

**WITNESS STATEMENT**

Criminal Procedure Rules, r27.2; Criminal Justice Act 1967, s.9; Magistrates' Courts Act 1980, s.5b

Statement of: RADLEY, ANDREW JAMES

Age if under 18: (if over 18 insert 'over 18')

Occupation: PLUMBING AND HEATING ENGINEER

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This statement (consisting of 7 page(s) each signed by me) 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.

Signature: A J RADLEY

Date: 19/12/2019

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

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1 My name is Andrew James RADLEY. I was employed by Skanska Construction UK Limited (Skanska) and worked on the Gas Distribution Strategic Partnership (East), appointed by tRIIO as a Site Agent for Multi-Occupancy Buildings (MOBs).

2 tRIIO is a joint venture between Skanska Construction UK Limited and Morrison Utility Services Limited.

3 The purpose of this statement is to respond to a request from the Metropolitan Police Service (MPS) for a witness statement in relation to my role in tRIIO's work at Grenfell Tower (the Tower) as part of its investigation into the Grenfell Tower fire.

4 I make this statement on my own behalf and do not speak for tRIIO.

Background in the Gas Industry

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5 I have worked in the gas, plumbing and heating industry for over 25 years. Over the years I have worked as a gas fitter for AMEC, TRANSCO and PJ Wood as well as a period being self-employed and running my own company.

6 I first started working for Skanska in 2012 and left the company in June 2017 to take up a position as a plumbing and heating engineer.

7 I was employed as a fitter in mains replacement working for North London Gas Alliance a joint venture involving Skanska and National Grid Transco which later became tRIIO to replace gas mains across North London and East Anglia. During my employment with tRIIO I worked in Connections and I also worked in-house in Barnet as a Multi-Occupancy Buildings Site Agent and then Site Manager. I was in these roles for approximately 18 months.

8 From October 2015 to June 2017 I was employed by tRIIO as a Site Manager for Multi-Occupancy Buildings (MOBs).

9 At that time I held a number of qualifications specifically relevant to the Site Manager role including:

- (a) UKATA Asbestos Awareness
- (b) CITB Site Managers Safety Training Scheme
- (c) Gas Meter Safety Training and Assessment (MET1)
- (d) Gas Safe Card
- (e) High Rise Design to Multi Occupancy Training
- (f) Site Managers Safety Training Scheme (SMSTS)
- (g) Utility Safety Health and Environmental Awareness (Gas)

10 As Site Manager I mainly covered the networks for the West London area. Approximately 90 per cent of the work I was involved in was reactive works. Reactive works were programme works that arose from reports from the public and others relating to gas leaks. I would oversee the rebuild of riser pipework and all other activities after a riser had been installed. This included painting, plastering and reinstatement. I

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would typically have five or six jobs allocated to me at any one time. I would visit each site and monitor each job.

11 Harvey SMITH was my line manager and I reported to him until he left the company in February 2017. After Harvey left I reported to Cerianne TALBOT and then Terry PENNY.

#### My role and involvement at the Tower

12 I understand tRIIO's work at the Tower has been described by other witnesses so I will not repeat the details here. tRIIO were notified of a gas leak at flats 22 and 32 at the Tower on 1 October 2016. tRIIO was instructed by Cadent to carry out works to reinstate the gas supply to that one riser and other flats that had been affected.

13 On 30 November 2016 I was asked by Harvey SMITH to take the Tower project on as Site Manager. I became involved in the project around the time the construction phase was due to start. I didn't have any involvement in relation to the design and pre-construction phases of the project. I remained as Site Manager for tRIIO at the Tower (alongside other projects) until the time of the tragic fire on 14 June 2017.

14 I wasn't involved in discussions at the design and pre-construction phases of the project, which would likely have included the route of the riser through the Tower. This was all agreed before I became involved.

15 Construction works started in early December 2016. As Site Manager, I was responsible for co-ordinating the works at the Tower. I was also to ensure the health, safety and welfare of contractors and residents during tRIIO's works at the Tower.

