

## Statement of Witness

### Statement of

Colin Richard Packer

### Age of witness

Over 18

### Occupation of witness

Head of Projects and Mechanical Fire employed by Sureserve Fire and Electrical Limited (previously known as Allied Protection Limited)

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- 1 I, Colin Richard Packer, of 6 Jubilee Road, Burgess Hill, West Sussex RH15 9TL will say as follows:
  - 2 I am employed as Head of Projects and Mechanical Fire at Sureserve Fire and Electrical Limited (previously known as Allied Protection Limited) (the **Company**). I am authorised to provide this witness statement on behalf of the Company in response to a request, pursuant to Rule 9 of the Inquiry Rules 2006, from the Solicitor to the Grenfell Tower Inquiry (the **Inquiry**) dated 27 May 2021 ("**CP01**": \_\_\_\_\_) (the **Request**). I refer to the questions set out on pages 2 to 7 of the Request ("**CP01**": \_\_\_\_\_) using the numbering therein. However, as a preamble to my statement I thought it might be helpful to provide some background to my experience and qualifications in order to put my responses into context.
  - 3 I joined the Company as a sprinkler manager in May 2018 and have held my current position at the Company since September 2019. I have a Degree in Production Engineering. I hold the City & Guilds AutoCAD Parts 4351 and 4353 and the City & Guilds in Electrical and Mechanical Engineering. I have also attended numerous courses on fire safety including the FPA Fire Protection Course, the FIA BS 5839 Fire Alarm & Detection Course, XACT FIRAS BS 9251 Residential Sprinkler Design, Installation & Canute Course, LPCB BS EN 12845 Sprinkler System Design Course, Fire Systems Hydraulic Calculations Course, FM & NFPA Sprinkler Training Course, Construction Skills – Manager CSCS Black Card Holder for the last 15 years and IOSH Directing Safety. I have worked in and around this sector for more than 34 years and, although my specialism is in fire sprinklers, I am experienced and have a good working knowledge of AOV, fire detection and passive fire protection systems.
  - 4 **Question 1 of the Request** ("**CP01**": \_\_\_\_\_): *What, if any, training or instruction (oral or written) was given to Allied Protection engineers (in 2017, either*

*at Grenfell Tower or generally) on (a) the tests, checks and maintenance tasks to be carried out on a smoke control system during a preventative maintenance visit and (b) specifically on how to correctly check the operation of dampers opening/closing, vents opening/closing, fans activating/running? Please exhibit any relevant materials to your response.*

- 5 When an engineer joins the Company they are given general basic health and safety training and training in the Company's processes and procedures. Their competencies are assessed during probation by reference to the qualifications they hold and the Company augments that training and those qualifications as the engineer progresses. In the case of the Grenfell Tower, Barry McAuliffe joined the Company as a qualified fire alarm engineer and held appropriate FIA qualifications for his position. I attach at Exhibit "CP02": \_\_\_\_\_ the FIA certification for Unit 5 Fire Alarm Systems Maintenance pursuant to BS 5839 Part 1 – 2013, obtained by Mr McAuliffe in January 2017. At this time (and indeed even today) there is little, if any, standardised independent formal training on maintenance of AOV systems. Most AOV systems are quite simple and a trained fire alarm engineer asked to service such a system would carry out the checks undertaken by Mr McAuliffe, as set out in his third witness statement ("CP03": \_\_\_\_\_). There are however a smaller number of complex AOV systems such as the sort found at Grenfell Tower. These more complex systems would usually require not only the simple checks carried out by Mr McAuliffe but more sophisticated checks including the operation of dampers, vents and fans which would require more specialist expertise. Had the Company been made specifically aware by KCTMO of the complexity of the system at Grenfell Tower prior to Mr McAuliffe's visit on 15 May 2017 we would have arranged for a specialist engineer from another company to accompany him as we did not as a Company have the necessary expertise. However, we were not so informed and in any event we could not have provided such a specialist engineer as this would need to have been arranged using a specialist third party company. With regard to the arrangements for Mr McAuliffe's visit, please see further details at paragraph 14 below.
- 6 **Question 2 of the Request** ("CP01": \_\_\_\_\_): *What was the basis (e.g. contract, Building Standards, industry guidance and/or other requirements) for this training and/or instructions?*



