

A. HOPKINS

ALAN HOPKINS Called

Examined by MR. PHILLIPS:

- Q. Are you Alan Hopkins? - A. That is correct.
- Q. Are you the Deputy Chief Metropolitan Ambulance Officer for South Yorkshire? - A. That is correct.
- Q. You have been in the City Ambulance Service in Sheffield since 1967. Is that right? - A. That is correct sir.
- Q. I want to ask you first about a meeting you had on the 9th August 1988. Do you have before you a bundle of documents which is the core bundle, the large bundle of documents. Would you turn to page 477 please. That is a memorandum in fact from Inspector Sewell to the Chief Superintendent Mr. Mole and it refers to a meeting chaired by Superintendent Murray, attended by Superintendent Marshall, Mr. Beale, Mr. Sewell and yourself? - A. That is correct.
- Q. And Mr. Jones I think also who is an Assistant Chief Ambulance Officer? - A. Yes, that is correct.
- Q. I think with two men, one person also from the Fire Brigade. Now what was the purpose of this meeting from your point of view? - A. The purpose of the meeting was the departure of the Superintendent and the Ground Liaison Officer and the introduction of Mr. Murray and Mr. Sewell who were taking responsibility for the ground and liaison of the ground and it was a meeting of introduction and to assure one another that the plan which had been agreed previously was still workable and would remain operational.
- Q. Mr. Sewell was taking over from Mr. Calvert I think? - A. That is correct, yes.
- Q. You went through, did you, the system that was in operation so far as it affected the Ambulance Service? - A. Yes we did. As I recall on the day the document relating to it on the Police side could not be found because in fact Mr. Calvert we were told had either misplaced it or took it with him but they had seen it and would get it.
- Q. Is this document you are referring to the one at page 322 in the bundle and 323, then 324. Are these the documents you mean? - A. I think 324 is the one which is specifically to Sheffield Wednesday Football Ground because that was the ground we were talking about on this occasion with Hammerton Road.
- Q. Had you in fact had other meetings in relation to other football stadia in South Yorkshire? - A. Yes, we had.
- Q. But with a different division, of course? - A. The person responsible for the liaison with all the Football Clubs

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in South Yorkshire had been delegated by the Chief Metropolitan Ambulance Officer to a Mr. Wilkinson his Staff Officer.

- Q. Were you able to supply the Police with a further copy of this plan? - A. I did not think that was necessary because in fact the Police acknowledged the document but had merely misplaced the file on that occasion. I think one was offered but we were reassured that the document was in existence and they knew it was in existence.

/Q. Did you go through .....

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- Q. Did you go through it with them, the plan? - A. I don't recall that. I don't recall particularly going through it item by item, no.
- Q. You mentioned some of the matters, because we see a note on page 477 that you were talking about the Senior Ambulance Officer to make his way to the gymnasium to direct operations, which corresponds with the emergency plan that we have? - A. That is correct, yes.
- Q. What was the system then as far as ambulance personnel was concerned at Sheffield Wednesday? - A. The system goes back quite some time in that it was felt prudent by the Police to have an ambulance attendance around the ground particularly, and we felt it prudent in that the streets become quite congested, and traffic movement from both sides of the city can cause some delays, particularly when responding to emergencies, and it was prudent in the sense we were there if needed, and vehicles at that side of the city could very quickly respond to emergencies at that side of the city.
- Q. So the Police really wanted the ambulance to attend, and you wanted it as well, and we understand you used to have two tickets for all home matches? - A. I think that was the arrangement they came to, yes.
- Q. There is nothing in fact in this memorandum of August 1988 that I have seen that refers to Semi-Finals and big events like that? What was the system as far as you were aware? - A. As I understood it, and it is my personal understanding, it was that the Semi-Final was under the jurisdiction of the Football Association, and it was definitely implied that Sheffield Wednesday had no say in the matter. That was my understanding of it.
- Q. Who told you this? - A. I have thought about this information, and I can't recall where it from, the seat of it, but I am absolutely sure that it was raised at one of the meetings.
- Q. Semi-Final matches in your view would they be more the sort of events that would more require the attendance of an ambulance? - A. One could assume that, yes.
- Q. What did you personally do about the situation? - A. Operationally it did not concern me greatly in fact because in the event of not having access to the ground we could revert to our original status and position vehicles very close to the ground, namely Herries Road bus garages, and be in a position to respond to any emergency.
- Q. Did you make any arrangement with the Police for them to see to it that two of your men were at the ground? - A. Personally, no.
- Q. We understand that Mr. Higgins and Mr. Eason were attending in their own time. Did you think that was a good idea? - A. Yes. If I attended I would be attending in my own time. I am a

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member of staff. I am an Officer and a senior Officer, and where I choose to go and investigate what our service is doing, I had the authority to do it.

