

## Witness Statement

Ian Moorhouse

General	
Q1.	Describe your role within Butler & Young', how long you have been in this post, any previous relevant roles within the lifts industry and your qualifications / training / experience in respect of lifts.
A1.	<p>I was a Director of Butler &amp; Young from company registration in April 1992 until my retirement in May 2005, at which stage I ceased all association with Butler &amp; Young. Having had no association for over fourteen years I was unaware of their involvement with the Grenfell Tower Inquiry, only being made aware on receipt of Ms Schwikkard's email to Butler &amp; Young, 12<sup>th</sup> July 2019, requesting my contact details.</p> <p>On receipt of the email and with the passage of time and events in my life, I had no recall or recollection of the project and I have since been totally reliant on Butler &amp; Young documentation on disc and also on my former colleague S Ellis whilst investigating the issues and responding thereof.</p> <p>My endeavours during this investigation have been further hampered by the fact that Butler &amp; Young have only their own documentation on disc, now in your hands, the remaining documentation, drawings, reports etc and other matters inwards being held in storage at The Chatham Archive, these having been destroyed 31<sup>st</sup> May 2016, <b>Document IGM/1: The Chatham Archive Record of Destruction</b></p> <p>My memory of the project and my visual recollection of the lifts and the site some 15/16 years ago is still limited, but I have, where possible and during the course my endeavours, included any such subsequent recall and recollection in the response</p> <p>The accompanying CV gives details of my extensive 46 years involvement in the lift and escalator industry, with particular emphasis on my involvement in the specialist area of lift refurbishment in existing buildings together, with other associated works. <b>Document IGM/2: Ian Moorhouse CV</b></p>

Q2.	Describe the nature and time frame of Butler & Young's involvement in respect of the lifts at Grenfell Tower.
A2.	<p>Butler &amp; Young were appointed following fee tender submission and extensive interview by Ms J Rhymes - RBKC Consultancy Services Manager, Mr J Rogers - RBKC Project Manager and Mr D Steppel - RBKC Building Services Manager.</p> <p>The appointment was for full lift consultancy services in accordance with and, I recall, the particularly specific RBKC Project Brief for the refurbishment of the duplex passenger lifts and the Social Services lift at Grenfell Tower (GT), through to project completion. <b>Document IGM/3: Letter 14<sup>th</sup> March 2003</b></p> <p>Butler &amp; Young do not have record of the Project Brief. (<b>Document IGM/1:.....</b>)</p>
Q3.	Set out your individual involvement / role / duties in Butler & Young's work in respect of Grenfell Tower.
A3.	<p>Contract Administrator, ensuring full lift consultancy services and adherence to the particularly extensive and comprehensive Project Brief and the Agreement, including, but not limited to:</p> <p>Feasibility study with options <b>Document IGM/4: Feasibility Study, July 2003.</b></p> <p>Preparation of selected option 3A specification for tender issue by RBKC <b>Document IGM/5: Lift Refurbishment Specification April 2004.</b></p> <p>Tender analysis and recommendation for acceptance by RBKC <b>Document IGM/6: Tender Analysis and Summary of Tender Returns 16<sup>th</sup> July 2004.</b></p> <p>Consequent lift consultancy project management throughout.</p> <p>My involvement with the project and Butler &amp; Young ceased on my retirement May 2005.</p>
Q4.	Please exhibit the final version of any contract / contractual documentation pursuant to which Butler & Young was engaged in respect of the Grenfell Tower.
A4.	Butler & Young do not have the Project Brief nor any other RBKC contractual documentation. ( <b>Document IGM/1:.....</b> )

Q5.	What was the scope of Butler & Young's engagement and its main duties?
A5.	John Rogers – RBKC Project Manager confirmed the Brief as achieving feasibility studies on all three lifts in Grenfell Tower with Options for refurbishment, all in accordance with the RBKC Project Brief specification requirements. See 2.0 Project Objectives and Scope of The Works. <b>Document IGM/7: Lift Refurbishment Meeting 9<sup>th</sup> July 2003</b> See also Q2 'A'
Q6.	How did Butler & Young come to be engaged in respect of Grenfell Tower (including in respect of any tendering exercise)?
A6.	Following submission of the Butler & Young fee tender in accordance with the Project Brief, Butler & Young attended for interview with Ms J Rhymes - RBKC Consultancy Services Manager, Mr J Rogers - RBKC Project Manager and Mr D Steppel - RBKC Building Services Manager and, I think, Mr R Cahalarn - RBKC Senior Lift Engineer. Butler & Young were subsequently awarded the commission. <b>(Document IGM/3:.....)</b>
Q7.	Identify the party / parties with whom Butler & Young entered into relationships in order to carry out its role, describing the purpose of those relationships. Please also set out which organisations and individuals Butler & Young staff regularly had contact with respect of design, construction, inspection or maintenance activities.
A7.	Those attending Grenfell Tower Lift Refurbishment project meetings, are identified with their roles in the Project Contact List plus, at varying times, Mr D Steppel - RBKC Building Services Manager and Mr R Braxton - Apex Service Manager. <b>Document IGM/8: Pre-Start Meeting Minutes 30<sup>th</sup> November 2004</b>