- 7 I attach at Exhibit “CP04”: \_\_\_\_\_ a copy of the technical specification (the **Specification**), which forms part of the Company’s contract with KCTMO for servicing fire alarm systems and AOVs. The relevant section relating to AOVs is at paragraph 4.1.7, which states as follows:
- “The Service Provider shall include for 6 monthly servicing of AOV systems in accordance with manufacturer’s instructions. The servicing shall include checking of interfaces with the fire alarm panel or AOV control system panel, together with checking and servicing of all AOV activators/mechanisms.”*
- 8 There is no reference to relevant British Standards in the Specification. As far as I am aware, none existed relevant to the servicing of AOV systems. Instead, reference is made to compliance with manufacturer’s instructions. These would have been critical to the Company’s understanding of the AOV system at Grenfell Tower, but these were not provided to the Company until the day of the Grenfell Tower fire (please see attached email from Claire Williams, Project Manager of KCTMO, at 12:46 on 14 June 2017 at Exhibit “CP05”: \_\_\_\_\_). The Specification, which was attached to the tender documentation for the Company’s contract with KCTMO, was provided by calfordseaden, a well-known and experienced consultancy within the social housing sector who would have been aware of relevant applicable standards.
- 9 **Question 3(a) of the Request** (“CP01”: \_\_\_\_\_): *In Section 11 of her Phase 2 Report on the Smoke Control System, at paragraphs 11.6.95 to 11.6.97, and in Table 11-7, Dr Lane states that BS EN 12101-6:2005, BS 5839-1:2013 and BS 9999:2008 required Allied Protection engineers to undertake the following operational tests on a quarterly basis, as a minimum. ‘a) Activate the system using a smoke detector; b) Inspect the position of the dampers in the lobbies on all floors; c) Inspect the position of the bypass dampers at Level 2; d) Inspect the operation of the smoke extract fan at roof level; e) Inspect the operation of the smoke extract fan at Level 2; f) Inspect the HMI panel, to check that it correctly indicates the system operation, floor activation and status of all dampers; g) Reset the HMI panel at the Ground Floor once all inspections of dampers and fans have been completed. [11.6.96] Therefore, the engineer was required to activate the system 24 times (i.e. once for each lobby), and for each activation of the system, carry out the relevant checks on the other 23 floors. [11.6.97] The engineer was also required to carry out checks on the Boxing Gym corridor AOV at Level 2 and Community Room*

*lobby AOV at ground level.' Further, at paragraphs 11.6.109 to 11.6.116, Dr Lane states that Allied Protection engineers were required to consider: (1) the primary and secondary power supply switchover at ground and roof level for the fans (2) the back-up batteries (3) the wiring (4) the control equipment in manual mode (5) the environmental function, (6) the interfacing of the smoke control system and BMS. However, she could not find evidence of the same. Do you agree with Dr. Lane's view that these were the applicable minimum requirements for Allied Protection's preventative maintenance visits in 2017? If not, why not?*

- 10 Dr Lane cites British Standards when assessing what she believes were the correct operational tests to be undertaken on such a system on a quarterly basis. This would have been a matter for KCTMO during selection, installation and maintenance of the AOV system at Grenfell Tower. The Company's contract was only to provide six monthly servicing (see my response further below). Any other arrangements would have been a matter for KCTMO and not the Company. However, Dr Lane has applied these standards in isolation without assessing their applicability either to an AOV system of the complexity of Grenfell Tower or the contractual arrangements put in place by KCTMO for design, installation, servicing and maintenance of the same. These were not the responsibility of the Company. As I understand it, the AOV system at Grenfell Tower was designed and installed by contractors PSB who would have had the obligation for compliance with the relevant British Standards for installation of such a system. The Company held a service and maintenance contract with KCTMO that set out our contractual responsibilities, which were to undertake a service every six months in accordance with KCTMO's requirements (referred to in the Specification by reference to the manufacturer's instructions, which were only provided to the Company on the day of the fire by Anthony Cheney, KCTMO Head of Contract Management (Interim) Assets & Regeneration). On my understanding of the contractual arrangements, KCTMO carried out further operational tests themselves on a monthly or quarterly basis but these did not involve and were not the responsibility of the Company. The Company were informed by Simon Hefferan, Contracts Manager, of KCTMO on 2 March 2017 that the system was still under warranty and that the Company should not interfere with the following "assets" when on site at Grenfell Tower, namely the AOV, fire alarm and dry riser. I attach at Exhibit "CP06": \_\_\_\_\_ a copy of an email sent from Mr Hefferan to Victoria Vincent, Contracts Administrator, of the Company, and Darren Bullock,



Operations Manager (South), of the Company on 2 March 2017 confirming this instruction. This is relevant in view of the action taken by the Company on the day of Mr McAuliffe's inspection in May 2017, in respect of which see my responses at paragraphs 14 and 21 below.

- 11 **Question 3(b) of the Request ("CP01": \_\_\_\_\_):** *If you agree that these operational tests were required, how did Allied Protection communicate the need to carry them out to the engineers (including Mr. McAuliffe and Mr Russell) carrying out the maintenance visits?*
- 12 Please see my response at paragraph 10 above.
- 13 **Question 3(c) of the Request ("CP01": \_\_\_\_\_):** *Do you consider, based on the Inspecting and Servicing Certificates and other information/documents available to you, that (a) Mr. Russell on 17th January 2017 and (b) Mr. McAuliffe on 15th May 2017 complied with Allied Protection's requirements/expectations for maintenance visits? If so, how? If not, why not?*
- 14 Mr Russell has since left the employment of the Company and I am not able to speculate as to the work he undertook. With regard to Mr McAuliffe's visit on 15 May 2017, I believe he carried out the checks that he was able to do based upon information available to the Company at that time. In his third witness statement ("CP03": \_\_\_\_\_), Mr McAuliffe explains that on arrival at the site he quickly identified that there was no fire alarm present. He reported to his line manager, Christopher Catty, that there was a very complex AOV system at Grenfell Tower and that specialist assistance may be needed to service the system. After consultation with Mr Catty, Mr McAuliffe was instructed to carry out a routine basic test of the system, which included testing, activation and remote monitoring to demonstrate the basic functionality of the system. This, Mr McAuliffe was competent to do and I believe did so to the best of his ability. The auto-dialler records and the fact that the fire brigade were called out before the system was placed on 'test' are in my view evidence that the system was working.
- 15 Given the instruction from KCTMO to the Company not to interfere with the system further because it was under warranty, I believe that Mr McAuliffe fulfilled the requirements of the Company's service contract with KCTMO and it would have been a

