

<p>1 (1.45 pm)</p> <p>2 IN THE PRESENCE OF THE JURY</p> <p>3 Examination by MS RICHARDS</p> <p>4 MS RICHARDS: Mr Edmundson, my name is Jenni Richards and</p> <p>5 I ask questions on behalf of the Yorkshire Ambulance</p> <p>6 Service.</p> <p>7 A. Yes.</p> <p>8 Q. Mr Edmundson, it is right, isn't it, that pursuant to</p> <p>9 the South Yorkshire Police major incident plan, the</p> <p>10 police's responsibility is not simply getting other</p> <p>11 emergency services there to help, as I think it was put</p> <p>12 to you earlier in the questions, but to have the overall</p> <p>13 control and coordination of the emergency response?</p> <p>14 A. That's correct.</p> <p>15 Q. That will include, as, again, the plan itself makes</p> <p>16 clear, the communication of all confirmed information to</p> <p>17 the other emergency services?</p> <p>18 A. That's correct, yes.</p> <p>19 Q. If we could just look, please, at the conversation</p> <p>20 between Force Control and the police control box at</p> <p>21 14:59, it is page 1 of the Racial summary, if that could</p> <p>22 be put on screen, and which the jury have in hard copy</p> <p>23 form. Thank you.</p> <p>24 Just looking at the 14:59 conversation, this is</p> <p>25 a conversation that took place solely between</p> <p style="text-align: center;">Page 1</p>	<p>1 code word "Catastrophe"?</p> <p>2 A. That's correct.</p> <p>3 Q. Superintendent Clarke's response to PC Rook in this</p> <p>4 call, as we have seen, was that the ambulance service</p> <p>5 couldn't simply send a fleet of ambulances. You would</p> <p>6 accept, I am sure, Mr Edmundson, that the ambulance</p> <p>7 service has to maintain emergency cover for the entirety</p> <p>8 of the geographical area for which it has</p> <p>9 responsibility?</p> <p>10 A. Yes, I would.</p> <p>11 Q. It can't simply send all ambulances to a single location</p> <p>12 on the basis of a simple request from a police constable</p> <p>13 for a fleet of ambulances in the absence of some more</p> <p>14 detailed information or the use of terminology such as</p> <p>15 "major incident"?</p> <p>16 A. Well, it's not just any old police constable. I mean,</p> <p>17 the police constable in question is a very experienced</p> <p>18 control room operator, which the ambulance service will</p> <p>19 be well aware of, will know him probably by his first</p> <p>20 name, because we were in constant contact with the</p> <p>21 ambulance service, and I would have thought we would</p> <p>22 have had a better response than we had from the people</p> <p>23 in the ambulance service.</p> <p>24 Q. So although you didn't use the words "major incident",</p> <p>25 you didn't use the word "catastrophe", and you didn't</p> <p style="text-align: center;">Page 3</p>
<p>1 Force Control and the police control box, isn't it? The</p> <p>2 ambulance service was not a party to this conversation?</p> <p>3 A. That's correct.</p> <p>4 Q. The ambulance service would have had no knowledge of</p> <p>5 the concerns that you had arising out of the events of</p> <p>6 the preceding 20 minutes or so at the turnstiles, would</p> <p>7 they?</p> <p>8 A. No.</p> <p>9 Q. No step was taken, was it, at this stage to share any of</p> <p>10 those early concerns with the ambulance service?</p> <p>11 A. No, it wasn't.</p> <p>12 Q. So the first call that was made to the ambulance service</p> <p>13 was nine minutes later, at 15:08. Is that correct?</p> <p>14 A. Yes.</p> <p>15 Q. I'm sorry, if we could have the second page, suffix 2,</p> <p>16 so that you can see that. You have already been taken</p> <p>17 to this, Mr Edmundson. It is the call from PC Rook,</p> <p>18 where he refers to pushing and shoving.</p> <p>19 A. Yes.</p> <p>20 Q. Then the conversation migrates to a request for a fleet</p> <p>21 of ambulances.</p> <p>22 A. Yes.</p> <p>23 Q. You have accepted already, I think, that in this call,</p> <p>24 and indeed in subsequent calls, Force Control did not</p> <p>25 say to SYMAS that there was a major incident or use the</p> <p style="text-align: center;">Page 2</p>	<p>1 provide any information other than that which is set out</p> <p>2 in the transcript we can see, you think somehow the</p> <p>3 ambulance service should have nonetheless sent a fleet</p> <p>4 of ambulances to Hillsborough?</p> <p>5 A. Yes, particularly in light of the fact that they had an</p> <p>6 ambulance or two ambulances already there.</p> <p>7 Q. We will come on to what was actually there,</p> <p>8 Mr Edmundson, and your knowledge or lack of knowledge of</p> <p>9 that. But you accept, don't you, that other than what</p> <p>10 we see in this conversation, no more detailed</p> <p>11 information, and certainly none of the concerns that you</p> <p>12 had had at 14:59, were passed on to the ambulance</p> <p>13 service, were they?</p> <p>14 A. That's correct.</p> <p>15 Q. There was no follow-up by you or by PC Rook, whom you</p> <p>16 have described as a very experienced control room</p> <p>17 operator, or anyone else to Superintendent Clarke's</p> <p>18 explanation that he couldn't simply authorise the</p> <p>19 sending of a fleet of ambulances, was there?</p> <p>20 A. No.</p> <p>21 Q. You didn't grab the phone or do anything of that kind</p> <p>22 and speak to him yourself?</p> <p>23 A. No, I didn't.</p> <p>24 Q. Now, just in terms of your, I think, repeated answer to</p> <p>25 questions that have been put to you that SYMAS had</p> <p style="text-align: center;">Page 4</p>

<p>1 officers at the ground, you have confirmed, I think, in 2 your evidence already that you, yourself, had no 3 knowledge of the precise nature of the SYMAS presence at 4 Hillsborough on that day? 5 A. I had knowledge that they were there. I didn't know how 6 many, no. 7 Q. You didn't know how many ambulances? 8 A. No. 9 Q. You weren't aware there was simply one ambulance? 10 A. No. 11 Q. You didn't know how many officers? 12 A. No, I didn't. 13 Q. And you didn't know, as I think you have said earlier -- 14 in fact, I think you said you had no idea where they 15 would be inside the ground? 16 A. That's correct. 17 Q. So you wouldn't have known whether they were, for 18 example, at the Leppings Lane end or the Penistone Road 19 end or somewhere else within the stadium? 20 A. No, I wouldn't. 21 Q. In terms of the police presence, by contrast, you would 22 have known that there was a police control box within 23 the ground with access to CCTV imagery and an elevated 24 view? 25 A. Yes, I would.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. It is a discussion about Operation Support and the 2 sergeant asks: 3 "So you want as many bobbies down there as possible? 4 What's going off?" 5 Someone within Force Control, within your 6 responsibility, says: 7 "That's it in a nutshell. Well, shall we just say 8 mass fighting in lumps, I think is a good expression." 9 Do you see that? 10 A. Yes, I do. 11 Q. That is a clear indication that in the police mind, at 12 least in the Force Control mind, at 3.15 this was 13 a situation of public disorder? 14 A. It is, yes. 15 Q. So it is more than a little unfair, isn't it, to assert 16 that the ambulance service should have had a clear idea 17 of what is going on when the ample police resources have 18 not provided you with that information? 19 A. No, it is not unfair. If a police officer -- if it was 20 the same situation and I'd got a police officer at an 21 incident and somebody, say SYMAS, were asking us and 22 saying to us they wanted a lot of officers to the scene, 23 I would speak to that officer to see why. 24 Q. You have no idea, have you, Mr Edmundson, of what 25 practical communication difficulties there might have</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. You would have known that there were three match 2 commanders? 3 A. Yes. 4 Q. That there were in excess of 800 police officers at the 5 ground and some 300 to 400 in the vicinity? 6 A. Yes. 7 Q. You would agree, I'm sure, Mr Edmundson, that the SYMAS 8 presence at the ground -- four individuals and one 9 ambulance -- wasn't remotely comparable to the police 10 presence, was it? 11 A. No, it wasn't. 12 Q. Yet all those police resources clearly weren't 13 sufficient to provide you, in Force Control, with much 14 detailed information about what was happening, were 15 they? 16 A. No. 17 Q. Indeed, you still thought, at 3.15, that this was 18 a situation of public disorder? 19 A. Yes, I did. 20 Q. If we could perhaps just look at one page that we 21 haven't looked at in this transcript, it is page 8, 22 which I hope will go on screen for you, Mr Edmundson, 23 and if we could look at the second entry down, this is 24 a police sergeant, isn't it, to Force Control? 25 A. Yes, it is.</p> <p style="text-align: center;">Page 6</p>	<p>1 been on the day between SYMAS control and the officers 2 on the ground? 3 A. No, I have no idea. 4 Q. And you have no idea what the officers on the ground 5 were or were not able to see or what information they 6 had? 7 A. No. 8 Q. Just two final points. The request to the fire service 9 that was made for cutting equipment. That was a request 10 made to the fire service alone, wasn't it? It wasn't 11 a request made to SYMAS? 12 A. No, it was a request made to the fire service. 13 Q. In terms of liaison on the ground between the emergency 14 services, is this right, that you don't have any 15 information, yourself, about what liaison did or did not 16 take place? 17 A. That's correct. 18 Q. And you can't know what difficulties were experienced on 19 the ground in that respect or whose responsibility they 20 were? 21 A. That's correct. 22 MS RICHARDS: In that case, I won't ask you any further on 23 that subject. Thank you, Mr Edmundson. 24 25</p> <p style="text-align: center;">Page 8</p>

<p>1 Examination by MS BARTON</p> <p>2 MS BARTON: Mr Edmundson, my name is Fiona Barton and I ask</p> <p>3 questions on behalf of the current Chief Constable of</p> <p>4 South Yorkshire Police. I only have a few matters of</p> <p>5 clarification with you, if I may. First of all,</p> <p>6 Mr Weatherby, who asked questions a little earlier</p> <p>7 today, put his questions on the basis that you were the</p> <p>8 emergency planning officer for South Yorkshire Police.</p> <p>9 Were you in fact the emergency planning officer for</p> <p>10 South Yorkshire Police?</p> <p>11 A. I can't remember whether I actually had that title.</p> <p>12 I was responsible for the emergency planning of</p> <p>13 the police, yes.</p> <p>14 Q. The position in respect of policies and procedures is</p> <p>15 that they were drafted, weren't they, by the Operations</p> <p>16 Department of the police?</p> <p>17 A. Yes, of which I was a part.</p> <p>18 Q. But you were not solely responsible for drafting them?</p> <p>19 A. No.</p> <p>20 Q. You had a role on the emergency services liaison</p> <p>21 committee?</p> <p>22 A. I did.</p> <p>23 Q. That committee was a committee which, in 1989, was in</p> <p>24 its infancy; is that correct?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 9</p>	<p>1 control room is concerned, the coordination and control</p> <p>2 overall was in the hands of the police?</p> <p>3 A. That's correct.</p> <p>4 Q. In order to have effective coordination and control,</p> <p>5 would it be fair to say that it is necessary to have</p> <p>6 effective communication?</p> <p>7 A. That's correct.</p> <p>8 Q. Is it preferable, in the early stages of an incident,</p> <p>9 before all the emergency services have their senior</p> <p>10 personnel on the ground, to conduct the coordination and</p> <p>11 control through the command and control centres of</p> <p>12 the organisations concerned?</p> <p>13 A. Yes.</p> <p>14 Q. Just looking at what happened on the day, if I may,</p> <p>15 could we please have the jury turn up their black file</p> <p>16 at tab R, which is section 7 of the major incident plan.</p> <p>17 For the screen, it is SYP000012820010. This, as I think</p> <p>18 you will recognise, Mr Edmundson, is a summary of</p> <p>19 the duties of the Force Operations room; is that right?</p> <p>20 A. Yes, that's correct.</p> <p>21 Q. Can I take you to the four specific responsibilities of</p> <p>22 the operations room and just examine them briefly in the</p> <p>23 context of this incident. The first one is to ensure</p> <p>24 that necessary action is taken in respect of special</p> <p>25 safety measures demanded by the circumstances of</p> <p style="text-align: center;">Page 11</p>
<p>1 Q. The reason that the committee had been established was</p> <p>2 because, in part, it was recognised as a result of</p> <p>3 liaison and major incident exercises that improvements</p> <p>4 could be made at that time in the communications and</p> <p>5 cooperation between the emergency services; is that</p> <p>6 right?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. So there was a recognition before this incident on the</p> <p>9 part of all the emergency services involved that</p> <p>10 improvements could be made?</p> <p>11 A. That's correct.</p> <p>12 Q. The position is this, isn't it, that in April 1989, the</p> <p>13 policies and procedures which were being drafted were</p> <p>14 still in draft form insofar as they were going to be</p> <p>15 amended at that time?</p> <p>16 A. I can't remember.</p> <p>17 Q. I can deal with that, because we see in the minutes, for</p> <p>18 instance, that drafts were being circulated.</p> <p>19 A. Yes.</p> <p>20 Q. Turning now to the major incident plan in respect of</p> <p>21 South Yorkshire Police, the control room of South</p> <p>22 Yorkshire Police had a particular part to play in that</p> <p>23 major incident plan, didn't it?</p> <p>24 A. Yes.</p> <p>25 Q. I think you have already accepted that, so far as the</p> <p style="text-align: center;">Page 10</p>	<p>1 the incident.</p> <p>2 A. Yes.</p> <p>3 Q. Does this apply to the particular facts of Hillsborough</p> <p>4 or is that designed to deal with circumstances such as</p> <p>5 chemical contamination or a firearms response, that sort</p> <p>6 of thing?</p> <p>7 A. Yes, I think it is.</p> <p>8 Q. So would you have said on the day that that subparagraph</p> <p>9 applied at all?</p> <p>10 A. No.</p> <p>11 Q. Paragraph (b), the duty was:</p> <p>12 "To alert the emergency services and other</p> <p>13 authorities and departments whose facilities and</p> <p>14 expertise will be needed."</p> <p>15 A. Yes.</p> <p>16 Q. Did you do that on the day?</p> <p>17 A. Yes.</p> <p>18 Q. Can I ask you this, Mr Edmundson: having alerted the</p> <p>19 emergency services, did the police then decide what to</p> <p>20 do with the personnel and resources of the other</p> <p>21 emergency services, or was that a matter for those</p> <p>22 emergency services to control and direct their own</p> <p>23 resources?</p> <p>24 A. It was a matter for those particular services to direct</p> <p>25 their own personnel.</p> <p style="text-align: center;">Page 12</p>

1 Q. In the light of that, is that why it is important that
 2 each of the emergency services involved gets an initial
 3 response to the incident as soon as possible?
 4 **A. Yes.**
 5 Q. Is it the duties of the initial response from each of
 6 the emergency services to do the assessment on behalf of
 7 that service?
 8 **A. I can't comment on what other services do.**
 9 Q. Let's go in a moment -- if you just hold that thought in
 10 your head for a moment while we look through the other
 11 duties of the Force Operations room, duty (c):
 12 "To deal with possible forcewide problem of traffic
 13 congestion."
 14 Did that apply, on the facts of Hillsborough?
 15 **A. Yes.**
 16 Q. Was that dealt with?
 17 **A. Yes.**
 18 Q. How did you deal with that, in summary?
 19 **A. We dealt with it by the traffic mobiles that were out on**
 20 **the ground, directing them to certain points to try and**
 21 **alleviate the traffic congestion.**
 22 Q. I won't take you to it now, but when one looks at the
 23 Racial transcript, which we have seen, I think there is
 24 reference in it that you were taken to this morning with
 25 things like police motorbikes on standby to escort