- Q. So you did not ask for the facility to attend with tickets, with seats, on a Semi-Final? - A. Me personally, no.
- Q. Did anybody to your knowledge? - A. Having listened to what was said this morning I can imagine Mr. Higgins did. I am not sure about Mr. Wilkinson, the previous Staff Officer.
- Q. If you had not had this arrangement which he spoke of which seems to have been arrived at between Mr. Higgins and Inspector Sewell for them to attend, would you have wanted to do any more about it, take any further steps? - A. Not really, no.
- Q. Did you think it would be appropriate to go to the FA, for example, and insist upon tickets? - A. Not really, no.
- Q. Why not? - A. The Ambulance Service has no statutory powers of presence anywhere, and if someone chooses to invite us then the Chief Officer's policy is we will accommodate. Where they are not inviting us, if we think it is prudent to have an input into that, whatever it may be, then we will put that input in or around, not necessarily on private property, but we will certainly get something near on.
- Q. So you would have been quite content to have had ambulances sitting outside on Penistone Road? - A. I would have been perfectly happy, yes.
- Q. How would you know what was going on in the ground? - A. There are various means of communication. Long before this arrangement was arrived at communication was maintained between South Yorkshire Police and the Ambulance Service even when we were at the Herries Road bus garages, because we used to interchange radios.
- Q. They could speak to you directly by radio. Is that what you are saying? - A. Radio or telephone or whatever.
- Q. There was some discussion about whether the Ambulance Officers should be placed when they were there, was there not? The note says it was considered he would be better based in the North Stand so he could get to the gymnasium without problem. This is the bottom paragraph, page 477, but that the club only wanted to give them tickets for the South Stand? - A. I am not aware of that, quite honestly. I read it and I agree with what you are saying, but it is not a copy of a minute I personally had sent. It has only come to light since this investigation has been going on.
- Q. But you were at the meeting? - A. Yes, I was at the meeting, but I am not conscious of the fact that that conversation took place. It may well have, but I can't recall it.

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- Q. One final matter on that. Can you recall this, that there was reference made to Police Tango units being specifically detailed to assist you in the event of a major disaster? - A. Yes, I do recall that.
- Q. And that these orders would be specifically written into the serial orders? That is the very last item on page 478? - A. I do recall the question of serials being deployed to assist in the event of. I definitely recall that.
- Q. Did you think it would help if you had received a copy of the relevant part of the Force Order if such arrangements were made? - A. Yes, I would have thought so.
- Q. Did you in fact receive any such copy? - A. Not to my knowledge.
- Q. Because you would be concerned with the routes you would take both to and from the ground, would not you? - A. I would be extremely concerned about the exit routes from the ground with casualties, yes.
- Q. And you would have to go to particular hospitals if you had casualties, would you not? - A. We go to the nearest hospital offering the facility initially.
- Q. Would you have wanted to be consulted over the assistance that the Tango or mobile units would provide to you? - A. I could imagine what assistance they would provide, and that would be to ensure clear access en route to the hospitals which were designated.
- Q. What I am asking you is whether you would be assisted to have been consulted over that before such instructions were drawn up? - A. I think the fact we were at the meeting and it was discussed, I would assume that would be consultation. The fact that we never received a copy of the letter to my knowledge is probably disadvantageous to us as an organisation.
- Q. So far as you were aware were the Police Officers who attended that meeting aware of first the use of the gymnasium as the casualty station? - A. I certainly was. There was no doubt in anybody's mind in the room where the clearing station was going to be.
- Q. And the need to keep the access to that station clear? - A. Yes.
- Q. So that ambulances could go in and come out? - A. That is correct.
- Q. I want to take you now to the day of the event itself. You, I think, after various journeys were in control just after 3 o'clock. Is that right? - A. Yes.

