



Sir John Saunders Manchester Arena Inquiry Report Briefing Note

Executive Summary

The Manchester Arena Inquiry, chaired by The Hon Sir John Saunders, was established by the Home Secretary in 2019 to investigate the 22 May 2017 Manchester Arena attack which killed 22 people and injured hundreds more. Seeking to reduce the risk of a similar attack from recurring and mitigating the harm caused in the event of a future attack, Saunders released an in-depth report on 17 June 2021 which found “serious shortcomings” by multiple parties charged with securing the venue. The purpose of this brief is to highlight key considerations from the Saunders report for Pool Re, its members and the wider insurance industry. This brief may also be of interest to those engaged in the security industry.

Key findings

- *Security providers lacked appropriately trained personnel and input from qualified counter-terrorism experts.* Security employees at the Arena were not adequately trained or qualified to identify and mitigate a potential terrorist situation.
- *Inadequacy of the risk assessments of the venue.* Without a coordinated joint risk assessment by all security providers, the risk assessments of the venue failed to detect several potential vulnerabilities which were exploited during the attack.
- *The placement of the security perimeter.* The security perimeter was placed inside the venue, moving the threat closer to a wider number of potential targets.
- *General complacency over the risk of terrorism.* Despite the national terrorism threat level classed as ‘SEVERE’ at the time, security providers at the arena failed to display proportionate levels of alertness and responsiveness to the terrorism threat.
- *Responsibility for “grey spaces” protection.* A lack of clarity over ownership of a multiple-venue “grey space” led to disjointed and insufficient protection over the shared space.

Key observations from the report

- *Risk assessment.* The report recommends “Protect Duty” legislation to centrally focus on the preparation of comprehensive risk assessments, the identification of control measures and explanations of how these should be implemented.
- *Responsibility for “grey spaces”.* The report recommends that all stakeholders of a shared space should have a Protect Duty responsibility over common areas which their visitors use, with the extent of this responsibility depending on the amount of use they make of the common space.
- *Multi-stakeholder coordination.* The report outlines the necessity for Protect Duty to rectify issues of multi-organisation coordination by legislation, as coordination has thus far not occurred on voluntary basis.
- *Training and enforcement.* The report recommends counter-terrorism training and the enforcement of Protect Duty legislation be as robust and rigorous as comparable regulatory regimes, such as the criminal offence of breaching health and safety measures.

Emerging points of consideration for the (re)insurance industry

- The significant costs of failing to adequately assess the risk exemplified by this attack.
- Lessons learned from the report’s findings and recommendations highlight potential implications regarding liability and the potential demand for appropriate risk finance.



Incident Description

On 22 May 2017, over 14,000 spectators, many of whom were teenagers and children, attended the Manchester Arena for an Ariana Grande concert. Shortly before 22.30, the concert began to draw to a close and people began to exit the venue. Many did so through an area called the City Room, one of the four customer access points into the Arena. Many family members and friends were waiting in the City Room at the time to collect concert goers. At 22:31 Manchester-born Salman Abedi, a Daesh supporter of Libyan descent, walked across the City Room foyer towards the main doors and detonated a shrapnel-laden device concealed in his backpack. Twenty-two people were killed and 800 were injured with 112 hospitalised for their injuries from the attack.

Key findings from the inquiry

Lack of suitably trained security personnel and qualified counter-terrorism specialist input

Several issues were identified in relation to the inadequate training of personnel tasked with securing the venue. Whilst Saunders notes that the online training provided for security staff was adequate, processes were not in place to test and ensure that the training had been thoroughly understood by those who were obliged to undertake it, resulting in insufficiently trained security staff.

The attacker carried out hostile reconnaissance on the venue on at least three occasions prior to 22 May 2017, which presented opportunities for security staff to detect, disrupt or deter the attack. Visibly weighed down by his backpack, over-dressed for the warm evening and walking between the City Room and a CCTV blind spot the attacker did not attract suspicion from security personnel on site. A member of the public waiting in the City Room at the time did, however, raise his concerns to Showsec¹ security staff after fearing the attacker would “let a bomb off” following an exchange with the attacker over his unusual behaviour. These concerns were not adequately reported to senior security management. The two teenage stewards on duty in the City Room were not permitted to carry out active profiling of audience members without an SIA licence. One steward told the inquiry he did not report his concerns of the attacker for fear “he might be accused of racism”.

The report is particularly critical of the online training of Showsec employees which did not adequately ensure security staff correctly understood how to identify or react when confronted with a potential terrorist situation. Training is necessary “to instil individuals with the necessary confidence to report potential terrorist activity”. When presented with opportunities on the evening of the attack, Showsec stewards did not react effectively as they had been rigorously tested on the training materials on risk awareness, radio use or reporting. There was no evidence that mandatory online training on counter-terrorism had involved structured or robust checks to ensure all training had been understood. Issues also arose over the lack of trained professionals monitoring CCTV footage at the time, as SMG had failed to provide “adequate training” to its CCTV operators in relation to counter-terrorism.