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1 ambulances?
 2 **A. Yes.**
 3 Q. Paragraph (d):
 4 "To direct the forcewide deployment of manpower and
 5 equipment."
 6 **A. Yes.**
 7 Q. Did that occur?
 8 **A. Yes.**
 9 Q. Does that particular paragraph reinforce what you have
 10 just said, which is that the Force Operations room
 11 directs the deployment of the force manpower and
 12 equipment, but not that of the other emergency services?
 13 **A. That's correct. But the operations room only directed**
 14 **the deployment of manpower to the scene. It then**
 15 **becomes the responsibility of the site commander to**
 16 **direct where he wants those people.**
 17 Q. Certainly. So you have an overarching responsibility,
 18 but the detailed specifics are for the person on the
 19 ground?
 20 **A. Yes.**
 21 Q. Can I then deal with the question of your expectations
 22 as a member of the Emergency Services Liaison Committee
 23 of the first responders in relation to SYMAS.
 24 So, once SYMAS had been told of the existence of an
 25 incident at Hillsborough, you were aware, I think, that

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1 there were SYMAS officers on the ground that day; is
 2 that right?
 3 **A. I was aware that there was a presence of SYMAS, yes.**
 4 Q. Did you know how many?
 5 **A. No, I did not.**
 6 Q. Did you know their seniority?
 7 **A. I knew there was a -- I don't know what the rank --**
 8 **I can't remember what the rank structure is, but**
 9 **a fairly senior officer there, yes.**
 10 Q. You were aware of that on 15 April?
 11 **A. Yes.**
 12 Q. What was your understanding and expectation from your
 13 role in the liaison committee as to what the SYMAS
 14 officers on the ground would do in response to the
 15 incident unfolding before them?
 16 **A. I would have expected them to have worked with the**
 17 **police commanders to decide what resources were required**
 18 **and where they were required.**
 19 Q. One of the problems often in a major incident, which
 20 does not occur when emergency services are already on
 21 the ground, is it is difficult to identify the senior
 22 officers, isn't it?
 23 **A. It is, yes.**
 24 Q. That is one of the problems which the major incident
 25 vehicle is designed to address, isn't it, because it's

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1 got tabards in it so that people can be identified?
 2 **A. The box has got tabards in.**
 3 Q. Right.
 4 **A. The vehicle probably has as well. I can't remember now.**
 5 Q. But, Mr Edmundson, that was not a problem on this day,
 6 was it, because much more visible than a tabard is
 7 a police control box on stilts, isn't it?
 8 **A. That's correct.**
 9 Q. So where would you, Mr Edmundson, have expected to find
 10 a senior officer as events developed on that day?
 11 **A. Whose senior officer?**
 12 Q. A police senior officer. If you were looking for
 13 a senior police officer.
 14 **A. I would have expected him to be in that control room,**
 15 **that control box.**
 16 Q. Would you, in your role on the committee, have expected
 17 other members of the emergency services to realise that
 18 a senior officer would be in the control box?
 19 **A. Yes.**
 20 Q. You accept, don't you, Mr Edmundson, that, on behalf of
 21 the operations room, and indeed in respect of
 22 communications, there are matters that could have been
 23 improved upon on 15 April?
 24 **A. Yes.**
 25 Q. But is it your view, Mr Edmundson, that, so far as the

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1 SYMAS officers on the ground were concerned, they had
 2 the same responsibility as police officers, who could
 3 see the same things as they could?
 4 THE CORONER: I don't know how he can answer that question.
 5 MS BARTON: Right. Well, I will put it this way. Let's go
 6 to section 5 of the major incident manual -- page 8 of
 7 black file, tab R -- SYP000012820008. This is the
 8 summary of the duties of the first police officer on the
 9 scene at a major incident.
 10 **A. Yes.**
 11 Q. It sets out in summary the steps they should take:
 12 "Approach the scene cautiously;
 13 "Initial reconnaissance -- speed is essential,
 14 a general picture will suffice."
 15 What would you have expected a first police officer
 16 on the scene to do pursuant to those two subheadings?
 17 **A. To inform us what exactly was happening.**
 18 Q. "Do not get involved in rescue work -- or take any
 19 personal risk!"
 20 Why is that?
 21 **A. That is because it is vitally important to have a man in**
 22 **control at the scene who knows exactly what's going off.**
 23 **If he gets involved in rescue, we have no contact with**
 24 **anybody at the scene until somebody else arrives.**
 25 Q. "Inform Force Operations room ..."

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1 Then there is a number of headings of information
 2 that you would expect to get?
 3 **A. Yes.**
 4 Q. Then:
 5 "Liaise with first supervisory officer at the
 6 scene."
 7 You saw the draft major incident plans of the other
 8 organisations at the time, didn't you?
 9 **A. Yes.**
 10 Q. Were the major incident plans and the duties on their
 11 first officers at the scene similar or very different to
 12 the officers of police?
 13 **A. I can't comment. I just cannot remember.**
 14 THE CORONER: We know this, don't we? Ms Barton, we have
 15 had the evidence about this, haven't we?
 16 MS BARTON: Thank you, sir.
 17 Examination by MR HOUGH
 18 MR HOUGH: Mr Edmundson, just a couple of questions arising
 19 from what you have just been asked by Ms Barton, who
 20 sits behind me. Can we have on screen YAS000003080253.
 21 These are the minutes of the January 1989 committee
 22 meeting. Ms Barton sought to clarify with you whether
 23 you were the officer responsible in charge of emergency
 24 planning for South Yorkshire Police. Could we blow up
 25 the penultimate paragraph, please:

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1 "Mr Jackson said that he intended to step down from
 2 the committee after the meeting and he would leave it to
 3 a superintendent and Chief Inspector Edmundson who was
 4 the officer in charge of the Force Operations room and
 5 the emergency planning for South Yorkshire Police."
 6 Was that an accurate description of your --
 7 **A. Yes, that was.**
 8 Q. Secondly, if we can take that down, in relation to the
 9 responsibilities of the operations room in the manual,
 10 you were asked about a section which referred to special
 11 safety measures, and you said that the need to arrange
 12 special safety measures might arise if the major
 13 incident involved, say, chemical contamination or
 14 a firearms incident?
 15 **A. Or a fire, or something like that, yes.**
 16 Q. Or a fire?
 17 **A. Fire.**
 18 Q. Would special safety measures be called for, or might
 19 they be called for, in a situation where the police were
 20 dealing with large crowds exposed to crush hazards or
 21 the hazards of sudden evacuation?
 22 **A. They might do, yes.**
 23 MR HOUGH: Thank you very much. Those are all my questions.
 24 THE CORONER: Thank you very much indeed, Mr Edmundson.
 25 **A. Thank you, sir.**

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1 **(The witness withdrew)**
 2 MR HOUGH: Sir, the next witness is Mr Litster.
 3 MR PETER LITSTER (sworn)
 4 Examination by MR HOUGH
 5 MR HOUGH: I know Mr Litster has brought his own file into
 6 the witness box. Could he just have the file that has
 7 been provided for him put close to him and the other one
 8 perhaps a little further away, but still to hand if he
 9 needs it?
 10 Could you confirm that your name is Peter Litster?
 11 **A. It is, sir.**
 12 Q. I think you understand I will ask you questions first on
 13 behalf of the coroner, and then you will be asked
 14 questions by other lawyers?
 15 **A. Yes, sir.**
 16 Q. If you can try to keep your voice up and speak into the
 17 microphone, that will be very helpful.
 18 Now, you have to your left a white file containing
 19 statements you have made over the years. Could you, or
 20 somebody for you, open that at divider 19. For the
 21 lawyers in the room, this is a statement of February
 22 this year, made by Mr Litster to Operation Resolve,
 23 which incorporates previous statements he made in 1989.
 24 Mr Litster, in 1989, were you employed by
 25 South Yorkshire Metropolitan Ambulance Service as

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<p>1 a leading ambulanceman?</p> <p>2 A. That's correct, sir.</p> <p>3 Q. Were you stationed at the Maltby station?</p> <p>4 A. That's correct.</p> <p>5 Q. When had you first joined the ambulance service?</p> <p>6 A. In 1973.</p> <p>7 Q. I think you'd then been promoted to leading ambulanceman</p> <p>8 in 1979?</p> <p>9 A. That's correct.</p> <p>10 Q. Were you up to date in 1989 with your training as an</p> <p>11 ambulanceman?</p> <p>12 A. That's right, sir, yes.</p> <p>13 Q. Including such matters as assessing casualties for their</p> <p>14 vital signs, resuscitation, and so on?</p> <p>15 A. That's correct, sir.</p> <p>16 Q. The jury have heard about that training, so I won't ask</p> <p>17 you more detail about that.</p> <p>18 The role of leading ambulanceman -- is this</p> <p>19 right? -- was a supervisory role?</p> <p>20 A. That's right, sir, yes.</p> <p>21 Q. In the hierarchy, above the level of qualified ambulance</p> <p>22 personnel?</p> <p>23 A. Yes.</p> <p>24 Q. But below the level of a station officer?</p> <p>25 A. That's right, sir.</p> <p style="text-align: center;">Page 21</p>	<p>1 Q. Both in theory and in practice?</p> <p>2 A. That's correct, sir.</p> <p>3 Q. Were you familiar also at that time with the SYMAS major</p> <p>4 incident plan of the time?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Prior to 15 April 1989, were you familiar with the</p> <p>7 Hillsborough ground?</p> <p>8 A. Sorry, I didn't catch that.</p> <p>9 Q. Were you familiar with the Hillsborough ground, with the</p> <p>10 Hillsborough Stadium?</p> <p>11 A. I was, sir, yes.</p> <p>12 Q. Having attended, I think, as a spectator?</p> <p>13 A. That's correct, sir.</p> <p>14 Q. But not for the semi-finals of the 1980s?</p> <p>15 A. No, sir.</p> <p>16 Q. Can we move on to 15 April, the day itself, and your</p> <p>17 call to Hillsborough. Were you on duty that day?</p> <p>18 A. I was, sir, yes.</p> <p>19 Q. I think your shift was 2 pm to 10 pm; is that right?</p> <p>20 A. Correct, sir.</p> <p>21 Q. Did you arrive at Maltby station on time, slightly ahead</p> <p>22 of your shift?</p> <p>23 A. About 10 to 2, sir, yes.</p> <p>24 Q. Were you crewed that day with a colleague;</p> <p>25 Chris Beighton?</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. Before the Hillsborough disaster, had you ever been</p> <p>2 involved in a major incident on anything approaching</p> <p>3 that scale?</p> <p>4 A. Yes, I had, sir.</p> <p>5 Q. What sort of incident?</p> <p>6 A. A severe motorway accident.</p> <p>7 Q. Following the Hillsborough disaster, have you, as an</p> <p>8 ambulanceman, ever been involved in a similar type of</p> <p>9 major incident?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Of what character?</p> <p>12 A. It was a pit disaster.</p> <p>13 Q. Had you, in addition, participated in major incident</p> <p>14 training exercises prior to 1989 involving other</p> <p>15 emergency services?</p> <p>16 A. Yes, sir.</p> <p>17 Q. I think you'd been involved in one based on the scenario</p> <p>18 of an aircraft crash?</p> <p>19 A. That's right, sir.</p> <p>20 Q. In addition to that, had you done practice runs with</p> <p>21 SYMAS alone concerned with motorway accidents?</p> <p>22 A. Yes, we had, sir.</p> <p>23 Q. So is this right, that you were aware in 1989 of</p> <p>24 the basic principles of major incident response?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 22</p>	<p>1 A. That's correct, sir.</p> <p>2 Q. Your vehicle call sign was, I think, R608?</p> <p>3 A. That's correct, sir.</p> <p>4 Q. That was an emergency ambulance, I think, rather than an</p> <p>5 outpatient ambulance?</p> <p>6 A. That's correct, sir, yes.</p> <p>7 Q. With a full complement of equipment?</p> <p>8 A. Correct, sir.</p> <p>9 Q. Including, for example, the rescue box about which the</p> <p>10 jury have heard?</p> <p>11 A. That's right, sir, yes.</p> <p>12 Q. Up to the time that you were called out to the</p> <p>13 Hillsborough disaster, where were you that afternoon?</p> <p>14 A. We had been checking our vehicle, equipment in the</p> <p>15 vehicle itself, and then we went into the mess room to</p> <p>16 await the call coming from control.</p> <p>17 Q. Did the time come when you received a call from SYMAS</p> <p>18 headquarters to attend the Hillsborough Stadium?</p> <p>19 A. From SYMAS control centre, sir, yes.</p> <p>20 Q. The message that we have given to you is "Proceed to</p> <p>21 Hillsborough, Sheffield. Query major."</p> <p>22 Is that what was said to you?</p> <p>23 A. That's correct, sir.</p> <p>24 Q. What did those last words signify to you, "query major"?</p> <p>25 A. Get moving. It's a major.</p> <p style="text-align: center;">Page 24</p>

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<p>1 Q. A major what?</p> <p>2 A. A major incident, whether query or not, off we go.</p> <p>3 Q. So you set off in your vehicle towards Hillsborough with</p> <p>4 Mr Beighton driving?</p> <p>5 A. That's right, sir.</p> <p>6 Q. Using your lights and sirens?</p> <p>7 A. Correct, sir.</p> <p>8 Q. I would like to bring up on screen your ambulance log to</p> <p>9 fix some of the times for us. It is INQ000195080001.</p> <p>10 It will appear on screen, but it is also in your file at</p> <p>11 divider 1. You may find it easier to read the screen,</p> <p>12 because we can maximise it.</p> <p>13 We can rotate that and then maximise the right-hand</p> <p>14 half of that page, please, Jyo. Do we see there the</p> <p>15 date 15 April 1989, the call sign R608, your vehicle,</p> <p>16 and the names of yourself and Mr Beighton?</p> <p>17 A. That's right, sir.</p> <p>18 Q. The occasion of the emergency is given as the</p> <p>19 Hillsborough football ground, and the words "Major</p> <p>20 incident" are written down. When would they have been</p> <p>21 written down, those two words?</p> <p>22 A. The fact is, whether it was given as a query or not,</p> <p>23 I intended -- but it was a major and then, if it wasn't,</p> <p>24 then, fair, we can stand in from that.</p> <p>25 Q. Would you have written those words as you set off, or</p> <p style="text-align: center;">Page 25</p>	<p>1 Hillsborough, did you switch onto the emergency radio</p> <p>2 channel of the SYMAS organisation?</p> <p>3 A. That's correct, yes.</p> <p>4 Q. How were radio communications when you did that?</p> <p>5 A. It always is a bit static when we first go on to</p> <p>6 channel 1, because the command then goes for everyone</p> <p>7 else to go onto it. So we have to log on to say that</p> <p>8 we're actually on channel 1 so it takes a minute or two</p> <p>9 to get communications sorted out.</p> <p>10 Q. Were you able, though, to make contact with control and</p> <p>11 tell them you were on your way to Hillsborough?</p> <p>12 A. That's right, sir, yes.</p> <p>13 Q. We have seen from your log that you arrived in the area</p> <p>14 of the ground at 15:38. Which part of the ground did</p> <p>15 you head to first?</p> <p>16 A. We were instructed to go to Leppings Lane.</p> <p>17 Q. At the entrance there, as the jury know and you know,</p> <p>18 there were outer blue perimeter gates. When you reached</p> <p>19 that area, did you encounter any police officers?</p> <p>20 A. Yes, we did.</p> <p>21 Q. Did they give you any directions?</p> <p>22 A. Yes, we did -- they did, yes.</p> <p>23 Q. What did they say?</p> <p>24 A. It was a senior police officer in the middle. He was</p> <p>25 waving to us to go towards him and towards two to three</p> <p style="text-align: center;">Page 27</p>
<p>1 some time later?</p> <p>2 A. It would have been as we set off.</p> <p>3 Q. We then see a number of times written in:</p> <p>4 "Notification received: 15:18."</p> <p>5 What time would that signify?</p> <p>6 A. That's the time we got the call from control.</p> <p>7 Q. Then "Left station" is self-explanatory, 15:19.</p> <p>8 "Arrived at scene: 15:38". Does that time your arrival</p> <p>9 at the Hillsborough football ground?</p> <p>10 A. That's right.</p> <p>11 Q. "Left scene: 15:45.</p> <p>12 "Arrived at NGH" -- Northern General Hospital?</p> <p>13 A. That's correct, sir.</p> <p>14 Q. "15:50."</p> <p>15 So does that set of times give us the chronological</p> <p>16 framework for the events we are about to hear from you</p> <p>17 about?</p> <p>18 A. It is. That's correct, sir.</p> <p>19 Q. Did you, yourself, write these times in?</p> <p>20 A. That's right, sir, yes.</p> <p>21 Q. At the time?</p> <p>22 A. At the time, yes.</p> <p>23 Q. Based on what you were checking on your own watch?</p> <p>24 A. Correct.</p> <p>25 Q. We can take those off screen now. As you travelled to</p> <p style="text-align: center;">Page 26</p>	<p>1 ambulances that were parked already in front of us.</p> <p>2 Q. If we can put on screen a sketch plan that you drew, and</p> <p>3 keep it on screen while you describe things, it is</p> <p>4 INQ000195090001. If we get our bearings, you have put</p> <p>5 Leppings Lane at the bottom of the page. Sorry, it is</p> <p>6 now at the top of the page. We can see a vehicle marked</p> <p>7 coming down the page and a vehicle ahead with the number</p> <p>8 "405" on it?</p> <p>9 A. Yes.</p> <p>10 Q. That to indicate the vehicle number of another SYMAS</p> <p>11 ambulance?</p> <p>12 A. That was our vehicle.</p> <p>13 Q. So your call sign is 608, you are vehicle number 405,</p> <p>14 and you have marked that?</p> <p>15 A. That's right, sir.</p> <p>16 Q. As you have told us, you indicated other SYMAS</p> <p>17 ambulances ahead of yours. Were they stationary?</p> <p>18 A. They were picking patients up and leaving as -- in that</p> <p>19 direction.</p> <p>20 Q. Based on your plan, it appears that your route took you</p> <p>21 along a service road, which the jury knows went behind</p> <p>22 the south stand, and that the vehicles were parking in</p> <p>23 the area of a blue exit gate called gate C?</p> <p>24 A. That's right, sir.</p> <p>25 Q. Dealing with what was going on in that area, there's an</p> <p style="text-align: center;">Page 28</p>