16 My main responsibilities as Site Manager at the Tower included:

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- (a) checking the competency of contractors attending on site;
- (b) conducting site inductions;
- (c) conducting site inspections;
- (d) ensuring the competency and training matrix was kept up to date;
- (e) ensuring contractors were following the design;
- (f) ensuring work was being carried out safely;
- (g) liaising with contractors including carpenters, electricians, fitters, riser teams and scaffolders;
- (h) liaising with residents and landlords;
- (i) liaising with the Temporary Works Co-Ordinator in relation to arranging workers to attend on site as and when needed;
- (j) making sure assurance logs and team audits were kept up to date;
- (k) mobilising the site and determining location of the welfare unit;
- (l) performing safety checks; and
- (m) setting up the logistics for the site including means of access and egress to the site.

17 The amount of time I spent at the Tower on a day to day basis varied and depended on what was happening on a particular day. I would typically spend a couple of hours on site each day. I had another five to six jobs to manage in addition to the Tower.

#### Subcontractors

18 I understand that Matthew DOLAN has provided you with details with of tRIIO's sub-contractors working at the Tower so I will not repeat that information here.

#### Health and safety on site

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19 As part of the management of health and safety on site, there were various measures in place including the following:

- (a) All contractors were required to work under tRIIO's Safe Systems of Work.
- (b) All contractors would produce their own Risk Assessment Method Statements (RAMS). I would check contractors were working in line with their RAMS.
- (c) Daily sign-in sheets were kept in the welfare unit so that we had a record of the contractors on site each day.
- (d) I checked the competency of contractors on site and updated the competency matrix which was kept in the welfare unit. Everyone on site had to have the Energy & Utility Skills Register (EUSR) standard of training as a minimum in order to be permitted on site.
- (e) I conducted site inductions and I would run through a generic induction checklist. All workers who were visiting the site for the first time had to be inducted before they could carry out any work.
- (f) I provided contractors with a copy of the asbestos survey and I warned them to keep away from asbestos.
- (g) I made sure contractors were wearing Personal Protective Equipment (PPE) including hard hats, glasses and gloves at all times whilst they were on site.
- (h) On site we had an air horn, fire extinguisher and serviced generator kept within the welfare unit. We also had a first aid kit and a list of mobile phone numbers for everyone on site in the welfare unit.
- (i) tRIIO's health and safety briefing record sheets were filled in every day. These briefing sheets were kept in the welfare unit so that everyone could access them easily.

20 Michelle UMAGHO-UKUEKU was a tRIIO Health & Safety Advisor. Michelle would conduct unannounced spot checks and advise in relation to general health and safety compliance on site.

Fire safety on site

21 I am asked about fire safety arrangements on site, in particular, the following measures were in place:

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(a) A MOBs Site Fire and Emergency Plan (Plan) dated 5 December 2016 was included in the Pack. The Plan confirmed fire safety arrangements for the site. I was one of the Emergency Co-ordinators (EC). The other EC was Russ SMITH from K&S. He was K&S' Site Co-ordinator. We were responsible for reviewing the plan and co-ordinating suitable arrangements for the plan.

(b) The Plan was reviewed during the project and I completed a Fire Inspection and Risk Assessment on 6 March 2017. This was following the asbestos incident at flat 12.

(c) The main contractors, K&S, completed their own fire risk assessment.

(d) We had an air horn, fire extinguisher and serviced generator kept within the welfare unit as well as a list of emergency contact numbers.

(e) Workers from K&S would carry fire extinguishers with them as they carried out work in the building. Other contractors would carry fire extinguishers as well.

22 I was aware that a 'Stay Put' policy was in place for residents I made sure contractors cleared their tools away and did not leave them in the stairwell so there were no obstructions in the fire escape.

#### Gas works

23 I saw a copy of the pipework design (Design) just before the works started. The riser was going to come up through the basement, utility shaft and then up through the stairwell. Laterals would then branch off with a small lateral to the Taylor Valve to take into each of the individual flats that were without gas. A lateral pipe would go through the top of each door.

24 On 5 January 2017 I received an email from Simon BOYGLE with a list of the residents that had

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confirmed they wanted their gas restored. Claire WILLIAMS, Project Manager at KCTMO gave me the forms to be given to residents so that they could confirm their preferences in relation to gas reinstatement.

25 I had to gain access to the individual flats for fitters in order to get people's cookers back on. I would be door knocking trying to book appointments. Russ SMITH from K&S was also knocking on tenants' doors to find out who used gas and to book appointments to gain entry to the properties so that works within the individual flats could be carried out.

26 Once we had a date arranged I would call the fitter supervisor or Holland Gas. I would meet them on site and Russ would take laterals in to do entries in the flats.

27 I kept a record in the health and safety file of which flats had been connected and had the gas back on.

28 . During works to the laterals, it was necessary to move some of the lighting in the stairwells and communal areas where extra room was needed for the new riser and lateral pipework and/or boxing-in to the individual flats. I asked Cape to attend the Tower on the weekend of 28th January 2017 to move 26 communal lights on floor 12. Each light needed to be moved down by 6 inches.

29 By mid-February 2017, the riser was constructed, gassed up with laterals done. We were going to begin boxing-in after the riser had been commissioned. This is because if there are any issues that arise on commission when the riser is purged you don't have to then remove all the boxing-in in order to resolve the issue.

30 However, there was a delay to starting the boxing-in due to the asbestos incident at flat 12 which occurred in February 2017. I discuss this below but the site was shut down due to the incident until mid-March 2017.

31 The boxing-in works started in March 2017 when the site was re-opened. Express carried out the boxing-in works and I recall that they had 3 to 4 workers on site carrying out the work.

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32 The use of flanged joints triggered a change to the Design towards the end of March 2017. I am aware the tRHO design team reviewed the Design which led to changes to the boxing-in requirements.

33 We normally box in the pipes on a job. The pipes in the stairwell were boxed-in. To my knowledge, the work complied with IGEM/G/5. K&S obtained the materials.

34 Scaffolding was required so that Express carpenters had the access they required to carry out the boxing-in around the new vertical riser from the 23rd floor up to the roof vent.

35 In May/June 2017, I met with John SALTER from Globe Scaffolding. John SALTER is a scaffold designer. I explained to John that the scaffolding needed to be kept right over so that the area would be kept clear as a fire exit. The scaffolding was to be built off the stairs and John made sure the scaffold design came up against the handrail.

36 On the Tuesday before the tragic fire, I signed off the scaffolding. It took two days for the scaffolders to set up the scaffold. However, they had not got as far as carrying out the boxing-in works to floor 23 by the time of the tragic fire. At the time of the fire, boxing-in needed to be completed for the basement, floor 23 and 12 remaining laterals. This work was going to be finished within five weeks or so.

#### Inspection of works

37 I am asked about inspections. During the works, inspections were carried out to the in-ground work, riser, laterals and internal gas works:

- (a) K&S pressure tested the in-ground pipework in January/February 2017;
- (b) Angle Inspections inspected the welded riser and visually inspected the lateral welds: and

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(c) Holland Gas and the Internal Works Engineers completed internal inspections in accordance with Gas Safe requirements.

38 I checked the standards of the riser being built as the job progressed. I would check:

- (a) the riser to see if it was welded and painted;
- (b) whether Taylor Valves were present on the laterals;
- (c) whether the riser had been pasted or plugged; and
- (d) whether the correct material or correct size plug had been used.

39 As mentioned above, Michelle UMAGHO-UKUEKU, would carry out random spot checks on site. Patrick KELLY from Cadent would also attend on site once every two weeks. KCTMO may have carried out their own inspections of the works. During the course of the works I think KCTMO visited the site on two occasions.

40 In terms of checking work, Harvey SMITH also visited the site on some occasions before he left the company. Martin LOVEDAY attended on site once the re-runs had been completed in the individual flats. He also inspected the work carried out to the flats.

#### Residents and KCTMO

41 I am asked about the residents of the Tower. A list of the known occupants of Grenfell Tower was provided to tRIIO.

42 In relation to the individual flats that had had their gas cut off, I was responsible for liaising with residents and landlords in order to keep them updated in relation to the works. I spoke to the residents in each of these flats. I explained the process of moving their gas meter and also had discussions with the residents in relation to the pipework. I warned them about asbestos in the door headers and how the boxing-in was going to go through the bathroom instead. When I spoke to the residents they were

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unaware of asbestos being in the building. I believe KCTMO sent a note to residents about the presence of asbestos shortly after.

43 I also booked appointments with tenants so that fitters could gain access into properties. Gaining access to properties was very difficult at times. The residents thought we were from KCTMO and they would complain about them. The residents generally expressed concern about the refurbishment at the Tower.

44 The residents were also concerned about the compensation they would receive in light of the gas being cut off.

45 I had some contact with KCTMO during the works. I liaised with Claire WILLIAMS who was Project Manager at KCTMO. Claire WILLIAMS provided me with forms that had to be completed by the residents to record their preferences in relation to the pipes. The options available to the residents were in relation to whether they wanted pipes left bare copper, boxed in or not boxed in.

46 In terms of complaints from the residents:

(a) I remember around the time that the works started, KCTMO flagged that the residents had complained about vans being parked behind the bollards adjacent to the Tower.

Once this had been flagged, I made sure that the vans were parked along the main road instead.

(b) the welfare unit was moved due to concerns raised by residents in relation to access for pedestrians and bin men.

(c) in around March 2017 I was made aware that some residents had raised concerns about the newly installed exposed gas pipes in the stairwell.

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## Asbestos incident

47 By around February 2017 the riser was constructed, gassed up and the laterals done. We had started completed re-runs in the individual flats that had had gas cut off.

48 I provided a copy of the asbestos survey undertaken by LAB UK Limited to each contractor so that they were aware of the areas in the building that contained asbestos.

49 On Thursday 16 February 2017 one of the fitters from Holland Gas, Deep BANGHARD, turned up on site to do a re-run at flat 12. He needed to relocate the gas meter in flat 12. He did not contact me to let me know he had arrived on site. He then carried out work at flat 12 without having an induction first.

50 On Friday 17 February 2017 the resident at flat 12, Zoe, phoned me about getting the pipework in the flat boxed in. The job passed over to Alan MONAGHAN at Express. Alan told me it was impossible to box the pipe. I viewed the quality of the pipework from the photographs and contacted Joe EDEN from Holland Gas about getting the pipework changed. A meeting was set up for Tuesday 28 February 2017 for Joe and me to discuss this further.

51 At 9.00 am on 27 February 2017 I received a call from Chris CAMPBELL who is a carpenter from Express. He contacted me about flat 12 and told me he had discovered debris in the flat from where asbestos had been drilled in the hallway.

52 I contacted LAB UK Limited straightaway and they attended on site immediately to assess the situation. LAB UK Limited carried out an asbestos background air test. T&S Environmental also attended to carry out an emergency clean up and arrange the disposal of the asbestos containing materials.

53 Martin LOVEDAY became closely involved. On 28 February 2017 I had a site meeting with Martin and Michelle in relation to the asbestos incident. Works on site were stopped immediately and the site was closed until further notice.

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54 A RIDDOR report was submitted to the HSE following our discovery of the incident.

55 Works at the Tower did not start again until mid-March 2017 after we received a further survey and report from LAB UK Limited confirming that works could be progressed safely on site.

56 I am aware that the resident at flat 12 made a claim for compensation in relation to the incident.

Further information

57 I understand that my tRIIO emails and relevant documents have been previously disclosed to the MPS and to the Grenfell Tower Public Inquiry by tRIIO.

58 I agree to this statement being shared with the Grenfell Tower Public Inquiry.

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