? Let me put that another way.

14 It's from page 4 and onwards that we're looking at
15 contemporaneous entries made at the time as opposed to
16 something I think you said to Mr Keith earlier that
17 there would have been entries made after the event; for
18 example, to clarify the Command structure which later
19 became clear?

20 A. Yes, the entries made from page 4 onward were
21 contemporaneously by Sergeant Probert.

22 Q. Right. It follows from that that the entry or the
23 actions that were taken as recorded on page 4 must have
24 been taken before 9.20 that morning because -- just for
25 you to see it, if we were to go to page 5 in the log,

1 the next page bears the time 9.20. So it follows, does
2 it, that on page 4, your actions as recorded must have
3 been taken by 9.20?

4 A. Yes, that's correct.

5 Q. Perhaps we needn't go to it, but for my Lady's note in
6 INQ10111, which is the CAD record 2376, which Mr Keith's
7 already taken us to, after the chronological time
8 entries for events recorded that morning, the CAD log
9 then goes on to record your call sign, EK1, at 09.03.08,
10 the suggestion being that you were deployed to this
11 scene at 3 minutes past 9.

12 A. That would be correct.

13 Q. As to your precise arrival time, as to which I can't
14 help you from the CAD entries, nor can I help, with
15 precision, from your incident management log, it follows
16 that you must have arrived at some stage between 9.03
17 and 9.14, because, as Mr Keith's already elicited, you
18 sent a message recorded on the CAD at 09.14.35, "There's
19 been a collision between Tube trains"?

20 A. Yes, that's correct. I have had the liberty of viewing
21 some CCTV footage to see -- show me arriving. The
22 difficulty there was there were two different times on
23 the CCTV, one showed me arriving, I believe, at about
24 09.07 and the other CCTV footage showed me arriving
25 about 09.13, I believe it is.

1 Q. So doing the best that one can and allowing for time
2 differences on CCTV footage, you were there between
3 7 and 13 minutes past 9 that morning?

4 A. Yes, that's correct.

5 Q. Thank you. As to page 6 in the item we still have on
6 screen, INQ9450, your liaison with the British Transport
7 Police was ongoing -- is this right -- had already
8 commenced, as it were, by 09.30, to inspector level,
9 hence the entry on the bottom of our screen now
10 Inspector Shields liaises with you 9.30?

11 A. Yes, that's correct.

12 Q. That only leaves this, page 12, please, in the same
13 incident management log. We have heard in evidence,
14 from both Dr Mackenzie and from Chief
15 Superintendent McCafferty, of a meeting, whether or not
16 correctly termed a Silver scene meeting, but a meeting
17 that took place at King's Cross station at 10.00 am that
18 morning, so half an hour before the Silver meeting that
19 you've recorded in this log as scheduled to take place
20 at 10.30, an entry you caused to be made at 10.10.
21 We can see, is this right, what you were doing at
22 10.00, because at the top of that screen we can see --
23 and you've already been asked about it -- an action in
24 relation to taking shields to act as stretchers for the
25 public service unit 111C.

1 A. Yes, that's correct.

2 Q. Does it follow that any partial scene meeting at
3 10.00 am wasn't one at which you were present?

4 A. That's correct, I was still on the -- from that -- my
5 recollection, I was still on the forecourt of
6 King's Cross.

7 Q. Yes. Finally this, if I may. For your actions that
8 day, and indeed subsequently, were you awarded the MBE?

9 A. Yes, I was.

10 LADY JUSTICE HALLETT: Any other questions?

11 Inspector, just a couple from me. Where were you
12 physically when you were carrying out your duties that
13 day?

14 A. Right on the forecourt, right beside the road.

15 LADY JUSTICE HALLETT: So you would always have been visible
16 throughout to people coming who wished to find out
17 whatever limited information you had, you could have
18 passed on to anybody, full uniform?

19 A. Yes, that's correct. At the start -- the only exception
20 to that was, when communication was getting that bad,
21 I went to one of the offices to use a landline to get
22 through to my base to give them an update.

23 Full uniform being white shirt, at that point, and
24 then, at some point, I actually managed to get back to
25 the car and take out a reflective jacket. But

1 generally, that surface area was quite secure and clear
2 of most people.

3 LADY JUSTICE HALLETT: As far as throughout the time that
4 you were there, as far as other agencies were concerned,
5 you've mentioned how you were liaising with British
6 Transport Police. What about the other agencies, the
7 other emergency services? Did you have much contact
8 with them and, if so, what?

9 A. The initial LAS officer who turned up, he came over to
10 me and we started to make plans from there. And he was
11 the one who advised me about the buses, saying that
12 would facilitate.

13 The Fire Brigade, to be honest, I cannot recall.
14 I know, having looked at CCTV, they turned up after me,
15 almost a minute or so after my vehicle turned up.

16 I cannot recollect that, the conversations we had.

17 LADY JUSTICE HALLETT: I've had this impression from
18 a number of witnesses that various organisations are
19 arriving and everybody is trying to go and find out
20 what's going on as opposed to, as it were, talking
21 amongst each other.

22 Were you conscious of people trying to get
23 information from you or from other police officers or --

24 A. I was conscious that I didn't have all the facts, and
25 I know every time you sent officers down there and then,

1 in hindsight, looking where they had to go and find
2 their way down there and quite easily you will be sucked
3 into helping, the information wasn't coming back up.
4 So there were other command sort of levels all the
5 way down and, in hindsight, looking at the term "ticket
6 office", for me, the ticket office was the mainline
7 ticket office on the ground floor. Looking back, there
8 are other ticket offices there, because now I use
9 King's Cross regularly. There's one on the sort of the
10 level below going into the Tube station. So there
11 are -- I've no doubt there were different levels that
12 people were at. I was very reluctant to go from where
13 I was; one, because you're a point of contact for
14 everyone who turns up, but also, as soon as you go
15 underground, for us, within the Metropolitan Police, our
16 radios don't work and I was, for me, the only link going
17 back to our control room and people turning up.

18 LADY JUSTICE HALLETT: As far as London Underground, or
19 anybody responsible for the rail infrastructure, did you
20 have contact with them?

21 A. Yes, I did. Periodically, different members of staff
22 came over to me. I believe I made mention to them in my
23 statement, I can't remember off the top of my head. And
24 they were offering different advice. They also
25 supported on areas where, when my officers came out,

1 where I could direct them to, rather than them basically
2 huddling at the front there so they had somewhere to
3 relax.

4 LADY JUSTICE HALLETT: If you wanted to designate an area
5 triage or whatever, they would help in that kind of
6 thing?

7 A. Yes, that's right.

8 LADY JUSTICE HALLETT: Did you get information from them?

9 A. Again, it was very scarce information of a collision,
10 possibly explosion. The initial stage was always
11 a power surge, but that quickly started to change, it
12 was more serious.

13 LADY JUSTICE HALLETT: Does anybody have any questions
14 arising from my questions?

15 MR KEITH: My Lady, may I ask one question?

16 LADY JUSTICE HALLETT: Of course.

17 Further questions by MR KEITH

18 MR KEITH: Inspector, we may hear evidence later this
19 afternoon from Stephen Sale, who was the Silver medic
20 from the London Ambulance Service at the scene, and he
21 refers to something called the Joint Emergency Services
22 Control Centre, which was a location set up at the
23 British Transport Police offices on platform 1 at the
24 mainline station at King's Cross.

25 Were you aware during your command of a Joint

1 Emergency Services Control Centre of that type?

2 A. I know what the term is, JESCC, which does come into
3 play. Depending on what time -- because I'm trying to
4 remember the layout.

5 If I remember correctly, British Transport Police
6 officers on platform 8, which, if looking from the front
7 of the station at the -- at King's Cross is on the
8 left-hand side, I think the other side is right beside
9 York Way and I think that might have been later on down
10 the incident that that was set up.

11 Q. From the contemporaneous notes, I think it was around
12 about 10.10.

13 A. Right.

14 Q. There is a reference to trying to find officers from the
15 other services for the purposes of attending a meeting
16 at 10.00 and a request is made to the London Fire
17 Brigade via Central Ambulance Control and the British
18 Transport Police for an officer from the Fire Brigade to
19 attend the Joint Emergency Services Control Centre. So
20 it appears to be around about 10.00?

21 A. At that point, no, I wasn't aware of that.

22 Q. No one told you of any such centre?

23 A. No.

24 MR KEITH: Thank you very much. In fact, I'm told -- I'm
25 very grateful -- that Mr Sale will say it was on

1 platform 8, but the notes actually say platform 1. But
2 you weren't aware of it?

3 A. Not at that time, but later on, platform 8 became where
4 we had the Silver meetings, which would indicate that
5 would be the location.

6 MR KEITH: Thank you very much.

7 LADY JUSTICE HALLETT: Thank you very much indeed,
8 Inspector Nasmyth-Miller. I do understand that
9 everybody has different roles to play when it comes to
10 an incident of this kind and you obviously played your
11 role to perfection. As soon as you realised something
12 serious had happened, you swung into action and acted
13 with great professionalism and efficiency. Thank you
14 for everything you did.

15 A. Thank you very much, my Lady.

16 MR KEITH: Thank you very much, Inspector. My Lady, may
17 I invite you to call Ken Leach, please?

18 MR KEN LEACH (sworn)

19 Questions by MR KEITH

20 MR KEITH: Good afternoon. Is your name Ken Leach?

21 A. Yes, it is.

22 Q. In July of 2005, were you one of the station managers at
23 King's Cross?

24 A. Correct.

25 Q. My Lady has heard evidence from Simon Cook, who was also

1 a duty station manager. How, if at all, did your roles
2 differ?

3 A. Simon was actually what we call a rostered station
4 manager on duty on the day. My job for the previous
5 X amount of years has been liaising with the main
6 project, redeveloping the station. So it was Simon's
7 actual job to be on the station on that particular day.

8 Q. Did you both answer to a man called Peter Sanders --

9 A. Correct.

10 Q. -- who was the group station manager?

11 A. Yes.

12 LADY JUSTICE HALLETT: So he was really the operational
13 station manager. You had this other --

14 A. Yes, Simon was the operational station manager, yes.

15 MR KEITH: Your statement records how you were in a nearby
16 cafe, I think, having a coffee with Mr Sanders, who was
17 the group station manager, when you received a text on
18 your mobile referring to a power surge?

19 A. Yes.

20 Q. What did "power surge" mean to you?

21 A. Well, we have several power surges on the Underground
22 and I wasn't sure whether it was going to be on one line
23 or across the system.

24 Q. What is a power surge?

25 A. It basically means that we've tripped out all the power,

1 we've lost power somewhere.

2 Q. A member of your staff then came in to where you were
3 and you realised, according to your statement, that the
4 escalators were still running at King's Cross?

5 A. Correct.

6 Q. So you realised that it couldn't be a power surge
7 because there was still power on the escalators?

8 A. Power on particular escalators. Escalators 4, 5 and 6
9 are DC-fed escalators. If we'd had a power surge, then
10 we would have lost them escalators, and we didn't lose
11 the -- because he actually said to me, as he came in,
12 that he was standing on the escalator and everybody was
13 running past him. When we asked him why he was standing
14 on a fixed escalator, he said it wasn't fixed, it was
15 moving.

16 Q. All right. In any event, you and Mr Sanders ran back,
17 I think, to King's Cross?

18 A. Yes.

19 Q. I'd like to ask you, please, about how Simon Cook, from
20 whom my Lady's heard evidence and who went down to the
21 train, came to get down to the train relatively quickly.
22 Did you and he discuss what you should both respectively
23 do --

24 A. No.

25 Q. -- or did you find out that he'd already gone down?

1 A. I found out that Simon was already on his way down there
2 by the time we got there.
3 Q. Did you find that out from a radio call?
4 A. Yes.
5 Q. How did the radios work that morning at King's Cross?
6 A. No different than what they usually do.
7 Q. Handheld radios for members of your staff?
8 A. Handheld radios, yes.
9 Q. Did they work in the tunnel?
10 A. No.
11 Q. So it was usual they only worked in the platform and
12 station areas?
13 A. They would normally go up to within 6, 7-foot within the
14 station tunnel. Past that, no.
15 Q. Evidence has been given of a number of calls, one at
16 08.48 from King's Cross to the line controller, talking
17 about a loss of power and evacuation and asking for
18 King's Cross to be a non-stop.
19 During the course of that call, the line controller
20 made reference to the possibility of a power surge.
21 Another call at 08.54 from King's Cross of smoke on the
22 eastbound platform requesting the Fire Brigade and, at
23 09.11, a call for ambulances.
24 Were you aware of any of those calls?
25 A. No.

1 Q. Did you instigate any of those calls?

2 A. No, not to start with, no.

3 Q. You record in your statement how you put out a radio
4 call to your staff to declare a major incident at
5 King's Cross. Do you know when that was?

6 A. No, because, to be quite honest with you, what normally
7 happens at a station, if you've got a major incident,
8 you've got everybody trying to talk to everybody over
9 one radio channel, so we made a protocol at the time to
10 say, "All of you, we've got an incident on our hands,
11 shut up unless it's an emergency, unless you really need
12 to talk to us", which is what we did.

13 Q. That's a message you sent out by handheld radio?

14 A. Yes, it's on a control panel in the control room.

15 LADY JUSTICE HALLETT: I'm sorry, I'm interrupting again.
16 When you're having your coffee and you get your text
17 message, you then rush back to find out what's going on
18 but as soon as you know that the escalators are moving,
19 it's not a power surge, can you give me any idea of what
20 time it was that both of you and the group station
21 manager would have been aware this was not a power
22 surge?

23 A. Graham came in maybe ten minutes after we got the text
24 messages, so I can't really give you a time.

25 LADY JUSTICE HALLETT: Do we have an estimate of the text

1 message?

2 MR KEITH: My Lady, we don't. The statement which my Lady
3 has simply records:

4 "Peter received a text on our mobile and it was some
5 time after 8.15."

6 That's why I'm asking you, Mr Leach, about those
7 calls to see whether or not you had any recollection of
8 those calls being made.

9 A. No, because this statement I made about 18 months after
10 the incident itself. All of the logs we had were --
11 I don't know where they went, but I can't give the exact
12 time. Not at the present time.

13 Q. Did you, yourself, ever speak to the Network Control
14 Centre?

15 A. Not until some time into the incident.

16 Q. Did you take steps to find out whether anybody had
17 spoken to the Network Control Centre?

18 A. Yes.

19 Q. How?

20 A. By asking the supervisors on duty there at the time.

21 Q. Who were they?

22 A. One was Ray Towle, and I can't recall the other one, to
23 be honest with you. I know I spoke to Mr Towle.

24 Q. Mr Cook had gone down to the train to find out fairly
25 quickly what was going on. Who was in charge in the

1 control room or the control room area dealing with
2 making sure that the Network Control Centre knew what
3 was happening and trying to collate, keep together,
4 garner the information?

5 A. Once I'd got there, I was dealing with that.

6 Q. What time did you get back there?

7 A. I can't recall the exact moment.

8 Q. Your statement records how you came across
9 Inspector Mingay, who you would have known from
10 King's Cross.

11 A. No, I didn't actually know Inspector Mingay at the time.

12 Q. All right. You came across a British Transport Police
13 inspector, who was covered in soot and out of breath and
14 very distressed. Did that happen fairly soon after you
15 got back to the King's Cross station?

16 A. Yes.

17 Q. Had he been down to the train, do you know?

18 A. He came -- he didn't tell me he'd been down to the
19 train, but he was coming up the escalators, so it was an
20 assumption that he'd come back from the train.