matter for KCTMO to liaise with the warranty provider to undertake any further checks or tests that it required.

- 16 **Question 3(d) of the Request** ("CP01": \_\_\_\_\_): *The Allied Protection Inspection and Servicing Certificate (Automated Opening Vents) form {LAK00000011} contains a checklist of 'tests/checks done' but does not include several tests which Dr. Lane considers to be required (testing the fans, environmental mode etc.) Why not?*
- 17 Please see my responses at paragraphs 5, 7, 8 and 14 above.
- 18 **Question 3(e) of the Request** ("CP01": \_\_\_\_\_): *The checklist includes 'clean, lubricate and tighten all actuators, dampers and louvres'. Was it your expectation that this would be done on each maintenance visit? If not, why not?*
- 19 Please see my responses at paragraphs 5, 7, 8 and 14 above.
- 20 **Question 4(a)(i) of the Request** ("CP01": \_\_\_\_\_): *In relation to Mr. McAuliffe's maintenance visit on 15th May 2017: Mr. McAuliffe's witness statement of 16th June 2020 {LAK00000522} states (at para 6) that he had a "basic knowledge of AOV systems, however I had not previously worked on AOV systems in tower blocks". In those circumstances: why was Mr. McAuliffe considered suitable to undertake the maintenance visit for a complex Smoke Control System in a high-rise residential building?*
- 21 Please see my responses at paragraphs 5 and 14 above. In my view, Mr McAuliffe was suitably qualified and competent to undertake the basic testing that he did on 15 May 2017. However, as has been indicated, the AOV system at Grenfell Tower was a complex one and would have required specialist contractors to fully service and maintain it. However, as the system was under warranty, KCTMO instructed the Company not to perform any further works.
- 22 **Question 4(a)(ii) of the Request** ("CP01": \_\_\_\_\_): *What steps were taken to ensure that Mr. McAuliffe was competent and confident to undertake the visit??*
- 23 Please see my responses at paragraphs 5 and 14 above.



- 24 **Question 4(a)(iii) of the Request ("CP01": \_\_\_\_\_):** *Was any consideration given to pairing Mr. McAuliffe with an engineer who was more experienced in such systems within tower blocks?*
- 25 Please see my response at paragraph 5 above.
- 26 **Question 4(a)(iv) of the Request ("CP01": \_\_\_\_\_):** *Would pairing Mr. McAuliffe with another engineer have allowed the testing to be more thorough for each floor tested (such as by having one engineer at one floor (between levels 1-23) while having another engineer, connected via phone or radio, on the floor with the HMI panel to reset the system?)*
- 27 Please see my response at paragraph 5 above. It is correct to say that if another engineer had accompanied Mr McAuliffe the tests he carried out would have been undertaken more quickly. Additionally a specialist engineer would have been required for any other tests.
- 28 **Question 4(b)(i) of the Request ("CP01": \_\_\_\_\_):** *Mr. McAuliffe, in the same witness statement, states (at para 8) that he "was not provided with any information regarding the AOV system" prior to his visit. In this respect, please clarify: What documentation/information about the Smoke Control System at Grenfell Tower did Allied Protection hold at this time? Where did it come from?*
- 29 Please see my responses at paragraphs 7 and 8 above. The Company was not provided with any information regarding the AOV system at Grenfell Tower until the day of the fire.
- 30 **Question 4(b)(ii) of the Request ("CP01": \_\_\_\_\_):** *The testing checklist refers to testing 'cause and effect'. Did Allied Protection hold a copy of the 'cause and effect' documentation/matrix for the Grenfell Tower system? If not, why not (given 'cause and effect' was specifically being tested)?*
- 31 The Company did not have any cause and effect document or matrix and was not provided with the same by KCTMO. The function test carried out was therefore of the system and not of the 'cause and effect' matrix as this was not held by the Company.

