

IN A MATTER CONCERNING THE GRENFELL TOWER INQUIRY

EXHIBIT MFT/1

WITNESS STATEMENT

Criminal Procedure Rules, r 27. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

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Statement of: Sarah Jane Dixon

Age if under 18: over 18 (if over 18 insert 'over 18') Occupation: Managing Director

This statement (consisting of 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.

Witness Signature: Date:

I have been asked to respond to 110 questions raised by the police in connection with their investigation into the fire at Grenfell Tower on 14th June 2017, as well as to formalise the answers to further questions previously given to them by one of my colleagues, PDERs' Operations Manager Philip Edwards.

I am the Managing Director of the Express Lift Co and Subsidiaries division of Otis Ltd. The division is made up of a number of UK lift maintenance businesses and sub-divisions, one of which is PDERs. While PDERs sits within the Express Lift Co and Subsidiaries division, in legal terms it too is an unincorporated trading division of Otis Ltd. Previously, PDERs was a limited company in its own right but its trade, assets and liabilities were transferred to Otis Ltd in January 2000.

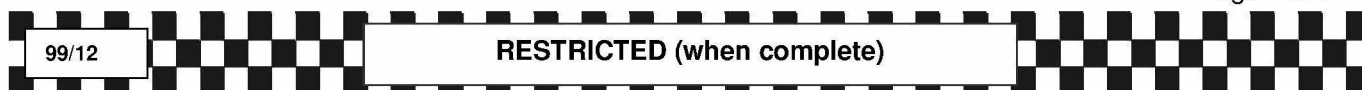
I set out the police's 110 questions below, exactly as they were sent to me via email at 1406 hours on 27th June 2018 (including strike-throughs) by DC Katie Bennett, followed by answers. I was asked a number of additional clarification questions via another email from DC Bennett timed at 1253 hours on 14th September 2018, but so as not to overcomplicate my statement I do not repeat those additional questions below. The information making up the answers has been gathered for me by a variety of different people within our business and as such I do not have first-hand knowledge of all of it. In order to answer the questions as fully as possible, I exhibit a number of relevant documents to this witness statement on a memory stick. The documents are numbered consecutively, "Reference 1 – [document description]", "Reference 2 – [document description]" and so on. The memory stick is exhibit number SJD/1..

After the answers to the 110 questions, I repeat and confirm the answers previously provided by my colleague Mr Edwards, to the extent that the latter answers do not duplicate any of the answers to the 110 questions and are consistent with my and my colleagues' current understanding. In other words, subject to any minor changes set out in my answers to questions 111-129 below, I confirm that I agree with the responses previously provided, based on my own understanding, and I provide them as my evidence.

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Continuation of Statement of:

1. Name of firm?

PDERS, an unincorporated trading division of Otis Ltd.

2. Ltd, Partnership, sole trader or Ltd t/a sole trader?

PDERS is an unincorporated trading division of Otis Ltd. Otis Ltd is a limited company.

3. Director's names?

The operational directors of PDERS are Sarah Dixon and Paul Hordon. The Statutory Directors of Otis Limited are: Alberto Hernandez, Hemant Jolly, Ales Korotvicka, Robert Sadler, and Dorje Soley.

4. Firm's make up, numbers of employees, business sites etc?

PDERS' business sites comprise: Express House, 100 Rolt Street, London SE8 5NN and Chiswick Park Building 5, 566 Chiswick Park, London W4 5YF. It has 70 employees, 55 in the field and 15 office based.

5. What professional certifications, accreditations and memberships of professional bodies does your company hold? When were these last updated?

PDERS holds the following: LEIA (Jan 2018), Constructionline (October 2017), Safecontractor (March 2018), Eurosafe CDM Competency (October 2017), CHAS (March 2018), ISO 9001 (April 2018), ISO 14001 (March 2018), OHAS 18001 (March 2018).

6. Interviewee has permission to speak on behalf of the firm?

Yes

7. What basically does the firm do?

PDERS' activities are the repair, maintenance and servicing of lifts and other associated equipment.

8. How long has the firm been in existence?

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PDERS dates back to 1927 and encompasses among others historic businesses P&D and Elevator Repair Specialists, hence the name PDERS. Otis Ltd has been in existence for 101 years (formerly the Express Lift Company Ltd).

9. Is the firm a primary, secondary or tertiary? (Construct/manufacture/service).

Tertiary

10. What input or involvement has the firm had with the Grenfell Tower?

(Please provide as much detail as possible regarding all successful and unsuccessful tenders to give a full understanding of your companies engagement with KCTMO)

PDERS has been the Planned Preventative Maintenance provider for lifts for the TMO since 3rd February 2014, covering routine servicing, callouts and repairs.