21 Q. But he was covered in soot, wasn't he?

22 A. He was covered in soot and he was quite distressed.

23 Q. He was quite distressed. He knew something about what
24 had happened?

25 A. Yes.

1 Q. He told you he thought there might have been a bomb?

2 A. Correct.

3 Q. We know from other evidence that he didn't come back up
4 to the top, to the surface, until after 9.30, because he
5 came out of the tunnel at 9.30 and briefed the London
6 Fire Brigade and he refers to London Underground staff
7 at 9.45.

8 Is it possible, therefore, that you didn't get back
9 to King's Cross until around the time that
10 Inspector Mingay came up from the tunnel, which was
11 about 9.30 to 9.40? Does that sound about right?

12 A. I think it was just a fraction before that, but it was
13 probably about right, yes.

14 Q. Was the station evacuated?

15 A. No.

16 Q. The Network Control Centre call at 08.48 declares the
17 Network Control Centre that the station was being
18 evacuate. What did you find out in terms of the
19 evacuation or the failure to evacuate when you returned
20 to the station then at 9.30, 9.40?

21 A. They had started evacuating the Northern Line. We've
22 got a -- what I call "Emergency. Do not enter" signs,
23 that you put on. When we went into the control room, we
24 found that only half of those were on, so even though
25 they were partially evacuating the station, there were

1 people coming in and out the station.

2 Q. So on top of your other woes, did you find that there
3 were trains still stopping at some of the platforms at
4 King's Cross and passengers were getting off?

5 A. Yes.

6 Q. Do you know why the full evacuation process had not been
7 triggered as opposed to evacuation only of parts of the
8 station?

9 A. No.

10 Q. You must have tried to find out afterwards.

11 A. I did find out afterwards. Apparently, what had
12 happened was the Northern Line was exceedingly
13 overcrowded, which it normally was at that time of the
14 day, and they'd made the decision to evacuate the
15 Northern Line. So they were partially evacuating the
16 Northern Line and that's what they were trying to do,
17 put in some form of crowd control to stop people getting
18 on to the Northern Line, being the deepest part of the
19 station. So although they had some EDNE boards, and
20 they'd had a one-way system put in, a crowd control
21 system put in, but they hadn't done a full evacuation.

22 Q. So the Northern Line had been evacuated, but the other
23 platforms hadn't?

24 A. That's correct.

25 Q. You took a variety of steps described in your statement

1 to try to contact the NCC, put staff onto the platform,
2 set up a triage area for the walking wounded who'd come
3 out, and no doubt emergency equipment was something at
4 the forefront of your mind.

5 Do you recall looking for the first aid equipment at
6 King's Cross in order to hand it out?

7 A. No, I didn't need to look for it, because it was in set
8 places.

9 Q. Where was it?

10 A. I asked them to get the first aid boxes. They were in
11 each of the booking offices, one in the supervisor's
12 office and one in the control room.

13 Q. Do you remember when they were handed out and to whom?

14 A. No, I don't recall who they were handed out to. I just
15 said, "Get all of the first aid out".

16 Q. Did you run out of equipment at any stage?

17 A. Yes.

18 Q. Do you recall when?

19 A. I would say probably -- maybe six or seven -- eight
20 minutes into the incident.

21 Q. After you had got back?

22 A. Yes.

23 Q. When you say "into the incident", you mean after you had
24 returned to the station?

25 A. Yes.

1 Q. What sort of equipment had the station run out of?

2 A. Well, we had basic first aid boxes on the station and
3 stretchers, and they were very, very basic first aid
4 boxes. That's all we really had. We had a couple of
5 megaphones and that lot, but that's all we actually had
6 on the stations.

7 Q. Did you stay in the control room with Mr Saunders, once
8 you'd returned?

9 A. No, because I actually went out into the booking hall
10 area.

11 Q. Were you in that area, the control room area?

12 A. I was always within that area, yes.

13 Q. Do you remember Mr Chaudhury, one of your customer
14 services assistants, coming in and trying to find more
15 medical equipment?

16 A. I can remember several staff coming in to try to get in,
17 not just Mr Chaudhury.

18 Q. Her Ladyship has heard evidence from Mr Chaudhury, who
19 describes how he came in and started filling his pockets
20 with bandages and pads from a supply of equipment in the
21 control room and, perhaps because he didn't have the
22 licence to be in the control room or you were busy, you
23 may have sworn at him and told him to piss off?

24 A. Highly unlikely. At the time, in that control room were
25 Mr Khan, and I've now got my general manager in there,

1 who is the boss of the line, and also my own boss in
2 there. So that's highly unlikely. I'm not saying
3 I didn't say it, but I cannot recollect saying to
4 Mr Chaudhury "Piss off, you ain't entitled to be in
5 here".

6 With regards to stuffing his pockets full of first
7 aid, we -- the first aid that he actually picked up was
8 not actually in the control room, there was nothing else
9 in the control room. He probably picked it up from
10 outside.

11 Q. Did he have a licence to be in the control room?

12 A. No.

13 Q. So if he'd said that you said, "You don't have a licence
14 to be in there", that might have been correct?

15 A. No, because every member of staff went in there, whether
16 they had a licence or not. He wasn't qualified to be
17 working in the control room, not to actually be in
18 there.

19 Q. Were you and Mr Sanders very concerned about the lack of
20 medical equipment?

21 A. Yes.

22 Q. What steps did you take to try to get more?

23 A. We got hold of Network Rail and they have a -- they sent
24 down all of their first aid and some special piece of
25 equipment, and then we got hold of St Pancras

1 International and they got hold of the workmen over
2 there, who then brought equipment down to the station.
3 So we had first aid equipment there, but it was -- it
4 was just first aid equipment, you know, plasters and
5 bandages.

6 Q. You describe in your statement how you asked a member of
7 staff, Mr Phillips, to go and get the equipment from
8 St Pancras and he returned with a van with --

9 A. Yes, he returned with a van and he brought a load down
10 from the actual building site.

11 Q. He tipped it down the stairs into the station, in order
12 that --

13 A. Yeah, we said to him, "Stop what you're doing, Col, we
14 need to get" -- he literally just threw it on to --
15 because we'd set up a triage unit or a place for the
16 walking wounded in the booking hall area, and that's
17 where all of the stuff was put into, it was just thrown
18 into there.

19 Q. This was equipment primarily for the people who were
20 being triaged and being treated at the concourse level?

21 A. It was -- to be honest with you, we didn't actually tell
22 him to say "You can only use it for this person or that
23 person there", first aid was there.

24 Q. First aid was visible?

25 A. Yes.

1 Q. What about stretchers, because the more seriously
2 injured needed stretchers. Do you recall having to try
3 to find stretchers?

4 A. Yes.

5 Q. What did you do about that?

6 A. Well, again, we got hold of Network Rail and St Pancras
7 International. We have one stretcher on each set of
8 platforms, and we have one in the Tube booking hall, and
9 that was literally all we had. So we had six
10 stretchers, and we knew we needed a lot more than that,
11 so we were having to use the stretchers, it was like
12 a -- use the stretcher, bring people out to a certain
13 point, take the stretcher back.

14 Q. Were you ever able to find any more stretchers than
15 those available on the station?

16 A. No, we didn't, no.

17 Q. I think the Fire Brigade had requests for lights and
18 masks?

19 A. Yes.

20 Q. Dust masks, because they were inside the tunnel.
21 Throughout this time, from your return to the
22 station, perhaps about 9.45, to about 11.00, 11.30, you
23 received a number of requests for equipment --

24 A. Yes.

25 Q. -- for lighting, ventilation, communications and so on?

1 A. Correct.

2 Q. Were you able to keep in touch with Mr Cook, your fellow
3 duty station manager, during this time or not?

4 A. No. The only way I could keep in touch with Simon was
5 to actually get a message to him. It was Simon that
6 actually asked for extra first aid via a member of
7 staff, "We want more first aid stuff down here". We
8 could not communicate directly with Simon. It was
9 through a runner.

10 Q. You got your information from runners --

11 A. Yes.

12 Q. -- or from attending, as we know you did, the Silver
13 meetings or meetings with other --

14 A. Yes.

15 Q. -- emergency services and I think you attended one at
16 10.30 with --

17 A. Yes.

18 Q. -- Chief Superintendent McCafferty and a number of other
19 individuals.

20 A. Yes.

21 Q. Did you know, in truth, where your staff were? We know
22 that Mr Cook was downstairs helping, Mr Chaudhury went
23 into the tunnel. Was it the position that, once they'd
24 left the control room or the concourse area, you had no
25 real -- for understandable reasons; there were no

1 communications -- but you had no real sight as to where
2 they were, if they were in the tunnel?

3 A. Once they'd gone into the tunnel, you lose all
4 communications with them.

5 Q. Yes. Did you go down at a later stage?

6 A. No.

7 Q. Did Mr Sanders go down?

8 A. I don't recollect Peter going down there. He might well
9 have done.

10 Q. Lastly, may I ask you this: after the incident was over,
11 you, I think, assembled a substantial number of
12 debriefing memos compiled by members of your staff,
13 about 25 of them, as well as the station logbook and
14 some CCTV tape from the control room. You bundled it
15 altogether and handed it in to one of your superior
16 managers. Did you ever see it again?

17 A. No. There was also CCTV, station logbook. I had
18 a designated scribe who had taken a lot of copious notes
19 for me, and there were some witness statements --
20 witnesses' names and addresses, people that were on the
21 train, and also there was about 25 -- I asked the staff
22 to go upstairs, sit down, if they were up to it, and
23 just give me a quick briefing of exactly what they did,
24 and, no, I never saw them anymore.

25 Q. You stayed at King's Cross until just about after 10.00,

1 and I think there was, naturally, a debate during the
2 course of the morning, in the afternoon, as to how much
3 of King's Cross could be reopened to the public, whether
4 trains could be allowed in again, how to move the trains
5 that had been left there during the morning emergency,
6 and you then, I think, returned to King's Cross in the
7 middle of the night, when you realised that the phone
8 calls during the night with additional problems were
9 such that it was easier if you simply returned there?
10 A. To be honest with you, a decision was made that, no
11 matter what happened, my job was to destroy half that
12 station and try to keep it running. I turned round and
13 said, "I'm not letting anybody just come in to do what
14 they want to do and keep the station closed", so I met
15 up with the police and everyone else and, from an
16 operational point of view, we gave our company the
17 opportunity to run the Metropolitan Line. The decision
18 was made not to, but that's what it was all about.
19 I then handed over to Paul Cleminson, the night duty
20 station manager, who came in, but the phone calls never
21 stopped. Me and Peter went back to my house, the phone
22 calls never stopped, "This is a waste of time, we're
23 wasting time, we might as well go back". I think we
24 left there about 3.30 the following afternoon.
25 MR KEITH: Thank you, Mr Leach. There may be some other

1 questions for you.

2 LADY JUSTICE HALLETT: Do I take it from some of your
3 answers that the organisations and people around
4 King's Cross were very receptive to any requests for
5 help? You mentioned the construction workers?

6 A. The construction workers were excellent. There was
7 a couple of the private companies, shall we say, that --
8 we were desperately in need of water, and we went to one
9 particular, well-known company that gives you bonus
10 points, they wanted us to give a barcode for every
11 single bottle of water we took.

12 So that might have been the day when I might have
13 turned round and told them what to do with themselves,
14 but everybody else was excellent. We had to get the
15 face masks -- to start with, we had the basic face masks
16 which workmen have, but as the incident progressed, they
17 needed these more specialist ones, and there was
18 a company across the road from us that actually supplied
19 them, the immediate ones for us, we went into them, said
20 we needed these particular masks, we didn't have a clue
21 what they were talking about, and they got them for us,
22 so, yes, the local firms were very receptive.

23 MR KEITH: You had to board up a lot of King's Cross
24 afterwards in order to allow parts of the station to
25 open up and remain -- for other parts to remain closed

1 and sterile?

2 A. Yes, that was under our recovery system. As I said, we
3 were quite determined that, you know, for what this chap
4 did or allegedly did, we were going to try and keep that
5 station open. So we worked a procedure out where we
6 could actually run one of the lines, so we're not going
7 to keep our station closed. King's Cross was not going
8 to close because of this person. 90 per cent of it
9 would, but we weren't going to allow it all to close.

10 And I'd managed to get hold of our fire officer at
11 home and said, "I need these special certificates", and
12 just said, "Do what you want. I need to get hold of the
13 controllers. This is what we're proposing to do. You
14 can tell me what you want, but this is what we're going
15 to do for you".

16 Got hold of the contractors and there's a special
17 material called Alpha-numeric and we took every bit out
18 of London just to seal off King's Cross so we could run
19 a particular part of the line.

20 Q. You ran the end two tracks, didn't you?

21 A. Yes.

22 Q. The platforms to the west side of the station?

23 A. We actually -- what we gave the firm the opportunity of
24 doing was running the Metropolitan Line. We could have
25 run part of the Metropolitan Line. The rest of it was

1 a no-no because it was a scene of crime and we couldn't
2 get people in and out of there, but we knew -- you know,
3 they were phoning me up and telling me, "We are going to
4 close". I said to him, "You don't tell me what to do on
5 my station. We tell you", and that was the attitude of
6 all of the staff at that particular time.

7 MR KEITH: Thank you, Mr Leach.

8 LADY JUSTICE HALLETT: Yes, Ms Gallagher?

9 Questions by MS GALLAGHER

10 MS GALLAGHER: Two brief matters, please.

11 Mr Leach, you, at the time, were a station manager
12 at King's Cross. Are you still a station manager there?

13 A. When, now?

14 Q. Now.

15 A. No.

16 Q. How recently did you stop being a station manager there?

17 A. 29 -- the actual precise date was 5.00 on 30 September.

18 Q. So very recent?

19 A. Yes.

20 Q. You were there for about 20 years, since 1992, so you
21 were obviously very experienced?

22 A. That's correct.

23 Q. You've described earlier the first aid kits or boxes.

24 You said they were very, very basic. You've told us
25 that you'd no trouble finding them because they were in

1 fixed places in two booking halls.

2 Isn't it right that there only were two, so one in
3 each of the booking halls?

4 A. Two in two booking offices, not booking halls.

5 Q. Excuse me, booking offices, but there were only two, one
6 in each of the offices?

7 A. No, there's one in the control room as well. Booking
8 offices are secure areas on the London Underground. Not
9 all staff are allowed in there. So there's no point
10 just keeping them in those two areas.

11 Q. I'm interested in the numbers of them. Are you saying
12 now that there were three of them rather than two of
13 them, as you said in your statement?

14 A. There was a minimum of three, there could have been some
15 spares as well.

16 Q. Because in your statement from December 2006, you
17 describe only having two of them.

18 A. Potentially, that's what I put in there. I'm not saying
19 that's correct. I don't think that was correct, it --
20 to be honest with you, that is not correct, because
21 booking offices are secure areas, we don't allow any
22 staff into those, so although we have one in each of
23 those, we certainly have one in the control room.

24 Q. So three, you think?

25 A. So three, yeah, minimum of three.

1 Q. Could you assist us with this? Given that you, until
2 very recently, continued in that role at King's Cross
3 until September 2010 -- I'm afraid I don't remember the
4 precise date --

5 LADY JUSTICE HALLETT: Or time.

6 MS GALLAGHER: -- could you help us with this: do you know
7 if the numbers of first aid boxes had changed --

8 A. Yes.

9 Q. -- between 2005 and then? Do you know how many there
10 were in September when you left your role?

11 A. No, not exactly, because we, since the redevelopment,
12 put in there -- we actually put in a designated first
13 aid room. We also included one into our new north
14 booking hall and we put first aid boxes virtually
15 everywhere we could, and we did hold at least a surplus
16 of ten of these boxes in the first aid rooms and we've
17 also got one of the National Health big green bags in
18 there now.