- 32 **Question 4(b)(iii) of the Request (“CP01”:** \_\_\_\_\_): *To the extent that Allied Protection did hold any documentation about the System, why was it not provided to Mr. McAuliffe?*
- 33 Please see my responses at paragraphs 7, 8, 10 and 29 above.
- 34 **Question 4(b)(iv) of the Request (“CP01”:** \_\_\_\_\_): *Mr. McAuliffe states, in the same statement (at para 12), that he could not find “any service history information (for example the service logbook)” and he does not recall if there was the usual information on Allied Protection’s system. Was there such information provided on the system? If so, please provide a copy. If not, why not?*
- 35 Please see my responses at paragraphs 7, 8, 10 and 29 above.
- 36 **Question 4(b)(v) of the Request (“CP01”:** \_\_\_\_\_): *Mr. McAuliffe states in the same paragraph of his witness statement that he called his manager at the time to check for this information but cannot recall if it was provided. Was it? If so, what information was provided? Was Andy Vernall Mr. McAuliffe’s manager at this time?*
- 37 Mr McAuliffe’s manager at the time was Mr Catty. I refer to my response at paragraph 14 above.
- 38 **Question 4(b)(vi) of the Request (“CP01”:** \_\_\_\_\_): *In Mr. McAuliffe’s interview with his then-manager, Andy Vernall, summarised in a statement dated 26 June 2017 {LAK00000486}, Mr. McAuliffe stated that he was not aware of the override switches for the System at Grenfell Tower. How were engineers made aware of these switches?*
- 39 In my experience it would be normal practice for the Company to place on the job notes details about any specific features of the system to be serviced. These would be made available to the allocated engineer via their mobile device prior to attending a site. If the Company has not received any information from the client, in this case KCTMO, then nothing would appear on the job sheet and this was the case with regard to Mr McAuliffe’s visit. As the Company had no information from KCTMO, details of the override switches, for instance, would not have been provided to the Company and would therefore not have appeared on Mr McAuliffe’s job sheet.



- 40 **Question 4(b)(vii) of the Request (“CP01”:** \_\_\_\_\_): *Mr. McAuliffe’s two witness statements explain that he had to obtain information and requested assistance from ‘Paul the Caretaker’. Do you consider it appropriate for an engineer to be reliant on the building’s caretaker for technical information about the system to be tested?*
- 41 I understand that KCTMO had advised the Company to contact the caretaker regarding access and location of certain areas but am unable to find any written communication evidencing that. In my experience it is common practice that people such as caretakers are utilised for their local knowledge of a building and often they also undertake routine testing as I believe was the case here. Paul Steadman had knowledge of the system at Grenfell Tower and I believe undertook some basic weekly or monthly testing of the system and would therefore have had knowledge of how it worked at a basic level and also how to reset the control panel. This is why I believe Mr McAuliffe would have asked for his assistance and in my experience it would be perfectly normal for him to do so.
- 42 **Question 4(c)(i) of the Request (“CP01”:** \_\_\_\_\_): *Dr Lane states at paragraphs 11.6.106 to 11.6.108 that ‘For the 1 hr 15 minute period the smoke detectors were recorded as activating this meant Mr McAuliffe had just under 4 minutes to carry out the 20 tests he purports to have carried out. For the reasons set out in Table 11-7, I do not consider this to have been viable. [11.6.107] Taking Level 18 as an example, Mr McAuliffe needed to go to Level 18, trigger the smoke detector, go back down to the Lobby to read the HMI Panel; it is not clear how he inspected the 4 dampers before or after he injected the smoke in the detector at Level 18 from his evidence. [11.6.108] Once down in the lobby he hit reset on the HMI panel, and then needed to travel back up to Level 18 to visually confirm the dampers had shut. He could not rely on the HMI Panel to do that as it did not record the physical state of the dampers, only the signal being sent to them.’ What is the usual duration (overall and/or per floor) of Allied Protection preventative maintenance visits for testing/maintaining the smoke control system in a high-rise building?*
- 43 I believe that Mr McAuliffe has dealt with these matters in his third witness statement (“CP03”:

- 44 **Question 4(c)(ii) of the Request (“CP01”:** \_\_\_\_\_): *What, if any, steps are taken to communicate this expectation to engineers and to monitor that sufficient time is allowed/taken to thoroughly maintain the Smoke Control System?*
- 45 Please see my response at paragraph 43 above.
- 46 **Question 4(c)(iii) of the Request (“CP01”:** \_\_\_\_\_): *Was the time period spent by Mr. McAuliffe on each floor on 15th May 2017 shorter than usual practice (and, if so, by how much)?*
- 47 Please see my response at paragraph 43 above.
- 48 **Question 4(c)(iv) of the Request (“CP01”:** \_\_\_\_\_): *Do you agree with Dr. Lane’s assessment that it was not ‘viable’ to carry out 20 tests within a 1 hour 15-minute period of time? If you do not agree, why not?*
- 49 Please see my response at paragraph 43 above.
- 50 **Question 4(c)(v) of the Request (“CP01”:** \_\_\_\_\_): *Given the 4 minute per floor inspection time, are you confident that the inspection of the smoke control system’s components on each floor was sufficiently thorough to detect any malfunctions?*
- 51 Please see my responses at paragraphs 14, 15 and 43 above.
- 52 **Question 4(d)(i) of the Request (“CP01”:** \_\_\_\_\_): *Mr. McAuliffe’s two witness statements explain that his 15th May 2017 maintenance visit had been cut short due to being called to an “emergency job and therefore was unable to do any further work due to time constraints” (par. 51, 16th June 2020 statement). The Inspection Certificate {LAK00000011} under ‘Comments’ records that the community area on the ground floor was not tested. The Certificate also records that actuators/dampers/louvres were not cleaned, lubricated and tightened. Please explain: What is Allied Protection’s procedure for a situation where a maintenance inspection of a fire safety system was left incomplete (due to shortage of time or any other reason)?*
- 53 Under normal protocols arrangements would have been made for a follow up visit if for any reason a maintenance or service inspection was incomplete. However, on the basis of the instruction provided to the Company by KCTMO regarding the warranty position, no