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- Q. You had previously heard at half-past-2 from Eason and Higgins that they were all right and they were at the ground?  
- A. Yes.
- Q. This is paragraph 13. You saw the Police line light up in the control just after 6-minutes-past-3? - A. That is correct.
- Q. And you overheard a conversation between Mr. Clarke and the Police operations room? - A. That is correct, sir.
- Q. And you then took it on yourself straight away to get in touch with the ambulance at Middlewood? - A. That is correct, sir.
- Q. And this was at 15.08-41 as has just been put? - A. Correct, sir.
- Q. Did you then see Mr. Morley? He is an Assistant Divisional Officer, is he? - A. Yes, he is.
- Q. And he came in the Range Rover. I think you went off down to the ground with him straight away? - A. I did, sir, yes.
- Q. At that stage had you had from Mr. Higgins or Mr. Eason at the ground? - A. I had been in the control room when they both indicated they were leaving base for the ground, and I think I had been in the control room when they both radioed saying they had arrived at the ground.
- Q. You overheard radio traffic on the way down to the ground, so you would know that ambulances were going to Leppings Lane as well as to Penistone Road, would you? - A. My main objective in leaving the control room was the message, "A fleet of ambulances to the Leppings Lane end of the ground". It was well within my knowledge that ambulances cannot gain access to the Leppings Lane end of the ground and I was somewhat confused as to why that request had been made, when in fact I was also well aware that the Leppings Lane entrance was no good to us. In fact the only entrance which was suitable for ambulance transport was the Penistone Road entrance, the agreed entrance against the gymnasium.
- Q. That is true if you want to get an ambulance into the yard behind the turnstiles, is not it, but an ambulance can go through the outer perimeter gates and round the back of the riverside road, can't it, and indeed many of them did? - A. You are talking about the service road, sir, yes.
- Q. Yes. - A. That is correct.
- Q. In fact, we know ambulances picked up people just outside Gate C and went off down the service road to take them away? - A. That is correct, sir.
- Q. What is the problem then with that? - A. The problem was for me that I was sat in a control room at Rotherham, and I was not aware what was going off at the ground, but knew something was going off, and it was in our interest to find out what was

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going off and get resources in there to accommodate it.

- Q. So you wanted to go down there, but you said you were concerned about the ambulances going to Leppings Lane? - A. That did give me some concern, yes, sir.
- Q. So you were, I think, on your trip down to the ground kept in contact with control, did you not? - A. Yes, sir.
- Q. And asked for other ambulances to be sent? - A. I asked for all vehicles to be made available.
- Q. You got there we know at 3.23 and parked the Range Rover at the Penistone Road end. Is that right? - A. Yes, sir.
- Q. And then did you go on to the pitch? - A. I did, sir, yes.
- Q. Did you meet up with Station Officer Higgins when you got to the ground? - A. Yes, I did, sir.

/Q. Did you go and get in touch....

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- Q. Did you go and get in touch with the senior Police Officer?  
A. No, I didn't, sir.
- Q. Did you know where the Control Box was? A. The Police Control Box, sir?
- Q. Yes. A. Yes, I know where it was, yes, sir.
- Q. Did you go to that box, or try to go to that box?  
A. No, sir.
- Q. Or send anybody? A. No, sir.
- Q. Why is that? A. Well, the agreed point for a major evacuation of Hillsborough is between the Stand and the gymnasium.
- Q. So you would have expected to see a senior Police Officer there? A. I would have, yes, sir.
- Q. And there was not one? A. Well, I did not see one, sir.
- Q. Did you then go on to the pitch? A. Yes, sir.
- Q. What was your object in going on to the pitch?  
A. I wanted to establish just exactly what was happening.
- Q. What did you see when you got on to the pitch? A. Very little, actually, other than a line of Police Officers across the pitch which necessitated me going across to go through them to see what was going on at the other side of them.
- Q. Did you manage that? A. Yes, I did, and when I got through it the scenes were quite horrendous; it was a battlefield and I stayed for seconds and in my mind was that the ambulances were at the wrong end of the ground, the Penistone Road end. That was going through my mind, so I ran back.
- Q. You, of course, were there to direct operations on the part of the Ambulance Service, not to give individual assistance to people; is that right? A. Well, I was the senior officer there and therefore it was my job to organise the Service response in the best possible manner.
- Q. But you did not get as far as the rear of the West Stand, did you? A. The ---?
- Q. The rear of the West Stand, the Leppings Lane end of the ground? A. No, I never went near there, sir.
- Q. So you do not know what was going on in the yard?  
A. That is perfectly true, sir.
- Q. Did you get any information from Ambulance Officers at the Leppings Lane turnstiles, what they were doing?



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A. I got information a little later about casualties at Leppings Lane end and deceased at Leppings Lane end of the ground.