19 Q. So the numbers had altered?

20 A. The numbers altered.

21 Q. You described them as very basic in your words?

22 A. Yes.

23 Q. Have the contents altered since 2005?

24 A. No.

25 Q. So the contents are still very, very basic?

1 A. The contents are still exactly the same.

2 LADY JUSTICE HALLETT: Apart from the National Health green
3 bag?

4 A. Apart from there's a big National Health green bag,
5 which has now been put in there, which they check.

6 LADY JUSTICE HALLETT: What sort of equipment has that got
7 in it?

8 A. I don't know, that's sealed. That's so, if there is
9 another major incident, at least they've got something
10 there that they can grab hold of straightaway.

11 LADY JUSTICE HALLETT: I think Ms Simcock can help me on
12 that, if necessary.

13 MS GALLAGHER: There's just one additional matter, Mr Leach.
14 You've described in detail today, and also in your
15 statement, being told by a very distressed
16 Inspector Mingay about there possibly having been
17 a bomb. In your statement -- and you didn't deal with
18 this in oral evidence -- you describe making a decision
19 not to tell the staff about that information because the
20 only way you could do it was by broadcasting over the
21 radio?

22 A. Yes.

23 Q. So it could cause "blind panic" is the way you described
24 it in your statement because everyone would necessarily
25 hear the information. Do you recall that?

1 A. Yes.

2 Q. So the impact of that, of course, would have been that
3 frontline staff assisting in the evacuation -- including
4 staff at station level -- may have continued to be under
5 the impression that this was a power surge. Certainly
6 they wouldn't be aware of the gravity of the situation
7 and they wouldn't be aware of the information that you
8 had from Inspector Mingay, because you'd no way of
9 passing that information on to him --

10 A. Not through --

11 Q. -- in a responsible way?

12 A. Not through the radio, no. They were told by word of
13 mouth rather than over the radio. If we put a radio
14 message out on the radios on a station like
15 King's Cross, it's not just them that will hear it, it's
16 30 people around them.

17 Q. So the way you had to do it was individual "pass it on"
18 messages?

19 A. Correct.

20 MS GALLAGHER: Thank you very much, I've nothing further.

21 LADY JUSTICE HALLETT: Thank you. Thank you Ms Gallagher.

22 Any other questions? Ms Canby.

23 Questions by MS CANBY

24 MS CANBY: Mr Leach, just two small matters to clarify on
25 behalf of Transport for London. The first matter is

1 what Inspector Mingay told you, and I appreciate that
2 your witness statement wasn't taken until 17 months
3 after the event, so when matters weren't particularly
4 fresh in your memory.

5 It is right that you refer to Inspector Mingay in
6 that statement as having told you that there was a bomb.
7 We've already heard, though, from PC Collins, who was
8 his loggist, and the court has already looked at his
9 log, and the log makes no mention of Inspector Mingay
10 having told you at that point that there was a bomb.
11 Can you be sure now that he did say to you that
12 there had been a bomb?

13 A. No. To be quite honest with you, no, because, as
14 I said, I did that statement 18 months later, so it
15 could have been very subjective what I was actually
16 saying with regards to the bomb.

17 I do remember Inspector Mingay coming up, I do
18 remember him being very distressed, I do remember him
19 asking me to make a 999 call and I -- to be honest with
20 you, that was the time when I did swear at him because
21 I said, "I can't use my own -- you're the man that does
22 all of this, not me".

23 Q. But if we wanted an accurate or a more accurate record
24 of what was told to you, the best place to look would
25 probably be his contemporaneous log?

1 A. Yes.

2 Q. Just a second point which was in relation to first aid
3 equipment, you've referred to the number of first aid
4 boxes being increased and the NHS pack. It's also right
5 that there's now a multicasualty dressing kit at
6 King's Cross Underground station?

7 A. That's the one. That's the green --

8 Q. That's the green NHS pack?

9 A. That's the big green -- we -- what we tried to do since
10 then -- there's a legal amount of staff we have to have
11 on duty, with first aiders. We try to keep that well
12 above that limit. We've got -- they've now got
13 designated first aiders who deal with all of that stuff.
14 So we found that we were short of -- it was such silly
15 little things that would have been handy, like the
16 silver foil blankets, so we ordered hundreds of them,
17 and the red blankets and blue blankets, we ordered loads
18 of them, so they're there on --

19 Q. They're there now?

20 A. They're there on the "what if" now.

21 MS CANBY: Thank you very much, Mr Leach.

22 LADY JUSTICE HALLETT: Could I just ask you one thing about
23 what Ms Gallagher was asking you. You made the decision
24 not to tell your staff essentially that it wasn't
25 a power surge, because you realised that the minute you

1 saw your escalators were working --

2 A. Yes.

3 LADY JUSTICE HALLETT: -- over the radios in case customers
4 standing around could hear. How, then, do you make sure
5 that everybody in the control room and all those who are
6 going to have to make decisions and those who are going
7 to be relaying messages from the Network Control, all
8 know it's not a power surge? Because this power surge
9 message seems to have carried on going out for rather
10 a long time.

11 A. It did. What we tried to do -- I mean, the control room
12 at King's Cross is probably about 6-foot square,
13 probably a little bit more than that, and there's about
14 8 people in there. Peter Sanders was in there at the
15 time, who had got the information about it being this
16 explosion, and I said to Peter, "I don't think we should
17 give this message out to the staff. If we do, there are
18 too many people round here, it will cause blind panic".
19 So what we had to do, we had the supervisor in there
20 with us, Simon was already down there with, I think it
21 was three others, so we knew that Simon was going to be
22 fully aware of what was going on down there, and then we
23 had to explain by word of mouth to each of our staff.
24 As and when we could get hold of them, we explained to
25 them "Look, listen, this is not a power surge, this is

1 more serious than that. We're in a little bit of
2 trouble here".

3 LADY JUSTICE HALLETT: What about Network Control, what
4 about the messages --

5 A. NCC eventually -- sorry, it was NTC in them days. NCC
6 were told that we had had a bomb go off. I can't
7 remember the exact time. We had had extreme
8 difficulties. Mobiles were completely dead. We tried
9 every line. We wasn't getting numbers. I think the way
10 we actually eventually got through was -- and it will
11 probably be checked through the logs -- that the
12 Victoria Line controller suddenly comes through to me
13 and turned round and said to me, "I've got a train stuck
14 in the tunnel and I'm going to bring them into your
15 platform and you're going to detrain them".
16 That's when I swore at him and said, "You do know
17 what the hell is going on down here?". So it was just
18 prior to that that the NCC were aware of it.

19 LADY JUSTICE HALLETT: So you say that that wasn't through
20 want of trying, it was that you couldn't get through?

21 A. We tried everywhere. Even to the extent I got the
22 general manager to try to use his mobile, thinking his
23 phone was a lot more expensive than my one, go outside
24 and give it a try. But we couldn't get through to
25 anybody at all, even when we got direct lines in there,

1 which -- you know, it's a straight line into their line
2 controllers which would then go through a special SIM
3 link system. We would phone up the Metropolitan Line to
4 say, "We've got a major problem down here", that's the
5 official way of doing it. The quickest way is to phone
6 everyone and let them all know, but we tried everybody
7 and we couldn't get through to anybody.

8 LADY JUSTICE HALLETT: A direct landline?

9 A. Yes, you pick it up and push a button. It's an
10 autophone which is permanently lined for you.

11 MR KEITH: You have an autodial to the Metropolitan Line
12 duty operations manager, Met DOM?

13 A. Yes.

14 LADY JUSTICE HALLETT: Thank you. Thank you very much
15 indeed, Mr Leach.

16 A. Thank you.

17 MR KEITH: May I invite you to call Stephen Sale, please?

18 MR STEPHEN WALTER SALE (sworn)

19 Questions by MR KEITH

20 MR KEITH: Good afternoon. Could you give the court your
21 full name, please?

22 A. It's Stephen Walter Sale.

23 Q. At the time of the making of your statement
24 in November 2005, you were an assistant chief ambulance
25 officer with the London Ambulance Service?

1 A. That's correct.

2 Q. In that senior position, you were also a qualified
3 paramedic, we presume?

4 A. Yes, correct.

5 Q. On Thursday, 7 July, I think you were attending the
6 conference of which we've heard, the conference of
7 senior managers at Millwall football ground.

8 A. Yes, sir.

9 Q. How did you come to leave?

10 A. At around about 09.17 hours, I received an SMS pager
11 message at the same time as a number of colleagues in
12 the room, and that told me that there was a major
13 incident declared at Liverpool Street Underground
14 station.

15 Q. Were you on the Gold Commander rota?

16 A. Yes, sir.

17 Q. What does that mean?

18 A. In normal circumstances, the Command and Control
19 structure of the Ambulance Service, there would be
20 a nominated Gold officer or manager of senior rank to
21 actually manage the strategic response to any incident
22 in London.

23 Q. So as a result of being on the rota and having received
24 that text message, did you contact the Central Ambulance
25 Control to see whether or not your attendance was

1 required?

2 A. I did, sir, yes.

3 Q. What happened?

4 A. When I contacted Central Ambulance Control, I was asked
5 initially to attend St Pancras station, and that was
6 quickly amended to King's Cross Underground station.

7 Q. Were you told what the nature of the incident was?

8 A. I was aware that the call was a potential explosion at
9 that site, and I believe it was mentioned it may be
10 a large incident.

11 Q. I think, even at that stage, there had been difficulties
12 in getting through on the normal radio channel, had
13 there not?

14 A. Actually, when I tried to book mobile on the radio
15 channel I was unable to get through to
16 Ambulance Control. The channel was very congested.

17 Q. What is "booking mobile"? Is that a direct dial or
18 a direct --

19 A. No, it's through service radio mainset that was in my
20 car.

21 Q. You just couldn't get through?

22 A. The radio channel was extremely congested with other
23 talk.

24 LADY JUSTICE HALLETT: That's your reporting that you were
25 mobile, do you mean?

1 A. Correct, from Millwall Football Club, yes.

2 LADY JUSTICE HALLETT: Was it the same uniform you were
3 wearing now, were you in full uniform?

4 A. No, my Lady, I was in civilian dress, as I was attending
5 a conference.

6 MR KEITH: You prepared an incident report because, as we'll
7 hear in a moment, you were the Silver medic, and the
8 report describes how you arrived on the scene at
9 approximately 9.48?

10 A. Yes, sir.

11 Q. When you arrived, were you quickly able to determine who
12 was in charge in terms of the London Ambulance Service
13 response?

14 A. Yes actually on the main concourse just outside the
15 station was a duty station manage officer whose name is
16 David Brennecke, and I made straight for him once
17 I arrived at the scene, after putting on my personal
18 protective clothing, a high visibility tabard. In fact,
19 it's a bright silver tabard that actually said
20 "Ambulance incident officer", and made my way across
21 David, who was outside standing by his duty officer
22 vehicle, and made myself known to him.

23 Q. Because you were more senior to him, you replaced him,
24 did you --

25 A. That's correct, sir.

1 Q. -- in the role that he had already taken, which was
2 Silver medic? You then became Silver medic?

3 A. Yes, I understand from Mr Brennecke that he arrived just
4 a few minutes earlier to me and had just commenced to
5 write a log, and it was agreed that I would take over as
6 Silver medic.

7 Q. My Lady's heard evidence about the roles of Gold, Silver
8 and Bronze. I won't detain you further in relation to
9 that issue. Whilst you were Silver medic, how good
10 a view did you have on the whereabouts and the roles
11 being performed by your various London Ambulance Service
12 colleagues?

13 A. At the initial stage when I first arrived there, the
14 only other ambulance officer was Mr Brennecke. He
15 informed me that he'd brought a team leader, a Mr Ward,
16 Nigel Ward, with him to the incident, who had gone
17 forward to act as Bronze forward. The reality of that,
18 Mr Ward did not make it to the incident site. He was
19 overwhelmed with walking wounded coming up from the
20 Underground station.

21 Q. During the time that you were Silver medic, were you
22 ever able, on account of the lack of direct
23 communication with the tunnel, to work out where, for
24 example, the first Fast Response Unit attendee,
25 Mr Taylor was, where Mr Philip Bell was, another Fast

1 Response Unit attendee, or the occupants of the first
2 two ambulances who arrived?
3 A. My understanding, when I asked where the crew --
4 ambulance crew staff were, I was told they'd gone
5 forward to the incident site. I didn't see them and
6 I had no knowledge of whereabouts they were, apart from
7 they'd gone down to the incident site which, at that
8 time, was not known to me. Nor was it known to
9 Mr Brennecke.
10 A British Transport Police officer -- I don't know
11 the gentleman's name -- directed me to another colleague
12 who was sitting at the back of an ambulance in
13 a distressed state and I found that to be a gentleman
14 who gave me his call sign as Lima Tango 27 and
15 identified himself as Acting Inspector Stephen Mingay.
16 That gentleman was extremely distressed. However, it
17 was clear to me that he'd been down to the scene and
18 I was able to, after some gentle questioning, get some
19 information from Mr Mingay which indicated to me that
20 there had been an explosion on a train which he thought
21 was on the Piccadilly Line and he believed it was on
22 platform 6.
23 He indicated he'd also walked the length of the
24 train and confirmed to me there were a number of
25 fatalities and some seriously injured patients.

1 Q. Having, therefore, met Mr Brennecke and having found out
2 from Acting Inspector Mingay what the position was on
3 the train, how did you set about, if at all, setting up
4 a command post or some place or structure that other
5 London Ambulance Service personnel would know was the
6 command post for them?

7 A. The initial actions I took was to try to identify the
8 senior police officer, the police incident officer and
9 the fire incident officer.

10 Q. Where were they?

11 A. At that time, I hadn't seen a fire officer. My
12 understanding, although there were fire appliances
13 there, the initial response from the London Fire Brigade
14 were down at the incident site. Therefore, I asked my
15 Ambulance Control, or via Mr Brennecke, to request
16 a senior fire officer to a Silver meeting.

17 I also looked for the senior police officer who was
18 introduced to me as Chief Superintendent McCafferty, and
19 we agreed to meet very briefly at 10.00, just to try to
20 understand what assets we had there, what other
21 emergency services were present, the number of
22 casualties and, in fact, the incident we were dealing
23 with, if Mr Mingay's information was correct.

24 Q. You passed a message via your control room, Central
25 Ambulance Control, to the Fire Brigade because you'd

1 been unable to locate an officer of the requisite
2 seniority from the Fire Brigade at King's Cross, so you
3 had to -- to look for him, you had to use the Control
4 networks in order to pass a message to the London Fire
5 Brigade to that officer to make himself known to you?

6 A. That's correct, sir. My understanding is they were down
7 at the incident site.

8 Q. I'm sorry?

9 A. My understanding is that the first response from the
10 London Fire Brigade were actually at the incident site.

11 Q. I think shortly after your arrival, at the same time as
12 you arrived, a member of the HEMS team made himself
13 known to you, Dr Mackenzie?

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

15 Q. Who became the medical incident officer?

16 A. Yes.

17 Q. Were you aware that he then went forward to the tunnel
18 itself and to the train?

19 A. We had an initial conversation where we made it known
20 that we would be meeting briefly at 10.00, to which he,
21 as Silver doctor, call sign Silver doctor, would be
22 attending. It was also clear that we had not much
23 information as to the incident itself apart from what
24 Inspector Mingay had told me.