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<p>1 area marked on your plan on the left. From your 2 perspective, looking at the plan it is just to the right 3 of the two vehicles that are ahead of the vehicle marked 4 405. Can you tell us what was going on in that area? 5 A. Yes. From the side of us, we can see a line of people 6 who were in various problems in respect of being 7 conscious, semi-conscious or unconscious, crying out or 8 not saying anything, but they were of reasonable sort of 9 problems that we could deal with quite comfortably. 10 Q. So if we can just put a yellow highlighter on the area, 11 which for us is just on the right of vehicle 405 and 12 a little further down the page, that's right, a line 13 going down there, that's an area by the outer wall of 14 the ground separating it from the service road, and you 15 say that there were various casualties lined up along 16 that wall? 17 A. Approximately 30, I believed at the time. 18 Q. What was being done for them by the emergency services? 19 A. They were being quickly assessed by the ambulances that 20 were in front of mine, and they were being put onto 21 stretchers, put onto the ambulances and taken away. 22 Q. As they were taken onto the ambulances and the 23 ambulances were setting off, which direction were those 24 ambulances moving? 25 A. They were going in one direction, out towards</p> <p style="text-align: center;">Page 29</p>	<p>1 A. Unfortunately, they didn't look that they were alive. 2 Q. In your witness statement that you made for 3 Operation Resolve, you describe the people in that area 4 as "obviously deceased". Is that something you could 5 tell from looking at them, or did you simply infer that 6 from the place they were being kept? 7 A. They were -- and had looked as if they had been deceased 8 for quite some time through the colour arrangement of 9 them, and there was a doctor in presence using his 10 stethoscope to check and verify those conditions. 11 Q. Did a time come later when you became aware of further 12 people being brought out and placed in that area? 13 A. On my return journey from Northern General. 14 Q. I will ask you about that later. 15 A. Sure. 16 Q. As you arrived at the ground on this first occasion, 17 your vehicle was obviously not the first in the queue, 18 did you leave the vehicle in order to check the scene, 19 leaving the driver in it moving forward? 20 A. That's right, sir. 21 Q. As you were about to get out, or getting out, were you 22 approached by a police officer? 23 A. A police sergeant. 24 Q. What did he ask you to do? 25 A. He said, "Quickly, there is a young lad who's stopped</p> <p style="text-align: center;">Page 31</p>
<p>1 Northern General. 2 Q. So straight along down that service road behind the 3 south stand? 4 A. That's right, sir. 5 Q. On the other side, if we can put some yellow highlighter 6 on the other side of that road, in an area you have 7 marked "Temporary mortuary", can you describe that area 8 as you saw it at the time? 9 A. Approximately 18 persons who were laid out, and they had 10 a police presence in front of them to not allow anyone 11 to get to the people that were laid out behind them. 12 Q. You say "a police presence", so a line of police 13 officers in front of them? 14 A. A line of police officers, sorry, yes. 15 Q. Any other sort of screens or tarpaulin or anything like 16 that covering them? 17 A. There wasn't, no. 18 Q. How were those people laid? 19 A. They were in fact laid slightly different to the way 20 I've drawn it. They were laid side-on, sort of thing, 21 so that there was more allowance for the ambulances to 22 come along and better protection for the casualties that 23 were laid there. 24 Q. What did you understand to be the state of the people in 25 that area and what was being done for them?</p> <p style="text-align: center;">Page 30</p>	<p>1 breathing, and we can't resuscitate. Can you come as 2 quickly as you can?" 3 Q. Did you go to the aid of that young man? 4 A. I did. 5 Q. What was the condition in which you found him? 6 A. I found him -- he looked pretty well. His colour was 7 not different to -- he was a good colour. It appeared 8 that he may just have stopped breathing. I could feel 9 a faint, fast pulse, and it was apparent that he was 10 breathing perhaps two to three times a minute, which is 11 not really viable, so I done what I had to do to assist 12 the breathing for that casualty. 13 Q. You supported his breathing as best you could? 14 A. Yes. 15 Q. Then did you take him on board your ambulance? 16 A. I called the police sergeant to go for my colleague to 17 bring the stretcher and we loaded the guy onto the 18 ambulance, yes. 19 Q. At around this point in the sequence of events, did you 20 come across Mr Yoxall, an off-duty ambulance officer, 21 from whom the jury heard last week? 22 A. While I was on the back of the ambulance with that 23 casualty, my friend came offering assistance. 24 Q. What did Mr Yoxall say to you about his experiences at 25 that time?</p> <p style="text-align: center;">Page 32</p>

<p>1 A. He said, "It's pretty chaotic in the ground. There are 2 people in all problems of dying". I says, "Well, come 3 on here and assist me". 4 Q. Did he assist you then with a second casualty? 5 A. That's right. We were brought to attention that there 6 was a further casualty at the side of the ambulance, at 7 the rear, and I told Lawrie and Chris, "See to this guy. 8 Get him on and we'll have the two casualties and now 9 have two people to look after them in the back", and set 10 off to Northern General. 11 Q. As we have seen from the log that you completed, you set 12 off at about 3.45 pm with Mr Yoxall and Mr Beighton on 13 board? 14 A. (Witness nods). 15 Q. You had been at Hillsborough for just seven minutes 16 between your arrival and your departure? 17 A. That's correct. 18 Q. We have also seen from your log that you arrived at the 19 Northern General at 10 to 4? 20 A. Correct, sir. 21 Q. When you reached the hospital, were there clinical staff 22 there waiting for the casualties? 23 A. There was, yes, sir. 24 Q. Were the casualties then taken into the care of those 25 staff?</p> <p style="text-align: center;">Page 33</p>	<p>1 on the scene and ask them to contact control, please. 2 Over." 3 Then that is acknowledged and there is reference to 4 a lane being established. 5 THE CORONER: The time of this, Mr Hough, would be shortly 6 after 15:50? 7 MR HOUGH: Exactly. 8 MR WEATHERBY: Sorry to interrupt, page 23, the bottom 9 entry. 10 THE CORONER: Thank you, Mr Weatherby. 11 MR HOUGH: It is 15:55, so exactly between 10 to 4 and 12 4 o'clock. The reason we are looking at it in this is 13 it is a much fuller transcript here and we need to look 14 at the whole, for reasons which will become apparent. 15 The operator then says: 16 "Further message. Please establish yourself as my 17 contact duty officer at this time. Over." 18 Then what is said is: 19 "608 ... Roger, contact duty officer. Over." 20 The operator is recorded as saying this: 21 "Roger. I say again, I designate you as my contact 22 officer at the scene at this time, until such time as 23 you can raise a senior duty officer there, please. Did 24 you receive that, Romeo 608?" 25 Then the response is:</p> <p style="text-align: center;">Page 35</p>
<p>1 A. They were, sir, yes. 2 Q. At that stage, what was the condition of those two 3 casualties? 4 A. They had improved dramatically, where they were not 5 dependent on any oxygen therapy. 6 Q. We can take that plan down now. Did you then return to 7 the ambulance and drive back to Hillsborough with 8 Mr Yoxall and Mr Beighton? 9 A. I drove back, yes, that's right, sir. 10 Q. On the way back, did you have a further radio exchange 11 with SYMAS control? 12 A. That's right, sir. 13 Q. Perhaps we can bring that up on screen. It is 14 INQ000166000018. 15 THE CORONER: Is this in your Racal transcript? 16 MR HOUGH: It is not, no. I don't believe it is. Certainly 17 not in the full form in which we need it. 18 If we can blow up the first half of that page, 19 please, Jyo, the message is: 20 "608 [your call sign] proceeding -- proceeding to 21 Hillsborough from Northern General after unloading two, 22 over." 23 Then the operator says: 24 "For the time being, proceed to the scene. Please 25 try to establish contact with one of the duty officers</p> <p style="text-align: center;">Page 34</p>	<p>1 "608. I got contact duty officer on scene, but you 2 are breaking badly. We are approaching Hillsborough. 3 Over." 4 Then: 5 "Roger to that. And until you contact the duty 6 officer, I say again, until you contact the duty 7 officer, I designate you as my contact point there. 8 Over." 9 If we move down the page, just to complete the 10 entry: 11 "Again, I say I can receive only, contact duty 12 officer on the scene. Nothing after that." 13 Then the call ends. So it appears from that 14 transcript that you and those in your vehicle heard the 15 message that you were to contact the duty officer at the 16 scene; yes? 17 A. That's right, sir. 18 Q. It looks, from the efforts of those who have listened to 19 these and transcribed them, that the person at the other 20 end of the call was trying to tell you to be the duty 21 officer at the scene until you identified someone more 22 senior to take that role. But is that part of 23 the message something that reached you? 24 A. We didn't receive that, sir, no. 25 Q. There is reference in the transcript to "breaking</p> <p style="text-align: center;">Page 36</p>

<p>1 badly". Would that refer to breakup of communications?</p> <p>2 A. Yes, with the radio, sir, yes.</p> <p>3 Q. I asked you about that in some detail, because we will</p> <p>4 look at it again when we come to the amendment of your</p> <p>5 statement; you understand?</p> <p>6 A. All right, sir.</p> <p>7 Q. Did you then return to the Leppings Lane entrance area</p> <p>8 at around or shortly before 4 o'clock?</p> <p>9 A. We did, sir.</p> <p>10 Q. What was the scene that greeted you there at that time?</p> <p>11 A. Pretty chaotic. We struggled to get through and into</p> <p>12 a line, and the line of ambulances had actually stopped</p> <p>13 for some reason.</p> <p>14 Q. What was the difficulty about getting through at that</p> <p>15 time?</p> <p>16 A. The amount of fans and people walking around.</p> <p>17 Q. What sort of numbers?</p> <p>18 A. We're talking about hundreds.</p> <p>19 Q. Did these include people who appeared to have sustained</p> <p>20 injuries?</p> <p>21 A. Some had, a lot were in shock, and a lot were trying to</p> <p>22 help each other and support each other, and eventually</p> <p>23 they made way to allow us through.</p> <p>24 Q. What did you personally do, as your vehicle was moving</p> <p>25 forward?</p> <p style="text-align: center;">Page 37</p>	<p>1 was the responsible officer at the scene?</p> <p>2 A. That's correct, sir.</p> <p>3 Q. Could you find any senior officers at the scene?</p> <p>4 A. I found a chap called Jack Flack, who was the same</p> <p>5 position as myself, leading ambulanceman, and he was up</p> <p>6 at the front of the queue of ambulances.</p> <p>7 Q. Was he aware whether there were any more senior officers</p> <p>8 on scene?</p> <p>9 A. He said there wasn't anyone, and the situation was</p> <p>10 chaotic.</p> <p>11 Q. So you took on a role of directing ambulances</p> <p>12 alternately to the Hallamshire and the Northern General?</p> <p>13 A. That's correct, sir.</p> <p>14 Q. While you were there, were you also able to give some</p> <p>15 guidance and assistance to casualties with respiratory</p> <p>16 problems?</p> <p>17 A. That's right, sir. People who were still walking and</p> <p>18 had their arms folded. I could see the problem that was</p> <p>19 identified by, when they were putting their arms down,</p> <p>20 from being able to walk and more or less talk, they just</p> <p>21 turned blue and fell, and I could see that and</p> <p>22 identified that, that we had to do something about that.</p> <p>23 Q. You could see that there were casualties who were having</p> <p>24 respiratory problems when they let their arms fall from</p> <p>25 their chest?</p> <p style="text-align: center;">Page 39</p>
<p>1 A. Sorry?</p> <p>2 Q. What did you personally do, as your vehicle was moving</p> <p>3 forward? Did you stay in the vehicle? Did you leave it</p> <p>4 at some point?</p> <p>5 A. I asked Lawrie if he would stay on as my role.</p> <p>6 Q. That's Mr Yoxall?</p> <p>7 A. Yes, and I would leave the ambulance and find out what</p> <p>8 the problem is further up.</p> <p>9 Q. What was the problem, as far as you could discern it?</p> <p>10 A. An ambulance had been left at the side, abandoned, more</p> <p>11 or less, and that prevented vehicles from passing and</p> <p>12 getting through.</p> <p>13 Q. Were you able to do anything, either for the casualties</p> <p>14 or for the organisation of ambulances there at that</p> <p>15 time?</p> <p>16 A. We were able to move that actual vehicle and allow the</p> <p>17 ambulances then to flow through, and because I'd taken</p> <p>18 over that role, I went up to the top to ensure that we</p> <p>19 started moving to alternate hospitals, the Hallamshire</p> <p>20 Hospital and the Northern General, to make it a 50/50</p> <p>21 split at that time, and also to see if I could find any</p> <p>22 other officer who should have been there to find out</p> <p>23 what they were doing about the scene.</p> <p>24 Q. Your understanding -- is this right? -- at this point</p> <p>25 was to try to identify and make contact with whomever</p> <p style="text-align: center;">Page 38</p>	<p>1 A. That's right, sir.</p> <p>2 Q. And you gave them some guidance about keeping themselves</p> <p>3 in a better condition?</p> <p>4 A. That's right, sir, yes.</p> <p>5 Q. How did you feel at this time the organisation of</p> <p>6 the emergency scene was being managed?</p> <p>7 A. To be honest, it were terrible.</p> <p>8 Q. In your witness statement, the statement at divider 19,</p> <p>9 on page 24 you say this:</p> <p>10 "Casualties weren't being labelled in any way.</p> <p>11 There wasn't time. The priority was getting clinical</p> <p>12 assistance to those injured and it was down to the</p> <p>13 individual attendants to make their own suppositions</p> <p>14 regarding levels of injury. If a casualty was</p> <p>15 particularly bad, they were provided with additional</p> <p>16 support and oxygen and immediately conveyed to hospital</p> <p>17 as a single patient in a double-crewed ambulance."</p> <p>18 A. That's right.</p> <p>19 Q. So you paint a picture there of individual ambulancemen</p> <p>20 making their own assessments but not a coordinated</p> <p>21 triage system?</p> <p>22 A. That's right, sir. We're all trained to be able to</p> <p>23 assess and deal with what we find.</p> <p>24 Q. Did the time come around this period when you</p> <p>25 encountered a more senior officer in the hierarchy?</p> <p style="text-align: center;">Page 40</p>