- Q. What was your means of communication at the ground itself with other Officers? A. Verbal.
- Q. Speaking to them directly? A. Yes.
- Q. Could you not use any other form of radio or anything like that? A. You could use radios on talk-through but, I mean, it is not an ideal situation. I think when you take charge of an incident, we were virtually operating in a given area - an agreed area - so communication did not become a problem.
- Q. So now I think you went back to the gymnasium end and you spoke to Control and asked for the major accident vehicle. A. Yes, I did.
- Q. You very kindly supplied this morning a list of the equipment which is carried -- an inventory of equipment carried by this vehicle. I do not want to go into it all but I do notice one of the things that it carries are bolt-crops and saws. A. That is correct.
- Q. Is this in fact confined to the major accident vehicle or do other ambulances carry them? A. No, not at all. Emergency vehicles have what we call a breaking-in kit which includes small bolt-croppers and saws and rope and gloves.
- Q. Do ordinary ambulances have these? A. What do you mean by ordinary ambulances?
- Q. An ambulance from the County Ambulance Service, does it have --- A. An emergency County ambulance carries a breaking-in kit.
- Q. So the ambulance that Mr. Higgins had brought to the ground, would that have this breaking-in kit? A. It would have had a kit, yes, sir.
- Q. LORD JUSTICE TAYLOR: I do not know - you have seen the fencing, have you, at the Leppings Lane end? A. Yes, my Lord. Yes.
- Q. I do not know what your bolt-croppers and saws were able to deal with. Would they have been able to deal with that? Cut the wire or ---? A. I think the big ones may have done. The ones that were carried on the ambulance would probably have had problems. The major incident - the large gauge - one would probably have cut it but ---
- Q. Can I get it clear? The ambulance which was standing by at the ground which Mr. Higgins had had some equipment of this kind but are you saying that would not have worked on this wiring, or what? A. I think the equipment carried

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on an emergency ambulance, my Lord, is equipment for gaining access to properties rather than breaking down security fences, and that is basically what it is on the ambulance for, for gaining access to property, really, when someone has collapsed inside.

- Q. It comes to this - it might have worked but it was not designed for that, does it? A. My impression would be I would be doubtful on whether it would have, in fact, fulfilled that role.

MR. PHILLIPS: Perhaps we can get round that, sir, if I ask for a set of these bolt-crops to be provided and we can have them looked at to see whether they would.

LORD JUSTICE TAYLOR: Yes.

- Q. MR. PHILLIPS: You then ask for the major accident vehicle to be brought to the ground. A. To be despatched, yes, sir.
- Q. By the time you got back to the Penistone Road end you clearly had the idea that this was a very serious matter. A. There was no doubt in my mind it was a serious matter, sir.
- Q. And you did then everything you could to get everybody there that you wanted. You saw, I think, some St. John's people, did you at the gymnasium? A. I saw a group of St. John's Cadets, sir. My initial reaction was to utilise them but they were quite distressed children, really, and not in a position to be utilised on what I wanted doing.
- Q. Now, you went into the gymnasium, I think. A. Yes, sir.
- Q. Did you see anybody in charge there from the Police? When you first went in? I am looking at Paragraph 22 of your statement. A. I didn't see anybody at that time, sir.
- Q. You describe the situation as chaos. A. That's right, sir.
- Q. Did you try to do anything to bring order to the chaos? A. Not really, sir. The main concern I had was getting resources to the ground to remove what I had seen on the pitch. At the time I came off the pitch I was conscious of two things - (1) that at that moment in time I hadn't the resources to remove the casualties from the pitch, and I was conscious of the fact that the people on the Penistone Road end of the ground seemed to have a total unawareness of what was going on at the other end of the ground and there was still quite a lot of clapping and chanting as I came off. My immediate reaction was to get an ambulance on to the pitch. That was the forefront of my mind, mainly, yes, to deal with casualties but so the rest of the people -- to bring home to them that something

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serious had happened at the other end of the ground.

- Q. A St. John's ambulance had gone on to the pitch, had it not? A. With hindsight, yes, sir, but I wasn't aware of that at the time.
- Q. You did not see it when you were there? A. I know it was there, looking at the video, but I was not conscious of the fact that it was there.
- Q. When you were outside the gymnasium, did you have any problems with vehicles? A. There was quite a lot of vehicles there, sir, yes.
- Q. Did it make any difference to the use to which you could put your ambulances, because by that time you would have had some attend at that end of the ground, would you not? A. Yes, we did. It caused us to reverse in, which is negligible, really.
- Q. You also mention horses. A. There were some horses there, yes, sir.
- Q. You see, Inspector Hand-Davies said that they had gone before the first ambulance arrived. Is it your recollection that they were still there when the ambulances arrived? A. I know they were there when I arrived, sir.
- Q. You were not in an ambulance, you were in a Range-Rover. A. Well, they were there when the ambulances arrived as well, sir.
- Q. I see. I think Mr. Beevers and Mr. Edwards came in an ambulance and you wanted to get them on to the pitch; that is right, is it not? A. Yes, sir.
- Q. And you also got Mr. Morley lining up ambulances outside? A. That is correct, sir.
- Q. Did you send an ambulance on to the pitch driven by Mr. Wadsworth? A. Yes, I did, sir.
- Q. I think that went on to the pitch. Did you see the St. John's ambulance coming off the pitch? A. Yes, I did, sir. We were, in fact, trying to get one on at the top of the slope and there was a problem there which, frankly, surprised me because I had not seen it before and there was a ramp running down the side of the Stand on a large block of concrete at the bottom of it.
- Q. That leads to the disabled area, the Westfield enclosure, I think, in the North Stand, does it not? A. Yes, but I had never seen it before, sir, and my ambulance came in on a left-hand lock and the moment he hit the concrete his body on the other side went over on to the gate-post. You could not negotiate the gate-post unless you came at it straight and we were attempting to push the vehicle off the top gate-post when the St. John's came out, trying to