The design and installation of two new lifts at Grenfell Tower (2004-2007) ('Project 1')	
Q8.	Please summarise (with reference to exhibited document, where necessary) the Employer's Requirements in respect of Project 1. Confirm whether Butler & Young was required by Kensington & Chelsea Tenant Management Organisation ("KCTMO") to provide lift specification / design compliant with the Building Regulations, British Standards and associated guidance / lifts guidance applicable at the relevant time.
A8.	Butler & Young do not have the Employers Requirements, the Project Brief or other exhibited documents. <b>(Document IGM/1:.....)</b>
Q9.	Who drafted the specification document <i>The Refurbishment of Two Electric Passenger Lifts and Replacement of One Hydraulic Passenger Lift at Grenfell Tower</i> (April 2004)?
A9.	Ian Moorhouse drafted the specification and it was proof read by Steve Ellis.
Q10.	When and by whom (within KCTMO) was the above specification approved?
A10.	<p>Butler and Young have no record of when or whom at RBKC approved the specification prior to RBKC tendering procedures. <b>(Document IGM/1:.....)</b></p> <p>John Rogers advised No of copies of tender documents as no of tenderers (possibly 5), plus 4 copies for TMO – as originally distributed. 2.0 Tender Procedures <b>Document IGM/9: Pre-Tender Minutes, 20<sup>th</sup> May 2004</b></p> <p>John Rogers did not wish to invite a contractor with whom the team would not be confident. 5.0 Final Agreed Tender List <b>(Document IGM/9:.....)</b></p> <p>6.0 Comments on Final Draft Specification <b>(Document IGM/9:.....)</b> 'No further comment on the final draft specification', John Rogers – RBKC Project Manager, Damian Donnelly – RBKC Lancaster Area Manager and Robin Cahalarn – RBKC Senior Lift Engineer and Janice Wray – RBKC Safety Officer.</p>

Q11.	Please exhibit the final drawings for the two new lifts, which were required to be provided pursuant to Section 2A.08 ‘Drawings to be Provided’ of the Butler & Young specification. Please also exhibit all documents required by Section 2A.09 to have been provided to Butler & Young by Apex Lifts Limited (“Apex”) as a condition of the lifts being deemed accepted.
A11.	Butler & Young have no drawings or records of the refurbished lifts relevant to the Lift Refurbishment Specification April 2004 Clause 2A.08 or Clause 2A.09 nor the O&M Manual. <b>(Document IGM/1:.....)</b> and <b>(Document IGM/5:.....)</b>
Q12.	Section 2A.06 ‘Design Standards’ of the specification states that “the equipment and installation shall conform to this specification and to the relevant British Standards including Codes of Practice and, in particular, BS5655, BS 7255 and EN81-1”. In this respect, please clarify:
A12.	Clause 2A.06, ‘Design Standards’ concludes in the first paragraph with this statement ‘Where this specification differs from those standards and codes, the provision of this specification shall prevail’. <b>(Document IGM/5:.....)</b>
Q12.a	Whether Butler & Young considered the two lifts installed as part of Project 1 to be “new lifts” for purposes of lift guidance? If Butler & Young holds a version of this specification endorsed on the front page by the Royal Borough of Kensington and Chelsea (in the fields provided for this purpose), please exhibit it to your answers.
A12.a	Butler & Young did not consider the lifts to be new lifts but to be refurbished lifts, all in accordance with the Project Brief and the RBKC approved specification issued to tenderers by RBKC. <b>(Document IGM/5:.....)</b> , 2.0 The Contract Particulars and the Scope of the Works <b>(Document IGM/8:.....)</b> & <b>(Document IGM/9:.....)</b> and 2.0 The Contract and the Scope of the Works <b>Document IGM/10: Project Start Meeting Minutes 16<sup>th</sup> March 2004</b> Butler & Young do not have a copy of the RBKC endorsed specification. <b>(Document IGM/1:.....)</b>