<p>1 A. That's correct, sir.</p> <p>2 Q. Who was that?</p> <p>3 A. That was the assistant divisional chief, David Jones.</p> <p>4 Q. Where was Mr Jones when you encountered him and what did</p> <p>5 he seem to be doing?</p> <p>6 A. He was leaning against the wall outside gate C, banging</p> <p>7 his personal radio against the wall.</p> <p>8 Q. Did you have a conversation with him?</p> <p>9 A. I did, sir.</p> <p>10 Q. What did you say?</p> <p>11 A. I asked him if he was -- what he was doing, and I asked</p> <p>12 him what his problem was. He said, "My radio is not</p> <p>13 working. Is yours okay?", and I said, "Yes, mine is</p> <p>14 okay". So he asked to swap radios. I said, "Will you</p> <p>15 help, and take over the scene, so that we can manage</p> <p>16 it?", and he says, "No, you carry on with what you're</p> <p>17 doing. I'm off around to the gymnasium".</p> <p>18 Q. Did he say anything about whether he knew what to do as</p> <p>19 the duty officer in that area?</p> <p>20 A. He looked more shocked than anything about the whole</p> <p>21 scenario and walked away.</p> <p>22 Q. Did you then stay in the role you'd created for yourself</p> <p>23 of directing the emergency vehicles to the hospitals?</p> <p>24 A. That's right, sir.</p> <p>25 Q. Did you get any assistance from the police?</p> <p style="text-align: center;">Page 41</p>	<p>1 of life amongst those bodies but I do recall later as</p> <p>2 more bodies were brought out and some were placed on top</p> <p>3 of each other, I saw some movement amongst them. I went</p> <p>4 over and checked and found a young lad maybe 13 or</p> <p>5 14 years old laying on top of his dad. The boy was,</p> <p>6 I recall, white-faced and didn't have a lot of hair.</p> <p>7 I can't describe him further. As we moved him, he</p> <p>8 screamed out 'Dad'. When I saw the movement, this was</p> <p>9 because another body was placed on top of the boy who</p> <p>10 wasn't moving prior to this."</p> <p>11 A. That's correct, sir.</p> <p>12 Q. When that happened, did you have any concerns that there</p> <p>13 might be anybody else in that area who wasn't in fact</p> <p>14 dead?</p> <p>15 A. I spoke to the doctor in attendance and asked him to</p> <p>16 ensure that whoever was on this pile, that they were in</p> <p>17 fact deceased.</p> <p>18 Q. While you were in this area giving your directions to</p> <p>19 ambulances and assisting in the walking station, as you</p> <p>20 have described, did a time come when you found your own</p> <p>21 ambulance, R608, on hand?</p> <p>22 A. They had taken two to the Hallamshire and then they</p> <p>23 returned to me after that.</p> <p>24 Q. Were Mr Beighton and Mr Yoxall still on board?</p> <p>25 A. That's correct, sir.</p> <p style="text-align: center;">Page 43</p>
<p>1 A. We did.</p> <p>2 Q. I think over this period you also provided some</p> <p>3 assistance in the care of casualties on board</p> <p>4 a Derbyshire ambulance?</p> <p>5 A. That's right, sir. We used that as a walking stage.</p> <p>6 Q. You referred earlier to the fact that you had seen some</p> <p>7 casualties being brought into the area where dead bodies</p> <p>8 had been left. Was it at this point in time that you</p> <p>9 saw that happening?</p> <p>10 A. Yes, they were two to three in depth of casualties who</p> <p>11 were laid out and being assessed by the same doctor that</p> <p>12 I'd seen previously.</p> <p>13 Q. Did you see any movement from any of the people in that</p> <p>14 area?</p> <p>15 A. I did, sir.</p> <p>16 Q. Can you describe that scene, please?</p> <p>17 A. It was a young person of about 13 years of age. He was</p> <p>18 in the second row of bodies, and he was moving, so I got</p> <p>19 hold of him and pulled him out, realising he wasn't</p> <p>20 actually a person who was deceased. He was actually</p> <p>21 laying on top of his father. He was calling out, "Dad".</p> <p>22 Q. In your statement, you described the scene in this way:</p> <p>23 "On my plan, I have drawn the deceased with their</p> <p>24 feet towards the wall. However, they were actually laid</p> <p>25 parallel towards the wall. Initially, there was no sign</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. As you have said, they had undertaken a trip to the</p> <p>2 Hallamshire, which Mr Yoxall has told us about. Do you</p> <p>3 at that point return to your ambulance as an ordinary</p> <p>4 crew member?</p> <p>5 A. That's right, sir.</p> <p>6 Q. Why were you able at this point to take on that role and</p> <p>7 stop directing the ambulances?</p> <p>8 A. The whole incident had started to clear up. There was</p> <p>9 no major trauma. They were all walking cases that were</p> <p>10 being fed into the Derbyshire vehicle that was then to</p> <p>11 be taken away.</p> <p>12 Q. Did Mr Beighton then tell you that he'd received some</p> <p>13 instructions to go around to the other side of</p> <p>14 the ground, the Penistone Road end?</p> <p>15 A. That's right, back around to the gymnasium, sir.</p> <p>16 Q. Did you then go to that side of the ground and find</p> <p>17 yourselves in the gymnasium area?</p> <p>18 A. We went towards that ground, sir, yes.</p> <p>19 Q. As you moved in that direction and reached that area,</p> <p>20 did you encounter Mr Jones again?</p> <p>21 A. I did encounter Mr Jones at the gymnasium.</p> <p>22 Q. What was he doing at that point?</p> <p>23 A. He offered to return the radio and swap the radios back</p> <p>24 and then informed us that there was going to be</p> <p>25 a debrief over at the bus station on Herries Road.</p> <p style="text-align: center;">Page 44</p>

<p>1 Q. What had he been doing when you arrived on the scene?</p> <p>2 A. He was just stood there, sir.</p> <p>3 Q. In your previous accounts, you have described him as</p> <p>4 offloading blankets and body bags in that area; is that</p> <p>5 right?</p> <p>6 A. That's right, sir, yes.</p> <p>7 Q. Did you in fact go into the gym at this time?</p> <p>8 A. We went into the gym.</p> <p>9 Q. What was the scene in the gym?</p> <p>10 A. We seen all the victims laid out in rows.</p> <p>11 Q. Was Mr Eason in charge at that time?</p> <p>12 A. Mr Eason was present there, yes.</p> <p>13 Q. Did the scene seem well or badly organised at that time?</p> <p>14 A. The victims were all in rows, neatly put in place with</p> <p>15 white blankets, but the officers were just stood at the</p> <p>16 back.</p> <p>17 Q. Police or SYMAS officers?</p> <p>18 A. The SYMAS officers.</p> <p>19 Q. Were you present in the gym for any length of time or</p> <p>20 only a brief period?</p> <p>21 A. Only a brief period.</p> <p>22 Q. Was it at that time that you were instructed to go to</p> <p>23 the Herries Road bus depot?</p> <p>24 A. That's right, sir.</p> <p>25 Q. When you reached that depot, were ambulances from areas</p> <p style="text-align: center;">Page 45</p>	<p>1 Moving on a sentence:</p> <p>2 "I believe how the ambulance service reacted on that</p> <p>3 day was the fault of senior managers. I had knowledge</p> <p>4 of a SYMAS major incident vehicle but don't know if it</p> <p>5 attended that day and I am aware of a disaster shelter</p> <p>6 available to the service but believe that this may have</p> <p>7 been after the disaster. Good practices were seeing the</p> <p>8 police cordoning off the area where the deceased were</p> <p>9 located at Leppings Lane, which allowed us to</p> <p>10 concentrate on what we were doing and were required to</p> <p>11 do and the assistance provided from various parties,</p> <p>12 including the police cadets and fans, who offered</p> <p>13 support. From where I was at Leppings Lane, I believe</p> <p>14 things went well."</p> <p>15 Does that accurately reflect a summary of your</p> <p>16 reflections on the response to the disaster?</p> <p>17 A. It does, sir, on that area that I was at.</p> <p>18 Q. So in your area, the Leppings Lane area, you were</p> <p>19 content with the way that you and your colleagues were</p> <p>20 dealing with the casualties; yes?</p> <p>21 A. That's correct, sir.</p> <p>22 Q. But frustrated with the response of Mr Jones?</p> <p>23 A. That's correct, sir.</p> <p>24 Q. Can I now turn to the production of your witness</p> <p>25 statement in 1989. The disaster was on Saturday, the</p> <p style="text-align: center;">Page 47</p>
<p>1 outside the South Yorkshire area who had arrived for</p> <p>2 assistance being sent home to their various home</p> <p>3 stations?</p> <p>4 A. Yes, that's right, sir.</p> <p>5 Q. But were you and fellow SYMAS vehicles kept on standby</p> <p>6 there for a time?</p> <p>7 A. We were, for the debrief period.</p> <p>8 Q. Were you, in the event, required for further duties that</p> <p>9 day?</p> <p>10 A. I was sent from Herries Road back to the gymnasium, and</p> <p>11 Mr Jones asked what shift we were on, and said, "Go back</p> <p>12 to your normal routine work for the day".</p> <p>13 Q. A few questions now about your reflections on the</p> <p>14 emergency operation that day. Perhaps you could look in</p> <p>15 your witness statement at page 25, right at the bottom</p> <p>16 of the page. It should have a long number ending with</p> <p>17 25 on the bottom. Perhaps Mr Litster could be helped?</p> <p>18 You should have a sentence beginning, right at the</p> <p>19 bottom, "My main concern". Do you see that?</p> <p>20 A. That's correct, sir.</p> <p>21 Q. What you are recorded as saying is this:</p> <p>22 "My main concern after the disaster was seeing</p> <p>23 AC Jones, who frustrated me by appearing to be in</p> <p>24 a state of shock and not being effective in his role.</p> <p>25 I later reported this, but not at that time."</p> <p style="text-align: center;">Page 46</p>	<p>1 15th. When did you first sit down to produce your own</p> <p>2 handwritten account of the events?</p> <p>3 A. I believe that was on the 17th.</p> <p>4 Q. On the Monday?</p> <p>5 A. Correct, sir.</p> <p>6 Q. Is this right, you don't believe that you have seen in</p> <p>7 more recent times the handwritten document you produced</p> <p>8 on that day, the 17th?</p> <p>9 A. I haven't seen it recently.</p> <p>10 Q. Then, on Tuesday, the 18th, the following day, did you</p> <p>11 attend a meeting when a further account was taken from</p> <p>12 you?</p> <p>13 A. That's right, sir.</p> <p>14 Q. If you can look in your file at divider number 5 --</p> <p>15 I don't ask for it on screen, but for the lawyers it's</p> <p>16 YAS000000420001 -- we can see there a handwritten</p> <p>17 account, and it has your initials on each page and your</p> <p>18 signature at the very end of it on the last page --</p> <p>19 A. That's right, sir.</p> <p>20 Q. -- if you turn to the last page.</p> <p>21 A. Yes, that's right, sir.</p> <p>22 Q. Was that manuscript document produced as a result of</p> <p>23 the meeting that you had on the 18th, do you think?</p> <p>24 A. On the 18th, correct, sir.</p> <p>25 Q. Where was that meeting and whom?</p> <p style="text-align: center;">Page 48</p>

<p>1 A. That meeting was at South Yorkshire Ambulance Service 2 headquarters in Rotherham, and Mr Higgins, station 3 officer, was the guy taking the statement. 4 Q. Was there anybody else in the meeting with you and 5 Mr Higgins? 6 A. There was two other people. 7 Q. Do you know who they were? 8 A. No. They didn't disclose who they were. 9 Q. Can you describe the process of your account being 10 taken? What sort of questions Mr Higgins was asking and 11 how he was taking you through events? 12 A. He tried to get me to give a statement in respect of 13 what had happened throughout, but I had to be careful of 14 what was actually being stated. 15 Q. What do you mean by that, that you had to be careful of 16 what was being stated? 17 A. When I mentioned one or two details, I was told that 18 I cannot put that sort of thing in. 19 Q. What sort of details? 20 A. The main parts were about senior officers. 21 Q. Mr Jones or others? 22 A. Mr Jones. 23 Q. Other than that concern about information about senior 24 officers and in particular Mr Jones, did Mr Higgins give 25 you any guidance about what you could or couldn't</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. Did you have the opportunity to review it, make 2 amendments as we can see, and sign it when it had been 3 produced? 4 A. No, sir. 5 Q. We can see that this document, this version here that we 6 are looking at, has been signed by you; yes? 7 A. Yes, sir. 8 Q. We can see that you have made a number of quite detailed 9 amendments to it with your initials by those amendments? 10 A. Correct, sir. 11 Q. Do we take it from that that you had the chance to read 12 it, make those amendments and then sign? 13 A. Yes, that's correct, sir. 14 Q. This version? 15 A. (Witness nods). 16 Q. Can we now turn on to divider 9, please, which for the 17 lawyers is YAS000001810001. We can see -- I don't think 18 there is any controversy here -- that the previous 19 version that you signed has been photocopied, and then 20 somebody else has made a number of manuscript 21 amendments? 22 A. That's correct, sir. 23 Q. If we turn on to the fourth page, as an example, 24 paragraph 15, has somebody, for example, made an 25 amendment there to give a precise time to an event,</p> <p style="text-align: center;">Page 51</p>
<p>1 include in your account? 2 A. Not specifically, no. No, sir. 3 Q. That document was signed by you and then it was typed 4 up. We can see the typed copy under your divider 6. 5 You have, I think, had the opportunity to look at this 6 account more recently. Are you satisfied that what it 7 does contain is accurate, at this stage? 8 A. It's very close to the accuracy of the day. 9 Q. If you can then turn to divider 7, we see here -- for 10 the lawyers, but not on screen, it is INQ000120640001 -- 11 an expanded version of that account with numbered 12 paragraphs, and we can see, if you look at paragraph 7, 13 that the word "officers" has been crossed out with 14 "staff" written in and I think your initials next to it? 15 A. That's correct, sir. 16 Q. Then if we flick on to the final page, we can see you 17 have signed it and it has been dated 5 May 1989; yes? 18 A. That's right, sir. 19 Q. Now, can you remember the circumstances and time at 20 which this statement was put together? 21 A. Again, that statement is pretty close to being accurate. 22 Q. Can you remember who produced it and how you were 23 involved in that? 24 A. Again, that would have been taken from the statements 25 that I'd already given to Mr Higgins.</p> <p style="text-align: center;">Page 50</p>	<p>1 referencing it to a Racial transcript? 2 A. Someone has, sir. 3 Q. But not you, you are indicating? 4 A. No, sir. 5 Q. Were you involved in making these amendments at the 6 time? 7 A. No, sir. 8 Q. If we can look on to one amendment which has caused you 9 particular concern, and if we can bring this on screen, 10 YAS000001810006, and if we can maximise the top third of 11 the page, please, Jyo. This is dealing, in the sequence 12 of events, with your first return journey from the 13 Northern General, when you received the message from 14 control, the transcript of which we looked at on screen? 15 A. Yes, sir. 16 Q. You had originally written: 17 "On the return journey, I contacted control stating 18 we had brought two casualties to Northern General and 19 were returning to Hillsborough Leppings Lane end unless 20 directed otherwise. They replied but instructed me on 21 arrival to contact the ambulance incident officer at the 22 ground." 23 That is what you had originally written? 24 A. Correct, sir. 25 Q. We can see that the amendments made are, first of all,</p> <p style="text-align: center;">Page 52</p>

<p>1 the word "on" has been changed to "during". Nothing</p> <p>2 very significant there. Then the time, 15:55 has been</p> <p>3 added, that's from the transcript, and we see that</p> <p>4 that's the correct time of that call; yes?</p> <p>5 A. Correct, sir.</p> <p>6 Q. Then at the end, somebody has crossed out the words from</p> <p>7 "the ambulance incident officer" and has written this</p> <p>8 in:</p> <p>9 "... one of the duty officers at the ground and</p> <p>10 asked him to contact control."</p> <p>11 And has also added this:</p> <p>12 "I also received a further instruction from control</p> <p>13 during this call which stated 'Romeo 608 a further</p> <p>14 message ... please establish yourself as my contact duty</p> <p>15 officer ...'."</p> <p>16 Is this a part of the statement, an amendment, which</p> <p>17 you played any part in making?</p> <p>18 A. All the amendments there that I haven't signed, which</p> <p>19 that is part of, was not done by myself.</p> <p>20 Q. Having checked this, do you consider that that</p> <p>21 accurately reflects the evidence, accurately reflects</p> <p>22 your account?</p> <p>23 A. No, sir.</p> <p>24 THE CORONER: Would it be helpful, Mr Hough, to have the</p> <p>25 detail of that call on the left-hand side?</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. So can we infer that whoever has been making this</p> <p>2 amendment appears to have had access to the transcript</p> <p>3 and has written in what the transcript says?</p> <p>4 A. That appears to be so.</p> <p>5 Q. But your evidence earlier is that that was something</p> <p>6 which you didn't actually hear?</p> <p>7 A. That's correct, sir.</p> <p>8 Q. We can tell from the transcript that fact because you</p> <p>9 are recorded as saying, "I got contact duty officer on</p> <p>10 scene, but you are breaking badly"?</p> <p>11 A. That's correct, sir.</p> <p>12 Q. Mr Weatherby has very kindly set up the audio to be</p> <p>13 played. Barring technical glitches, we are about to</p> <p>14 hear the call which is being referred to here.</p> <p>15 THE CORONER: We can't do it all together, of course.</p> <p>16 Members of the jury, you have part of it, if you look at</p> <p>17 page 23 of the Racial transcript in the red file,</p> <p>18 section 1.</p> <p>19 MR HOUGH: It will be 15:55 in the real time.</p> <p>20 THE CORONER: 15:55.</p> <p>21 MR WEATHERBY: Track 57, part 4.</p> <p>22 THE CORONER: It is the bottom entry on page 23.</p> <p>23 MR WEATHERBY: 2:14:10.</p> <p>24 (Audio file played)</p> <p>25 THE CORONER: It should go on, shouldn't it, Mr Weatherby?</p> <p style="text-align: center;">Page 55</p>
<p>1 MR HOUGH: We can certainly do that.</p> <p>2 THE CORONER: From the full Racial transcript.</p> <p>3 MR HOUGH: Yes.</p> <p>4 THE CORONER: And this comment on the right.</p> <p>5 MR HOUGH: Yes. The full Racial transcript is</p> <p>6 INQ000166000018.</p> <p>7 THE CORONER: I think we only need on this document from</p> <p>8 "They replied but instructed me", so the rest can go.</p> <p>9 Could we highlight from "They replied", on the left-hand</p> <p>10 side?</p> <p>11 MR HOUGH: Mr Weatherby has pointed out that he has teed up</p> <p>12 this part of the Racial recording to play, and we will</p> <p>13 play it in a moment.</p> <p>14 THE CORONER: Right. Sorry, Mr Weatherby, I didn't mean to</p> <p>15 forestall your questioning.</p> <p>16 MR WEATHERBY: Not at all. I was just inviting Mr Hough to</p> <p>17 do it. It would be more convenient now than later.</p> <p>18 MR HOUGH: Just before we play that, though, do we see that</p> <p>19 the person who has made the amendment has recorded, has</p> <p>20 written in, the words which are on the right attributed</p> <p>21 to the operator as the operator's second communication:</p> <p>22 "Please establish yourself as my contact duty</p> <p>23 officer."</p> <p>24 They have written that in?</p> <p>25 A. I can see that, that's correct, sir.</p> <p style="text-align: center;">Page 54</p>	<p>1 MR HOUGH: That's what I thought the answer should be.</p> <p>2 I don't know if there is more to that recording. There</p> <p>3 is certainly in the original.</p> <p>4 MS DELAHUNTY: Sir, I think I can help. We also have been</p> <p>5 on the same point. I don't know if this reference would</p> <p>6 help on the timing. Perhaps it is worth another try.</p> <p>7 We have it ambulance Racial track 57 to be played from</p> <p>8 2:13:05 to 2:15:15, which will then give the complete</p> <p>9 sequence.</p> <p>10 MR HOUGH: I'm very grateful for all the assistance I'm</p> <p>11 getting, thank you.</p> <p>12 (Audio file played)</p> <p>13 THE CORONER: Perhaps we will have our break, would that be</p> <p>14 sensible?</p> <p>15 MR HOUGH: Perhaps that would be sensible. I don't think</p> <p>16 anybody is suggesting the communications were quite as</p> <p>17 bad as that.</p> <p>18 THE CORONER: Let's have our break, members of the jury.</p> <p>19 (3.08 pm)</p> <p>20 IN THE ABSENCE OF THE JURY</p> <p>21 THE CORONER: Mr Litster, you are free to go. We are going</p> <p>22 to have a ten-minute break.</p> <p>23 A. Thank you, sir.</p> <p>24 MR HOUGH: Sir, I had thought that the point could be made</p> <p>25 by the document on screen alone. We will do our best to</p> <p style="text-align: center;">Page 56</p>

1 locate the best copy of the audio recording over the
 2 break.
 3 THE CORONER: Can I just ask Mr Weatherby something, because
 4 I want to see if I follow this and see what it actually
 5 amounts to.
 6 Is it the case that the person who inserted this
 7 part at paragraph 19 accurately summarised what is on
 8 the Racal tapes?
 9 MR WEATHERBY: Yes. The point is, it is in a statement that
 10 is apparently from Mr Litster.
 11 THE CORONER: Yes. I understand that. But of course --
 12 well, yes.
 13 MR WEATHERBY: I now promise not to be helpful again,
 14 because that is my fault there.
 15 THE CORONER: Yes. Well, I think I get the point.
 16 (3.09 pm)
 17 (A short break)
 18 (3.20 pm)
 19 IN THE PRESENCE OF THE JURY
 20 MR HOUGH: Mr Litster, I understand the gremlins in the
 21 computer system have been quelled and we are about to
 22 listen to the call. So everybody is aware, what we are
 23 listening for is the control room asking you to
 24 establish yourself as the contact duty officer, and the
 25 extent to which you hear or don't hear that message, as

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1 we can tell from the recording. Can we play on, please?
 2 (Audio file played)
 3 MR HOUGH: So that is the call recorded. Is that your voice
 4 or the voice of your crew colleague that we are hearing?
 5 **A. That's my voice.**
 6 Q. So is this right, in summary, that your difficulty with
 7 the amendment that's been added here is that it records
 8 you receiving an instruction to establish yourself as
 9 the contact duty officer, when that is actually
 10 something that was said but that you didn't hear?
 11 **A. That's correct, sir.**
 12 Q. If we can now move on to the next divider in your file,
 13 divider 10, we can see there that that statement has
 14 been retyped as a clean copy, and if you flick on to
 15 page 6 at the bottom, paragraph 19, you will see that
 16 that amendment, along with the others that the other
 17 person has made, has now been typed into the clean copy.
 18 Do you see that?
 19 **A. That's correct, sir.**
 20 THE CORONER: If, for example, there had been added on the
 21 back of the last sentence of paragraph 19, "but I did
 22 not hear it", that would reflect what you are saying was
 23 the case?
 24 **A. That's correct, sir.**
 25 MR HOUGH: If you move on, then, to the last page of that

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1 statement, do you see that your signature appears with
 2 a new date, 5 June 1989, about a month on since the last
 3 statement date?
 4 **A. Correct, sir.**
 5 Q. Did you have the opportunity to read this statement in
 6 this form before you signed it?
 7 **A. Yes, sir.**
 8 Q. Did you notice the amendments that had been made by
 9 another hand?
 10 **A. On reflection, I may have misinterpreted that actual
 11 piece, sir.**
 12 Q. Did anybody point out to you either the amendments that
 13 had been made or, in general terms, the fact that there
 14 had been some amendments?
 15 **A. No, sir.**
 16 Q. Can I finally deal with an article that quoted you, an
 17 article in the Sunday Express newspaper, and it is
 18 divider 13 of your file. I'm not asking for it to go on
 19 the screen. Mr Litster, this was an article published
 20 after the publication of the HIP Report. I am not going
 21 to ask you about the HIP Report or what was said by the
 22 Yorkshire Ambulance Service afterwards, because we are
 23 not concerned with that, but I am just going to quote
 24 some of the passages attributed to you as your
 25 reflections on the day. Do you understand?

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1 **A. Yes, sir.**
 2 Q. See if you agree with them. It is the first column,
 3 first of all. You are described as the second
 4 ambulanceman to have arrived at the Leppings Lane
 5 entrance:
 6 "Rank and file ambulance crews worked tirelessly to
 7 save lives as their senior officers caved in under
 8 pressure. He said, 'The paramedics saved, in my
 9 estimation, 264 lives. When I got there at 2.50 pm,
 10 I had to take control because my senior officer was in
 11 a panic and unable to function. He couldn't cope. He
 12 was overwhelmed. As other crews arrived, he lost it,
 13 banging his radio and complaining it wasn't working!'"
 14 Is that an accurate account of what you said about
 15 Mr Jones?
 16 **A. It's a rough estimation, sir.**
 17 THE CORONER: Sorry, I missed that, Mr Litster.
 18 **A. It is a rough estimation.**
 19 THE CORONER: A rough estimation, a newspaper estimation.
 20 MR HOUGH: Then if we look at the final column, it says this
 21 at the third paragraph:
 22 "Mr Litster said, 'I know from records that there
 23 are 264 people alive today thanks to the treatment they
 24 received. The Liverpool fans were magnificent. They
 25 helped us all they could to save their mates. The

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<p>1 subsequent ..."</p> <p>2 Then there is a reference to a cover-up. Then:</p> <p>3 "At a debriefing session two days later Mr Litster</p> <p>4 says he was told to omit any mention of the meltdown of</p> <p>5 senior ambulance officers."</p> <p>6 That's a reference to the meeting with Mr Higgins,</p> <p>7 is it?</p> <p>8 A. That's correct, sir.</p> <p>9 Q. Then:</p> <p>10 "I said it was left to me to take control because</p> <p>11 we were virtually abandoned by our senior staff, but</p> <p>12 I was told to keep their inability to cope from my</p> <p>13 statement', he said."</p> <p>14 A. That is correct, sir.</p> <p>15 Q. That's what you said to the journalists at that time?</p> <p>16 A. That's right, sir.</p> <p>17 MR HOUGH: Thank you very much. Those are all my questions.</p> <p>18 Examination by MS DELAHUNTY</p> <p>19 MS DELAHUNTY: Good afternoon, sir. Good afternoon,</p> <p>20 Mr Litster.</p> <p>21 A. Good afternoon.</p> <p>22 Q. You are looking at the jury, which is absolutely the</p> <p>23 right thing, and that is what you should continue to do,</p> <p>24 even though I am asking questions.</p> <p>25 First of all, may I just say that I ask questions on</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. You were entitled to expect, when you turned up, at</p> <p>2 35 minutes past 3 o'clock on the 15th, that there would</p> <p>3 be someone there from SYMAS directing operations so as</p> <p>4 to make sure the greatest care was delivered to the</p> <p>5 largest number?</p> <p>6 A. Correct, ma'am.</p> <p>7 Q. Thank you. What I will do, therefore, is to take that</p> <p>8 as a basis and then work through what you saw and did by</p> <p>9 comparison with what you actually were entitled to</p> <p>10 expect to.</p> <p>11 Now, it is not right, is it, to say that simply</p> <p>12 because any senior member of staff has not actually been</p> <p>13 in a major accident before that excuses them from</p> <p>14 responding appropriately to the situation they are in?</p> <p>15 A. That's correct, ma'am.</p> <p>16 Q. Because, as you said to Operation Resolve, the thing</p> <p>17 that sets you, the professional ambulance service, apart</p> <p>18 from Joe Public is that you receive training in order to</p> <p>19 enable you to go into action to make sure you save life?</p> <p>20 A. Correct, ma'am.</p> <p>21 Q. Chaos, as part of a major accident, is one of</p> <p>22 the predictable features of coming across such</p> <p>23 a situation?</p> <p>24 A. Correct, ma'am.</p> <p>25 Q. The training is there to equip you to go forward, to</p> <p style="text-align: center;">Page 63</p>
<p>1 behalf of ten bereaved families, and you will receive no</p> <p>2 criticism from me whatsoever for the remarkable efforts</p> <p>3 you made on that day to try to save as many lives as</p> <p>4 possible.</p> <p>5 Instead, I offer you thanks on behalf of</p> <p>6 the families.</p> <p>7 Can I, therefore, ask you and explore with you how</p> <p>8 it was it came to be that what you saw and did on that</p> <p>9 day changes so significantly in the accounts that emerge</p> <p>10 over the course of the succeeding months.</p> <p>11 What I am going to ask you, first of all, is about</p> <p>12 why it is that you expressed the view that effectively</p> <p>13 senior managers let down their rank and file staff on</p> <p>14 that day?</p> <p>15 A. The reason I said that was because there was no actual</p> <p>16 senior managers came to the position to where I was, and</p> <p>17 there should have been. There should have been senior</p> <p>18 officers there directing the actual -- the actual job in</p> <p>19 itself.</p> <p>20 Q. So it is not simply a question about whether Mr Jones</p> <p>21 was up to his role or not, it goes right back to what</p> <p>22 you think you were entitled to expect when you turned up</p> <p>23 at Leppings Lane that first time of the afternoon on</p> <p>24 15 April?</p> <p>25 A. That's correct, ma'am.</p> <p style="text-align: center;">Page 62</p>	<p>1 assess, look, listen, report back and then act?</p> <p>2 A. Correct, ma'am.</p> <p>3 Q. Because the essence of responding appropriately to</p> <p>4 a major accident is that the correct information is</p> <p>5 gathered from the scene, relayed back to headquarters,</p> <p>6 who are then capable of dispatching resources to meet</p> <p>7 that need?</p> <p>8 A. That's correct, ma'am.</p> <p>9 Q. The officer on scene, whether it's the first on scene</p> <p>10 person or whether it's an allocated officer who is there</p> <p>11 in situ, their responsibility is to act up to that major</p> <p>12 accident, whilst resources are coming, to make sure that</p> <p>13 decisions are made early on that minimise chaos</p> <p>14 continuing?</p> <p>15 A. Correct, ma'am.</p> <p>16 Q. So far as you are concerned, as you first picked up the</p> <p>17 message from headquarters at 18 minutes past 3, at that</p> <p>18 point, you still weren't aware that a major had been</p> <p>19 formally declared, were you?</p> <p>20 A. When I received the call, they put it as a "query</p> <p>21 major". That to me is still a major, and I classed it</p> <p>22 as such.</p> <p>23 Q. You did. In terms of the information you received,</p> <p>24 however, you were told, as I believe, initially that</p> <p>25 there were two casualties that had some difficulty with</p> <p style="text-align: center;">Page 64</p>

