

Witness Statement of: Paul Lennon

Statement of Witness: First

Exhibits: PL/01-PL/10

Date: 3 February 2020

THE GRENFELL TOWER INQUIRY

WITNESS STATEMENT OF PAUL LENNON

I, PAUL LENNON, of Baily Garner (Health & Safety) Ltd (**BGHS Ltd**), 34 Lafone Street, London, England, SE1 2LX, will say as follows:

1. This statement is made pursuant to a request for evidence made by the Grenfell Tower Inquiry (the **Inquiry**) on 2 January 2020.

Background

2. I am the Managing Director of BGHS Ltd. I am duly authorised by BGHS Ltd to make this statement.
3. I have over 40 years of construction experience and over 25 years in health and safety (**H&S**) management. I have a dedicated team of construction H&S consultants delivering services under the Construction (Design and Management) Regulations previously 2007 (the **CDM Regulations**) (which have now been superseded by the 2015 regulations). Under the CDM Regulations these services mean as a CDM co-ordinator. My project experience ranges from internal refurbishment schemes such as kitchens and bathrooms, and external repairs including replacement of doors and windows and roofs; to large demolition and regeneration projects up to a value of £230,000,000.00. I am a Chartered Member of the Institution of Occupational Safety and Health, a Chartered Member of the Chartered Institute of Building and a training

provider for the National General Certificate in Occupational Health and Safety certificate.

4. By an email dated 4 January 2011 [11:07], (PL/01:) Kensington and Chelsea Tenant Management Organisation (**KCTMO**) instructed BGHS Ltd to carry out the CDM co-ordinator services for fire door replacement works across the borough of Kensington and Chelsea, including at Grenfell Tower. An email from 4 January 2011 [10:13] (PL/02:) contained a project notification form which requested BGHS Ltd to carry out CDM co-ordinator services for the "*Supply and fit in accordance with TMO performance specification one number GRP 30m fire/security door set, complete with all necessary ironmongery, letter plates, door viewer and chain, handles, cylinder locks, hinges and other requirements*" (the **Project**).
5. Alan Thomas, previously of BGHS Ltd, dealt with the Project on a day to day basis but has since left BGHS Ltd. I was copied in on emails for this Project.
6. At the date of the instruction from KCTMO (PL/01:), the Project was due to be put out to tender to contractors imminently.

Services

7. BGHS Ltd carried out CDM co-ordinator services for the Project by seeking information from KCTMO in order to prepare the project information register for the pre-tender information pack to be included in the tender documents issued to contractors (PL/03: BAG00000012). KCTMO provided a portion of the information requested in an updated version of the project information register (PL/04: BAG00000016). BGHS Ltd issued the project information register (PL/05: BAG00000024) on 10 January 2011. This project information register was based on the information made available to BGHS Ltd by KCTMO as part of email exchanges on 4 January 2011 referred to in this paragraph 7.
8. BGHS Ltd gave advice by way of the project information register by email (PL/05: BAG00000024). I am not aware of any verbal advice and we do not have any record on file of verbal advice issued to KCTMO.

9. To my knowledge, BGHS Ltd did not attend any meetings in relation to the Project. This is usual in projects where there is a quick turnaround time for issue of the project information register to enable a project to go out to tender.
10. The information provided by KCTMO in the emails on 4 January 2011 prior to tender stage (PL/04 BAG00000016, PL/06: , PL/07: , PL/08:) is all of the information relevant to the Inquiry provided to BGHS Ltd in relation to the Project by any party, including KCTMO.
11. After issuing the project information register to form part of the tender pack on 10 January 2011 (PL/4: BAG00000024) BGHS Ltd had no further involvement in the Project. BGHS Ltd did not receive any further instructions from KCTMO after those issued on 4 January 2011 (PL/01:).
12. KCTMO never advised BGHS Ltd that a contractor had been appointed or the identity of that contractor.
13. BGHS Ltd was not involved in any way in the appointment of a principal contractor for the Works.
14. Further to paragraph 13, to my knowledge BGHS Ltd was not involved in or aware of any amendments that were made to the F10 notification served on Health and Safety Executive on 4 January 2011.
15. Further to paragraph 11, BGHS Ltd did not receive any further additional information to add to the project information register. The project information register which is document PL/04:BAG00000024 was the last project information register that BGHS Ltd prepared for the Project.

Invoices

16. Following the issue of the project information register for inclusion in the pre-tender information pack it is our standard practice to issue an invoice up to that stage.

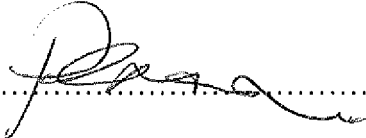
17. The invoice dated 31 January 2011 at document PL/09:BAG00000028 was issued on 31 January 2011 to Ms A Acosta at KCTMO (PL/10:) following the provision of the project information register for inclusion in the pre-tender information pack to be sent to contractors tendering for the Project referred to at paragraph 11 above.
18. KCTMO did not instruct BGHS Ltd to carry out any further works on the Project, and BGHS Ltd was not given any more information about the Project after 4 January 2011 by anyone, including KCTMO.
19. BGHS Ltd did not issue any further invoices as no further work was carried out on the Project.

Completion of Services

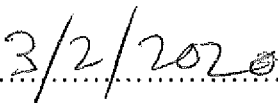
20. BGHS Ltd ceased to act as CDM co-ordinator and provide CDM co-ordinator services on the provision of the project information register on 10 January 2011 (PL/04 BAG00000024).
21. BGHS Ltd ceased to act as it was not instructed to carry out any further works by KCTMO. BGHS Ltd was not informed that the Project was proceeding, or that tenders had been returned, or that a contractor had been appointed. This is not unusual in BGHS Ltd's work as a CDM co-ordinator, as the results of the tender influence the next steps in any project. As BGHS Ltd did not receive any further instructions from KCTMO, BGHS Ltd assumed that the Project was not going ahead on the basis tendered and that our role as CDM co-ordinator for this Project was no longer required.

Statement of Truth

I believe that the facts stated in this witness statement are true. I am willing for this witness statement to form part of the evidence before the Inquiry and published on the Inquiry's web site.

Signed.....
Paul Lennon

Managing Director, Baily Garner (Health & Safety) Ltd

Dated..........