25 So he went forward to liaise with his other

1 colleagues that were already down towards the incident
2 site.

3 Q. We know from other evidence that members of the London
4 Ambulance Service had been there for some time by the
5 time you arrived, because Mr Taylor had arrived at 9.14,
6 Mr Bell at around 9.13, the Rixons at 9.20 and another
7 ambulance, Desmond/Sinclair, at 9.32.

8 In hindsight, are you not a little surprised,
9 perhaps, that the information that you'd received had
10 had to come from a very distressed British Transport
11 Police acting inspector and you'd had to call through
12 the Control networks for a London Fire Brigade officer
13 as opposed to receiving information from other members
14 of the London Ambulance Service sequentially as the
15 baton of command got passed down each of the officers?

16 A. The initial person I met, as I say, was Duty Station
17 Officer Brennecke, who had just arrived --

18 Q. Who had only arrived before you?

19 A. -- before me, and the information I received from him
20 was our initial responders were down at incident site.

21 I believe there was one ambulance technician with an
22 ambulance acting as a control point at that time.

23 I think you asked me if I was surprised, sir. The
24 size of the incident and what was going on in London,
25 no, I wasn't surprised that our staff had gone forward.

1 Q. It would have been more desirable, would it not, though,
2 if there had been somebody from LAS who had been able to
3 brief you as you arrived and say, "This is the
4 information that I have gathered so far. I am perhaps
5 now needed down on the bottom, subject to your command,
6 but this is what we know"?

7 A. That would have been extremely useful, yes.

8 Q. Communications were, as generally accepted, a real
9 problem?

10 A. Yes, sir, they were on the day.

11 Q. Do you recall, whilst you were there, there being any
12 calls from the train for further medics to attend, any
13 calls for more paramedics?

14 A. We had no radio communications with the incident site
15 itself. The information I received was, in fact, from
16 Dr Mackenzie when he returned back to the surface.

17 Q. For the 10.30 meeting?

18 A. I believe he returned just before that. The information
19 I was receiving from Mr MacKenzie was the number of
20 casualties, the fact that I had a number of medics, some
21 HEMS paramedics and a number of ambulance staff at the
22 scene dealing with some casualties, and we needed to
23 evacuate them and treat them as a number of priorities
24 from the initial triage back up to the casualty clearing
25 station which had been set up in the main booking hall

1 on the concourse.

2 Q. So from between your arrival at 9.48 and speaking to
3 Mr Mingay, and Mr MacKenzie's return from the tunnel
4 just before the Silver meeting at 10.30, you received no
5 further information as to what the condition was on the
6 train?

7 A. We briefly met at 10.00 in the British Transport Police
8 office which had been designated as the JESCCs which, as
9 been explained, is the Joint Emergency Services
10 Co-ordination Centre.

11 Q. You heard the reference in the course of the previous
12 witness's evidence to the JESCC. Where was it?

13 A. It was actually in the British Transport Police office,
14 which is actually platform 8. I believe I recorded it
15 as platform 1, so apologies for the confusion.

16 Q. You have a very good memory. You did, indeed, call it
17 platform 1 in your note.

18 Was it generally known that that was the place for
19 the command officers to meet?

20 A. That was the agreed place, as it was a sterile area, no
21 members of the public or other people, and it was
22 actually in the transport police office where a landline
23 would be available, as we were experiencing some
24 problems with the mobile phone networks.

25 Q. At that meeting, around about 10.00, there was nobody

1 attending there other than yourself from the London
2 Ambulance Service, and Mr Brennecke?

3 A. Correct.

4 Q. So you didn't receive any further information from
5 a paramedic or medical technician between, roughly,
6 09.40 or 09.50 and 10.30 when Mr MacKenzie returned?

7 A. No, sir.

8 Q. You were not, therefore, in a position -- and again,
9 I intend no criticism, because communications were what
10 they were -- but you, therefore, weren't in a position,
11 other than by way of runners, to find out what, if
12 anything, the paramedics on the train were short of,
13 whether it be analgesics or stretchers or just paramedic
14 technicians?

15 A. That's correct, sir.

16 Q. Could we look, please, at LAS397? Over the page, at
17 1.8, this is a document which summarises -- and I'm sure
18 you've seen it before Mr Sale --

19 A. Yes, I have.

20 Q. -- some of the reports made by officers who attended the
21 subsequent debrief:

22 "Silver officers should not attend Silver meetings
23 until such time as the Command structure is robust."

24 We cannot say whether or not this was an observation
25 made in relation to King's Cross or Russell Square or

1 any of the other incidents, we don't know which one it
2 was, but did it take time on your arrival for a Command
3 structure to bed in? You'd arrived at the same time as
4 Mr Brennecke. It must have taken some considerable time
5 to establish yourselves, get your bearings, find out
6 what was going on, establish the command post, the
7 JESCC, and then start operating as a Command structure?

8 A. Yes, certainly from the time of my arrival at 09.48
9 until our first Silver meeting at 10.00, it was really
10 a fact-finding, information-gathering, understanding
11 what resources we had, and trying to establish the exact
12 number of casualties and the likely resources that we
13 would need.

14 Q. There was a meeting at 10.00 and then another one at
15 10.30, or the main Silver meeting was at 10.30 --

16 A. Yes.

17 Q. -- which took almost up to 11.00, I think, it was much
18 lengthier. You will see at paragraph 1.9 a comment
19 which I don't expect you to agree with, but the comment
20 is there nevertheless:

21 "There was too much time spent in Silver meetings at
22 the Tavistock Square bus incident and King's Cross ..."

23 My screen has just gone blank.

24 "... rather than concentrating on the incident."

25 What do you say to that?

1 A. I would say that our major incident plan makes it clear
2 that we need to put in a Command and Control structure.
3 Whilst the Silver medic attends meetings, it doesn't
4 mean there's inactivity. In fact, between 10.00 and
5 10.30, we'd already put in a CHALET report giving
6 Central Ambulance Control the number of casualties, the
7 type of incident, the location of the incident, and
8 I actually requested that we make ambulances 10, I asked
9 for additional officers to scene, and subsequently after
10 that we asked for an emergency equipment vehicle and an
11 emergency command vehicle. With the limited assets
12 I had available, I can understand why those comments are
13 made.

14 Q. Because the reality for those who were in the tunnel is
15 that they had no direct communication with the Command
16 structure. The Command structure had arrived, through
17 no fault of its own, about an hour after the bomb had
18 detonated, and it took time for the Command structure to
19 embed itself, and then, any requests through the Command
20 structure for further equipment, further ambulances,
21 would necessarily take yet further time?

22 A. Yes, sir.

23 Q. So the structure itself wasn't really designed and
24 didn't operate in a way as to encourage rapidity of
25 response. It slowed it down to a certain extent. Would

1 you agree with that?

2 A. No, the actual response was already being undertaken.
3 We had medical staff at the incident site. The
4 communications was a problem between the incident site
5 and Silver control.

6 Q. I put the question badly. The first responders got in
7 there as quickly as they were able, apart from the
8 London Ambulance Service, but the Command structure,
9 which we accept, of course, isn't designed to deal with
10 the immediate response, couldn't work as fast as the
11 first response and a considerable amount of time was
12 spent putting together the structure, arranging
13 meetings, and then conducting those meetings, but all
14 the time, the first response was still down in the train
15 and, as you subsequently discovered, short in certain
16 areas.

17 A. Yes.

18 Q. At LAS397-4 at 1.17 you'll see a reference to
19 King's Cross Underground incident:

20 "... the Command structure seemed to be
21 non-existent. No tabards in use and no command officer
22 directing staff."

23 It seems from what you said, Mr Sale, that certainly
24 when you arrived -- and also Mr Brennecke -- one of the
25 first things you did do was to put on the correct

1 tabards, make yourself visible and put a Command
2 structure in place.

3 A. That's correct, sir.

4 Q. This, therefore, may be a reference to the hour or so
5 before you arrived when there was no such structure?

6 A. I believe that's so.

7 Q. At LAS397-5, you will see a reference to radio channels,
8 and the radio channel being too busy to allow effective
9 communication with Gold control because the Central
10 Ambulance Control was allocated two radio channels but
11 had only one radio operator.

12 Whilst you were Silver medic, did you have
13 difficulties getting through to Gold control?

14 A. Yes, sir.

15 Q. Did you subsequently discover that that was because of,
16 not only overuse of the radio system because of the
17 sheer proliferation of calls or radio transmissions, but
18 also because of a limited number of personnel at the
19 control end to deal with the number of calls coming in?

20 A. That wasn't known to me at the time, but certainly
21 subsequently and after the debrief that was -- I was
22 aware of that.

23 Q. Brought to your attention. Finally, on LAS397-7,
24 paragraph 2.20, the Silver medic at King's Cross -- and
25 you were the Silver medic -- was not advised by Central

1 Ambulance Control that this was a potential bomb
2 incident?
3 A. No, I was aware that there had been an explosion.
4 Q. But not a bomb?
5 A. Not necessarily a bomb, but that was always a potential
6 cause of the explosion.
7 Q. Do you recall there being, finally, any issue relating
8 to the shortage of oxygen for the treatment of
9 casualties or of a shortage of stretchers?
10 A. I was aware of a shortage of stretchers around about --
11 I believe it was just before 11.00 I'd actually
12 requested an emergency support vehicle, emergency
13 equipment vehicle, which would have brought more
14 stretchers to the scene. I was aware that improvised
15 stretchers had been used, police shields, blankets,
16 ladders, et cetera, to bring casualties up as well as
17 a number of our own stretchers.
18 Q. The position, ultimately, was that, although a call had
19 gone up for more stretchers, the number of deceased
20 relative to the number of seriously injured was such
21 that people did make do with what they had and brought
22 out the six or seven very severely injured and,
23 therefore, there was, by 11.00, no need for more
24 stretchers because most people had been brought out by
25 then?

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

2 Q. So although your colleagues had reported a shortage of
3 supplies, ultimately it didn't matter because, around
4 about 11.00, all the living casualties were out?

5 A. Correct, sir.

6 MR KEITH: Thank you. I have no further questions, Mr Sale,
7 but there may be some more from my colleagues.

8 LADY JUSTICE HALLETT: Mr Coltart?

9 Questions by MR COLTART

10 MR COLTART: Good afternoon, Mr Sale.

11 A. Good afternoon.

12 Q. At the end of your statement, your witness statement,
13 you say this:

14 "During the course of dealing with this incident at
15 King's Cross, I believe our major incident plan worked
16 very well. We experienced some problems with
17 communications and, also, due to the traffic congestion
18 in the area, we had some problems getting resources to
19 the station initially. But overall the plan worked very
20 well."

21 Now I'd like to explore that contention with you,
22 and there are a number of areas which I'd like to cover
23 in doing so, starting with the circumstances in which
24 you and the other senior officers from the London
25 Ambulance Service found yourselves to be at King's Cross

1 on that day.

2 Can we have up on screen, please, LAS649?

3 LADY JUSTICE HALLETT: Is this going to cause a problem for
4 you, Mr Keith, without your screen?

5 MR KEITH: I'm delighted to say that, by putting my hand
6 round the back and wriggling it, I've reestablished
7 power.

8 LADY JUSTICE HALLETT: It's better than clicking it, which
9 is usually the best method. Right.

10 MR COLTART: Thank you. LAS649-2, please? If we could just
11 enlarge the middle of the page there for a moment, this
12 is your report, incident report, that you completed
13 after the event.

14 A. Yes.

15 Q. In the middle of that page, you tell us what you've told
16 us already this afternoon, that you received your
17 message at 09.17, you were tasked to attend St Pancras
18 but that quickly changed to King's Cross.

19 A. Yes.

20 Q. "... informed that there had been an explosion ..."
21 You responded on blue lights but you were unable to
22 make contact with Central Ambulance Control via radio
23 transmission as the channel was busy, so you arrived on
24 scene at approximately 9.41.

25 A. Yes, sir, the timing has been amended since then on the

1 original. It should be 09.48.

2 Q. 09.48. Thank you, I'm grateful. So the position is
3 this: that at the time that you arrive about to adopt
4 the role of Silver medic, it's an hour or so -- in fact,
5 almost exactly an hour after the explosion has taken
6 place, but you've got no information as to where it is,
7 what nature of explosion we're talking about, or what
8 the consequences may be?

9 A. No, sir, I do not.

10 Q. On your arrival, you observe two ambulances, A&E units,
11 one Rapid Response Unit and one duty officer vehicle.
12 The latter containing, I think, Mr Brennecke and Mr Ward
13 who had recently arrived from Camden.

14 A. Correct, sir.

15 Q. In fairness to you, in fact, there might have been, at
16 that time, at least one more ambulance present. I think
17 Mr Desmond and Mr Sinclair might have parked round the
18 back of the station, and there might have been one more
19 Rapid Response Unit driven by a man called Phil Bell.

20 A. That's what I observed on arrival, sir.

21 Q. Given the scale of what, in fact, confronted you on
22 arrival, can we agree that that was plainly an
23 inadequate response at that point in time?

24 A. What I saw when I arrived was a large number of people
25 on the concourse. I was still unaware of the nature of

1 the incident itself, how large that explosion was and
2 how many casualties I might be facing.

3 Q. Given what you know now and, in fact, what you knew by
4 later that morning, about the scale of the incident, can
5 we agree simply on this, that that was an inadequate
6 response at that time?

7 A. There were not as many ambulances as I would have
8 wished. However, with the information that we had at
9 that time, I was not aware of how large that incident
10 was.

11 Q. I don't want you to take any of my questions as
12 a personal criticism of your actions on that day. In
13 conjunction with the London Ambulance Service personnel,
14 the other personnel who attended, you undoubtedly did
15 your best, given the circumstances which confronted you.
16 All right?

17 But what we are trying to explore, amongst other
18 things, in the course of this inquest, is the extent to
19 which your major incident plan came up to scratch. All
20 right?

21 A. I understand.

22 Q. That's what I'm trying to get to the bottom of. All
23 right?

24 A. Yes.

25 Q. The first person that you liaised with was

1 David Brennecke. Now, he's a duty station officer from
2 Camden, isn't he?
3 A. Yes, he is.
4 Q. The circumstances of his deployment, we can have a look
5 at, if we get LAS371-2 on the screen, please, and if we
6 enlarge the top half of that document.
7 To put this into context for you, this is a document
8 that was prepared shortly after the event on 15 August
9 by Jonathan Edmondson from your Emergency Planning Unit.
10 A. Right.
11 Q. All right? He says:
12 "Through collating the Central Ambulance Control
13 paper and electronic logs, the call receipts and radio
14 transmission tapes and debriefs [we have] identified
15 a number of concerns about the Central Ambulance Control
16 response to the incident.
17 "Several issues have been teased out of the reports
18 and debrief process which are reflected in the 'areas of
19 improvement action plan' though I feel that these are
20 the most important that probably need urgent action."
21 The very first one says this:
22 "It appears to have taken 39 minutes to activate an
23 officer (the ambulance operations manager at
24 Pinner) ..."
25 Just pausing there, that's Peter Thorpe --

1 A. Yes.

2 Q. -- who arrived at about 10.10 that morning.

3 A. Correct, sir.

4 Q. "... to the King's Cross London Underground incident.

5 Even though the Camden DSO [that's Mr Brennecke] was at

6 Camden ambulance station and had run the sector desk

7 'begging' (his words) to attend while he watched the

8 incident on television with Camden crew staff. The

9 deployment of an officer was prompted by a crew report

10 from scene."

11 Do you recollect ever having any discussions with

12 Mr Brennecke that morning or later about the

13 difficulties he'd encountered in just getting himself

14 sent to the scene?

15 A. No, I didn't have that conversation with Mr Brennecke on

16 that day or since.

17 Q. Can we have a look at Peter Thorpe's arrival, which we

18 can do if we have look at LAS656, please? This is his

19 incident report form and he says he was on duty at

20 Pinner, he was deployed at about 9.45. If you look at

21 the third paragraph down:

22 "En route to King's Cross, I attempted to receive

23 updates from Central Ambulance Control. However, due to

24 communication problems, I was unable to be updated. Due

25 to the heavy traffic, I did not arrive at King's Cross

1 until approximately 11.00."

2 In fact, the records show that he was there by about
3 10.10.

4 A. Yes.

5 Q. "On arrival, I was met by Steve Sale who appointed me as
6 Bronze incident officer and he left to join the Joint
7 Emergency Services Control Centre. Mr Sale advised me
8 that, at that time, there were no other Major Incident
9 Command roles covered due to the lack of staff."

10 Pausing there for a moment, so we are now 10.10,
11 some hour and 20 minutes after the explosion, and the
12 fact of the matter is that, not only are there
13 insufficient paramedics, but there aren't even enough
14 officers to fulfil all the various major incident roles.

15 A. Correct.

16 Q. I think that that situation pertained, didn't it, right
17 through to the end of the incident?

18 A. There certainly weren't sufficient officers to fulfil
19 all the roles. The three main roles from the major
20 incident plan, Bronze triage, Bronze clearing and Bronze
21 parking, were fulfilled by officers, and I took the role
22 of Silver medic.

23 The incident was fairly dynamic and progressing
24 fairly rapidly. It would have been -- in ideal
25 circumstances, it would have been better to have all of

1 the Bronze roles fulfilled, and more resources than we
2 actually had on the day at the initial stages of the
3 incident.

4 Q. What does the Silver Tango role involve? Sorry, you
5 won't find it on there. Can we just have LAS610 on the
6 screen for a moment? This is the attendance sheet for
7 the ambulance staff who attended on that day. If you
8 look at the top, you have the various major incident
9 roles which are allocated by the London Ambulance
10 Service. We see that Silver Tango wasn't allocated, nor
11 was Bronze safety --

12 A. No, sir.

13 Q. -- or, if you look on the right-hand side, FCT. Now,
14 I don't know what FCT stands for, I don't know whether
15 you --

16 A. That's a forward control role. Someone from our control
17 room would normally come out on a command vehicle, they
18 would act as loggist and record decisions and keep the
19 log. We did actually get a forward control team there,
20 but not until late in the incident.

21 Q. Just taking you up on that, it became a real issue,
22 didn't it, after the event, the fact that it had been
23 impossible for Central Ambulance Control to keep up the
24 log of the calls that were coming in?

25 A. I believe that to be the case, sir.

1 Q. Things began to be recorded on scraps of paper in the
2 Central Ambulance Control room, which were only
3 discovered after the event. Were you aware of any of
4 this?

5 A. I believe that came out in the Central Ambulance Control
6 debrief.

7 Q. Those scraps of paper included the recording of one
8 major incident being declared by an officer, and there
9 was a concern that that might have been missed.

10 A. I wasn't -- as I was at King's Cross, I was unaware of
11 that at the time, but certainly in debriefs afterwards
12 that came out.

13 Q. In fairness to you, and to keep matters moving this
14 afternoon, we can explore that later in some depth with
15 Mr Edmondson perhaps.

16 Mr Thorpe continues in his form -- there's no need,
17 for the moment, to get it back on the screen:

18 "Prior to Mr Sale leaving for that meeting, he
19 advised me he had been unable to establish communication
20 links to CAC Gold base and that his mobile phone was not
21 working either."

22 Mr Thorpe makes reference to a CHALET report that he
23 submitted at 10.15, up to 100 uninjured, unknown dead,
24 and so on and so forth:

25 "During this update, channel 9 ..."

1 That was a special channel which had been dedicated,
2 wasn't it, by the Central Ambulance Control for this
3 particular incident?

4 A. Yes, sir.

5 Q. "During this update, channel 9 became unreadable and
6 I am unsure if the details were received by Central
7 Ambulance Control Gold base."

8 So in other words, details of the CHALET report
9 which he was submitting, which is crucial, isn't it?

10 A. Yes, sir.

11 Q. And:

12 "During the incident, I requested information on
13 a number of occasions from Central Ambulance Control
14 including number of resources deployed, locality and
15 availability of the ECV. I heard a number of similar
16 requests from colleagues at other sites and ascertained
17 that they, too, were unable to establish
18 a communications link to Central Ambulance Control Gold
19 base."

20 Mr Huggins was also an important person on that day,
21 and he arrived shortly after Mr Thorpe, I think. Is
22 that right?

23 A. I believe so, yes.

24 Q. He became designated Bronze parking in order to resolve
25 access and egress issues for the ambulances. If we just

1 have a look at the circumstances in which he made his
2 way to King's Cross, could we have LAS638 please on the
3 screen?

4 He says this:

5 "As ambulance operating manager for Islington, I was
6 attending an emergency planning meeting at Arsenal
7 Football Club with Mr Alan Barrett currently attached to
8 the Emergency Planning Unit."

9 To summarise the rest of that first paragraph, he
10 got sent to Aldgate initially to see if he could assist
11 there.

12 Then the second paragraph:

13 "JE [Jonathan Edmondson] stated that there was no
14 need for any other officers and that I should report to
15 London Ambulance Service headquarters to see what else
16 was required."

17 So he left Aldgate at about 9.40 to head for London
18 Ambulance Service headquarters in Waterloo. He says:

19 "In doing this, I had to attempt to pass
20 King's Cross junction. On arrival there, traffic was
21 static and I remained with my car for another 10 minutes
22 or so. During this time, I listened to both commercial
23 radio (LBC) and the service channel 11 (EC sector). At
24 some point, there was an instruction to change to
25 channel 9 for this major incident. At no time had

1 I heard that a major incident had been declared from my
2 service radio, but I thought I heard this statement from
3 the commercial radio."

4 So he arrives, we know, at about 10.20, so this is
5 some time perhaps around about 10.00:

6 "By this time, I had realised that service radio
7 traffic was too high to gain realistic information about
8 where I was. Mobile phones were not usable as the
9 system had gone down. There was no way to communicate
10 with anyone.

11 "Realising that I was completely stuck in traffic,
12 I put on my hi-vi jacket and decided to see what the
13 obstruction was at this [incident]."

14 So here he is, he's spent the morning with someone
15 from your Emergency Planning Unit, but by about 10.00 or
16 perhaps shortly thereafter, he's in traffic, stuck
17 outside King's Cross. He doesn't even know that there
18 has been an incident at King's Cross by this stage.

19 Does that give us an idea of the level of
20 communication difficulties which the London Ambulance
21 Service was experiencing by this time?

22 A. I think that would be fair comment.

23 Q. Anyway, he abandons his car and he moves forward on foot
24 and turns up at King's Cross. We're on page 2. On
25 moving forward, he teams up with Peter Thorpe, who

1 seemed to be dealing with something. It was not until
2 he spoke to Peter Thorpe that he realised something
3 serious was going on, and then he gives some detail of
4 what he did on arrival:

5 "Mr Thorpe asked me to go into the ticket office and
6 get the names, ages and sex of the people who had
7 already been triaged."

8 At this time, he says he came across Nigel Ward, who
9 was in the ticket office by that stage undertaking
10 a triage role.

11 We know that you attended your meeting at 10.00 and
12 we've heard evidence about that already, I don't propose
13 to dwell on it. Then, between that time and 10.30,
14 there were, I suggest, a number of very significant
15 issues which needed to be addressed. We'll see to what
16 extent you can agree with them.

17 Firstly this: there was a problem, wasn't there,
18 caused by the lack of paramedics which meant that there
19 were insufficient people to carry out first aid on the
20 walking wounded who were waiting in the ticket office.

21 Do you recall that?

22 A. There was certainly large numbers of people coming out
23 of the Underground system, some with injuries that
24 needed some treatment.

25 Q. Do you recall that, in fact, some of the injured

1 passengers who had been on the train volunteered their
2 services to assist in administering first aid to others
3 of their number within the ticket office area?

4 A. I'm not aware of that, no, sir.

5 Q. Do you recall that the lack of ambulances present
6 outside the main concourse at King's Cross was delaying
7 the evacuation of the walking wounded from those ticket
8 offices?

9 A. We certainly didn't have enough ambulances to cope with
10 the walking wounded, but we did arrange for some London
11 buses to take those people away after they'd been
12 triaged, some initial treatment given.

13 Those buses were also staffed with medical staff and
14 a police officer to ensure that those casualties got
15 away. That wasn't until later in the incident, however.

16 Q. Stretchers was an issue, wasn't it?

17 A. Yes.

18 Q. It's been put to you by Mr Keith this afternoon that, in
19 the end, it didn't really delay matters or cause
20 a difficulty, because there were only a few very serious
21 stretcher cases who needed to be brought up from the
22 train: but do you recollect, in fact, during the course
23 of the morning, at about this time, there was a real
24 concern that the lack of stretchers was delaying the
25 evacuation of those people from the train?

1 A. I wasn't made aware of any delays of evacuating
2 casualties. I was made aware that there was a lack of
3 stretchers and that's why I had requested the emergency
4 equipment vehicle and I was aware that improvised
5 stretchers had been used.

6 Q. Could we just have a quick look at LAS656 please? This
7 is Mr Thorpe's report. If we go through to the last
8 page, which is page 4, I think, if you could enlarge the
9 middle of the page for me, thank you very much.

10 "Lessons identified - improvements.

11 "Communications breakdown at the start of the
12 incident, while no particular person's fault, hindered
13 our response. It should be noted though that this
14 breakdown, in my opinion, did not adversely affect any
15 clinical outcomes."

16 That was the view of Mr Thorpe. There's an issue
17 with call signs which we needn't trouble ourselves with.

18 Then he says this:

19 "As an incident site, we were unable to resource
20 equipment required and for a time were unable to bring
21 patients up to the surface due to a lack of suitable
22 stretchers. This caused a great deal of anxiety and
23 stress for VCS."

24 LADY JUSTICE HALLETT: VCS?

25 A. Vehicle crew staff, my Lady.

1 LADY JUSTICE HALLETT: Thank you.

2 MR COLTART: I'm very grateful, thank you. So we're not
3 dealing with an academic problem here, are we?

4 A. No, sir.

5 Q. This really was an issue in terms of removing the most
6 seriously injured, the stretcher cases, from the train.
7 That process was being delayed because there were an
8 insufficient number of ambulances at King's Cross at
9 that time?

10 A. The number of vehicles at King's Cross was not as many
11 as I would have wished for.

12 Q. It wasn't, was it? And it didn't improve in the
13 immediate future, because by the time we came to your
14 meeting at 10.30, in fact between that time and
15 45 minutes earlier when you had arrived, it appears that
16 not a single further London Ambulance had arrived.
17 If we just look at INQ8853-2, please, this is
18 Mr Brennecke's typed note of his log for that day, and
19 towards the bottom of that first page you can see
20 "10.30, Silver coordination meeting". He lists the
21 people who are in attendance and, over the page, please,
22 the top of page 2, the Fire Brigade have made it
23 a 12-pump incident?

24 A. Yes.

25 Q. Then the observation from SS, from yourself:

1 "We have two ambulances, one Fast Response Unit and
2 one Cycle Response Unit on scene."

3 So in fact, the only additional resource which had
4 arrived between 9.45 and 10.30 was a paramedic on
5 a bike, Simone McAdam, who had arrived as part of the
6 Cycle Response Unit team.

7 Now, can you agree with me that that was a highly
8 unsatisfactory state of affairs?

9 A. It took an awful long time to get further ambulance
10 resources to King's Cross. The context would be useful
11 to consider. We had multiple sites, major incident
12 sites. The traffic was gridlocked. It took me 35 --
13 over 30 minutes to arrive. So there were some problems
14 in getting resources to the scene.

15 Q. I totally accept that these matters have to be put into
16 context: multiple sites, all over London, middle of
17 London, serious traffic difficulties. But wasn't it the
18 case that there were ambulance resources based in
19 Central London very near this site which were not used
20 at a time when you were desperately short of ambulances
21 at this site?

22 A. That is my understanding, sir, yes.

23 Q. You ended up, didn't you, with ambulances from Surrey
24 and Bedfordshire and Hertfordshire, which came in from
25 outside London. They arrived at the station at about

1 11.50, which was well after they were of any use to
2 anybody, wasn't it?
3 A. That's correct, sir, yes.
4 Q. If we could just have LAS371 back up on the screen,
5 please, for a moment, could we enlarge the middle of
6 that page, please? This is back to Mr Edmondson's note.
7 "[As] at all the incidents, it has been documented
8 by crew staff and officers that there were insufficient
9 LAS ambulance and equipment resource dispatched, despite
10 logged entries in Central Ambulance Control and Gold
11 Control requesting further resources. A total of 201
12 ambulances were rostered (this figure excludes vehicles
13 off road/unstaffed) during the period between 8.51 and
14 10.00. A request was made for mutual aid that resulted
15 in Surrey, Beds and Hertfordshire and voluntary aid
16 ambulances responding to the King's Cross incident.
17 Many of these mutual aid vehicles came from long
18 distances and would have had to come past London
19 Ambulance Service ambulance stations that management
20 information statistics suggest had resources on station.
21 CAC received a further 544 calls between 8.51 and 2.00
22 that afternoon."
23 That's absurd, isn't it? If you just stop to think
24 about it, ambulances requested from the Home Counties
25 driving past ambulance stations which have spare

1 resources sitting on the forecourt. I mean, would you
2 agree with me that that is a highly unsatisfactory state
3 of affairs?

4 A. I hadn't seen this document before from Mr Edmondson,
5 but clearly, if that is the case, yes, I would agree
6 with you.

7 LADY JUSTICE HALLETT: I think we are really straying into
8 the new year's matter, Mr Coltart. I mean, this is very
9 much Command, Control, mobilisation, deployment.
10 Where you, in fact, put to the witness that he had
11 said the major incident worked, I don't think Mr Keith
12 had elicited that, so could we try to focus on Mr Sale's
13 experience at the scene because, otherwise, I think
14 we're going to be trespassing on other territory.

15 MR COLTART: I respectfully agree, and of course I don't
16 want to do that. It's not easy from our perspective.

17 LADY JUSTICE HALLETT: I know.

18 MR COLTART: Because at the same time as not wanting to
19 trespass on issues for the new year, it's terribly
20 important, particularly for the families, of course,
21 that matters are put in context through those who
22 actually attended at the scene.

23 Mr Edmondson never went to King's Cross. But the
24 point is taken, if I may say so, and I shall move on
25 swiftly.

1 LADY JUSTICE HALLETT: I think it is just that when we get
2 to, "Isn't it daft that ambulances are coming through
3 Surrey and Bedfordshire past ..." that does sound as if
4 we are moving a bit beyond King's Cross.

5 MR COLTART: Yes. I have very little left for Mr Sale.

6 LADY JUSTICE HALLETT: I do understand the difficulties. We
7 had to split up the issues in some way and I do
8 understand there are going to be cross-overs.

9 MR COLTART: Of course.

10 Two more short issues, Mr Sale, which I hope are
11 directly relevant to your experiences on the day.
12 It was suggested to you by Mr Keith that to the
13 extent that there was a lack of coordination at the
14 surface, that may have been confined primarily to the
15 first hour of the incident, largely before your arrival,
16 and so on.

17 But can we have a look, please, at LAS658, which is
18 the incident report form of Simone McAdam, who I've
19 mentioned already. She was the Cycle Response lady who
20 attended on the day.

21 She arrived, doing the best we can, some time
22 shortly after 10.00. Can we go through to page 4,
23 please, of that document? She talks of the
24 communication issues with which we're well familiar.

25 There was:

1 "No communication between train and ground level.
2 Once the major incident system was in place, working
3 practices improved. What about the organisation of the
4 first few on scene, solo responders, et cetera? When
5 I arrived, I had no idea what the situation was, where
6 people were, which London Ambulance Service were on
7 scene and where they were. Of the crews on scene,
8 I couldn't find who had assumed charge. No one seemed
9 to know who was the police person in charge", and so on.

10 Then:

11 "Confusion as to how to organise patient treatments
12 when facing incidents of such scale. Much [was] done to
13 organise logistics but, as a medic, felt directionless
14 and frustrated for the initial period of [the]
15 incident."

16 Is that, in your experience, a fair reflection of
17 the confusion which reigned at about that time or is
18 your recollection different?

19 A. I don't know the exact time of that person's arrival at
20 King's Cross. Certainly there would have been an
21 ambulance with blue lights left on. There was, at that
22 point, a Silver control site which was on the main -- on
23 the concourse outside the main entrance.

24 Who she met at that time, I'm not sure. If it was
25 at 10.00, I would have been in a Silver coordinating

1 meeting. If that is that young lady's -- or that
2 person's impression, I can't comment further on that.
3 It's certainly not my impression.

4 Q. Finally this, Mr Sale, if I may: we're going to hear
5 from Mr Woodrow, your colleague, in relation to
6 Russell Square, and the difficulties which he
7 encountered there, but to what extent were you aware of
8 those difficulties and his predicament during the course
9 of your hour or two at King's Cross that morning?

10 A. I wasn't aware -- I was aware of an incident at
11 Russell Square. It was quite late into the incident
12 that it became clear that those two incidents were
13 linked and I understand that Mr Woodrow did suffer some
14 delays in getting some response to that site.

15 Q. But were you able to coordinate matters at all with
16 either Mr Woodrow or Mr Hughes or Mr Ward or the other
17 LAS officers who were present at Russell Square? Were
18 you able to speak to them and have any dealings with
19 them?

20 A. No, sir, I was not.

21 MR COLTART: Thank you. I have no further questions.

22 LADY JUSTICE HALLETT: Mr Saunders?

23 MR SAUNDERS: Nothing, thank you, my Lady.

24 LADY JUSTICE HALLETT: Mr Patterson? Ms Gallagher?

25 MS GALLAGHER: Nothing, thank you.

1 LADY JUSTICE HALLETT: Anybody else? Ms Simcock?
2 Questions by MS SIMCOCK
3 MS SIMCOCK: Could we have on screen, please, INQ9002-24?
4 Does that, Mr Sale, show the different Command and
5 Control roles?
6 A. Yes, it does.
7 Q. Although this isn't in colour, this version, do the grey
8 blocks at Silver medic, Bronze clearing, Bronze parking
9 and Bronze triage usually appear in red?
10 A. Yes, they're in the major incident plan of 2004, that's
11 since been revised.
12 Q. In the bottom right-hand corner, we see there "Diagram
13 of Silver/Bronze level operations. Red indicates
14 important initial command roles". Is that right?
15 A. That's correct.
16 Q. You, we've heard, clearly assumed the role of Silver
17 medic, which is one of the red roles, if I can call them
18 that. You allocated, as soon as you had officers
19 available, Bronze clearing, Bronze parking and Bronze
20 triage. Is that right?
21 A. That's also correct.
22 Q. For completeness, we've heard about Silver Tango. If we
23 go to the next page, page 25, please, in the middle
24 there:
25 "Ambulance tactical adviser - call sign

1 'Silver Tango '.

2 "This role will be assigned to the ambulance
3 emergency planning officer."

4 That role acts as a support to your role, Silver
5 medic. Is that right?

6 A. That's correct.

7 Q. So it's only -- it's not considered a red role, an
8 essential role, being a backup support mechanism. Is
9 that right?

10 A. That's also correct.

11 MS SIMCOCK: Thank you very much.

12 LADY JUSTICE HALLETT: Any other questions? Thank you very
13 much, Mr Sale. Those are all the questions that we have
14 for you.

15 What are we going to do about timing, Mr Keith? My
16 difficulty tomorrow is that I must complete tomorrow's
17 open and closed hearings by 1.00.

18 MR KEITH: Yes.

19 LADY JUSTICE HALLETT: I am content to carry on sitting, but
20 I don't wish to cause inconvenience to others who may
21 have awkward journeys home.

22 MR KEITH: My Lady, I've been able to confer with
23 Mr Andrew O'Connor by email and between us we hope
24 my Lady would not be detained for more than two hours,
25 in terms of public interest arguments tomorrow, provided

1 the open submissions are kept relatively short, and that
2 is to say, if I can complete my examination of
3 Mr Woodrow, the next witness, tonight, Mr Coltart could
4 complete his examination, perhaps half an hour or
5 three-quarters of an hour tomorrow. Then, if we could
6 complete the open evidence -- the evidence in relation
7 to King's Cross tomorrow by 11.00, that would, we think,
8 leave you ample time to conclude public interest
9 immunity.

10 LADY JUSTICE HALLETT: I think we'll finish Mr Woodrow
11 tonight, unless it's going to cause anybody terrible
12 concern getting home.

13 MR KEITH: I'm bound to say, my Lady, that I've taken
14 a straw poll of my learned friends and, whilst they're
15 obviously all here tonight, some are not, in fact,
16 available tomorrow morning, so it would probably be
17 preferable if we cracked on.

18 LADY JUSTICE HALLETT: I'll understand, if anybody does have
19 problems getting home, if they wish to go now because
20 they want to catch trains, I would understand. Is there
21 anybody who has to remain who really would get stuck
22 getting home, if we carry on?

23 Let's get on. Mr Woodrow, please.

24 MR KEITH: Mr Woodrow.

25

1 MR PAUL ANDREW WOODROW (sworn)
2 Questions by MR KEITH
3 MR KEITH: Good afternoon, could you give the court your
4 full name, please?
5 A. It's Paul Andrew Woodrow.
6 Q. In July of 2005, were you employed as an ambulance
7 operations manager by the London Ambulance Service?
8 A. That's correct, sir.
9 LADY JUSTICE HALLETT: Which is the equivalent of what,
10 Mr Woodrow?
11 A. It would be equivalent of a borough commander for the
12 Metropolitan Police. So at the time, I was the manager
13 of operations for the Borough of Southwark.
14 LADY JUSTICE HALLETT: Thank you.
15 MR KEITH: You were also at the conference at Millwall?
16 A. That's correct, sir.
17 Q. Therefore, you also became aware of the text message,
18 because you received one yourself, as did some of your
19 fellow officers, and did you make your way to the
20 Central Ambulance Control office in Waterloo Road in
21 London?
22 A. That's correct, sir.
23 Q. I think, when you reached there, you were told that
24 there were a very large number of casualties coming out
25 of Russell Square station.

1 A. That's correct.

2 Q. So did you make yourself available and were you
3 dispatched, along with Mr Hughes, to Russell Square?

4 A. We were dispatched from the Gold suite. We were
5 dispatched from there to attend Russell Square
6 Underground station.

7 Q. The log prepared by you of the attendance at
8 Russell Square is on our system at INQ9908-2 and it
9 shows, at approximately 10.04, you arrived on the scene.
10 When you were there, did you meet Mr Ward and Mr Kearns?

11 A. That's correct.

12 Q. How much did they tell about what the nature of the
13 incident was at Russell Square?

14 A. The initial report from Paul Ward is that there was an
15 incident on the Tube line down in the deep tunnel, that
16 there were a number of casualties, and that really was,
17 in essence -- there were a limited amount of resources
18 on scene at Russell Square and that they were assisting
19 those resources down on the track.

20 Q. Had one or both of them already adopted a command role
21 prior to your arrival?

22 A. Yes. Paul Ward had assumed the role of Silver at that
23 time.

24 Q. On your arrival, was he then released from that role?

25 A. He was.

1 Q. Was he therefore available for -- was he then available
2 to go underground to the tunnel to try to see what had
3 happened?

4 A. I had a discussion with Paul Ward and, during that
5 discussion, we agreed that I would assume the role of
6 ambulance incident officer and then I nominated
7 Paul Ward to become Bronze medic or Bronze forward, as
8 it's sometimes referred to.

9 Q. Was somebody nominated as Bronze triage?

10 A. It was indeed, and that was Bill Kearns.

11 Q. May I ask you about that? We now know that
12 Mr Kilminster, who was the first gentleman to respond to
13 Russell Square, and also an ambulance crewed by
14 Tracey Russell and Liam Whittaker, had already gone into
15 the station and, when they reached the first carriage,
16 they, of course, started triaging along with treating as
17 they could, and they effectively formed a three-man team
18 to triage and intervene as they went through the
19 carriage.

20 Was there much purpose, in truth, in appointing
21 a Bronze triage without knowing which of your colleagues
22 had already gone forward to the train and whether or not
23 they had already completed a process of triage?

24 A. Well, no, I did consider that, but first crews that
25 arrive on scene, where there are multicasualties, will

1 do a quick, sweeping triage and that will be a sift,
2 really, of patients to identify an initial priority for
3 those patients.

4 What happens then is that is the order that they
5 have down on the tracks, on the train, about which
6 patients should be evacuated from the scene first of
7 all.

8 Those patients under the major incident will come up
9 to a triage point where we will have a further
10 assessment of those patients and make sure that the
11 initial triage with more diagnostics is the correct one
12 so that we can appropriately sort patients in
13 a controlled environment, not in the initial
14 environment, to make sure that those -- those patients
15 are prioritised to go to hospital.

16 Q. So Bill Kearns was appointed Bronze triage for surface
17 level?

18 A. He was, yes.

19 Q. What steps did you take to ensure that those of your
20 colleagues who were in the tunnel had enough support
21 there?

22 A. Well, I asked -- the first actions was to ask Paul Ward,
23 who I nominated as Bronze medic, to actually go back
24 down on to the platform and down to where our first
25 responders were to give me a sit rep. As a result of

1 that sit rep, I requested further resources from EOC.

2 I also requested for an emergency support vehicle to
3 come with more equipment and there were a range of other
4 measures that I took.

5 Q. When did Mr Ward return with his sit rep?

6 A. That was at around 10.15. I think, it was around 10.15
7 when he came back to me with an initial sit rep.

8 Q. So he hadn't been all the way to the train?

9 A. No, he'd been down -- down to the platform.

10 Q. Before you called in with a sit rep and before you
11 requested further paramedics, which you did at 10.20,
12 had you received any more information from the train
13 itself?

14 A. No.

15 Q. When did you first receive information from the train?

16 A. Really, the first information we would have received
17 from the train would have been at the -- I had an
18 initial conversation with a Chief Inspector
19 Matt Saunders from the British Transport Police on
20 arrival, and then there was a formalised Silver meeting
21 at 10.30.

22 I think that's -- in reality, and from recollection,
23 that was the first time when we got accurate information
24 fed back from the scene.

25 Q. The note of that meeting at INQ9908-2, you can see at

1 10.35, doesn't actually refer to much information being
2 made available to you from the train.

3 A. Yes, I think in essence that more -- that would be more
4 of a logging issue as opposed to the information,
5 because if I can take you to the entry below at 10.45,
6 we're quite specific on the priority of patients that we
7 have.

8 So that information would have been received
9 although I accept the point that it's actually not
10 logged at the 10.35 entry.

11 Q. Did you ever receive information when you received
12 information about the number of casualties to suggest
13 that there was a shortage of equipment on the train or
14 that more paramedics were required?

15 A. I didn't need to receive direct information from the
16 train to inform me that there was a shortage of
17 equipment, because it was apparent to me, when I arrived
18 on the scene, that there was one ambulance on the scene
19 in Bernard Street along with a Fast Response Unit.

20 Now, it was apparent that those vehicles had no
21 equipment on them, so I didn't need anyone to confirm to
22 me that there was a shortage of equipment. The fact
23 that the ambulance had the equipment removed from it,
24 automatically gave me -- I took the decision that we
25 needed more equipment.

1 Q. In broad terms, you were aware throughout that there was
2 a shortage of equipment at Russell Square?
3 A. Yes, I was.
4 Q. Indeed, you made requests for more ambulances and there
5 was a general recognition that such resources as there
6 were took a long time to arrive.
7 A. That's correct.
8 Q. Can we look, please, at a debrief document, LAS379-4?
9 "GH" at the bottom is Gareth Hughes, is it not, who
10 was with you at Russell Square?
11 A. That's correct.
12 Q. He refers in the fourth line:
13 "Approximately five of us, Paul [that's yourself]
14 myself, one crew and a Fast Response Unit ... Paul [Ward
15 and] Bill Kearns [were there]. It was a nightmare. We
16 did about eight roles each. Don't know how many times
17 I requested ambulance backup, support equipment,
18 communications. We had casualties coming out and we
19 could see ambulances going by. The only communications
20 I had was a vehicle 20 yards up the road."
21 Not ideal?
22 A. Not ideal.
23 Q. Over the page, we can see reference to an observation
24 from you, PW:
25 "We could hear there was a bus explosion ..."

1 You, of course, heard the explosion at 9.47.
2 "No method of communications - I was Silver and
3 could not speak to anyone."
4 You were able, though, to get through to Central
5 Ambulance Control in the end to make your request for
6 further resources?
7 A. Yes, in fairness, that needs some clarification.
8 Gareth Hughes was there as my loggist and Gareth Hughes
9 was the one who was actually undertaking the radio
10 communication. I wasn't physically attempting to
11 communicate with EOC or CAC, as it was then. It was
12 Gareth Hughes who was trying to make the communications
13 through CAC under my request.
14 Q. But this is a reference to a comment made by you, PW, at
15 a debrief meeting.
16 A. Yes.
17 Q. So it was you who had no method of communications and
18 was unable to speak to anybody?
19 A. Yes.
20 Q. How did you resolve that problem?
21 A. Well, there were a number of things that we -- that we
22 did. We had capacity problems with the mobile phone
23 network, as you've heard previously.
24 Q. Yes, we have.
25 A. It wasn't that the network failed, but there were

1 capacity issues. There was an awful lot of radio
2 traffic on the Ambulance Service's emergency RT, but we
3 were able to log our request for resources there.
4 Later on in the incident, what we relied on is what
5 you've heard previously. We started to adapt. We
6 accepted that there were communication problems, so we
7 set up a system of runners to ensure that we were
8 getting face-to-face communication by using a network of
9 staff to pass information and bring information back.

10 Q. But passing through messages for more ambulances didn't
11 solve the immediate problem when equipment supplies ran
12 out and, as we can see there, you ran out of oxygen at
13 some stage and you had no immediate means of resupplying
14 that, did you?