Q12.b	Whether Butler & Young considered that new lifts installed within Grenfell Tower (being a high-rise residential building) were required by the lifts guidance (including section 7.2.1 of BS5588 Part 5:2004 and the equivalent part of BS5588:1991) to be 'firefighting lifts'?
A12.b	Butler & Young did not consider the refurbished lifts to be 'firefighting lifts'.
Q12.c	If not, why not?
A12.c	<p>The Project Brief for lift refurbishment was particularly extensive and comprehensive, developed, in part, with considerable lift knowledge and understanding of RBKC specific lift project requirements.</p> <p>The Project Brief required refurbished lifts with fireman's control and made no mention of achieving 'firefighting' status. 2.0 The Contract Particulars and the Scope of the Works (<b>Document IGM/8:.....</b>) &amp; 2.0 The Contract and the Scope of the Works (<b>Document IGM/9:.....</b>)</p> <p>The requirement for fireman's control on the refurbished lifts, with other matters, was discussed and clarified with John Rogers - Project Manager and David Steppel - Building Services Manager prior to the feasibility study.</p> <p>I do not recall full compliance with BS5588 being discussed, I assume as this could only be achieved with completely new lifts in new buildings, not those existing with structural and other constraints.</p> <p>Other matters included 'drop-key' release and in car cameras.</p> <p>Butler &amp; Young instructions were to proceed with feasibility refurbishment option 3A, 2.0 The Contract Particulars and the Scope of the Works (<b>Document IGM/8:.....</b>) &amp; 2.0 The Contract and the Scope of the Works <b>Document IGM/11: Progress Meeting Minutes, 26<sup>th</sup> January 2005</b>, incorporating specifics including, but not limited to, fireman's control, the provision of drop key emergency release to landing doors and the fireman's control faceplate, this giving access to the fireman's control switch, and to specify the in car communication system to be removed and reinstated on completion by the RBKC nominated contractor. (<b>Document IGM/5:.....</b>)</p>

Q12.d	If so, was the requirement for ‘firefighting lifts’ expressly set out in the Butler & Young specification? If the specific requirements for ‘firefighting lifts’ was not set out in the Butler & Young specification, why not?
A12.d	Butler & Young were not instructed to specify ‘firefighting lifts’. The specific requirements of the Project Brief were for refurbished lifts with ‘fireman’s control’. <b>(Document IGM/5:.....)</b> See also Q12 ‘C’
Q12.e	What, if any, communications (verbal or in writing) did Butler & Young have with Apex and / or KCTMO and / or RBKC Building Control in respect of Design Standards, compliance with lifts guidance and whether the new lifts are / should be designed / installed as ‘firefighting lifts’?
A12.e	See Q12‘C’ above. Butler & Young have no record of communication on this with Apex or RBKC Building Control. <b>(Document IGM/1:.....)</b>
Q12.f	Did the lifts installed at Grenfell Tower as part of Project 1 and pursuant to the Butler & Young specification meet the requirements for ‘firefighting lifts’ including: <ul style="list-style-type: none"> <li>i. Means of external rescue / escape hatch;</li> <li>ii. Water protection;</li> <li>iii. Ability to control when / how / to what extent the lift doors open when operating in fire-fighting mode;</li> <li>iv. A communication system between the lift car and the Fire Service Access Level (‘FSAL’).</li> </ul>
A12.f	Items i, ii, iii and iv are not applicable to the Project Brief or the agreed option. However, item iii ‘Ability to control when / how / to what extent the lift doors open’ is specified in Fireman’s Control Clause 2A.70. <b>(Document IGM/5:.....)</b>