<p>1 breathing; is that right?</p> <p>2 A. That's correct, ma'am.</p> <p>3 Q. That was increased to four further casualties?</p> <p>4 A. On our way from station to the --</p> <p>5 Q. Right.</p> <p>6 A. Yes.</p> <p>7 Q. So between 3.18, when you received the call, and 3.35,</p> <p>8 when you actually pulled up at Leppings Lane, the only</p> <p>9 information given to you about what you were to expect</p> <p>10 was six casualties who had difficulty with breathing?</p> <p>11 A. That's correct, ma'am.</p> <p>12 Q. No further updates on the way. Effectively, you were</p> <p>13 flying both deaf and blind to the scene that would greet</p> <p>14 you upon arrival?</p> <p>15 A. Correct, ma'am.</p> <p>16 Q. So the nature of the injuries that had been sustained at</p> <p>17 Hillsborough, the number of the injuries sustained, the</p> <p>18 severity and their location was not information relayed</p> <p>19 to you?</p> <p>20 A. No.</p> <p>21 Q. So far as the position that greeted you at 3.35 was</p> <p>22 concerned, having expected simply six casualties, you</p> <p>23 must have been struck immediately to see that there were</p> <p>24 some people presumed dead immediately visible upon your</p> <p>25 arrival to the left?</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. Now, in terms of the severity and the speed with which</p> <p>2 those resources need to be gathered, you were there for</p> <p>3 just some 7 to 10 minutes, placed in a position where</p> <p>4 you could only assess those who were in the immediate</p> <p>5 vicinity or brought to your attention?</p> <p>6 A. That's correct, ma'am.</p> <p>7 Q. There was no assessment officer by way of assessment of</p> <p>8 triage; there was no person there to assess in terms of</p> <p>9 loading priorities?</p> <p>10 A. There was just the police officer, the police sergeant.</p> <p>11 Q. Just the police officer. It was just the police officer</p> <p>12 who brought your attention to one casualty that was</p> <p>13 clearly in very significant need of immediate attention?</p> <p>14 A. That's correct, ma'am.</p> <p>15 Q. Which means that it must have been somewhat of a lottery</p> <p>16 as to whether or not this officer recognised that that</p> <p>17 particular patient needed treatment and a matter of</p> <p>18 a lottery that you happened to be there, that he brought</p> <p>19 that patient to your attention and, therefore, to your</p> <p>20 care?</p> <p>21 A. I would have made my own assessment if he had not come</p> <p>22 forward, ma'am.</p> <p>23 Q. Of course, yes. But in the absence of a triage zone,</p> <p>24 where someone does that methodically and practically,</p> <p>25 you were placed in the very difficult position of having</p> <p style="text-align: center;">Page 67</p>
<p>1 A. It was a bit of a shock, but everything seemed to be</p> <p>2 quite organised.</p> <p>3 Q. When you arrived at Leppings Lane, that sight greeted</p> <p>4 you in addition to other casualties who appeared to be</p> <p>5 in significant need of medical attention. That's right,</p> <p>6 isn't it?</p> <p>7 A. That's correct. That's correct, ma'am.</p> <p>8 Q. So it is not simply that you have numbers of dead which</p> <p>9 you estimate now to be 18, but, in addition, some</p> <p>10 30-plus casualties who were in need of medical</p> <p>11 attention?</p> <p>12 A. That's correct, ma'am.</p> <p>13 Q. You were one of only a few ambulances that had arrived</p> <p>14 at Leppings Lane at that point, at 35 minutes past?</p> <p>15 A. That's also correct, ma'am.</p> <p>16 Q. When you arrived, the scene that greeted you was, in its</p> <p>17 own right, a major accident, wasn't it, within</p> <p>18 Leppings Lane itself?</p> <p>19 A. It was a major incident, ma'am.</p> <p>20 Q. Yes. Not knowing what was going on in the Hillsborough</p> <p>21 ground itself, by the pitch, by the gym, what was</p> <p>22 happening in Leppings Lane was something that warranted</p> <p>23 an incident officer being there in order to manage the</p> <p>24 response and the resources accordingly; correct?</p> <p>25 A. Most definitely, yes, ma'am.</p> <p style="text-align: center;">Page 66</p>	<p>1 to respond to an officer telling you to come and look at</p> <p>2 this one particular casualty?</p> <p>3 A. We all worked together, ma'am.</p> <p>4 Q. You did. Working together. That is another theme,</p> <p>5 isn't it, of responding in a major accident, because</p> <p>6 there should be no division in terms of the need to care</p> <p>7 for those who are critically ill between the police and</p> <p>8 SYMAS because the police are there to facilitate the</p> <p>9 medical response, are they not?</p> <p>10 A. That's correct, ma'am.</p> <p>11 Q. That is exactly what was happening between you and this</p> <p>12 unnamed police officer?</p> <p>13 A. Correct, ma'am.</p> <p>14 Q. In terms of the degree of severity that this particular</p> <p>15 casualty was in, in your original account you describe</p> <p>16 him as apparently not breathing?</p> <p>17 A. That was apparent at the time.</p> <p>18 Q. Right. Apparently not breathing. He clearly needs to</p> <p>19 be given assistance. What you do as a result is you</p> <p>20 attempt to resuscitate him by oxygen therapy?</p> <p>21 A. That's correct, ma'am.</p> <p>22 Q. You describe it as being forcibly administered by</p> <p>23 a resuscitation unit. Does that ring a bell?</p> <p>24 A. Yes, that's correct, ma'am.</p> <p>25 Q. It doesn't work the first time, but on the second time</p> <p style="text-align: center;">Page 68</p>

<p>1 it results in the patient taking a gasp and starting to 2 breathe? 3 A. That's correct, ma'am. 4 Q. That illustration alone, in just those few seconds, goes 5 to illustrate, does it not, the value of immediate 6 medical attention by someone who knows what to do and 7 has the equipment in order to deliver that type of aid 8 at the point of need? 9 A. Yes, ma'am. 10 Q. Because what you go on later to say is that, although 11 there may have been erratic breathing, that situation 12 could rapidly become a critical, leading to death, 13 situation if oxygen isn't administered appropriately? 14 A. Correct, ma'am. 15 Q. That is because a little occasional gasp, separated by 16 periods of not breathing, cannot continue unless that 17 process is checked and stopped? 18 A. That's correct, ma'am. 19 Q. Oxygen can either be administered and the patient can 20 recover, as this patient did, or, if not administered, 21 then the patient can die? 22 A. That's correct, ma'am. 23 Q. By virtue of your presence with that police officer, you 24 interrupted that process of decline in that casualty, 25 didn't you?</p> <p style="text-align: center;">Page 69</p>	<p>1 A. They did, ma'am. 2 Q. Because you gave them that assistance, two casualties -- 3 one casualty, I should say, that hadn't been breathing 4 before was able to breathe independently en route to the 5 hospital and you were able to deliver him in a good 6 condition? 7 A. That's correct, ma'am. 8 Q. In terms of the scene you left behind, and you describe 9 some 30 other casualties, you have no idea, I'm afraid, 10 do you, about whether they, too, were able to receive 11 the assistance which had been rendered so productively 12 to that one casualty that you took into your care? 13 A. I hoped that, the way things were moving, the ambulances 14 behind us would be doing exactly the same thing: 15 assessing and taking the casualties to hospital. 16 Q. You say the ambulances that were arriving behind you. 17 Is that because Mr Yoxall told you his belief based on 18 a conversation with Mr Smith, the departing SYMAS 19 person, that some 20 more ambulances were expected in 20 that region? 21 A. I'm not aware of a conversation with -- 22 Q. All right. Certainly you're not aware of how many or in 23 fact how few ambulances arrived after you departed the 24 scene, are you? 25 A. Not aware, ma'am.</p> <p style="text-align: center;">Page 71</p>
<p>1 A. That's correct, ma'am. 2 Q. He was loaded onto the ambulance? 3 A. Correct, ma'am. 4 Q. You were able as well to use your initiative, because 5 you saw Mr Yoxall, an off-duty SYMAS fellow worker -- 6 yes? 7 A. That's right, ma'am. 8 Q. And you co-opted him, in effect, so you could carry on 9 giving attention to this one casualty that was still in 10 critical need; yes? 11 A. Mr Yoxall attended to the second one, who was laid at 12 the back of the ambulance. 13 Q. You were able to take two because in your ambulance -- 14 hadn't you got oxygen that is dual-sided? There is one 15 unit on each side of the ambulance? 16 A. We have. 17 Q. So by virtue of co-opting Mr Yoxall, again, showing the 18 value of resources, I would suggest -- is that right? 19 A. That's correct, ma'am. 20 Q. You were able to take two casualties into your ambulance 21 and to continue treating them in the back of your 22 ambulance en route through to the hospital? 23 A. Correct, ma'am. 24 Q. Those casualties continued to need help on the way to 25 the hospital, did they not?</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. That is a matter I can take up elsewhere. 2 Can I just return briefly, if I could, to those 3 group of casualties lying down that you presumed 4 potentially to be dead. 5 You didn't go over and check any of those at all, 6 did you? 7 A. On the initial -- 8 Q. Yes. 9 A. No. 10 Q. No criticism at all, Mr Litster. There was a very short 11 period of time and you had to identify the person who 12 needed the greatest care with the most immediate effect. 13 A. Correct, ma'am. 14 Q. But you can't say, can you, whether any one or any 15 combination of those casualties were in fact dead, as 16 opposed to unconscious and lying prone? 17 A. I relied on the doctor on scene. 18 Q. That is one off-duty doctor there attending to do the 19 best he can. There was no SYMAS person there, was 20 there, able to spare the time in order to assess and to 21 assist him on that triage process? 22 A. That's correct, ma'am. 23 Q. Because noticeable in the absence of everything that you 24 have described upon your arrival at 15:35 and your 25 departure at 15:45 is that still there was no senior</p> <p style="text-align: center;">Page 72</p>

<p>1 person from SYMAS there taking control of the scene?</p> <p>2 A. During my absence from that area, I was not aware.</p> <p>3 Q. So far as the way patients were carried, you have</p> <p>4 described in your Operation Resolve statement that when</p> <p>5 you came to see the 30 or so casualties there, the way</p> <p>6 they were carried was not, in your terminology,</p> <p>7 "conducive to life". Do you recall saying that?</p> <p>8 A. Is that to the ones who were being guarded by the --</p> <p>9 Q. No. That is to some of the 30 casualties that were</p> <p>10 there awaiting treatment. You described them as being</p> <p>11 carried in a way that wasn't conducive to life.</p> <p>12 A. There may have been one or two in that condition.</p> <p>13 Q. What was it that you saw that led you to think that,</p> <p>14 Mr Lister?</p> <p>15 A. They probably would have been in a collapsed condition</p> <p>16 without sign of life and may have turned into a colour</p> <p>17 significant to those who were already on the other side</p> <p>18 of the concourse.</p> <p>19 Q. That concerned you presumably because, if someone is</p> <p>20 unconscious and not breathing, what you need to maintain</p> <p>21 at all times is the opportunity for them to be in</p> <p>22 a position where their survival isn't compromised</p> <p>23 because their airway becomes blocked?</p> <p>24 A. That's correct, ma'am.</p> <p>25 Q. You saw people being carried in such a way that that was</p> <p style="text-align: center;">Page 73</p>	<p>1 Q. You make your way back to the ground and you go straight</p> <p>2 back to Leppings Lane. Is that because it was by that</p> <p>3 stage a scene known to you to be where you could make</p> <p>4 use and do the greatest good for the people you had</p> <p>5 encountered?</p> <p>6 A. I believed that was the best place to go, ma'am.</p> <p>7 Q. Having gone there, the scene that greeted you appears to</p> <p>8 be very different in nature and number in terms of cases</p> <p>9 than that which you had left at 45 minutes past; is that</p> <p>10 right?</p> <p>11 A. Correct, ma'am.</p> <p>12 Q. Because what had been a trickle of fans had now moved to</p> <p>13 hundreds or so leaving the ground?</p> <p>14 A. That's correct, ma'am.</p> <p>15 Q. They were extremely distressed and extremely frightened?</p> <p>16 A. That's correct, ma'am.</p> <p>17 Q. So you had to manage a situation where you had a number</p> <p>18 of people leaving who were in shock, potentially looking</p> <p>19 for those they had lost or could not find, as well as</p> <p>20 trying to protect those who needed help?</p> <p>21 A. That's correct, ma'am.</p> <p>22 Q. That was an entirely unmarshalled process, wasn't it?</p> <p>23 A. It was, ma'am.</p> <p>24 Q. You had to drive into and through that in order to</p> <p>25 understand how you could then devolve your skills in</p> <p style="text-align: center;">Page 75</p>
<p>1 a likely consequence of the way they were being handled?</p> <p>2 A. People --</p> <p>3 Q. Being laid down?</p> <p>4 A. People were doing what they could.</p> <p>5 Q. Of course.</p> <p>6 A. For the best.</p> <p>7 Q. They were doing what they could and their best in</p> <p>8 a situation where there was no-one there to guide them?</p> <p>9 THE CORONER: Ms Delahunty, we have had quite a lot of</p> <p>10 evidence about this, aren't we?</p> <p>11 MS DELAHUNTY: Thank you. Yes, I was just being assisted</p> <p>12 with the reference, which I have there.</p> <p>13 So far as your passage and transition to the</p> <p>14 hospital was concerned, when you were on your route to</p> <p>15 NGH did you receive any further information about the</p> <p>16 nature of the injuries that were still occurring at</p> <p>17 Hillsborough?</p> <p>18 A. Is that on the way to Northern General?</p> <p>19 Q. Yes. That's right.</p> <p>20 A. I didn't hear anything at all.</p> <p>21 Q. No, so that means, taking us from 15:45 through to the</p> <p>22 point at which you say you are clear at NGH, again,</p> <p>23 still devoid of any information about the nature, number</p> <p>24 and location of the injured?</p> <p>25 A. That's correct, ma'am.</p> <p style="text-align: center;">Page 74</p>	<p>1 terms of that environment?</p> <p>2 A. That's correct, ma'am.</p> <p>3 Q. Yet again, despite this time being possibly now around</p> <p>4 4 o'clock, there was no senior representative from SYMAS</p> <p>5 there to greet you and to direct your resources</p> <p>6 appropriately, were there?</p> <p>7 A. No, ma'am.</p> <p>8 Q. So, again, now some 4 o'clock, 54 minutes after the</p> <p>9 match had stopped, some significant number of minutes</p> <p>10 after a major accident had been declared from</p> <p>11 Leppings Lane at 3.18, you were again going into</p> <p>12 a situation where you had to do the greatest good for</p> <p>13 the greatest number but acting very much in isolation</p> <p>14 from the organisation. Is that right?</p> <p>15 A. That's right, ma'am.</p> <p>16 Q. In that situation arriving, you have already described</p> <p>17 very graphically the message from headquarters which</p> <p>18 asked you to act up, effectively, to the incident on</p> <p>19 scene was not a message you received?</p> <p>20 A. I didn't receive it, ma'am.</p> <p>21 Q. Which explains entirely why, when you first arrive, you</p> <p>22 first of all tend to see what it is you are meant to do,</p> <p>23 you assess the situation; you speak to a fellow officer</p> <p>24 that you know, which is Mr Flack?</p> <p>25 A. That's right, ma'am.</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. You ask him if he's seen an incident officer, and he 2 hasn't either; yes? 3 A. That's right, ma'am. 4 Q. He volunteers to you that the scene is one of chaos? 5 A. Yes, ma'am. 6 Q. Which tallies entirely with what you can see and hear 7 around you? 8 A. (Witness nods). 9 Q. You see the line of ambulances are blocked and, 10 therefore, the free-running system that operated before 11 appears to have stopped? 12 THE CORONER: Ms Delahunty, we have heard all this. You are 13 just repeating the evidence which has already been 14 adduced. 15 MS DELAHUNTY: I shall move on. 16 What you do is then assume a role in order to try to 17 deliver the greatest good to the greatest number 18 because, as you say, there had to be some change in 19 order to make sure the situation did not deteriorate? 20 A. Correct, ma'am. 21 Q. In that role you act up. The first thing you do is go 22 to investigate what happened in order to cause the 23 blockage and that's where you find the abandoned 24 ambulance and you turn that into a static treating zone, 25 don't you?</p> <p style="text-align: center;">Page 77</p>	<p>1 A. Organised chaos, I would put the words at. 2 Q. Well, the words you used previously were "pandemonium" 3 and "total bedlam", it required some type of order. Can 4 we tie that into your description of organised chaos? 5 A. You can, ma'am. 6 Q. We can. Thank you very much. 7 So far as the arrival of Mr Jones is concerned. 8 I wonder if we could understand the hierarchy within 9 SYMAS. There is a document that has been provided to 10 us, and I wonder if we can call it up on screen. 11 INQ000088580002. So we can get an understanding, we 12 have Mr Jones at the top of the page. He is the 13 assistant chief ambulance officer (operations) and he is 14 one of the people that reports directly to Mr Hopkins 15 and thence to Mr Page, isn't he? 16 A. That's correct, ma'am. 17 Q. So there is only two tiers above Mr Jones: Mr Hopkins, 18 whom the jury have heard some little about; and Mr Page 19 whom the jury have already heard from. 20 If we look to see where Mr Jones is in relation to 21 the sequence of command beneath, we then have Mr Dale, 22 and if we look along towards the Maltby station, which 23 is immediately to the bottom left, we have station 24 officer Mr Bettison and then we have you; yes? Are you 25 finding it? I can see you are glancing. Can you see</p> <p style="text-align: center;">Page 79</p>
<p>1 A. That's correct, ma'am. 2 Q. You then organise who should go in which ambulance and 3 with what speed to make sure you move the line of 4 ambulances along, because you need to get them out of 5 the way to clear room for others? 6 A. Correct, ma'am. 7 Q. More significantly, possibly, you actually alternate the 8 destination of the ambulances between NGH and RHH, don't 9 you? 10 A. That's correct. 11 Q. Why do you do that? 12 A. To make it a 50/50 split to offload a lot of the work up 13 at Northern General, to ensure that Hallamshire gets 14 a fair quota of casualties as well. 15 Q. In fact, one of the instructions you give that to is the 16 one crewed by your own Mr Beighton and Mr Yoxall, who 17 leave to go to the NGH and in fact have a rapid 18 turnaround, coming back to you from RHH in just 19 16 minutes because those resources are being effectively 20 marshalled? 21 A. That's correct, ma'am. 22 Q. If we were to summarise the scene that greeted you on 23 arrival, would it be right for you still to use the two 24 words which you described to Operation Resolve as being 25 one of pandemonium?</p> <p style="text-align: center;">Page 78</p>	<p>1 that? 2 A. Yes. 3 Q. Thank you very much. So when Mr Jones eventually 4 arrived, you had already established some type of order 5 upon the scene. It was in a fit state to be handed 6 over, wasn't it? 7 A. That's correct, ma'am. 8 Q. Did you expect Mr Jones to take over? 9 A. I did, ma'am. 10 Q. Why did you expect Mr Jones to take over? 11 A. As a senior officer and with his position, he should be 12 able to allow then for myself to get back to what I was 13 doing. 14 Q. You have described a situation in terms of what needed 15 to be done because you have described a situation where 16 there was a living child amongst a presumed dead adult; 17 yes? 18 A. That's correct, ma'am. 19 Q. That demonstrated to you very clearly, I suggest, that 20 there was still a very great deal to be done to make 21 sure that those who could live got the best chance of 22 living? 23 A. Correct, ma'am. 24 Q. And that the opportunity of separating those who were 25 dead from those presumed dead from those who were not</p> <p style="text-align: center;">Page 80</p>

