

In the matter of the Grenfell Tower Inquiry

Witness statement of Jonathon David Earl

1. My Name is **Jonathon David Earl**.
2. This is my first witness statement prepared to assist the Chairman of the Grenfell Tower Inquiry.
3. I have not previously made any witness statement to the Metropolitan Police Service.
4. I am currently employed by J S Wright & Co. Limited, Atlas Building, 16 Portland Street, Birmingham B6 5RX ("**JSW**" or "**the Company**") as an Electrical Contracts Manager. I was employed in this role at the material time and I was based at JSW's London office at 1 Northumberland Avenue, London WC2N 5BW.
5. In this witness statement I will provide some background information and details of my involvement in the Grenfell Tower refurbishment in my capacity as an employee of JSW. I am authorised by JSW to make this statement.

Qualifications and Experience

6. After leaving school I obtained the following qualifications:-

City & Guilds 236 part 1 (1981);
City & Guilds 232 parts 1 and 2 (1981);
City & Guilds 236 part 2 (1982); and
City & Guilds EC 4 (1983).
7. Prior to joining JSW I was employed by Briggs & Forrester Group as a Senior Project Manager. I have over 25 years' experience as a Project Manager, specialising in electrical engineering.
8. I joined JSW as an Electrical Contracts Manager in June 2015. I am responsible for growing the electrical side of JSW's business and managing contracts for electrical installations out of our London office. As we are still growing the electrical side of the business I am also involved in the procurement of specialist materials for JSW's electrical projects.

9. Over the course of my career I have attended a number of training courses and I have gained a number of qualifications including:-

City & Guilds 2391 Test and Inspection (2003);
SMSTS Health and Safety course (CITB accredited) (2007);
BS7671 17th Edition course (2008); and
SMSTS Health and Safety course (renewal) (2012).

10. I also led JSW's successful application for accreditation by the National Inspection Council for Electrical Installation Contracting (NICEIC).

Responsibilities during the Grenfell Tower Refurbishment

11. JSW was appointed to the position of sub-contractor for the mechanical & electrical ("**M&E**") installation on the Grenfell Tower refurbishment project ("**the Project**") before I joined the Company.
12. Initially I had very little involvement in the Project as the mechanical side of the installation was being run by one of our Project Managers, Dave Peacock and the electrical package had been sub-contracted by JSW to R J Electrics Limited ("**RJE**").
13. During September 2015 I was asked by my boss, Paul Featherston to step in and provide some help and support to Dave Peacock and the Project team. Robin Thorne, JSW's Contracts Manager in London had left a few months earlier and it was felt that my involvement in the Project, particularly with my project management experience would reassure our client, Rydon Maintenance Limited ("**Rydon**"). I understood from Paul that some of the mechanical works had been delayed on site and Rydon were concerned to ensure that the programme didn't slip.
14. I reviewed recent correspondence between Rydon and JSW and went to site a few times to meet with Steve Blake, Rydon's Project Manager and his team to discuss the outstanding issues. It emerged that a leak in one of the existing apartments had caused some damage and delayed the programme of mechanical works to the existing apartments. However, the leak had come from the existing pipework, which was heavily corroded and in poor condition, and which had split when we attempted to clamp our new pipework to it.

15. Once I had reassured Rydon that the delays were not a result of JSW's works and the programme was back on track I stepped back a little and left Dave Peacock to manage the day to day relationship with Rydon. However, I continued to attend the fortnightly progress meetings when I could and made myself available if and when issues arose.

Supervision of the electrical side of the M&E installation

16. I understand that RJE were involved in the Project from an early stage and had worked with JSW to prepare the tender for the M&E package. Once Rydon had confirmed that JSW's tender was successful, RJE were appointed as the electrical sub-contractor for the Project.
17. RJE was responsible for all aspects of the electrical installation. The original order placed by JSW with RJE was to 'carry out the design, coordination, supply, installation, testing and commissioning of the electrical installation, including all specialist services installation at Grenfell Tower' on 8 December 2014 (JDE/l:).
18. The electrical installation by RJE was managed by Andy Bridges. Andy also had a couple of managers working with him who supervised RJE's installation works on site.
19. As RJE had full responsibility for supervision, testing and commissioning I wasn't directly involved in verifying or signing off any aspects of their parcel of work. They were responsible for supervising their own works and providing the necessary testing and commissioning certificates to JSW.
20. However, I did liaise with Andy on some of the more complex electrical issues that arose as I was better able to better assist him with the technical details than Dave Peacock or our engineers who had mechanical backgrounds. I was also involved in negotiating variations to our order with RJE, and verifying that particular works had been completed when RJE requested payment for those works.