Whilst counter-terrorism services were not specified in the contract, Showsec did regard itself as having expertise in counter-terrorism. However, it was evident from the inquiry that Showsec was unable to fill SMG’s substantial knowledge gap in relation to the effectiveness of its overall counter-terrorism strategy. Specialist input from an appropriately qualified counter-terrorism expert was needed for securing the venue but was not sought at the time.

¹ Showsec provided a crowd management and security service to arena operators SMG



Inadequacy of risk assessments of the venue

The area where the attacker positioned himself, in a CCTV blind spot, presumably identified during hostile reconnaissance, would have been noticed had security staff been alert to the terrorist threat levels and suitably trained to identify such behaviours. As the owner and principal operator of the CCTV system, it was SMG's ²responsibility to identify the existence of the blind spot. It should have done so as part of the proper conduct of its risk assessment process. Had there been an additional camera or the area covered by foot patrols, this would have increased the possibility of detecting the attacker in the City Room before the attack was conducted.

Also, had Showsec employees been invited to meetings with the local Counter-Terrorism Security Advisors, it would have ensured the accurate exchange of information regarding the risk of a terrorist attack and embedded Showsec into a process focused on counter-terrorism. This would also have led to more discussion about counter-terrorism between SMG and Showsec and increased dialogue on the risk of terrorism during on-site staff briefings.

Security perimeter

Had the perimeter been moved away from the Arena, the attacker would not have been able to gain access to the City Room. The report found that SMG should have sought permission from its landlord to push out the security perimeter before May 2017, so that people entering the City Room with large bags were checked with x-ray machines before entry. This method would have likely deterred the risk of a terrorist attack in the City Room and possibly the Victoria Exchange Complex more broadly and also reduced the number of people killed and injured.

General complacency towards the risk of terrorism

From the evidence it was found that on the 22 May 2017, and in the lead up to the Ariana Grande concert, inadequate attention was paid to the national terrorist threat level by those directly concerned with security at the Arena. The threat level was 'SEVERE' which means a terrorist attack is highly likely. However, as the national threat level had been set at 'SEVERE' for some years, none of those directly concerned with security at the Arena considered it a realistic possibility that a terrorist attack would happen, particularly in a location outside of London. The report found that the level of alertness proportional to the threat was absent by all three security organisations and the resulting security arrangements for such a large-scale event was "insufficient." This is a key lesson learned for any business especially if staff believe nothing will happen. Maintaining alertness is critical to preventing an attack.

British Transport Police (BTP) officers deployed to police the concert were expressly briefed to stagger breaks during the concert and to have concluded them by 21:00. This instruction was ignored by the officers, consequently there were no officers in any of the public areas of the Victoria Exchange Complex during the period of the attacker's departure from and return to the City Room between 21:10 to 21:33. None of the four BTP officers on patrol were in the City Room at the time of the attack, despite additional instructions that one officer should be positioned there at the end of the concert. If an officer had been present in the City Room from 22:00 onwards, concerned members of the public would, they said, have approached BTP instead of Showsec stewards, who were properly trained to handle such reports. An approach by a police officer may have caused the attacker to leave the City Room or detonate the device earlier. In either case, it is likely that fewer people would have been killed.

² SGM are the arena operators of the Manchester Arena



Multi-venue liability of “grey spaces”

The City Room where the attack occurred, is located in a shared space outside the arena which is publicly accessible. The City Room is an example of what Colonel Richard Latham and Dr David BaMaung, the Security Experts instructed by the Inquiry, described as “grey space” where there is a lack of clarity over ownership or where various neighbours, partners or tenants have responsibility for security. The City Room is part of the Victoria Exchange Complex, but not within the Arena itself. The report found that SGM, Showsec and BTP all had significant responsibility for the security within the City Room however these responsibilities were not sufficiently coordinated.

Key observations from the report

The Saunders report also includes several recommendations. Most notably Saunders emphasises his support for the introduction of “Protect Duty” legislation, which is currently undergoing public consultation, which will ensure best practice with counter-terrorism mitigation strategies. “Protect Duty” will build on “Martyn’s Law” which was campaigned for by Figen Murray, mother of Manchester Arena victim Martyn Hett. “Martyn’s Law” calls for venues and local authorities to have action plans against terror attacks.

Had the necessary precautions and processes been undertaken, the Manchester Arena attacker may have been identified early as a threat and disrupted on or before 22 May 2017 by those responsible for the security of the venue. Saunders states in the report, that whilst it was likely the attacker would still have detonated his device if confronted earlier, “the loss of life and injury is highly likely to have been less”. “As a result of combined failings, thousands of young people who attended the concert on that night were left an open and vulnerable target for terrorists”. Without legal obligations, many which were conditions on the Arena licence designed to protect the safety of the public, were ignored.