Q13.	<p>What steps did Butler &amp; Young take to ensure that the lifts proposed / installed by Apex were compliant with the Design Standards within the Butler &amp; Young specification and within the lift's guidance? Please exhibit any documents / certificates showing the outcome of any such enquiries.</p>
A13.	<p>The lift refurbishment specification required Butler &amp; Young to be provided with drawings and documentation by Apex for comment, review and approval, where appropriate. Letter to R Thorne at Apex 19<sup>th</sup> October 2004, <b>Document IGM/12: Letter to R Thorne Apex, 19<sup>th</sup> October 2004, Document IGM/13: Letter to G Poynter at Apex 21<sup>st</sup> December 2004 and (Document IGM/5:.....)</b></p> <p>Butler &amp; Young have no other records on this. <b>(Document IGM/1:.....)</b></p> <p>Butler &amp; Young undertook Witness Inspection Points throughout the project in accordance with Clause 2A.77 <b>(Document IGM/5:.....)</b></p> <p>Instruction, undertaking and observing of some witness inspection points identified in minutes.</p> <p><b>(Document IGM/11:.....)</b></p> <p><b>Document IGM/14: Progress Meeting Minutes, 22<sup>nd</sup> February 2005</b></p> <p><b>Document IGM/15: Progress Meeting Minutes, 23<sup>rd</sup> March 2005</b></p> <p><b>Document IGM/16: Progress Meeting Minutes, 24<sup>th</sup> May 2005</b></p> <p>Ian Moorhouse retired May 2005.</p>
Q14.	<p>What, if any, consideration was given to the provision of a fire-fighting / protected lift lobby. If its inclusion was not considered to be practicable, why not and how was this recorded / communicated?</p>
A14.	<p>See Q12 'C' above</p> <p>Butler &amp; Young have no record. <b>(Document IGM/1:.....)</b></p>



Q15.	Did Carl Stokes (fire risk assessor) make any enquiries with Butler & Young about the fire safety of lifts and associated subsystems?
A15.	This name is unknown to me and Butler & Young have no record. <b>(Document IGM/1:.....)</b>
Fire control switches	
Q16.	In respect of the fire control subsystem including Switches, please set out, at the time of Butler & Young's work on Grenfell Tower:
Qa.	The location of any Switches at Grenfell Tower;
Aa.	Adjacent to ground floor entrance. <b>(Document IGM/5:.....)</b> <b>Document IGM/17: Clause 2A.11, Controller: General</b> <b>Document IGM/18: Clause 2A.70, Fireman's Control</b>
Qb.	Whether and how these Switches were connected to the lifts;
Ab.	Lift refurbishment specification <b>(Document IGM/5:.....)</b> <b>Document IGM/19: Clause 2A.75, Tests on Completion and Handover</b>
Qc.	The make, model and supplier of the Switches (with pictures if available);
Ac.	Butler & Young have no record. <b>(Document IGM/1:.....)</b>
Qd.	What, if any, instructions were provided for their use;
Ad.	O&M Manual <b>(Document IGM/1:.....)</b>

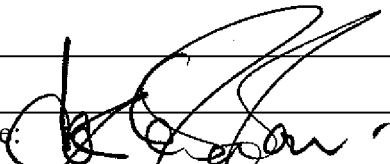
Qe.	The intended functionality of the Switch(es) including where there are two lifts in operation;
Ae.	Lift Refurbishment Specification ( <b>Document IGM/5:.....</b> ) ( <b>Document IGM/18:.....</b> )
Qf.	The reason why 'drop key' switches were specified, rather than a Euro key as required by EN81-1?
Af.	RBKC requirement as confirmed at meeting in Q12 'C'. RBKC requirement of drop key release gives additional lift and shaft security rather than the frequent availability of the Euro key to unauthorised persons. The drop key release is in use with other local authorities for the same reason.
Qg.	If / how the Switch(es) were tested at the completion of Project 1;
Ag.	Lift Refurbishment Specification ( <b>Document IGM/5:.....</b> ) ( <b>Document IGM/19:.....</b> )  Ian Moorhouse retired May 2005.
Qh.	Butler & Young's expectations for the maintenance and testing of the Switches following completion of Project 1 (frequency, extent of maintenance / inspection).
Ah.	Lift Refurbishment Specification ( <b>Document IGM/5:.....</b> ) <b>Document IGM/20: Clause 2A.76, Maintenance and Remedy of Defects</b> O&M Manual, Butler & Young have no record ( <b>Document IGM/1:.....</b> )  Ian Moorhouse retired May 2005.

A17.	Ian Moorhouse retired May 2005.
Q18.	Did Butler & Young or you personally have any concerns about the operation, suitability, safety and / or compliance with the Butler & Young specification's Design Standards and the lifts guidance of the lifts at Grenfell Tower and, if so, how and with whom were concerns raised?
A18.	I do not recall any.

### Statement of Truth

I, Ian Moorhouse, believe the facts stated in this Witness Statement are true

I am happy for this statement to form part of the evidence before the Inquiry and be published on the Inquiry's website.

		I MOORHOUSE	23/9/2019
Signature:		Print Name:	Date: