

PATRICK HIGGINS, CalledExamined by Mr. GOLDSACK:

- Q. Are you Patrick Higgins? A. Yes, sir.
- Q. A long time member of the South Yorkshire Metropolitan Ambulance Service, and since 1983 a Station Officer?
A. That's right, sir.
- Q. Since the Bradford fire in particular, have you had particular involvement with Sheffield Wednesday Football Club? A. I have, sir.
- Q. I think following the fire at Bradford, it was decided within your service that there should be a disaster plan covering each of the main football stadiums in South Yorkshire? A. That's correct.
- Q. And you attended a meeting in July 1986 involving police officers, fire officers and yourself? A. That's right.
- Q. And as a result of that meeting and other major consideration, your major accident plan for Sheffield Wednesday was drawn up? A. That's correct, sir.
- Q. And we find that at page 322 in the core bundle. Prior to 1986, had there been any ambulance service presence at Sheffield Wednesday football matches? A. Not at Sheffield Wednesday football matches, sir; only at semi-finals.
- Q. At semi-finals? A. Not actually in the ground at semi-finals, but it was provided as cover.
- Q. So if we can just briefly go back to 1981, say, what was the position then so far as your Service attending the semi-final was concerned? A. We provided ambulances that stood by close to the ground.
- Q. But outside rather than inside? A. That's right, sir.
- Q. I think in 1986 you decided that it would be useful if there was an Ambulance Service presence within the ground at all matches? A. That's right, sir We were concerned after the Bradford fire.
- Q. And that is obviously a matter that you would have broached with the Club? A. I believe the Chief Officer approached the Club, sir.
- Q. The identify of that person, the Chief Officer? A. Mr. Page.
- Q. Mr. Page did that. Was the effect of that approach that two tickets were made available? A. That's right, sir.
- Q. For yourself and Mr. Eason, in fact? A. Initially it was for myself and Mr. Keyworth. Mr. Eason came on later.

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- Q. Now when you were discussing with the other interested parties in 1986 how you would cope with a major incident at Hillsborough, was the question of access for your vehicles discussed? - A. We knew the ground pretty well, the Police, the Fire and ourselves and it was obvious from the onset of the meeting that the only access to the ground was via the gymnasium entrance.
- Q. Now there are in fact two entrances from the road at that end of the ground? - A. That is right, they are very close together, sir, so they both serve the same entrance at the gymnasium.
- Q. In the event of a major incident did you envisage using just one of those entrances or both? - A. I think initially we envisaged using both the entrances as a turn in for one and exit through the other.
- Q. LORD JUSTICE TAYLOR: An in and out? - A. That is right, my Lord.
- Q. MR. GOLDSACK: With whom was that discussed? - A. Well it was a general discussion as we went round the ground with the Police and Fire Brigade. I don't think there was anything formal.
- Q. Do you recall whether a Club representative was present at that discussion? - A. There was only the Club Groundsman sir.
- Q. Was there general agreement amongst that group that the idea of a one gate in and one gate out was a good idea? - A. I think that was the idea that came from everyone at that time, yes sir.
- Q. Well now that plan having been drawn up, do you know to whom it was circulated? - A. I don't sir. I got a copy from Mr. Wilkinson who was the ADO at Headquarters at the time. I understood that they had been circulated to all the other parties but I couldn't
- Q. You weren't personally involved in that? - A. No.
- Q. But thereafter you attended at many matches? - A. That is correct sir.
- Q. Did you in the course of routine checks during those matches ever check to see whether both the exits and entrances were kept clear? - A. On semi-final days we used to check the immediate area round the gymnasium but I don't think I ever checked the actual drive-in between.
- Q. Well now can I come to the arrangements for the semi-finals. The 1986/87 season you had had a season ticket? - A. That is correct.