further preventative maintenance visits were scheduled by the Company to Grenfell Tower following Mr McAuliffe's visit.

54 **Question 4(d)(ii) of the Request ("CP01": \_\_\_\_\_):** *Was that procedure followed after the incomplete 15th May 2017 maintenance visit?*

55 Please see my response at paragraph 53 above.

56 **Question 4(d)(iii) of the Request ("CP01": \_\_\_\_\_):** *How is engineers' work supervised? In particular, were the Inspection and Servicing Certificates for Grenfell Tower reviewed by a supervisor?*

57 Engineers' work is subject to sample auditing which is programmed in and undertaken periodically by supervisors. Approximately 5% to 10% of all work is subject to auditing on a routine basis.

58 **Question 4(d)(iv) of the Request ("CP01": \_\_\_\_\_):** *Did Allied Protection appreciate following the 15th May 2017 visit that the testing/maintenance had not been completed? If not, why not?*

59 Yes, please see my responses at paragraphs 53 and 61.

60 **Question 4(d)(v) of the Request ("CP01": \_\_\_\_\_):** *If its incomplete status was appreciated by Allied Protection, what action was taken to ensure it was completed?*

61 The Company did follow up with Mr McAuliffe to obtain the missing Certificate but only after the Grenfell Tower fire had occurred. The Company was aware of course on the day of the inspection that Mr McAuliffe had been called away but in fact I believe the only missing element of his work was the completion of the Certificate and the Company was aware of the standing instruction from KCTMO that no further work (beyond the basic testing) should be undertaken. Whilst I accept that the paperwork was not completed on the day this had no bearing on the efficacy of Mr McAuliffe's work or the Company's knowledge of the completion of this visit. Steps have been taken since this time to improve response times of service engineers for completing paperwork and I anticipate that Mr McAuliffe would have completed the Certificate on the date of his site visit had he not been called away to an emergency visit. Since that time, the Company has moved

to an online job sheet system which means that an engineer cannot move on to the next job until they have completed the Certificate of Inspection which means that delayed completion of Certificates should no longer occur.

- 62 **Question 4(d)(vi) of the Request ("CP01": \_\_\_\_\_):** *Was KCTMO informed that the checks/maintenance were not fully completed on this occasion?*
- 63 I have instigated a search of the Company's email system from that time to check any notifications sent from Mr Catty or Mr Vernall to KCTMO either before or after the Grenfell Tower fire. I have been unable to locate any such notifications.
- 64 **Question 4(d)(vii) of the Request ("CP01": \_\_\_\_\_):** *In the circumstances, why was there no further maintenance visit for the Smoke Control System prior to the Grenfell Tower fire?*
- 65 Please see my responses at paragraphs 10, 15 and 53 above which explain why no further maintenance visits took place by the Company. I am aware that there was an emergency call out to Grenfell Tower on 24 May 2017 to investigate a loose coil of cable. This was an emergency call out and as such an engineer would always have attended. On this occasion the engineer in question was Magnus George who I believe has already provided a statement to the Inquiry and I believe that no further action was taken. The loose cable was identified on a formal defects list and was therefore being dealt with by the installation contractor under a warranty and defects period. No action was required from the Company and as far as I am aware KCTMO were fully appraised of the situation. I attach at Exhibit "CP07": \_\_\_\_\_ a copy of an email from 21 June 2017 from Mark Mathers, Area Contracts Manager, of the Company to Darren Bullock, Operations Manager (South), of the Company detailing the conversations with KCTMO on the day of Mr George's call out.
- 66 **Question 4(d)(viii) of the Request ("CP01": \_\_\_\_\_):** *In relation to Dr. Lane's analysis of the adequacy of Mr. McAuliffe's visit (par. 11.6.86 to 11.6.119 and Table 11-8 of the Smoke Control report), do you accept Dr. Lane's conclusions in this respect? If not, why not?*
- 67 No, I do not accept Dr Lane's conclusions for the reasons set out in this statement.



- 68 **Question 5(a) of the Request (“CP01”:** \_\_\_\_\_): *In relation to Mr. Russell’s maintenance visit on 17th January 2017, stated to have lasted 3 hours (arrival: 09.00 and departure: 12.00) {LAK000000009} in respect of the Smoke Control System, which crossed over with his visit in relation to Emergency Lighting between 08:00 and 13:00 {LAK000000245}: The Inspection Certificate checklist records that actuators were working correctly, that they (along with dampers and louvres) had been cleaned/lubricated/tightened, that the control equipment was working correctly and that Cause and Effect was tested. However, it also records ‘N/A’ in response to ‘smoke detectors tested?’ Do you hold any information about why the smoke detectors were recorded as ‘N/A’?*
- 69 I am unable to speculate as to why Mr Russell recorded the smoke detectors as ‘N/A’ and I am unable to find any records regarding the same. In any event I note that Mr Russell’s visit was undertaken prior to Mr Hefferan’s email to the Company on 2 March 2017 (“CP06”: \_\_\_\_\_) requiring no detailed work to be undertaken on the system. In any event, I believe that such tests as were carried out during Mr McAuliffe’s visit on 15 May 2017 confirmed that the smoke detection system was working.
- 70 **Question 5(b) of the Request (“CP01”:** \_\_\_\_\_): *Was Allied Protection aware that 26 smoke detectors were installed as part of the Smoke Control System at Grenfell Tower?*
- 71 The Company was not provided with any detailed information about the smoke control system at Grenfell Tower by KCTMO but a basic understanding of such systems would have meant that the Company was aware of the presence of smoke detectors on each floor and of their basic design.
- 72 **Question 5(c) of the Request (“CP01”:** \_\_\_\_\_): *Do you agree that it is not possible to correctly test the actuators, control equipment and Cause and Effect without locating and activating the 26 smoke detectors?*
- 73 The Company would agree that the smoke detectors would need to be located and activated.
- 74 **Question 5(d) of the Request (“CP01”:** \_\_\_\_\_): *Dr. Lane at par. 11.6.72 of her Smoke Control report states that the Tunstall auto-dialler records do not list any smoke detector activations for 17th January 2017, “confirming that no activation*

*of the system was carried by Mr Russell.” Do you agree with this conclusion? Are Allied Protection engineers are expected to activate/test all smoke detectors connected to the Smoke Control System via injection of artificial smoke?*

- 75 I can agree that the Company’s engineers are expected to activate / test all smoke detectors connected to a smoke control system via the injection of artificial smoke. This is indeed the test carried out by Mr McAuliffe during his service and maintenance inspection on 15 May 2017. I cannot speculate as to why Mr Russell would not have undertaken or recorded such tests but I can confirm that the later tests by Mr McAuliffe were appropriate.
- 76 **Question 5(e) of the Request (“CP01”:** \_\_\_\_\_): *In the scenario posited by Dr. Lane at par. 11.6.75 to 11.6.76 of her report (Mr. Russell activating the HMI panel in the ON position at ground floor only), do you agree that the HMI panel is not the appropriate means of ascertaining that all dampers/actuators were opening/closing correctly on all floors, as the HMI panel provided no feedback on the ‘true’ position of the dampers?*
- 77 I would agree that the HMI panel does not provide feedback on the position of the dampers. However, I understand that in his third witness statement (“CP03”: \_\_\_\_\_) Mr McAuliffe confirms that he heard the noise of the vents opening and closing and could feel the change in air pressure in the lift lobbies as a result.
- 78 **Question 5(f) of the Request (“CP01”:** \_\_\_\_\_): *Do you consider that, given the intersect between the Smoke Control System and Emergency Lighting inspection periods on 17th January 2017, the 3-hour period recorded for the System’s inspection would not represent the actual time available for that task?*
- 79 The three-hour period recorded for the emergency lighting inspection represents the discharge period of the lights in accordance with their rating. Whilst this discharge of power is in progress the engineer would be able to undertake other activities on site and therefore I believe that this period of time would be realistic.
- 80 **Question 5(g) of the Request (“CP01”:** \_\_\_\_\_): *Do you agree with Dr. Lane’s assessment at par. 11.6.78 to 11.6.79 of her report that, in order to service each actuator/damper/louvres across 91 dampers and 2 AOVs in the smoke control system during a 3-hour visit, Mr. Russell would only have had 2 minutes per actuator and*



*damper (which would have required the removal of the grille). Do you consider that this is realistic for one engineer? If not, do you consider that the Inspection Certificate is likely to be inaccurate in this respect?*

- 81 As I have stated previously, I cannot speculate as to the testing undertaken by Mr Russell and I am unable to find any other records that might assist. However, it would appear on the face of the Inspection Certificate that the timeframes recorded may not be entirely accurate.
- 82 **Question 5(h) of the Request ("CP01": \_\_\_\_\_):** *Dr. Lane further concludes at par. 11.6.84 to 11.6.85 that it was not possible for the checks recorded on the Inspection Certificate (including backup batteries and wiring) to have been carried out within a three-hour period. Do you agree?*
- 83 Please see my response at paragraph 79 above.
- 84 **Question 5(i) of the Request ("CP01": \_\_\_\_\_):** *How was Mr. Russell's work supervised by Allied Protection? In particular, was the 17th January 2017 Inspection and Servicing Certificates for Grenfell Tower reviewed by a supervisor?*
- 85 I have been able to ascertain from the Company's records that the Inspection Certificate for 17 January 2017 was reviewed by the Company's 'contracts team' as part of its auditing function. It should be noted that this was not a technical review but was an administrative review.
- 86 **Question 5(j) of the Request ("CP01": \_\_\_\_\_):** *Was a copy of this Certificate sent to the client? If so, was there any response to its contents?*
- 87 Yes. I am not aware of any response received from KCTMO.
- 88 **Question 5(k) of the Request ("CP01": \_\_\_\_\_):** *Did Allied Protection notice that Mr. Russell incorrectly recorded 'N/A' in respect of smoke detectors at Grenfell Tower, in spite of there being 26 such detectors installed? If not, why not?*
- 89 As noted in my response at paragraph 85 above, Mr Russell's work was at that time subject to an administrative audit rather than a technical audit, which would now be carried out. As such, the Certificate was sent by the Company to KCTMO and I am not aware of any further action by either the Company or KCTMO.

- 90 **Question 5(l) of the Request ("CP01": \_\_\_\_\_):** *If any deficiencies with Mr. Russell's visit were spotted, was there any consideration given to a return visit to remedy those deficiencies, ahead of the next planned visit on 13th April 2017 (which, in any event, did not proceed)? If not, why not?*
- 91 Please see my response at paragraph 85 above. I believe that following Mr Russell's visit the next planned visit was that of Mr McAuliffe which I believe confirmed that the smoke detectors were working.
- 92 **Question 5(m) of the Request ("CP01": \_\_\_\_\_):** *Mr. McAuliffe was interviewed by his manager following the Grenfell Tower fire. Was Mr. Russell similarly interviewed? If so, please disclose any material from this interview.*
- 93 As far as I can ascertain from the Company's records, Mr Russell was not interviewed.
- 94 **Question 5(n) of the Request ("CP01": \_\_\_\_\_):** *In relation to Dr. Lane's analysis of the adequacy of Mr. Russell's visit (par. 11.6.65 to 11.6.85 and Table 11-8 of the Smoke Control report), do you accept Dr. Lane's conclusions in this respect? If not, why not?*
- 95 I do not have sufficient information or knowledge about Mr Russell's visit to comment further.
- 96 **Question 6(a) of the Request ("CP01": \_\_\_\_\_):** *Dr. Lane, in section 19.6 of her Chapter 7 report concerning the Management and Maintenance of Grenfell Tower, concludes that the extent and frequency of Allied Protection's testing of the Smoke Control System did not meet the requirements of the relevant British Standards, with the checks undertaken by Mr. McAuliffe being "akin to part of the weekly testing which should be carried out described in BS EN 12101-6" rather than meeting the requirements for monthly operational tests described in that BS EN. Table 11-7 of Dr. Lane's Smoke Control report sets out the checks/maintenance activities which were required to be undertaken, as opposed to being actually undertaken: Do you agree with Dr. Lane's conclusions in this respect? If not, why not?*
- 97 No I do not agree with Dr Lane's conclusions, the reasons for which are given in my responses at paragraphs 7, 8 and 10 above.



- 98 **Question 6(b) of the Request ("CP01": \_\_\_\_\_):** *Please describe how the frequency and content of maintenance/inspection visits for Grenfell Tower was determined and by whom.*
- 99 This would have been the responsibility of KCTMO and in so far as the Company was concerned please see my responses at paragraphs 7, 8 and 10 above.
- 100 **Question 6(c) of the Request ("CP01": \_\_\_\_\_):** *Did, at any point in or before 2017, Allied Protection advise KCTMO that the Smoke Control System required more frequent and/or thorough inspections (whether by Allied Protection or TMO Estate Service Assistants) than had been put in place? If not, why not?*
- 101 No. The Company did not know what inspection regime KCTMO had in place, either with the installation contractor or with any other providers. The Company was only aware of its obligations pursuant to its contract with KCTMO, the details of which are given in the Specification ("CP04": \_\_\_\_\_).
- 102 **Question 7(a) of the Request ("CP01": \_\_\_\_\_):** *In relation to Allied Protection's reactive visit to Grenfell Tower on 25th May 2017, the Call Out (Repair) Visit Certificate {LAK00000014} records that the system was left 'part operational': What was meant by 'part operational' as far as the operability of the Smoke Control System in the event of a fire was concerned?*
- 103 I would refer to my response at paragraph 65 above. My understanding is that the loose coil was not connected to anything and therefore did not affect the operability of the smoke control system.
- 104 **Question 7(b) of the Request ("CP01": \_\_\_\_\_):** *Did the 'part operational' comment relate to the specific floor/issue (coiled up cable not linked to smoke detector) or the performance of the System throughout the tower?*
- 105 Please see my response at paragraph 65 above. In my view the engineer attending Mr George, would have used the phrase 'part operational' to reflect the fact that an element of the system did not appear to be connected. As he was attending on an emergency basis he would not have gone further and this is a typical phrase that an engineer would use in those circumstances. It did not mean however that the smoke control system was not working. It simply meant that there was an element that needed further explanation or

investigation. It was a note to the client who would be responsible for any further follow up.

106 **Question 7(c) of the Request ("CP01": \_\_\_\_\_):** *Was any consideration given by Allied Protection to carrying out an early maintenance/inspection visit to test the operability of the Smoke Control System in light of the fault found during the call-out? If not, why not?*

107 Please see my response at paragraph 65 above. KCTMO were aware of the call out and instructed our service engineer to undertake no further work as the fault was recorded as part of the formal defects procedure and was the responsibility of another contractor.

108 **Question 7(d) of the Request ("CP01": \_\_\_\_\_):** *Was any remedial work undertaken by Allied Protection in respect of the defect?*

109 No, please see my response at paragraph 65 above.

110 In conclusion, I have read Professor Jose Torero's report and would respectfully agree with his conclusions based on my knowledge and experience. In particular, the report makes reference to the spread of the fire in four stages and says that through the first stage of the fire the smoke control system appeared to be operating as intended. As the fire spread vertically (which characterised the second stage of the fire) and was significantly faster than lateral flame spread, this meant that the smoke control system was now operating outside its intended purpose and was becoming overwhelmed. In effect, it appears from that report that the smoke control system was not designed for or capable of responding to a fire of the nature of the Grenfell Tower fire.


111 It is also worth mentioning the failure of the fire compartmentation in the building, in particular the lobby fire doors, which only provided protection for 15 minutes (as opposed to the expected minimum of 60 minutes) which also appears to have contributed to the system being overwhelmed. Given the intensive nature of the fire, the cross-ventilation strategy could not have overcome these events and continue to operate effectively. As far as I am aware, there are also no provisions in the Building Regulations that require the designer of a smoke control system to control the inward penetration of an external fire. A correctly designed and specified system would be sized to perform within the framework of a contained single compartment fire, with the intention of maintaining a single lobby as passable. Given the scale of the event and the number of lobbies that were



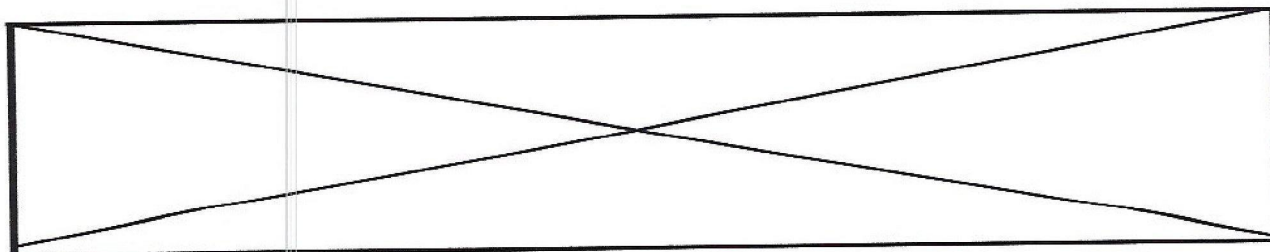
simultaneously compromised by smoke ingress, in my view a fully functioning, compliant system would have provided negligible benefits to egressing occupants.

- 112 I am asked by the Inquiry Solicitor to explain why Mr McAuliffe only completed his Certificate of Inspection on the day of the fire. I believe he has stated that this is because he was called away to an emergency on the day of his inspection and had a backlog of paperwork to complete which included the relevant Certificate. I have now ascertained that, on the day of the fire, KCTMO contacted the Company and sent through relevant O&M documents and also asked for all current Certificates to be provided to them by the Company. I believe that this is what prompted the call to Mr McAuliffe asking for the completed Certificate. This information has only just come to light in view of the recent detailed questions received from the Inquiry Solicitor to which this statement responds.

This statement consisting of 19 pages together with Exhibit "CP02" consisting of 1 page, Exhibit "CP04" consisting of 57 pages, Exhibit "CP05" consisting of 3 pages, Exhibit "CP06" consisting of 1 page and Exhibit "CP07" consisting of 1 page is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true. I am willing for this witness statement to form part of the evidence before the Inquiry and published on the Inquiry's website, provided that all confidential personal information has been removed prior to such publication.

  
.....  
**Signed**

9TH JULY 2021  
.....  
**Date**



### Statement of Witness – Index of Documents

Document Number	Inquiry's Unique Reference Number	Document Description
CP01		Inquiry's Rule 9 Request Letter to Sureserve Group / Allied Protection dated 27 May 2021
CP02		FIA Unit 5 Fire Alarm Systems Maintenance (BS 5839 Part 1 – 2013) certification of Barry McAuliffe dated 18 January 2017
CP03		Third Witness Statement of Barry McAuliffe dated 1 July 2021
CP04		Technical Specification by Calford Seaden, issued 4 December 2015
CP05		Copy of an email from Claire Williams, Project Manager of KCTMO, at 12:46 on 14 June 2017
CP06		Copy of an email from Simon Hefferan of KCTMO to Victoria Vincent and Darren Bullock of the Company on 2 March 2017
CP07		Copy of an email from Mark Mathers of the Company to Darren Bullock of the Company on 21 June 2017