15 A. Yes, well, yes, I did. Oxygen became a problem for us,
16 but again you have to --

17 Q. You improvised?

18 A. You have to accept that we were faced with some
19 challenges, but there were opportunities for us to
20 overcome those, and one of the opportunities was the
21 large amount of medical staff --

22 Q. From Great Ormond Street?

23 A. -- that came from Great Ormond Street. So one of the
24 first things that we did, while we had lots of personnel
25 coming there, was to actually redirect them back to the

1 hospital and ask them to bring as much equipment as they
2 could and that included dressings, oxygen, blankets, and
3 suchlike.

4 So we overcame that issue, although that log informs
5 us that, in terms of what I actually had in terms of LAS
6 equipment, the oxygen supplies that the ambulance had
7 and the Fast Response Unit had at that time had been
8 exhausted. There was no more oxygen on those vehicles.

9 Q. We can see from INQ9908-2 that, at 10.50 -- so quite
10 a while into the incident, as far as you were
11 concerned -- a number of staff arrive from Great Ormond
12 Street with oxygen and more equipment?

13 A. Yes.

14 Q. So they came to your rescue. In relation to ambulances
15 could we perhaps -- sorry, in relation to stretchers, by
16 contrast, could we have a look please at LAS379 again at
17 page 5?

18 GH, Gareth Hughes, refers to carrying patients in
19 blankets with legs blown off from the hotels.
20 Great Ormond Street weren't able to solve your
21 problem in relation to stretchers, however. What steps
22 were you able to take in relation to that?

23 A. Right, we were assisted by Great Ormond Street. Not
24 necessarily with stretchers, but what we were assisted
25 with was the push trollies. So we were able to take

1 patients off in the casualty clearing that were
2 occupying stretchers and put them on to hospital
3 trollies enabling to us free up the use of stretchers.
4 If I can just clarify the particular point that
5 you've raised there around carrying patients in
6 blankets, that actually refers to an issue we had where
7 we were at the casualty clearing and the police
8 identified a suspect package or a suspect vehicle which
9 was parked in Bernard Street. And we were told to
10 evacuate the immediate area as a matter of urgency.

11 Given that situation, and given that we had
12 a casualty clearing area some 50 yards away where they
13 suspected a device to be in a vehicle, we used blankets
14 to take those patients that were at risk to a place of
15 safety away from the vehicle.

16 Q. You will see, further down the page, GH says again:

17 "We had issues with the press and people in the
18 surroundings buildings videoing. We did not have
19 stretchers. We could not get them. We could not get
20 people out."

21 A. Yes.

22 Q. It does appear that the issue of stretchers concerned,
23 not only the movement of people already out, but
24 concerned people being brought out of the station as
25 well?

1 A. Yes, we identified we had an issue with stretchers and
2 equipment.

3 Q. In terms of the response to your calls for more
4 ambulances, what was the response?

5 A. We were told, or Gareth Hughes was told, from our
6 colleagues within Central Ambulance Control that the
7 resources had been deployed and that they were on their
8 way.

9 Q. Did they arrive as speedily as you would have wished?

10 A. Clearly not.

11 Q. Indeed, by the time that some ambulances arrived,
12 there's a reference in the statement of a man called
13 Mr Stephen Colhoun to LAS personnel screaming at the
14 ambulances when they arrived to say "Get a move on,
15 hurry up, we need them here, time is very much of the
16 essence". Do you recall that?

17 A. I don't recall those particular words.

18 Q. I'm paraphrasing, but a scream went up for more
19 resources and more ambulances from Russell Square.

20 A. I believe that we were insistent and it was problematic
21 that we didn't have the resource.

22 What we actually had, although we didn't have
23 ambulance resource there -- as much ambulance resource
24 as we would have liked -- and there are reasons for
25 that. I accept, having been the ambulance incident

1 officer, that I was put into a position that I would
2 rather have not been put into on that particular day.

3 Q. Of course.

4 A. But contextually, the issue that we had is that there
5 were ambulances sent to us. In some ways, the timing
6 was quite cruel, in terms of the Tavistock Square
7 explosion.

8 Q. Was that because some were diverted?

9 A. The only way you could get into Russell Square was to
10 come through Tavistock Square, so of course, that
11 already had become a declared major incident. So a lot
12 of the resources that were deployed to my specific scene
13 were caught up in Tavistock Square and obviously caught
14 up with the traffic issues that were experienced the
15 other side, so north of Tavistock Square, Euston Road.

16 Q. It had a practical impact, did it not? Because your
17 statement records how, at 10.45, you made a further
18 request to Central Ambulance Control for -- as to the
19 whereabouts of the ambulances and of the further
20 resources you'd requested and, shortly after that, you
21 were told that one of the priority 1 female casualties
22 had gone into cardiac arrest on the pavement outside
23 Russell Square awaiting transfer to hospital by
24 ambulance?

25 A. That is correct. I just want to clarify, these

1 patients, although they were in a paved area, this was
2 a casualty clearing area that was specially put aside
3 for that purpose, so I don't want to give the impression
4 that we had people on pavements.

5 Q. I'm not concerned with the fact of the pavement. I'm
6 concerned with the fact that the patient had to be
7 resuscitated and went into cardiac arrest whilst
8 waiting, plainly waiting, for transfer to hospital.
9 The impression from your statement is that it caused
10 you concern because the condition of that lady was that,
11 when an ambulance did arrive, I think you directed
12 a police officer to drive it so that she could be
13 transferred as soon as possible?

14 A. Yes, I mean, when I first got to the scene, we know
15 that -- we deal with incidents on the Underground
16 station on a daily basis, and I know that, if we've got
17 someone that's either trapped on a train, under a train,
18 that it takes a significant period of time, particularly
19 down on the deep lines, to evacuate a patient. Never
20 mind the scale of this incident. So it was in
21 anticipation that I requested ten further ambulances.
22 The patients were brought up and some of the
23 patients that we tended on that day, you know, had
24 particularly severe injuries.

25 Q. Indeed.

1 A. Those patients need to be stabilised before
2 transportation anyway, to give them the best chance of
3 survivability, and also to ensure that they're going to
4 be sent to the appropriate hospital. On that particular
5 occasion, a patient did go into cardiac arrest, and that
6 patient was successfully resuscitated.

7 Q. She was indeed.

8 A. Then I took the decision that that patient was the
9 priority and had to be moved in the ambulance that we
10 had that was the first ambulance that arrived on scene
11 there.

12 Q. It was, in fact, I think, the only ambulance available
13 when she was moved. Is that right?

14 A. That's correct.

15 Q. Do you recall when the final priority 1 patient was
16 removed from Russell Square to hospital?

17 A. Probably shortly after 11.00.

18 Q. The P2s, there were six P2s still at 11.28. The P3s
19 were all finally removed by 12.08, the scene was
20 declared clear of casualties. But it's not entirely
21 clear from your statement when the P1s were removed.

22 I think it was after 11.00, just after 11.00?

23 A. Yes.

24 Q. Was one patient, I think, taken to Great Ormond Street
25 in a trolley because of the need, again, for speed and

1 for urgency of treatment?

2 A. Yes, that was a decision that was taken. As I say,
3 there were a large number of clinical staff, doctors,
4 surgeons, anaesthetists, that had made their way both
5 from the National at Queen Square and at Great Ormond
6 Street. There was a decision taken whilst in the
7 casualty triage/clearing area that this patient be
8 removed. That patient was actually a P2 patient and not
9 a P1 patient.

10 Q. Lastly, may I ask you this: your note at INQ9908-2 at
11 11.22 refers to a doctor arriving, a Mr Julian Redhead.

12 A. That's correct.

13 Q. Do you know whether Mr Redhead remained at the surface
14 level assisting with the casualties outside and in the
15 foyer of Russell Square, or did he go down to the
16 tunnel?

17 A. No, I believe Dr Redhead stayed on the surface. I asked
18 him to liaise with, as it says there, a Dr Batch, but by
19 that time, we were having information that the -- I'd
20 had information that -- from Bronze medic that the train
21 was empty of survivors, so our need was greater within
22 the triage area than it would have been about sending
23 another doctor down onto the line.

24 Q. Do you recall the name of the doctor who went down to
25 the tunnel before him?

1 A. No.

2 MR KEITH: You don't. All right, Mr Woodrow, thank you very
3 much, I have no further questions for you.

4 LADY JUSTICE HALLETT: Mr Coltart?

5 Questions by MR COLTART

6 MR COLTART: Mr Woodrow, I do have some questions for you.

7 I can assure that you it isn't going to take 45 minutes.

8 I anticipated that, my Lady, but there are a number
9 of issues I wish to explore.

10 LADY JUSTICE HALLETT: Of course, Mr Coltart.

11 MR COLTART: Just to put this in context, Mr Woodrow is the
12 only witness who is coming from the London Ambulance

13 Service who deals with the surface at Russell Square,

14 but we will get through it as quickly as we can.

15 You had been at Millwall in the morning and you were

16 deployed initially back to Central Ambulance Control at

17 London Ambulance Service headquarters, I think. Is that

18 right?

19 A. Yes, we took a decision to -- people were being

20 activated from Millwall to scene to various sites. We

21 activated back to headquarters because we thought that

22 would be where we would be most useful.

23 Q. Absolutely. On your arrival, as you say in your witness

24 statement, information was coming into the Central

25 Ambulance Control about 150 casualties exiting

1 Russell Square Underground station. So it's perfectly
2 clear that, at that stage of events, which we estimate
3 was probably at about 9.45 that morning, Central
4 Ambulance Control knew there were a large number of
5 casualties at Russell Square Underground station?

6 A. That's the reports they had, yes.

7 Q. What I'd like to do with you, please, if I may, is just
8 to go through some of the entries on the contemporaneous
9 log that was kept by Central Ambulance Control.

10 Can we have LAS565 on the screen, please? So that
11 we can properly understand the depth of the difficulties
12 which faced you that morning, can we start, please, at
13 page 31?

14 At the bottom of that page, we have an entry at
15 09.36.

16 This is an entry relating to Paul Ward which
17 actually predates your arrival --

18 A. Yes.

19 Q. -- at Russell Square, but this is Paul Ward who called
20 in the major incident, and he says:

21 "My name is Paul Ward. I am declaring a main
22 incident at Russell Square. I was en route to
23 St Pancras but I have been flagged down. Declaring
24 major incident ... Approximately 50 plus casualties.
25 Approximately 6-15 fatalities. The train is still

1 between two stations."
2 He's acknowledged by Central Ambulance Control:
3 "Roger [they say], just confirm declare major
4 incident, 50 plus casualties."
5 And they repeat the information he's given. Mr Ward
6 says:
7 "That's correct. At the moment, obviously I am
8 aware of the other situations but could do with some
9 resources."
10 They say:
11 "Roger, will get someone to you as [quickly as
12 possible]."
13 He says:
14 "I've got to go now to start putting people into the
15 recovery position."
16 Then he's asked to switch to channel 9.
17 He would have suspected, presumably, certain set
18 consequences to follow from that declaration of a major
19 incident?
20 A. Yes.
21 Q. If we go forward in time, please, to page 52, this is
22 shortly after your arrival. Could we highlight the
23 entry at 10.02, please. D491 was Bill Kearns' call sign
24 on that day. He calls in to Central Ambulance Control,
25 he says:

1 "I've just had to go down on to the track with the
2 crew and the Fast Response Unit. Have no resources at
3 Russell Square. I've counted 30 plus P3s, not sure if I
4 have any P2s, probably fatalities on the track."
5 That's acknowledged by Central Ambulance Control.
6 They say "We'll get you some more crews". He asks for
7 something to move the P3s, the priority 3s, and he asks
8 for five ambulances and a bus in order to achieve that
9 aim.
10 You've arrived on scene by this stage, and I think
11 you've told us already that Gareth Hughes was
12 responsible for actually making the radio
13 transmissions --
14 A. Yes.
15 Q. -- at your direction or following discussion with you.
16 The first of those we can see at page 63, please, of
17 this log.
18 Can you see about halfway down that first entry, the
19 major entry on that page, there's reference to M291?
20 A. That's correct.
21 Q. That was Mr Hughes' call sign on the day.
22 A. Yes.
23 Q. This is at about 10.15:
24 "Report from Russell Square. We have approximately
25 45 to 50 walking wounded casualties on the upper ..."

1 Then the radio cuts out.

2 "... 45 to 50 walking wounded casualties requesting
3 there a train approximately a mile between here."
4 He's told to stand by. We see in brackets:
5 "Interference crews calling up booking on scene,
6 talking over one another, unable to confirm what is
7 being said and by who."
8 In a sense, does that encapsulate the difficulties
9 that you were having with the radio on that day, which
10 was too many people trying to channel their discussions
11 through too few radio channels and the crews talking
12 across each other and it became incomprehensible, didn't
13 it?

14 A. That's correct.

15 Q. He perseveres and, at the bottom of that entry, we can
16 see that he complete his report, he says:
17 "Apologies for that. We've got 45 to 50 walking
18 wounded ... We have approximately 100, I repeat, 100
19 stretcher cases, on the platform between here and the
20 train. The train is stuck in tunnel approximately one
21 mile from Russell Square ... towards King's Cross.
22 I have one vehicle on scene. Request 10 ambulances ...
23 and some walking wounded a transport bus ..."
24 If we move forward in time, please, to 10.22,
25 page 71 of the same document, Mr Hughes puts in another

1 report. If you highlight, in fact, the top of the next
2 section, you can see his call sign M291:

3 "I also request an EEV ..."

4 That's one of these special equipment vehicles,
5 I think, is it, which is stocked with a bit more kit?

6 A. It is.

7 Q. We have no equipment at Russell Square, one ambulance
8 that is stripped, no equipment Russell Square, Roger."
9 To which he gets no reply that time from the Central
10 Ambulance Control. So this is the one ambulance which
11 was originally in the square, which was Mr Whittaker and
12 Ms Russell, that has very quickly been depleted?

13 A. That's correct.

14 Q. There is no more equipment left in it?

15 A. No.

16 Q. At this stage, of course, this is in advance of, at
17 10.50, the Great Ormond Street supplies arriving with
18 oxygen and other equipment which you desperately needed?

19 A. Yes. I think it is fair to say that, pretty much from
20 my arrival at Russell Square, we were having medical
21 staff and nursing staff arriving all the time. I think
22 it was around, for me, getting sit reps, understanding
23 where we were, that I pushed the messages out for
24 actually why it was helpful to have personnel to use
25 equipment. Although the log says that equipment didn't

1 get there, it's an iterative process, because we had
2 personnel turning up from those two hospitals and from
3 my time of arrival.

4 Q. That was a godsend, frankly, wasn't it, that you had
5 Great Ormond Street round the corner and that they were
6 able to assist you in that way?

7 A. My job would have been far more difficult that day if
8 they had not have been there.

9 Q. Page 76, please. The middle of the page, at M291, the
10 time isn't recorded but the next entry following it is
11 at 10.27. So Mr Hughes tries again:

12 "M291."

13 "Go ahead" says Central Ambulance Control. He says:

14 "I know I've got at least four confirmed P1
15 casualties here. Any ETA on some equipment and
16 vehicles?"