1 dead had to be an operation that was undertaken?
 2 **A. Correct, ma'am.**
 3 Q. Because Mr Jones didn't relieve you of that task, that
 4 role was undertaken by simply the doctor who was still
 5 there?
 6 **A. The doctor, ma'am, yes.**
 7 Q. And you weren't able to release resources in yourself in
 8 order to go to assist?
 9 **A. No, ma'am.**
 10 Q. That must have been shocking?
 11 **A. It was at the time, but we had to work fast.**
 12 Q. You did. You say you had to work fast. Just explain to
 13 the uninitiated, why did you have to work fast?
 14 **A. When there's a vast amount of numbers, we have to**
 15 **quickly try and move them so that we can get them off to**
 16 **hospital as quickly as possible.**
 17 Q. So would it be right to describe the situation that you
 18 were in at, say, 4 o'clock, as being one where there was
 19 nothing to be done medically?
 20 **A. At 4 o'clock? I would have believed that everyone would**
 21 **have been able to walk into an ambulance and just go for**
 22 **minor problems at the time.**
 23 Q. But not having an overview command of the scene, that
 24 wasn't something you were able to say at that point,
 25 were you?

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1 **A. No, ma'am.**
 2 Q. Which must have been troubling. In terms of describing
 3 Mr Jones's actions, what you have said to
 4 Operation Resolve in the recent months is that you
 5 considered him to be not effective, he wasn't managing
 6 the area, he was in a state of shock and he wasn't fit
 7 to do the job he should have been doing. Are those
 8 words you still stand by?
 9 **A. That was my opinion. Correct, ma'am.**
 10 Q. It must be very difficult for you to say that, because
 11 you worked for the ambulance service for upwards of
 12 15 years circa 1989, and you continue to be in their
 13 employ?
 14 **A. I prefer to put the truth down, ma'am.**
 15 Q. It may not be quite as eloquent as those words you have
 16 used but when you were interviewed by another agency you
 17 described him as being like a headless chicken.
 18 A graphic description, but one, again, that would be apt
 19 from what you have described?
 20 **A. I can't recall that pointer.**
 21 Q. So far as the division of the dead from the living
 22 again, you have described a child that was with his
 23 father and that was within a group of casualties
 24 believed to be some two to three in depth. Were those
 25 casualties still in the same position as you observed

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1 when you first arrived at Leppings Lane at 35 minutes
 2 past the hour?
 3 **A. That's correct, ma'am.**
 4 Q. But they had grown in number?
 5 **A. Correct, ma'am.**
 6 Q. You weren't able to say, because of your late arrival on
 7 the scene, at what point those numbers got added to or
 8 whether or not any chance to save them had been lost in
 9 the meantime?
 10 **A. They may have been added to whilst I was actually going**
 11 **to Northern General and back. I believe that was the**
 12 **case, ma'am.**
 13 Q. So far as your role over the day was concerned, first
 14 arriving at 35 minutes past for those critical seven
 15 minutes or so, going to the NGH and then returning to
 16 take charge of the scene. Did there come any point when
 17 you received further information from the headquarters
 18 of SYMAS to let you know what the situation was outside
 19 of Leppings Lane so far as injured and casualties were?
 20 **A. No, ma'am.**
 21 Q. So you were operating entirely in isolation throughout
 22 that entire period, focusing purely on Leppings Lane?
 23 **A. Correct, ma'am.**
 24 Q. When, in your interviews with Operation Resolve, you
 25 describe a situation where there was not one major

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1 accident but three scenes of a major accident, what did
 2 you mean?
 3 **A. That's my experience of being to football matches in the**
 4 **past, that it did appear that I've got a major incident**
 5 **where I was.**
 6 Q. Yes.
 7 **A. And there was probably one on the pitch and there would**
 8 **probably be one at one part of the terracing. That was**
 9 **my belief at the time.**
 10 Q. Was that your belief based on the particular nature of
 11 Hillsborough or your practice based on your experience
 12 as an ambulance officer, which is that where there is
 13 one major accident declared, you often have other
 14 pockets of accidents which need to be identified and
 15 addressed so they can be met and managed?
 16 **A. Both, ma'am.**
 17 Q. You were, again, operating an area of Leppings Lane
 18 alone which, for the entirety of that period, received
 19 absolutely no external assistance from any senior
 20 officer taking a role of incident officer?
 21 **A. Except the police, ma'am.**
 22 Q. Except the police, absolutely. Can I therefore please
 23 move on to the way in which your statement was gathered
 24 and presented to you. When the changes and alterations
 25 were presented to you, you were asked why you thought

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<p>1 that changes had been made in the script that we have 2 seen in the interim version, the one that's in 5 May and 3 incorporated in 5 June. What you said was: 4 "What we have got here is someone who is trying to 5 manipulate and do things according to the way they 6 wanted it to be rather than the way it actually was." 7 Is that still your view? 8 A. Yes, ma'am. 9 Q. If we look to see why you came to that view, and we 10 track the changes that were made, and Mr Hough has very 11 helpfully taken you through the sequence, can I please 12 ask you in particular to look at that tab number 7, 13 which is the document immediately preceding the changes 14 that are made within your own statement. The sequence 15 we have is that you think you prepared a handwritten 16 account which you take along to SYMAS offices shortly 17 after the incident happens. That's your own handwritten 18 account? 19 A. That's right, ma'am. 20 Q. Do you hand that handwritten account in? 21 A. That handwritten account was taken away from me. 22 Q. Was it taken away from you at that meeting where 23 Mr Higgins was there taking a second account from you? 24 A. I can't recall that, ma'am. 25 Q. Do you recall ever seeing it after it was taken from</p> <p style="text-align: center;">Page 85</p>	<p>1 then which was clearly critical of the senior 2 management's response to the occasion and that news was 3 not welcome to them? 4 A. Correct, ma'am. 5 Q. When we look to see what changes were made even after 6 that first process of editing your account, we are 7 already seeing, are we not, on the 5 May statement, 8 a statement which is already diluted because it doesn't 9 contain the criticism of the officers that you would 10 have made had you been able to give a free-flowing 11 account? 12 A. Correct, ma'am. 13 Q. Neither does it include the account which you have given 14 to us about finding a living child amongst the mixture 15 of bodies presumed to be dead? 16 A. That's also correct, ma'am. 17 Q. You told them that, didn't you? 18 A. I did so, ma'am. 19 Q. You also made plain to them that you expected to be 20 assisted by a senior officer not simply on the second 21 occasion, but the first as well? 22 A. That's correct, ma'am. 23 Q. So it wasn't simply the presence of Mr Jones appearing 24 and then departing so quickly, it was the whole of 25 the sequence of responses from the time you arrived at</p> <p style="text-align: center;">Page 87</p>
<p>1 you? 2 A. Only on the television. 3 Q. Only on the television. The account that was taken by 4 Mr Higgins, can you recall how long it was that you were 5 in interview with him where he was taking your account? 6 A. I can't recall the time, ma'am. 7 Q. Was it a surprise to you that in addition to Mr Higgins 8 there were two other gentlemen who were part of 9 the interview process? 10 A. It was a surprise to me, ma'am. 11 Q. You weren't introduced to them. They didn't tell you 12 what function they were performing there? 13 A. No, ma'am. 14 Q. Over the process of extracting this first handwritten 15 account which is in handwriting not yours, a sequence of 16 questions and answers were put to you where you 17 described yourself as feeling very much under pressure? 18 A. That's correct, ma'am. 19 Q. Pressure to say the thing that would be acceptable to 20 the SYMAS people that were taking the statement rather 21 than reflecting your experiences on the day? 22 A. That's correct, ma'am. 23 Q. So it is not simply a question of what additions are 24 made within the statement we will later come to, it is 25 also the fact that you were volunteering information</p> <p style="text-align: center;">Page 86</p>	<p>1 35 minutes past until the time that you stood down? 2 A. Correct, ma'am. 3 Q. Not only would those accounts not find their way in, but 4 when you had extracted relevant facts from Mr Flack, who 5 had also described not being able to find an incident 6 officer, and had also described the situation as being 7 one of chaos, that, too, had not found its way into your 8 account? 9 A. That's correct, ma'am. 10 Q. So when we look at the first version which you have 11 amended, the 5 June one, which has a couple of 12 hand-annotated accounts, we are right in looking at 13 that, aren't we, Mr Litster, and thinking that that is 14 pretty much a pale reflection of the story you went into 15 that office ready to tell immediately after the 16 Hillsborough accident? 17 A. That's correct, ma'am. 18 Q. The only reason that full story wasn't told is because 19 of the degree of intimidation and pressure by those 20 within the room who were responsible for extracting the 21 most reliable and accurate and full account from someone 22 who had been there at the hard face? 23 A. That's correct, ma'am. 24 Q. How did that make you feel? 25 A. Disappointed, in the way that people who were supposed</p> <p style="text-align: center;">Page 88</p>

1 **to be looking after us didn't.**
 2 Q. Mr Higgins was the SYMAS officer known to you who took
 3 that account. Were you aware that he was one of
 4 the officers who was meant to be on scene acting within
 5 the Hillsborough ground?
 6 **A. I wasn't aware, ma'am.**
 7 Q. Because that would have meant a very difficult situation
 8 presented itself to Mr Higgins because he was there
 9 taking an account from you which could implicitly
 10 criticise him for what he had not done so signally on
 11 the pitch?
 12 **A. That's correct, ma'am.**
 13 Q. So to place you in a position where you were providing
 14 an account in good faith to someone who had every reason
 15 not to want to hear what you had to say was a very, very
 16 improper thing to do, was it not?
 17 **A. Correct, ma'am.**
 18 Q. So when we come to look to see even after that process
 19 what changes are made and we look, therefore, if I can
 20 please turn to that document which has the changes
 21 within it, and I think that is the one which is at
 22 tab 9 -- could you turn that one up, please?
 23 THE CORONER: We are not going to run through everything
 24 that has been run through so carefully by Mr Hough, are
 25 we?

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1 MS DELAHUNTY: No, I am certainly not going to, sir. Thank
 2 you.
 3 If you have tab 9 open, please, and first of all go
 4 to paragraph 19, it is a point, sir, to pick up
 5 a comment you made, to make sure I have dealt with it
 6 appropriately. If you look at paragraph 9, Mr Litster,
 7 and look at the handwritten annotations at the final
 8 line or so of that paragraph --
 9 THE CORONER: Paragraph 9?
 10 MS DELAHUNTY: Paragraph 19. Do you have that?
 11 **A. I have that.**
 12 Q. It was suggested by the coroner that that paragraph
 13 could be appropriately corrected if added onto that
 14 sentence were the words "I did not receive the call" or
 15 "I did not hear the call". Do you recall that?
 16 **A. I can't recall anything.**
 17 Q. But the difference in this paragraph here, Mr Litster,
 18 is not the question of it didn't make clear that you
 19 didn't hear it, but it actually inserts, "I received"?
 20 **A. That's untrue.**
 21 Q. It is not only untrue, but the person who had access to
 22 that Racial would have had access to the transcript we
 23 have looked at where we can now see that no less than
 24 three times do you make plain to your headquarters that
 25 you had not received that second part of the message?

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1 **A. That's correct, ma'am.**
 2 Q. So to suggest in this paragraph that you had received it
 3 and as a result acted on it is a gross misrepresentation
 4 of the truth of the matter, isn't it?
 5 **A. Correct, ma'am.**
 6 Q. The second addition that we have down here is the
 7 absence of information that we find in paragraph 22, if
 8 you can just move on there, please. It is not simply
 9 a question of what is added, it is what is missed out.
 10 Now, when you are describing here the Derbyshire
 11 ambulance vehicle that was parked with its rear doors
 12 open, you have very graphically described to us, as you
 13 did initially, that that was a vehicle that was
 14 effectively abandoned, because the attendant had gone in
 15 to see what he could do in order to --
 16 THE CORONER: Ms Delahunty, I'm not sure this has been drawn
 17 to the jury's attention. I don't think it has. I will
 18 be corrected if I am wrong. In paragraph 22 what has
 19 been crossed out is:
 20 "The markings indicated it was a Derbyshire
 21 vehicle."
 22 As I follow the question, this is said to be the
 23 vehicle which was causing the obstruction.
 24 MS DELAHUNTY: That's right. That gives a very factual
 25 description of an ambulance being there within the

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1 setting. It does not describe that ambulance as being
 2 abandoned, does it?
 3 **A. No, not abandoned.**
 4 Q. Nor does it describe the young girl who was in the
 5 ambulance as being upset and distressed, which is
 6 something that had struck you and which appeared in your
 7 former account. Nor did it describe that the very
 8 presence of that abandoned ambulance vehicle was what
 9 had blocked the exit of the ambulances from
 10 Leppings Lane; yes?
 11 **A. That's correct, ma'am.**
 12 Q. So what that paragraph is signally not doing is
 13 identifying what it was that led to the breakdown in the
 14 exit of the ambulances which meant that you had to go to
 15 investigate and, upon finding it, you had reallocated
 16 that vehicle to be a static medical resource, therefore
 17 moving it out of the way; yes?
 18 **A. That's correct, ma'am.**
 19 Q. So it is an omission from that paragraph which is almost
 20 parallel to the additions we have seen: it is sanitising
 21 something that was a very real --
 22 THE CORONER: Ms Delahunty, I'm sorry, it is obviously me
 23 being very slow on this. I'm not quite following this.
 24 Paragraph 22 has, as I see it, the one crossing out of
 25 the sentence about the markings.

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1 MS DELAHUNTY: Yes.
 2 THE CORONER: An addition before "a vehicle in front", it
 3 says "a Derbyshire ambulance vehicle" and "in front" is
 4 crossed out --
 5 MS DELAHUNTY: Yes.
 6 THE CORONER: -- and was actually moved -- in fact, is moved
 7 to another position. Those seem to be the only changes
 8 in paragraph 22 that I can see. Have I missed
 9 something?
 10 MS DELAHUNTY: No, you haven't. The point is --
 11 THE CORONER: So the points that you are now making are not
 12 to do with any changes, as I understand it, but to do
 13 with the content of the paragraph, which is just the
 14 same as the previous paragraph, as I understand it?
 15 MS DELAHUNTY: It is to do with the omission of the material
 16 which this --
 17 THE CORONER: But that was no doubt right at the beginning,
 18 as I understand it.
 19 MS DELAHUNTY: Yes. But the opportunity to correct it
 20 hasn't therefore come into the statement.
 21 THE CORONER: The opportunity to correct it hasn't come in.
 22 Yes, I see.
 23 MS DELAHUNTY: That's right.
 24 Paragraph 21, if I can just turn you back in your
 25 mind's eye to that particular paragraph there, if we can

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1 look at those changes. This is the paragraph that
 2 concerns Mr Flack and his conversation with you.
 3 When we see the changes here, and I wonder if we
 4 could have it brought up on the screen for the jury,
 5 because I'm conscious it will be very difficult for them
 6 to follow this. I have it as YAS000001810006.
 7 If we can highlight that paragraph there, when we
 8 are looking to see what is struck out there, I'm
 9 particularly interested in the words that appear in the
 10 second sentence:
 11 "I asked him where the incident officer was."
 12 That's been crossed out to "if there was an incident
 13 officer". The distinction, I suggest, Mr Litster, is
 14 that you were expecting an incident officer to be there.
 15 It wasn't "if", it was "where"; yes?
 16 **A. That's correct. "Where" is what I put in.**
 17 Q. "He said he did not know where the incident officer was
 18 and that it was chaos."
 19 That has been deleted in its entirety?
 20 **A. That's correct, ma'am.**
 21 Q. Because he, too, was looking for an incident officer and
 22 hadn't been able to find one because one didn't exist?
 23 **A. That's correct, ma'am.**
 24 Q. The consequence of that was a scene of chaos, which he
 25 had inherited and which he conveyed his view to you?

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1 **A. That's correct, ma'am.**
 2 Q. That was accurate factual information which had been
 3 given to you by a fellow officer which is deleted here
 4 in this account, is it not?
 5 **A. That's correct.**
 6 Q. It should have been within it, shouldn't it, because
 7 that was your evidence?
 8 **A. Correct, ma'am.**
 9 Q. There are other corrections that we go through and
 10 through as we go through. What you have said previously
 11 is that, overall, you don't take issue with the
 12 individual changes because overall it presents
 13 a picture, but now you have been taken through the
 14 significance of some of the omissions as well as some of
 15 the additions, it does change your account very
 16 significantly, doesn't it? It makes it look,
 17 Mr Litster, as though the whole process was a lot more
 18 organised --
 19 THE CORONER: Shall we just let him answer the question?
 20 **A. Yes, the changes were made without my blessing, ma'am.**
 21 MS DELAHUNTY: They were made without your blessing. They
 22 were presented to you, as we now know through Mr Hough's
 23 careful work, in a final document that appeared and was
 24 dated 6 June. When you were provided with that, you
 25 weren't given a copy to show the annotations, were you?

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1 **A. No, ma'am.**
 2 Q. You weren't given a cover letter which identified that
 3 any changes had been made at all?
 4 **A. That's right, ma'am.**
 5 Q. When that document was presented to you for signature,
 6 it was intended that that would go in front of the
 7 Taylor Inquiry to be the public face of SYMAS; yes?
 8 **A. I believe so, ma'am, yes.**
 9 Q. You weren't required to give evidence, were you, at the
 10 Taylor Inquiry?
 11 **A. No, ma'am.**
 12 Q. Mr Page gave evidence at the Taylor Inquiry, didn't he?
 13 **A. He did, ma'am.**
 14 Q. I ask, if I could, please, to call up one page from his
 15 evidence: HOM000026140049. It is the very top question.
 16 This brings us almost full circle, which is Mr Page is
 17 giving evidence in front Lord Justice Taylor, and this
 18 question was put:
 19 "Question: Another matter, please, Mr Page. You
 20 have heard my telling Lord Justice Taylor that, in fact,
 21 two incidents -- one outside the Leppings Lane end of
 22 the ground, that is by the turnstiles, and one inside on
 23 the pitch. Is it right that control instructed one of
 24 the senior ambulance officers, Mr Litster, to assume the
 25 position of duty officer outside the Leppings Lane end

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<p>1 turnstiles?"</p> <p>2 Do you see that question put?</p> <p>3 A. Yes.</p> <p>4 Q. The answer given by Mr Page is this:</p> <p>5 "Answer: Yes, sir, he is one of the first vehicles</p> <p>6 to arrive on the scene."</p> <p>7 Now, you are raising your eyebrows when you look at</p> <p>8 that. The implication from that question and answer,</p> <p>9 Mr Litster, is that Mr Page was taking the amendment</p> <p>10 which we have just addressed within paragraph 2, which</p> <p>11 effectively has you as the designated headquarters</p> <p>12 officer at Leppings Lane, without referring to the fact</p> <p>13 that that was done by your own initiative, as opposed to</p> <p>14 under direction and command; yes?</p> <p>15 A. That's correct, ma'am.</p> <p>16 Q. But almost as significantly, he is bringing that right</p> <p>17 forward to your very first trip at Leppings Lane, 15:35,</p> <p>18 which is just not right, is it?</p> <p>19 A. Totally incorrect, ma'am.</p> <p>20 Q. The implication of that question and answer is that that</p> <p>21 is trying to impose a sense of command and control by</p> <p>22 a senior SYMAS directive --</p> <p>23 THE CORONER: I don't think he can comment on what the</p> <p>24 purpose of it was. You have made the point, which you</p> <p>25 are perfectly entitled to do, but he can't take it</p> <p style="text-align: center;">Page 97</p>	<p>1 Q. As a result of that, you instructed a doctor who was</p> <p>2 present -- I think you describe him as having</p> <p>3 a stethoscope -- to carry out checks on others in the</p> <p>4 pile; yes?</p> <p>5 A. To recheck and confirm the presence of fatalities there,</p> <p>6 ma'am.</p> <p>7 Q. So we can put some timing on this, your return to the</p> <p>8 ground was, I think, at about 15:55; is that right?</p> <p>9 A. Correct, ma'am.</p> <p>10 Q. So this particular aspect of events would have been</p> <p>11 sometime after that; yes?</p> <p>12 A. A short time after, ma'am.</p> <p>13 Q. A short time after that. What, a matter of minutes</p> <p>14 after that?</p> <p>15 A. Correct, ma'am.</p> <p>16 Q. In relation to that doctor, because we will hear</p> <p>17 evidence from a number of other witnesses, and it might</p> <p>18 help us to identify who that is. First of all, this:</p> <p>19 are you able to tell us who that was? Do you know who</p> <p>20 that was?</p> <p>21 A. No, ma'am.</p> <p>22 Q. Can you give us any description or help with</p> <p>23 a description?</p> <p>24 A. I recognise his face, but other than that, I couldn't</p> <p>25 say.</p> <p style="text-align: center;">Page 99</p>
<p>1 further than that.</p> <p>2 MS DELAHUNTY: Were you aware that that had been said by</p> <p>3 Mr Page at or near the time that that evidence was</p> <p>4 given?</p> <p>5 A. No, ma'am.</p> <p>6 Q. When did that evidence first come to your notice, if you</p> <p>7 can recall?</p> <p>8 A. This is the first time I've seen this, ma'am.</p> <p>9 Q. Do you find that shocking?</p> <p>10 A. I do, ma'am, yes.</p> <p>11 MS DELAHUNTY: Thank you very much. No further questions.</p> <p>12 THE CORONER: We are obviously finishing at 4.15, Ms Khan.</p> <p>13 MS KHAN: I think I will be about one minute.</p> <p>14 THE CORONER: Yes.</p> <p>15 Examination by MS KHAN</p> <p>16 MS KHAN: Mr Litster, just one matter which may be</p> <p>17 important, and it relates to the young lad that you</p> <p>18 retrieved effectively from a pile of bodies, and this</p> <p>19 was on your second visit to Leppings Lane. That's</p> <p>20 right, isn't it?</p> <p>21 A. Correct, ma'am.</p> <p>22 Q. It was quite clear, wasn't it, that he had been left</p> <p>23 amongst that group of bodies, it seemed to you, in the</p> <p>24 expectation or belief that he was also deceased?</p> <p>25 A. Yes, ma'am.</p> <p style="text-align: center;">Page 98</p>	<p>1 THE CORONER: So you would recognise his face, would you?</p> <p>2 A. Correct, sir.</p> <p>3 MS KHAN: Have you seen him on television, for example,</p> <p>4 after the event?</p> <p>5 A. I believe I have, ma'am.</p> <p>6 Q. Can you remember when that would have been?</p> <p>7 A. On one of the documentaries, I believe, ma'am.</p> <p>8 Q. When would that have been, the documentary?</p> <p>9 THE CORONER: Ms Khan, isn't the best way to deal with this,</p> <p>10 when he has completed his evidence, for him to be asked</p> <p>11 about it and see if it can be pursued?</p> <p>12 MS KHAN: I'm very happy to deal with it that way, sir.</p> <p>13 THE CORONER: That seems the easiest way.</p> <p>14 MS KHAN: I'd be very grateful for that.</p> <p>15 Can I just ask one other matter: are you clear that</p> <p>16 doctor was present on both your first visit and the</p> <p>17 second or might he only have been there on the second</p> <p>18 visit?</p> <p>19 A. There was one doctor there on the first visit and there</p> <p>20 was one on the second. I can't recall if it would be</p> <p>21 the same doctor or whether another one had arrived,</p> <p>22 ma'am.</p> <p>23 Q. On that first visit, bearing in mind you are not clear</p> <p>24 whether it was the same or a different one, are you</p> <p>25 clear, on that first visit, you drove past the line of</p> <p style="text-align: center;">Page 100</p>

<p>1 officers who were obscuring your view of the bodies; 2 that's right, isn't it? 3 A. That's correct, ma'am. 4 Q. The doctor, whoever he was, on that first visit, did you 5 see a stethoscope at that time or is that something you 6 only became aware of on the second visit, when you were 7 anxious that checks should be carried out? 8 A. I believe there was a stethoscope the first time. 9 Q. You believe. Can you be sure or not sure? 10 A. Not 100 per cent sure, no. 11 MS KHAN: Thank you very much. 12 THE CORONER: Thank you very much, Mr Litster. I think 13 Mr Horstead might be slightly longer than 45 seconds. 14 MR HORSTEAD: Slightly. 15 THE CORONER: You will have to come back tomorrow anyway. 16 Would you be kind enough to be here so we can begin at 17 10 o'clock tomorrow? 18 A. I will, sir. 19 THE CORONER: You mustn't discuss your evidence with anyone 20 A. That's fine, sir. 21 THE CORONER: Thank you. You are free to go. 22 (The witness leaves the hearing room) 23 THE CORONER: Members of the jury, we will resume at 24 10.00 am tomorrow, if we may. 25 (4.15 pm)</p> <p style="text-align: center;">Page 101</p>	<p>1 that we still have 11 members of the jury so long after 2 we have begun. But everybody should clearly know that 3 this is not risk free, as far as the jury is concerned. 4 I simply thought it worthwhile to observe that so 5 everybody takes that well on board. That is all I was 6 going to observe. 7 MS LAMBERT: Sir, so far as hearing any submissions, if 8 there are to be any tomorrow, would you be minded to sit 9 at quarter to 10? 10 THE CORONER: No, I am happy to sit at quarter to 10. We 11 will adjourn. 12 (4.20 pm) 13 (The hearing was adjourned until 14 Tuesday, 16 December 2014 at 9.45 am) 15 I N D E X 16 17 Examination by MS RICHARDS1 18 19 Examination by MS BARTON9 20 21 Examination by MR HOUGH18 22 23 MR PETER LITSTER (sworn)20 24 25 Examination by MR HOUGH20</p> <p style="text-align: center;">Page 103</p>
<p>1 IN THE ABSENCE OF THE JURY 2 Housekeeping 3 MS LAMBERT: Sir, might I just raise one matter by way of 4 housekeeping before we depart. Last week, we circulated 5 a timetable for both phase 1 and phase 2, and interested 6 persons are at the moment considering those documents. 7 I was going to propose that anyone who wishes to make 8 any observations or submissions in connection with the 9 timetables should be in a position to do so tomorrow. 10 THE CORONER: Certainly. I don't know whether it is helpful 11 for me just to say something? 12 Events, funerals apart, or time lost, funerals 13 apart, when somebody rings in, as sometimes happens, 14 indicating that they are not well, I think can, to 15 a substantial degree, be ascribed to two members of 16 the jury. In other words, the sickness relates 17 substantially to two members of the jury. I obviously 18 have some concerns. I don't think it is right to 19 identify them, but I obviously have some concerns about 20 their reliability in the longer term. 21 Again, without going into details which are personal 22 to individuals, there are two other members of the jury 23 about whom I do have some concerns. It is obviously the 24 case that the longer we go on, the more risks there are, 25 as far as the jury is concerned. It is quite remarkable</p> <p style="text-align: center;">Page 102</p>	<p>1 2 Examination by MS DELAHUNTY61 3 4 Examination by MS KHAN98 5 6 Housekeeping102 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 104</p>

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