Risk Assessment

Central to the process of discharging the Protect Duty should be the preparation of a comprehensive risk assessment, the identification of the control measures and an explanation of how these will be implemented. Without a rigorous risk assessment process or “Protect Plan”, a haphazard tick-the-boxes approach occurred which inadequately identified salient areas of concern, vulnerabilities within the venue or inadequacies in staff training against a terrorist attack. The existence of the Blind Spot in the City Room, for example, would have been identified had a comprehensive risk assessment process been undertaken. For large commercial venues, such as the Manchester Arena, for which preparation of risk assessments and solutions may be complex, the report recommends that owners should pay for the preparation of the “Protect Plan” by an in-house consultant or contracting specialists. Whilst greater risk awareness may have prevented many of the fundamental issues which led to missed opportunities on the night of the attack, this is only the first step. As evidenced in the report, both training and mitigation are also of equal importance.

Responsibility of “grey spaces”

The report highlights the difficulties deciding who is subject to the Protect Duty in relation to areas over which multiple stakeholders have rights. The Manchester Arena attack is a pertinent reminder of how crucial this decision is. When considering an area such as the City



Room, these “grey spaces” can be particularly vulnerable to attack as lack of clarity over responsibility may leave shared spaces unprotected. The report recommends that all actors should have a Protect Duty over common areas which their visitors use, with the extent of this responsibility depending on the amount of use they make of the common space. Alternatively, the report also proposes that there is a strong case for making an organisation, such as Showsec, with no legal interest in the property but responsibility for security, subject to such a Duty.

Multi-stakeholder coordination

One of the recurring themes of this report was the need for co-operation between different stakeholders and organisations in the interest of securing the venue. All those concerned with occupying the Victoria Exchange Complex, in which the Arena was located, should have been cooperating together over security. The Counter Terrorism Security Advisor (CTSA) advising the station and the CTSA advising the Arena should have carried out at least part of their security assessment together. Showsec should have been involved with the CTSA when security matters were discussed with SMG. BTP should have liaised more closely with both SMG and Showsec. “Each should have known what the other was doing, so that the protective measures each provided were complementary”. Had SMG and Showsec known BTP’s deployment plan for example, this would have provided the opportunity to discuss and plan for the situation where BTP did not do as expected. It is hoped that a Protect Duty will achieve this coordination by legislation, as commercial pressures and insufficient communications may mean that it will not be achieved on a voluntary basis.

Training and enforcement of new legislation

Part of the Protect Duty proposals include the provision of mandatory ‘Action Counters Terrorism’ (ACT) training for staff, which would have mitigated issues arising from the inadequate training of Showsec stewards at the Arena. As the nature of the threat changes it is also important that there are regular refresher trainings to avoid the hesitancy reacting to reports of suspicious behaviour and general complacency which led to missed opportunities before the Manchester Arena attack. The report recommends the enforcement of the Protect Duty to be as robust and rigorous as comparable regulatory regimes, such as the criminal offence of breaching health and safety measures. Relevant to the current business environment following COVID-19 restrictions, Saunders notes that when cutbacks occur, security and enforcement budgets can be one of the first to be cut. As operators and commercial businesses are under financial pressure to try and make savings, the report calls it a “false economy” to cut enforcement, given what is at stake, namely the lives of people.

Emerging points of consideration for the insurance industry

The Manchester Arena inquiry report demonstrates the impact of a devastating terrorist attack using improvised explosive materials to deliver mass casualties. Without a thorough and appropriate risk assessment process to help identify the vulnerability of the venue to a potential terrorist attack, insufficient oversight of staff training and their responsibilities and a failure to engage effectively with partners to ensure vulnerabilities were known and managed, led to a series of failings that proved fatal.

The attack also exemplifies the potential costs that might arise when policyholders fail to adequately address potential threats, whether through a lack of understanding or failure to take the necessary preventative measures to mitigate terrorism risks. As a result of several



missed opportunities to prevent or reduce the impact of the Manchester Arena attack, the insurance industry suffered losses covering, business interruption, loss of attraction, long term health care for the injured and building damage. The private prosecution case currently in process by the families against the operators and service providers may also lead to significant compensation pay-outs.

This report is of particular significance to the insurance industry as Saunders draws notable attention to the forthcoming “Protect Duty. Pool Re *Solutions* will continue to work with the government to ensure the insurance sector’s interests are best represented in the consultation process. Pool Re *Solutions* have already outlined several issues of concern to the Homeland Security Group which arise from the proposed legislation. Potentially there may be demand for higher limits within terrorism liability policies, which could be influenced by the families’ private prosecution outcome. It is unclear whether the UK insurance market has sufficient capacity to offer increased coverage to every business. Second, there remains a question over what mitigation requirements are appropriate and proportionate and how much assurance will be required to confirm, at the minimum, compliance with any legislation.

Given Home Office estimates of up to 650,000 businesses that could be subject to the “Protect Duty” legislation once it is in place, it is necessary that lessons are learned from previous failings which have contributed to terrorist attacks. Having access to the appropriate tools and advice will be essential and, where necessary, competent risk advisors may be required to assist, particularly for complex or bespoke threat issues. The release of the Saunders report adds weight behind the necessity of “Protect Duty” legislation; the findings of his report underline the expectation that will be placed on businesses to uphold their responsibility to protect the public and to take proactive and appropriate steps to reduce or mitigate the impact of a terrorist attack. The compliance requirements are, as yet unclear, but the expectation is not.

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