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- Q. LORD JUSTICE TAYLOR: That is 1987? - A. That is right, my Lord.
- Q. MR. GOLDSACK: Had you simply told his Secretary that you were Station Officer Higgins or had you let her know that you were ringing up with a specific request concerning the semi-finals? - A. The first year I actually mentioned that we were there on a normal match-to-match basis; after the Popplewell Report that we should be in attendance at such occasions and I did tell her that for the semi-final of 1987 but it did not make any difference, we were just told that the tickets were not available.
- Q. Were you able to glean on your third or fourth telephone calls whether she appeared to have spoken to the Secretary in between? - A. Well the reply I got on either the third or the fourth was that she had spoken to Mr. Mackrell and the tickets were not available for SYMAS.
- Q. LORD JUSTICE TAYLOR: How many times did you ring in 1988? - A. Just the once, my Lord. I did attend at the ticket office and I got the same reply that year sir.
- Q. Is there any suggestion that the F.A. might be asked about this? - A. There was not, my Lord.
- Q. MR. GOLDSACK: Well now you did in fact attend the 1988 semi-final I think? - A. I did sir, yes.
- Q. How did you arrange that? - A. Mr. Jones who had taken over in Chief of Operations for SYMAS approached the South Yorkshire Police and the Police allowed us to go in to their area near the gymnasium where we parked our vehicle.
- Q. For the purposes of identification, was that contact through Mr. Sewell? - A. That was through Mr. Sewell by then, yes.
- Q. And he arranged, did he, for yourself and Mr. Eason? - A. I went along with another Officer, Mr. Bentley on that first occasion plus an Ambulance Crew.
- Q. So that altogether there were four SYMAS officials in the ground? - A. That is right, plus there was an ambulance outside the ground.
- Q. Just again identify for us, if you will, where the ambulance was positioned? - A. It is an area between the Spion Kop and the North Stand, close to the gymnasium.
- Q. Is the stick in the right place? - A. Yes, just there.
- Q. LORD JUSTICE TAYLOR: And who was paying for that attendance? - A. That was paid for by SYMAS, my Lord.
- Q. MR. GOLDSACK: Did the two officers with the ambulance

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- remain in it throughout the match? - A. On which occasion sir?
- Q. 1988 semi-final? - A. The ambulance was parked at the top of the ground and all four ambulance personnel were at the bottom of the ramp with a view to the pitch.
- Q. And when you say "bottom of the ramp" is that simply standing there so that you are able to see the pitch itself? - A. That is right.
- Q. At the 1988 semi-final were your services in fact called upon? - A. Not actually inside the ground we did not respond to anything in the ground. We were used afterwards outside, there was trouble after the match.
- Q. You say at that semi-final in addition to the ambulance inside, you had a second one on standby nearby? - A. That is right sir.
- Q. Again your own initiative? - A. Yes sir.
- Q. Did that arrangement also occur this year? - A. That is right. Mr. Jones approached Mr. Sewell again and we had the same arrangements with the South Yorkshire Police.
- Q. Do you know whether the Club were told that you were there? - A. The Club were told. My colleague Mr. Eason contacted the Club.
- Q. Is that before the 15th of April? - A. Yes sir. I believe Mr. Eason contacted the Club after he had spoken to Inspector Sewell.
- Q. To let the Club know that you had made arrangements to be present? - A. Yes.
- Q. Do you know yourself to whom within the Police Mr. Sewell passed the information on? - A. I don't sir, no.
- Q. Did you personally speak to anyone more senior to Mr. Sewell? - A. I didn't sir.
- Q. Were you parked in the same position this year? - A. We were sir, yes.
- Q. And again did you have another ambulance on standby near to the ground? - A. We did.
- Q. On the day itself did you position yourself between the Kop and the North Stand? - A, We did.
- Q. Were there any calls on your services before 3 o'clock? - A. None at all sir.

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is correct, sir. We tried to maintain 10 outside the ground.

- Q. In practice they reversed in, collected their patients and then came out forwards? - A. That is correct.
- Q. Did that in practice cause any appreciable delay? - A. I don't think so. It went rather smoothly once the operation got underway.
- Q. I think the arrangement as per the plan was that initial casualties would be taken to the Northern General? - A. That is correct.
- Q. With the Hallamshire as the reserve? - A. Yes.
- Q. Again, on the day did that part of the plan appear to work smoothly? - A. As far as I could see it did, yes, sir.
- Q. And also the plan to use the Herries Road bus station as the holding point for ambulances, again many were there within a short period? - A. Yes, sir.
- Q. In fact, possibly surplus to requirements? - A. We had too many in the later stages, yes, sir.
- Q. Once Mr. Hopkins had taken over from you at the ambulance did you divert your attention to the gymnasium? - A. It was between the gymnasium area and the ambulance loading area. I was trying to assess patients, priority to move them, sir.
- Q. Is it right again at the time you declared at major incident you had visited the gymnasium at that stage? - A. Yes, sir.
- Q. It was then being used as a dining room, but you made the request that that be cleared away, and that was done immediately? - A. That is correct, sir.
- Q. Mr. Higgins, you then spent the rest of the day taking a leading role in ensuring that the casualties and fatalities were then attended to and moved from where they were to where they had to be taken? - A. Yes, sir.

Cross-Examined by MR. GIBSON-WATT:

- Q. Mr. Higgins, when you were asking to be able to attend the Semi-Finals you told us that the reason or excuse given to you was that the ticket allocation was a matter for the Football Association and not the club? - A. That is correct, sir.
- Q. You have confirmed, I think, you did not suggest to the club that they should take up the problem with the Football Association? - A. I didn't press it, sir.
- Q. You did not press it, and so far as you are aware no-one in SYMAS took up the problem direct with the Football Association? - A. Not that I am aware, sir.

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- Q. MR. GLASGOW: I think that the arrangement grew up in this way, and if I can put it to you shortly, Mr. Higgins, you can then tell me if I have got it wrong, otherwise I won't need to ask you questions. When you made your visit to the ground you walked round first with the groundsman, Mr. Ward, to talk about the layout of the ground? - A. That is correct.
- Q. Is that much correct? - A. Yes, sir.
- Q. After that there was a meeting just with you and your colleague, and the physiotherapist, Mr. Smith? - A. That is correct.
- Q. Mr. Smith raised a particular question with you, again I think about team players getting hurt? - A. yes, sir.
- Q. And what he asked, and I think it was by way of a favour personally of you as football enthusiasts. Is that the way it was raised? - A. I think they were concerned about the transport of the injured players in a quicker fashion.
- Q. Yes. Again, we are not dealing with whether this was right or wrong or sensible or not. I promise I will take that up with others. What he said was he wanted if possible to arrange a quicker method of getting an injured player for whom he was responsible to hospital? - A. yes, sir.
- Q. And this was something quite separate from the formal part of the day which had been preparatory work for drawing up the incident plant? - A. Mr. Smith did touch on the other points of the Popplewell Report and the safety angle of the ground, but his major concern was for the players, that is true, sir.
- Q. His personal concern was the job he did in the club which was looking after the players? - A. Yes, sir.
- Q. Again, no criticism, it happened that you and I think Mr. Eason later were quite keen football enthusiasts? - A. We did visit Hillsborough prior to that, yes, sir.
- Q. And taking it very shortly, he said he would be in a position to organise for you to have tickets yourself, complementary tickets, in your own time, and that the quid pro quo, if I may put it like that, what you could do for him was that you would then be able to arrange more quickly than a 999 transport of an injured player to hospital? - A. That would result, sir, but our prior function was after the Popplewell Inquiry to be in the ground from the safety point, the people in the ground.
- Q. Can we move to the second phase, the Semi-Final games, because it was clear and I think made formally clear by Mr. Hopkins to the Police that the arrangements at Semi-Finals was not for these off-duty officers to attend in the ground, but no tickets available, an ambulance manned at or just outside the ground? That was the difference? - A. That is correct, sir.

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- Q. So far as whether that was a good idea or not, the question of the formal arrangements with the club at the official level you understood were to be taken up by Mr. Page? - A. Mr. Wilkinson acted on behalf of Mr. Page initially, yes, sir.
- Q. You told us that Mr. Page approached the club. Your understanding was that he would deal either directly or through Mr. Wilkinson with the club as to the formal arrangements post-Popplewell and for security of the ground as a whole? - A. Yes, sir.
- Q. Did anybody ever say anything to you after that meeting with the physiotherapist I think in 1986 - is that right, 1986? - A. That is right, sir.
- Q. In the following three years did anybody ever say anything to indicate that that arrangement had been changed? - A. No, sir.
- Q. And for the next three years, whether good or bad, the arrangement remained, tickets for League matches when Sheffield Wednesday were playing, no tickets but formal on duty attendance of ambulance crews at Semi-Finals? - A. That is correct, sir.

/Q. Despite the fact.....

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MR. KALLIPETIS: If I may interrupt, so as not to cause any confusion, the plan at page 187 is not the Hillsborough Plan, it is the Major Incident Plan which applies to all major incidents. The one at 322 is the one that was drawn specially for the Club.

MR. GLASGOW: Thank you very much.

- Q. 322 we see is just a list of names; you can refresh yourself of those and the important telephone numbers. Going to 323, is this what you drew up - 323? A. Mr. Wilkinson did this one, sir.
- Q. Can we look through it? First 323. Can you help us as to the difference between 323 and 324? Is one before Bradford and one after?

LORD JUSTICE TAYLOR: Somebody has written so.

THE WITNESS: Yes.

- Q. MR. GLASGOW: Are you the author of 324? A. 324 is the one I had involvement with, yes.
- Q. Let us go to 324 - it is only fair to you, Mr. Higgins. Again, so that I do not confuse you or myself, the point that I want your help with is as to whether or not this plan ever reflected that there would be Ambulance Officers inside the ground or at the ground at any time?
A. It wasn't really relevant at that time because we were still going to use the designated area and that would be our first point, the gymnasium area, whether we were there prior to the match or when called.
- Q. Let us just then look at one page, the very last two lines, the "NB" you see at the bottom. "If on arrival at the scene the incident warrants special resources and man-power, the Major Incident Plan will be considered." I just give you that as one example. It was never agreed with either the Police or the Working Party or the Club that there would be an Ambulance Officer in attendance at the ground other than this very sensible and co-operative arrangement with the physio-therapist that you would attend when Sheffield Wednesday team was playing in order to help him with players going to hospital. A. There were always Officers on duty on Semi-Final days specifically for that match, sir.
- Q. Again, it is not a criticism, Mr. Higgins, please, but where do we find that even hinted at in the order? A. We don't.
- Q. We don't. Well, I will not push it. Could we come to the arrangements --- I think I should ask you about your requests for your complimentary tickets. I say to you sincerely I am sorry that that went wrong. Can you accept, Mr. Higgins, that there are a large number of people ringing up and enquiring about their complimentary tickets at Semi-Final times? A. I can, sir. yes.

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- Q. Your honest recollection is that when you spoke to the girl on the telephone you told her particularly the reason why you particularly wanted your complimentary tickets?
A. On the first occasion, sir, I presented myself in uniform at the ticket desk.
- Q. At the ticket desk? A. Yes, that was the first contact.
- Q. And were you just told "No complimentary tickets available Semi-Final"? A. I was referred then to Mr. Mackrell's secretary.
- Q. And spoke to her? A. She was not available at that time but I made phone contact with her on four occasions after that.
- Q. Again I accept entirely as honest your belief that Mr. Mackrell was told of the contacts that you had made but it is right, is it not, to say you never actually made contact either on the telephone or by letter with Mr. Mackrell? A. That is correct, sir.
- Q. And you did not consider that it was serious enough either to tell Mr. Page or anybody senior to take the matter up in writing, did you? A. I did pass on the information to Mr. Wilkinson but it was left, I believe, at that level, sir.
- Q. Again, lest anybody think that there were deaths or injuries that might not have occurred, is it your belief that it would have made any difference on this tragic day if you had, in fact, been in your normal complimentary seats? A. I think it is impossible to say that, sir.
- Q. The last matter, Mr. Higgins, is your attendance in the area where the ambulances were on the day when the tragedy occurred. It is right to say that when you get into that area the Police have control over who comes through the gates in a vehicle? A. That is correct.
- Q. And even though you have made your arrangement with the Police Liaison Officer, when you arrive with your ambulance on that day, you report to the Police Control at that gate?
A. No, sir, we drive inside, the Police let us through and then we see the inspector inside.
- Q. The Police let you through when you arrive? A. That is correct.
- Q. But the Police are controlling any vehicle which comes in and out of that area? A. That is correct.
- Q. If you had noticed - again there is no criticism of this - if you had noticed that there were vehicles which might block the in/out arrangement which you had agreed with the Groundsman, Mr. Ward, you would have probably asked the Police to have them moved? A. If they were there at that time, sir. I am not sure they were.

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- Q. And 324 is the Control action - Control referring to what, Mr. Higgins? A. It is the Control person inside the ground, sir.
- Q. In Rotherham? A. No, the person, as I understand it, inside the ground.
- Q. It is suggested this, in fact, is the plan for the Control Room --- A. I am sorry, sir, I misunderstood. The Control Unit would initiate this plan, yes.
- Q. Exactly and your part of it, of course, is that you are the person who the Control Room should contact in the event of a major incident at Hillsborough. A. Yes, sir.
- Q. By means of the very helpful arrangement you came to with Mr. Smith, you in fact are already on the scene and therefore the first five stages of this plan have been achieved by the very fact of your presence at the ground. A. Yes, sir.
- Q. And when you attended the Semi-Final, Mr. Higgins, you spoke to Mr. Sewell who was the Liaison Officer between the Police and the Ambulance Service. A. Yes, sir.
- Q. In the event of a major incident, Mr. Higgins, who is it that is responsible for co-ordinating the services?
A. The Police, as I understand it, sir.

/You were in charge....