17 Again, there's no reply to that message.

18 Priority 1, patients with potentially life-threatening
19 injuries, that's how they're categorised, isn't it?

20 A. That's correct.

21 Q. Despite such assistance as you're receiving from the
22 hospital, you are desperately in need of that kit.

23 At page 79, some good news appears to be on its way
24 if we look at the bottom of that page, please, because
25 some time shortly after 10.33 Mr Hughes receives

1 a transmission from Central Ambulance Control:
2 "Red base go ahead."
3 And Central Ambulance Control say this:
4 "Just to confirm that we've got C131 on way, supply
5 and stuff for you, roger. Also, we've had a bus
6 exploded Upper Woburn Place and Russell Square just to
7 make you aware."
8 They give you some more information about the
9 explosion on the bus.
10 C131, that was, in fact, we know, the emergency
11 vehicle which you had been waiting for.
12 A. Yes.
13 Q. Do you recall it in fact arriving?
14 A. Yes, I do.
15 Q. Do you recall there being a problem with the oxygen
16 cylinders on that emergency vehicle once it had arrived?
17 A. No, I don't recall that.
18 Q. Could we briefly have a look at LAS402, please, at
19 page 5?
20 This was an email sent by a chap called Nick Smart
21 to Jonathan Edmondson the following day. He says:
22 "Hi, Jon, I know you're probably very busy after
23 yesterday's incidents, but having spent most of the day
24 on C131 [that's the same emergency vehicle] there are
25 a couple of issues that may need to be considered.

1 "The spare oxygen and Entonox cylinders carried on
2 this vehicle are the old-type pin index system which
3 requires therapy heads to be attached to be useful.
4 Although there were some oxygen regulators on the
5 vehicle, this still made them unusable as there were no
6 therapy heads. The solution would be to change the
7 cylinders carried to the new lightweight types as used
8 on the Mercedes ambulances, as these have built-in
9 contents gauges", and other technical equipment.
10 "It would also be difficult to resupply new Mercedes
11 ambulances, as they do not carry spare valves to be able
12 to use the old-style cylinders."
13 Then he said:
14 "In addition, another issue is storage and location
15 of supplies on this vehicle. It was initially difficult
16 to locate equipment as things were all in brown
17 cardboard boxes, some weren't labelled."
18 He suggests a better system for putting that into
19 place.
20 So does that assist you at all, do you remember now,
21 once it did finally arrive, that there was a difficulty
22 with the oxygen cylinders on that vehicle?
23 A. No, I don't, and furthermore to that, I don't actually
24 recall it being Charlie 131 that came to assist me.
25 Q. Oh, I see.

1 A. My understanding was that -- well, I know, because I'm
2 based in that position, I was based at Deptford
3 ambulance station, and it was the EEV that came from
4 Deptford which would have been a November 131, so
5 I actually think that information, although EOC have
6 given it on the log --

7 Q. It might be wrong?

8 A. -- I clearly remember the two people who came on the EEV
9 and they were from my ambulance station at Deptford, so
10 I think that's actually --

11 Q. So the duff cylinders might have been someone else's
12 problem, but they didn't come to --

13 A. I'm saying I don't recall it, because I don't believe it
14 was Charlie 131 that attended the scene at
15 Russell Square and I liaised with the two personnel
16 on November 131 and that's why I don't recall a problem
17 with oxygen.

18 Q. All right. Final entry on the log, please, page 87, top
19 of that page, M291 again, Mr Hughes' call sign, and this
20 is now some time shortly before 10.42, and he says:
21 "M291. Appreciate we have no comms here. I have no
22 vehicles here. Casualty update. 2 times priority 1.
23 Resuscitation in progress. 6 times P2s. 14 times P3s
24 and X number 100 on the platform that we are trying to
25 reach now. Got no equipment. I have no comms. Any

1 update for an ETA?"

2 So again, the situation obviously not very good at
3 that time.

4 Just in terms of the reason why it was proving so
5 difficult to get ambulances there, there were plainly,
6 as I said to your colleague, Mr Sale, this afternoon,
7 difficulties with the traffic condition and difficulties
8 arising out of the confusion of the multiincident sites,
9 but could we have a look, please, just so that I've
10 covered this properly, at LAS663-3? Highlight the top
11 half of the page, please.

12 This is Kearns' incident report completed after the
13 event. He says under "Lessons identified":

14 "A lack of communication ... coordination was
15 extremely difficult.

16 "There was an unacceptably long delay in ambulance
17 crews arriving at the scene and it appears that many
18 ambulance resources were not mobilised from their
19 stations, even within the Central London area and that
20 many arrived at the parking point for the
21 Tavistock Square incident and were not redirected."

22 It's right, isn't it, that once things had finally
23 settled down, you discovered that there was a line of
24 seven or possibly nine ambulances parked just round the
25 corner which were unused which had been queueing up for

1 the Tavistock Square incident, and which could have been
2 used by you if only they had been told to drive round
3 the corner. Do you remember that?

4 A. Well, I don't remember it at the time because I was
5 focused on trying to deliver the best standard of care
6 to the patients that we were looking after.

7 At the end of the day, my job, on that day, was to
8 do the best that I possibly could with what I had and
9 using innovation and flexibility to try and overcome the
10 challenges that we were facing.

11 That was my absolute priority, to do the best for
12 patients. I believe that we achieved that on that day.

13 Therefore, I did not have time at that time, when
14 dealing with the incident, to question why those
15 vehicles weren't coming. I understand that there was
16 a complicated set of circumstances and, ultimately, we
17 did identify that there were resources at
18 Tavistock Square, and that was through the use of using
19 a Motorcycle Response Unit and, in actual fact, once
20 we'd highlighted that issue, then we got ambulances
21 directed very quickly.

22 But that was part of a process that we went through.

23 At the time, my priority was around the safety of my
24 crews that were committed down on the track and,
25 obviously, to make sure that we rescued -- an effective

1 rescue of the patients that still required it and the
2 treatment that they needed.

3 Now --

4 Q. I'm sorry to cut across you, but there's no criticism of
5 you. I want you to understand that.

6 A. Yes.

7 Q. There's no question that you were doing your best. The
8 fact of the matter is, I'll just read you this one
9 sentence from Mr Ward's witness statement:

10 "I left the station and found a line of
11 approximately nine ambulances with crews. They were on
12 the other side of Tavistock Square. I then instructed
13 them to follow me back to Russell Square where they
14 conveyed the casualties to hospitals that had been
15 placed on standby."

16 He went on to say in his debrief report -- we don't
17 need to look at it -- that, if he'd known they were
18 there earlier, they could have been used. That was the
19 fact. That's symptomatic, isn't it, of the difficulties
20 that you had on that day?

21 A. Quite clearly.

22 Q. Last topic. We've looked already at some aspects of
23 your debrief form, your managers' debrief at Millwall.

24 Can we have back on screen, please, LAS379-2. Could you
25 highlight the middle of that page?

1 There's talk about the communication difficulties
2 with which we're so familiar, but in the middle of that
3 page, someone said that these problems had been foreseen
4 at least two years ago. Are you able to recollect,
5 firstly perhaps, who was it who made that observation?
6 A. Sorry, I'm -- problems ... No, I can't recall.
7 Q. On page 3, please, in the middle of the page:
8 "Coordination with [the] Fire Brigade.
9 "Slow response to requests for appliances (arrival
10 up to an hour after request to assist with taking people
11 from [the] platform)."
12 It's important to clarify here. There's no
13 indication from that bare comment as to which site that
14 related to, but were you hoping, did you anticipate,
15 that the Fire Brigade would be arriving to assist you at
16 Russell Square?
17 A. Yes.
18 Q. Can we go over the page, please, to page 5, in fact,
19 bottom page.
20 You've been referred to this already, the
21 difficulties with not having stretchers, but the last
22 sentence on that box:
23 "100 people came off the train. UAs assessed them.
24 100 P3s."
25 This is Mr Hughes' observations.

1 "About 7-8 P2 and P1. Between 20 and 23 still down
2 in the carriage, perhaps more. We lost a couple of
3 patients."

4 We're not going to hear, certainly at present, from
5 Mr Hughes. Are you able to assist us with what he might
6 have meant by that?

7 A. I think this debrief was done on the 7th, was done in
8 the afternoon.

9 Q. Yes.

10 A. I think it's appreciated by all that we had a difficult
11 scene to deal with.

12 Q. Yes.

13 A. I think Gareth is referring to the fact that we had two
14 patients, one going into full cardiac arrest and one
15 went into a respiratory arrest on the scene. Those
16 patients were successfully resuscitated and were
17 conveyed to hospital. I think he's referring to "we
18 lost a couple of patients", is that there were patients
19 that went into cardiac arrest on scene.

20 Q. With respect, you didn't lose them, did you? You saved
21 them. Were you ever party to any discussion with the
22 paramedic crews who attended the train about people who
23 had been lost as a result of a shortage of stretchers or
24 any other type of equipment?

25 A. No, I wasn't party to any conversations. We had -- the

1 information that I had as the AIO at Russell Square is
2 that there were a number of fatalities on the train and
3 those patients were going to stay in situ. But all the
4 patients that were rescued from the train or exited
5 through self-rescue up through Russell Square, of all of
6 those patients, all of those patients, we lost none of
7 those patients.

8 We did successfully resuscitate two patients. But
9 as the incident officer there, none of the patients we
10 treated were lost to us, so I don't -- I can't answer
11 where Gareth is referring that comment.

12 LADY JUSTICE HALLETT: It sounds as if you're saying he must
13 be plain wrong, because, as incident officer, if you had
14 two patients die on you, you would have known about it.

15 A. I most certainly would have known about it.

16 MR COLTART: Two final points, both short, please. Page 8
17 of that document. Could you enlarge the top half of the
18 page, please?

19 There was an observation made at that meeting by one
20 of your colleagues, Athar Khan, AK, he talked about:

21 "I found it very frustrating."

22 Someone had sent a pager message which he is still
23 waiting to arrive. He was self-deployed. He said this:

24 "A training course a year ago said communications
25 would be a problem - too much talking. We must have

1 a main channel separate from an operational channel to
2 enable Silvers to report important information to Gold."
3 Did you attend that training course which had
4 identified a year previously communications as
5 a problem?

6 A. Well, first things first. There's something that needs
7 to be corrected in that statement.

8 Q. Yes.

9 A. Athar Khan could not have been waiting for a pager
10 message that day because, in actual fact, the messages
11 were done on SMS to officers' mobile phones. So that --
12 just to clarify that, it wasn't a pager message.

13 We have a number of training courses and I've also
14 attended a number of major incidents and one of the key
15 things we do explore is around communications. There
16 were issues raised around whether there should be more
17 than one dedicated channel, whether channels should be
18 split in order to control. We know that, in the first
19 45 minutes of a major incident, there is an awful lot of
20 volume in terms of radio traffic going through. People
21 trying to get messages back and information coming back
22 and forward.

23 So that issue around whether you could provide more
24 radio channels was being explored.

25 Q. Thank you. Finally this, on the next page, at page 9,

1 please. In fact, I think we can pinpoint the earlier
2 observation about the Fire Brigade which we looked at
3 a minute or two ago.

4 A. Yes.

5 Q. Because, in fact, it's one of your observations:

6 "We had trouble with the Fire Brigade -- [we] could
7 not get them. We made several requests for the
8 Fire Brigade so as to get people off the platform, but
9 it was an hour before we had an appliance."

10 Does that help you refresh your memory as to the
11 difficulties you had in that regard?

12 A. Yes, it did, that was a difficulty.

13 MR COLTART: Yes, thank you, I have no further questions.

14 Questions by MS GALLAGHER

15 MS GALLAGHER: Three very brief references, Mr Woodrow, all
16 to documents you've already seen. The first one is
17 remaining with LAS379. If we could go to the bottom of
18 page 6. This is just to put it in context for you. The
19 bottom of page 6 is "JH", that's John Huggins, and he
20 complains there about briefings about hospital
21 availability chopping and changing. Over the page, on
22 page 7, there's a comment by you, PW:

23 "Caused confusion for crews who didn't know where to
24 go next."

25 Was that a reference to the changing information

1 about hospital availability or was it something else?

2 A. No, it was around hospital availability.

3 Q. So you were agreeing with Mr Huggins?

4 A. Yes.

5 Q. There's one further criticism here which you haven't

6 been taken to, which is not a criticism by you, it was

7 a criticism made by your colleague Gareth Hughes and

8 I just want to see whether you agree with it.

9 Could we go to page 5 of the document, please? It's

10 the very top box, the very top of the page, please. He

11 describes feeling isolated, but in the first paragraph

12 at the last sentence he says:

13 "Police had to be told to take P3s away."

14 It sounds as if he was expressing some frustration

15 and that's also indicated by page 3 of this document.

16 Under "Coordination with police" the fourth bullet point

17 down says:

18 "Slow response of police Silver at one site to

19 requests, EG police had to be told to take P3s away."

20 Which appears to be echoing the reference from

21 Gareth Hughes on page 5. Is that a criticism you'd

22 agree with?

23 A. I wouldn't say it was a criticism. It was an

24 observation. We'd made a decision early on to

25 commandeer a hotel to the left of Russell Square

1 Underground and then the Holiday Inn, which was
2 opposite. There were a large number of P3s that were
3 milling about and actually adding to the issues that we
4 already had in terms of proximity of space and we had
5 a number of people videoing, spectators and that kind of
6 thing. So it was an observation that having
7 commandeered hotel accommodation where those patients
8 could be treated and then could be processed as
9 potential witnesses, that probably could have been done
10 a little bit quicker.

11 Q. That's very helpful. Then one final reference, it's
12 INQ9908-3. Again, this is a document that you've been
13 taken to earlier. If we could turn it sideways. At the
14 very top of the page, just three lines down, Mr Woodrow,
15 there's a description here at some stage during the
16 incident, it's given as approximately 11.00 am, a number
17 of LAS staff presenting themselves from the tunnel
18 having walked from King's Cross, obviously shaken, they
19 rested for about 10 minutes in a Tesco store and on the
20 third line down it says:

21 "Once refreshed, they were asked if they could
22 continue with their duties as we were now desperate for
23 support."

24 We can see from further down the page that they do
25 all agree with that request and, to their credit, it

1 says that they performed their duties with diligence.
2 What I just want to take from this is it appears from
3 this document, at about 11.00, there was a sense of
4 desperation about the lack of resources you had
5 available. Is that accurate?

6 A. No, I think if you read through, we asked for P3
7 patients, the walking wounded patients, and patients
8 that had self-evacuated were in a hotel, there were
9 large numbers of these patients, and I felt it
10 important, while the priority for us on the scene was to
11 deal with the most seriously injured patients, we now
12 had large numbers of those patients congregating in
13 hotels.

14 Q. So the phrase there "now desperate for support" relates
15 to clearing the P3s?

16 A. Well, actually going in there and offering support to
17 the P3s, because they were now forming in considerable
18 numbers.

19 MS GALLAGHER: Thank you very much. I've nothing further,
20 Mr Woodrow.

21 LADY JUSTICE HALLETT: Any other questions?

22 Thank you very much, Mr Woodrow. I'm sorry we've
23 kept you here so long. I'm particularly sorry to those
24 who are trying to make a note of the proceedings. I'm
25 afraid, when I insisted on going on, I completely forgot

1 to give them a five-minute break, I'm very sorry.
2 I think we'll leave the statements until tomorrow
3 morning, Mr Keith.
4 MR KEITH: My Lady, there may be difficulties there because
5 the annex isn't, in fact, open tomorrow and some of the
6 families may have decided not to attend tomorrow for
7 obvious reasons, because all that is scheduled on
8 Lextranet is the public interest immunity issues, so
9 with my Lady's leave, may I leave over the reading of
10 those six statements to January and the next open
11 hearing on the 12th?
12 LADY JUSTICE HALLETT: Very well. So tomorrow we're into --
13 it's open submissions at 10.00?
14 MR KEITH: It is, my Lady.
15 LADY JUSTICE HALLETT: Thank you very much.
16 (4.48 pm)
17 (The inquests adjourned until 10.00 am the following day)
18
19