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come off the pitch at the bottom and his bumper was fast on the stanchion holding the perimeter railing up and I recall he had a couple of runs at it and bounced off it again and then had a real run at it and came off it minus his number-plate and I think some damage to his bumper.

LORD JUSTICE TAYLOR: Can we see this?

MR. KALLIPETIS: Sir, if I may, I think these photographs are easier to demonstrate what Mr. Hopkins is talking about.

LORD JUSTICE TAYLOR: Are these some new ones?

MR. KALLIPETIS: Sir, yes. (Handed)

MR. PHILLIPS: I have not got them but do they help, sir?

LORD JUSTICE TAYLOR: I think they may do, yes, because they look at it from the top of the ramp whereas the photographs we have got I think look at it from the bottom.

Q. MR. PHILLIPS: Yes. Can you just perhaps point to the particular post that you say the ambulance was getting caught on? We can see the ramp there. A. It was the gate and the post, sir.

Q. On the left-hand side of the large photograph? A. Yes. We were having to come in and turn sharp left and the moment the front wheel hit the concrete nodule, it threw the ambulance across on to the pillar - both ambulances that went on to the pitch - sort of identical damage.

Q. LORD JUSTICE TAYLOR: The bit of lighter coloured concrete on the right is a rise, is it? A. My Lord, I think the concrete is to accommodate the ramp.

Q. MR. PHILLIPS: So it is the thin end of the ramp, is it? A. I don't know what one calls it, but ---

Q. LORD JUSTICE TAYLOR: You are talking about coming in past where you are standing there. A. Yes, sir.

Q. Turning left. A. Turning left in.

Q. And the right-hand front wheel goes up, does it? A. Up on to the concrete, sir, and throws the offside on to the gate-post.

Q. MR. PHILLIPS: Was that the same gate-post that the St. John's ambulance got stuck on? A. Yes, but --- No, no, he was at the bottom of the ramp trying to come off. There are some angles holding the perimeter fence. He had come down and tried to turn right up the ramp and got fast.

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- Q. You had not seen that before, you say? A. No, I hadn't.
- Q. When had you last been to the ground? A. I went to the ground the year before merely on a courtesy visit because Officers were on duty there and I wasn't conscious of it then, and I was quite surprised.
- Q. LORD JUSTICE TAYLOR: Had anybody actually tried driving an ambulance in there before, do you know?  
A. No, sir. I am sorry, before the ramp, my Lord?
- Q. MR. PHILLIPS: Yes, before the ramp was put on. Do you know if an ambulance had been sent through on any earlier occasion? A. No, I don't, sir.
- Q. Well now, these two or three of your ambulances went on to the pitch, did they not? A. Yes, sir.
- Q. I think you then came into contact with Mr. Hornsby, the Assistant Chief Fire Officer. A. That is correct, sir.
- Q. Can you say what time that was? Paragraph 30 of your statement, you just sent a couple of ambulances down to the pitch. How long had you been there before you spoke - perhaps you can remember it that way - how long had you been there when you spoke to Mr. Hornsby? A. I think possibly around 15.44 I spoke to Hornsby.
- Q. By then you still had not spoken to a senior Police Officer? A. Bearing in mind, sir, I hadn't been back to the gymnasium and I hadn't seen one in the area where I was working.
- Q. But you had been in the vicinity of the gymnasium, had you not? A. Yes, sir, I was there all the time.
- Q. In the yard, sending ambulances to the pitch and getting people sorted out into ambulances? A. Yes, sir.
- Q. And I think you gave various other instructions and the major incident vehicle arrived. That was about 15.45, was it? A. Yes, sir.
- Q. And then you started to use the body-bags which had been provided with that ambulance, is that right? A. Yes---
- Q. You tell us then that ---
- Q. LORD JUSTICE TAYLOR: I am sorry, did you want to say something? A. I thought around that time, sir, I went into the gymnasium and met Chief Superintendent Addis.