Secondary power supply for the AOV system

21. As a life safety system, the AOV system designed by PSB UK Ltd ("PSB") required a secondary power supply. This had not been included in Max Fordham's initial design specification and had to be incorporated as a variation to the existing works order.

22. I understand that Paul Hanson, a Building Control Officer at the Royal Borough of Kensington and Chelsea (“RKBC”) came to site on 8 October 2015 to discuss the route for the secondary power supply for the AOV system. I was copied into a calendar appointment by my colleague, Dave Bradbury informing me of the visit (JDE/2:). Although I was included in the distribution list for this email I do not recall being present at this meeting. As RJE were responsible for cabling the secondary supply Andy Bridges would have led the discussions with Building Control on this issue in any event.
23. At a subsequent progress meeting on 21 October 2015 Rydon confirmed that Building Control had signed off the secondary supply route, providing that both the primary and secondary supplies were installed in fireproof cable through the existing risers on either side of the lift shaft (JDE/3:).
24. On 28 October 2015 Andy Bridges, on behalf of RJE, sent me an update on the issues arising from the progress meeting with Rydon the previous week. Andy also sent me a document entitled ‘Grenfell Tower Smoke Extract System Power Supply Philosophy 28.10.15’ (JDE/4:) which described his meeting with Building Control and the principles which had been agreed for the secondary power supply installation. It reiterated that the primary and secondary supplies would be installed in fireproof cables in separate risers running up through the communal lobbies on either side of the lifts. The two supplies were then connected to an automatic transfer switch panel in the rooftop plant room which would automatically switch the AOV system over to the secondary power supply if the primary supply failed.
25. On 2 December 2015 JSW received RJE’s quote for cabling the secondary power supply (JDE/5:). As this related to electrical works I would have reviewed RJE’s quote before authorising the variation to RJE’s works order raised by Dave Peacock to cover the cabling of PSB’s AOV system the same day (JDE/6:). Any variation would also have been approved by Max Fordham on behalf of their client, Kensington and Chelsea Tenancy Management Organisation (“KCTMO”) and Rydon.

Testing and Commissioning

26. RJE were responsible for testing and commissioning the electrical installations on this Project. However, I would sign-off RJE's requests for payments throughout the Project which required me to verify that particular works had been completed.
27. I liaised with RJE to ensure that we had all the necessary commissioning certificates for each of the discrete parcels of work.

Existing flats

28. In the existing flats two minor electrical installation works certificates were provided by RJE. The first certified the installation of a fused spur for the kitchen window extract fan and the second certified the extension of the existing circuit and the addition of two fused spurs for the heating interface unit ("HIU") and water meter.

New residential flats

29. In the new residential flats two installation certificates were provided by RJE for each flat. The first covered the complete electrical installation for that flat. The second was specific to the design, installation and commissioning of the mains smoke alarm that was installed in the hallway of each flat.

The door entry system

30. The door entry system was independently commissioned by SW Security Limited for RJE. Separate test certificates were provided for each of the individual components in that system. A final commissioning and acceptance certificate was provided to RJE by SW Security Limited (JDE/7:).

Other installations

31. A separate commissioning certificate was provided for the stand-alone fire alarm system in the nursery and for the installation of the secondary power supply to the roof top plant room for the AOV system.
32. Commissioning certificates were also provided for the emergency lighting that RJE installed in the boxing club, nursery, community room, entrance lobby and the lift lobbies on the ground, mezzanine, walkway and walkway+1 levels.

Operating and maintenance manual

33. In June 2016 RJE prepared a 'Description of Electrical Services' detailing the scope of their electrical works and the method of installation of each element of those works (JDE/8:). I understand that the accompanying manufacturers' product information, instruction and data sheets have already been disclosed to the Inquiry. These documents were passed to Rydon and ultimately formed the basis of the electrical aspects of the operating and maintenance ("O&M") manual for the Project.

Aftercare

34. On 18 July 2016 JSW achieved practical completion on the Project. I recall that the negotiations with Rydon over settling our final account were require protracted, particularly in relation to the agreement of an appropriate prolongation period. But other than assisting in settling our final account, my involvement in the Project ended at practical completion. At that point the Project was transferred from JSW's Contracts team to our Aftercare Department, managed by Toby Guise.
35. My general impression at the conclusion of the Project was that it had gone smoothly. Although I was initially brought in to deal with delays to the programme caused by the flooding in one of the existing apartments, that was resolved quickly and the Project then ran fairly smoothly to conclusion.

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 website.

Signed:



Dated:

20/10/18