/MR. PHILLIPS: I am...

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- MS/R1:
- Q. I am coming to that. That is paragraph 36 of your statement. You say that you met Chief Superintendent Addis. Again can you give us a clue as to what time that would be? A. About 1550, sir.
- Q. So you had been there 25 minutes anyway before you saw a senior police officer? A. Well, he was the only one I recognised. I hadn't seen anybody else I recognised.
- Q. Did you get any further information from Mr. Addis over and above what you already knew from your own observations? A. Chief Superintendent Addis seemed to have taken charge of the deceased side of the gymnasium, and that's what one would expect. He seemed to be sorting things out in there.
- Q. Yes. A. With a view to ---
- Q. I think he had been in touch with the Coroner, had he not? A. I think he gave me the impression that they had been in touch either with the Coroner or the Coroner's Office.
- Q. Yes. A. And that he would let me know as soon as he got some detail.
- Q. I think you finally managed to get all the injured away from the ground by half-past-4? A. Yes.
- Q. During this time when you had been engaged at the gymnasium end of the ground, until seeing Mr. Addis and shortly afterwards, did you become aware at that stage of what had been going on at the Leppings Lane end, the turnstile end? A. I think the first time I became aware of what had gone on at Leppings Lane end in its entirety was much later that night. Mr. Jones, the Assistant Chief Officer (Operations) came to me at the ground and informed me that he had gone to that end of the ground, been directed to that end of the ground, and that there were casualties there and that there were in fact a number of bodies round there, which frankly ---
- Q. But you had not known about this at the time and you were at the ground, at the gymnasium? A. I hadn't known about it.
- Q. Had you expected, first of all, anyone to tell you about what was going on at Leppings Lane end? A. To be perfectly honest, sir, I had enough on my plate in the ground and at the Penistone Road end. I was not really concerned about Leppings Lane end, and that is exactly as it was. I probably never gave it a thought.
- Q. But, of course, you had been told right from the beginning that ambulances were to be sent there? A. That's right, sir.
- Q. And you are saying that that really went out of your mind, did it? A. When I saw what I saw on the ground, my 100 per cent attention was given to the evacuation of what

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I saw on the ground. To be perfectly honest, until Mr. Jones came to me, I don't think Leppings Lane entered my head whatever until he told me what was round there, and then it did.

Mr. PHILLIPS: Thank you very much, Mr. Hopkins.

Cross-examined by Mr. GLASGOW:

- Q. Mr. Hopkins, did it ever occur to you that the arrangements which you had for dealing with an incident at Hillsborough were unsatisfactory in any way? A. A major incident, no.
- Q. No. Were you aware of the fact that it had become the Ambulance Service's policy to have two of its ambulance officers at the ground for all games? A. Was I aware of that?
- Q. Yes. A. Yes, sir.
- Q. You knew that? A. Yes, sir.
- Q. And the only difference between League games and semi-finals, so far as you were aware, was that at League games they would have their complimentary tickets in the Stand and at semi-finals they would not? A. That was my understanding.
- Q. That was your understanding. Did that, to your mind, produce anything that was unsatisfactory from the Ambulance point of view? A. Only that if we haven't got officers in the ground then, we are reliant on somebody else telling us what to do or what is happening, and on this occasion I personally felt from a Service point of view that the analysis of a situation is best done by your own officers who are aware of what is going on and what resources are required to overcome what is going on.
- Q. The important thing from your point of view was to have at least two of your officers at the ground? A. To me, yes, because my experience tells me that if one relies on other organisations, they tend to look at their point of view and not other people's.
- Q. But once it had become a matter of established policy that there were two ambulance officers at the ground for every game, wherever they were, how did the emergency plan that we see at 324 operate? What was the relevance of it? If you take 324, can we go through it line by line? We are now talking about, in rough terms, the last three years during which it has been established practice to have officers at the ground for all games, wherever they may be. Now, first of all, (1) does not apply, does it? You do not have to despatch a crew to the location to establish the nature of the incident, because they are already there? A. That's correct.
- Q. (2) does not apply, does it, because you do not have to contact Station Officer Higgins because he is already there? A. That's correct, sir.

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- Q. (3) does not apply? You do not have to despatch a number of available crews to the bus depot? A. That's correct.
- Q. And (4) does not apply because the duty officer will already have been notified, will he? A. Possibly, yes.
- Q. And (5) does not apply because on arrival at the ground Station Officer Higgins does not have to do anything because he is already there - correct? A. That's correct, sir.
- Q. Does (6) affect anything that the officers at the ground have got to do? A. Well, as it says, "Station Officer to update control."
- Q. Does that mean that the officer at the ground has then got to update Control when he knows what is going on? A. Yes, sir.
- Q. And he is already there, as we know? A. Yes, sir.
- Q. (7) is dealing with extra crews available for stand-by. Is that something that is done by Control in any event once the incident has been declared? A. Based on the update, Control may decide to move additional resources into the area.
- Q. Once this set of rules, or whatever they are, is no longer material because the first five have been complied with, what instructions are given to the liaison officers on the ground as to the steps that they should take to deal with the incident once they are there? A. Well, if they are on the ground, sir, the liaison officer is the eyes and ears of the Ambulance Service. These rules would come into effect in the event of the liaison officer not being in the ground.
- Q. Did nobody think, during the three years preceding this incident, to agree with either the Club or the Police or anybody else that "Now that we have established the policy that there will be officers at the ground for all games, it might be a good idea to re-write the Rule Book when the first five principles out of eight do not apply any more"? A. I'm not sure what difference re-writing the Rule Book would make, quite honestly.
- Q. You just do not think it would have mattered? A. In this event, no.
- Q. LORD JUSTICE TAYLOR: Were the Club aware of the arrangement that had been made by the Police for the two officers to stand at the corner by the Kop? A. I have no idea, sir. The co-ordinating body for that is the Police.
- Q. Mr. GLASGOW: Your Service would have preferred to have them in the North Stand, I think? You told the Police that at your meeting with them. We can see it on page 477. You would have preferred your officers to have been in the North Stand? A. I recall that.



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- Q. Did anybody tell the Club that? A. The co-ordination point between the Club and the emergency services is the Police.
- Q. But did anybody in the Ambulance Service at all get in touch formally with the Club officials to tell them what was going on and what was expected of them, or was this left to the arrangement that we heard about this morning with the physiotherapist for taking a team player away? A. I don't know.
- Q. The whole purpose of the meeting which you attended, the note of which is at page 477, was to update the incoming police liaison officers as to the arrangements with the Ambulance Service, and we see from the last few lines of 477 that the only arrangement there was with complimentary tickets was, in the words of the writer of this memo, "Service for use in the South Stand so that the Club physio., Alan Smith, can signal straight away to the Ambulance Officer if an ambulance is required for a Wednesday player". Now, I ask again, was anything said by the Ambulance Service to the Club officials, as distinct from the man responsible for physiotherapy for the players, as to the arrangements that they were expected to co-operate with? A. I am of the belief that the Chief Metropolitan Ambulance Officer wrote to the Club. The content of the letter I am not privy to.

Mr. GLASGOW: Then we will ask him. Thank you very much.

Cross-examined by Mr. WOODWARD:

- Q. Mr. Hopkins, I think you said that the eyes and ears of the Ambulance Service would be their liaison officers? A. Yes.
- Q. Their liaison officers at the ground? A. Yes, that's right.
- Q. So is it the position that when anything occurred which necessitated the attendance of the Ambulance Service at the ground, you would have expected contact to be made with the liaison officers? A. Not necessarily, sir.
- Q. But that would be one of the first points of call, perhaps, for you? A. It is a possibility but it's not necessarily the way it would happen.
- Q. You do not recall, do you, on this day having any particular contact with either of your liaison officers, do you? A. Do I recall it?
- Q. Yes. A. I know I did have contact with the liaison officers.
- Q. But your recollection of it is very hazy? A. Yes, I will admit to that, sir.

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- Q. Are you able to say when it was, roughly? A. I had contact with one of the liaison officers the moment I arrived at the ground and while I was running across the ground.
- Q. Was that with Mr. Higgins or with Mr. Eason? A. That was Mr. Eason.
- Q. You knew where the Police Control was? A. That's correct, sir.
- Q. At any stage did you receive from SYMAS a request to go to the Police Control? A. I think there was a request for a senior officer to go to the Police Control.
- Q. Do you remember when that happened? A. No, I don't.
- Q. Did you respond to that? A. No.
- Q. LORD JUSTICE TAYLOR: Request from whom? A. I think the request, sir, was from the Police, for a Senior Ambulance Officer to go to Police Control.
- Q. Was this whilst you were at the ground? A. I learnt of it after, sir, not whilst I was there.
- Q. MR. WOODWARD: A request obviously, you say, coming from the Police in origin, but do you know how it was communicated to anybody? A. No, I don't.
- Q. Of course, you say that you did not observe any senior Police Officers? A. No, I didn't.
- Q. There came a point when your attention and your sole endeavour was a preoccupation with making your own arrangements? A. To remove the injured.
- Q. Yes. A. Yes, sir, that's right.
- Q. If you had wanted to make communication with senior police officers, was there anything to have prevented yourself or sending one of your men as a runner to the Control Room? A. There was nothing to prevent me doing it, sir, no.
- Q. May I ask you if you made any endeavour? A. Well, no, I didn't, sir, because I was at the recognised area for removal of casualties.
- Q. And were you able to do what you wanted to do and fulfil your function there? A. Certainly, yes. I was never conscious of a great deal of problem.
- Q. There were no problems and you were not in any way inhibited from getting on with what you needed to do? A. I wasn't conscious of any problems inhibiting me from doing what I wanted to do, no.
- Q. I think it would follow that if you had been, you would have dealt with it? A. I would, yes.

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- Q. May I ask you just about the problems of access that you have mentioned. I think you said that ambulances were in fact able to get in and out? A. We were able to reverse two or three ambulances in at any one time.
- Q. You were? A. There were a number of vehicles in the yard which were Police vehicles, but one understood why they were there.
- Q. Are you saying, in fact, that their presence was an inconvenience but it did not really prevent you getting on with the job? A. No, it didn't.
- Q. And if you had wanted them to be removed, you would have taken some steps? A. Well, we did eventually get them moved, sir.
- Q. And they were moved as you requested? A. Yes, sir.
- Q. The horses that you have spoken about were no problem for you, were they? A. I acknowledged their presence. They did not give me a problem as such.
- Q. I imagine you are talking about horses with men upon them, are you? A. Yes, sir.
- Q. And if you wanted a horse moved, it would have been a simple job to get it done? A. Yes, sir.
- Q. And although you have mentioned horses, you are not suggesting that the vehicles there or the horses were really an impediment to getting your job done? A. They didn't stop us doing the job, sir.
- Q. Thank you. Is it right that you did not in fact have any conversation with any of the men on the horses? A. I have a recollection --- I don't think I did, no. One spoke to me as I got to the ground, but I didn't have any conversations with them regarding the incident.
- Q. May I ask you about one further matter. Bolt croppers or equipment on the ambulances have been referred to. I think three of your ambulances actually went out on to the pitch? A. There were three ultimately, yes, sir.
- Q. What equipment is it that you have in mind on the ambulance ---
- Mr. KALLIPETIS: Sir, if it helps, I am having them brought here.
- LORD JUSTICE TAYLOR: Thank you.
- Q. Mr. WOODWARD: Are you aware of any of the equipment having been used? A. No, I'm not aware of it, sir.
- Q. It would follow, would it, that your experienced ambulance-men, if they thought they had got any tackle on board that could have helped, would have soon had it out? A. I think they would have used it, sir, yes.

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Mr. WOODWARD: Thank you.

Cross-examined by Mr. KALLIPETIS:

Q. Mr. Hopkins, you were asked about your recollection of the events of that day. What time did you come on duty?

A. About half-past-11, sir.

Q. Is it right that you stayed at the ground and eventually came off duty at half-past-5 the following morning?

A. There was a break in between, sir, but I actually finished at 5.30 on Sunday morning.

Q. You were asked about the meeting in August, 1988 - page 477 of the bundle which I think is in front of you?

A. Yes, sir.

Q. Just so that we understand the purpose of that meeting and who was there, Mr. Hopkins, will you just turn to it?

Q. LORD JUSTICE TAYLOR: Where are you now?

Mr. KALLIPETIS: Page 477, sir.

Q. Present were Ambulance, Police and Fire Service? A. Yes, sir.

Q. It was an update between those three Services of the plans that had been made in 1986? A. Yes, sir.

Q. And also as a result of a change of liaison officers and senior officers on the Police side? A. Yes, sir.

Q. Present was Superintendent Murray, Superintendent Marshall, Chief Inspector Beale and Inspector Sewell from the Police? A. Yes, sir.

Q. Yourself and Mr. Jones? A. Yes.

Q. And a Fire Officer? A. Yes, sir.

Q. At that meeting, Mr. Hopkins, is it right that all three Services were made aware of the arrangement about home matches? A. Yes, sir.

Q. And also that the contingency plan would be as set out in that memo, namely that the Herries Road bus depot would be used for the rendezvous of ambulances - is that right? A. Yes, sir.

Q. The Senior Ambulance Officers already at the ground would control the ambulance vehicles in and out of the football stadium? A. Yes, sir.

/Q. That the senior officer ...