11. Was the firm aware that Grenfell Tower was a residential tower block circa 75m tall?

Yes

12. Had your firm completed any building or construction work previously?

No. PDERS has never been contracted to carry out any building or construction work at Grenfell Tower.

13. Had your firm provided materials or service either to another firm who have worked on Grenfell Tower or the tower direct?

No

14. When were you or your firm contacted regarding the construction, materials or service to be provided?

See 18 below.

15. Who contacted you or the firm? From which firm?

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Continuation of Statement of:
See Reference 1 - tender documents. Jenny Jackson, Procurement Manager at KCTMO, contacted PDERS regarding award of contract.

16.How were you contacted?

In writing

17.What precisely was the point of the contract, what was requested?

As per the Service Information and Preambles, at 2.0.1, “The scope of the works is for the Contractor to provide a fully comprehensive servicing of the lifts throughout the Royal Borough of Kensington and Chelsea but not including any breakdown response repairs due to vandalism or misuse which shall be charged at hourly rates and the Schedule of Repair Rates as Appendix B. The Works are essentially the routine inspection, maintenance and repair of lifts” and it went on to set out a number of basic areas of work. See Reference 2 – service information and preambles.

18.Was there a tender process for the works, items or service? Please describe the tender process for service provided by your firm.

We completed an initial PQQ in 2011 and a tender return in January 2012. The tender process was then halted, for reasons I do not know, and new tender documents were issued in January 2013. We submitted new quality question responses and prices and were awarded the Lift Preventative Planned Maintenance and Repair Contract (“the Contract”) on 13th November 2013.

19.Did your company conduct a site visit prior to submitting tender? If so, who did you meet and what issues were raised?

Two PDERS employees, David Petchey and Adrian Rowland, attended a tender information meeting with the following on 11th January 2013:

- Ricki Sams of the TMO
- John Parsons of the TMO
- Jenny Jackson of the TMO
- Margaret Pinder of Harlow Associates Limited
- Richard Carre of Pellings LLP

See Reference 1 - tender documents.

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20. Did your firm win the contact?

Yes

21. If not, why?

N/A

22. If so, how much did your firm charge?

£1,895 per unit at Grenfell per annum. £282,895.00 per annum for the whole contract portfolio.

23. Were you ever informed why your firm won the contract?

Yes, we received a full scoring breakdown from the tender submitted and PDERS scored highest from the companies who submitted tenders.

24. When did your firm commence the construction work, supply the items or providing the service, between which dates?

The Contract commenced on 3rd February 2014. PDERS held the Contract with the TMO. The Contract was still in place and operational on 14th June 2017.

25. Did the construction work lifts comply with the then current building regulations?

PDERS was not involved in construction/installation works.

26. What type of lifts were your firm contracted to maintain at Grenfell Tower (i.e. firefighting lift, fire lift or otherwise)?

As per page 3 of the Schedule of Lift Installations contained in the Service Information and Preambles, PDERS was contracted to carry out the routine inspection, maintenance and repair of two Apex lifts of type Traction 2.0 M/S VVVF. The hydraulic lift mentioned in the Schedule had been decommissioned prior to the contract with PDERS commencing, did not therefore form part of the Contract and was not therefore subject to any work by PDERS. See Reference 2 – service information and preambles.

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27. Did the materials supplied by your firm have a kite mark or British Standard?

28. What standard was that?

29. When was the material actually delivered or used?

30. Did your firm affix, repair or advise the site manager regarding your firm's construction work, materials or service?

PDERS advised the TMO regarding the work done via Electronic Service Visit Report (ESVR) reporting, and monthly core meetings were held to discuss PDERS' performance under the Contract with the TMO's Contracts Manager.

31. If yes, which employee did the construction, affixing, repairing or advising?

See Reference 3 - staff and contact schedule.

32. What qualifications has your employee obtained to construct, affix, repair or advise?

All engineers on site hold an NVQ Level 3 in QCF Engineering Maintenance – Lift Service (Repair)

33. If no, who did construct, affix, repair or advise?

N/A

34. What is the name of the sub-contractor?

See schedule of sub-contractors and suppliers used by PDERS, Reference 4.

35. Do you know their qualifications?

See Reference 4 - schedule of sub-contractors and suppliers.

36. Did your employee who affixed, repaired or advised at the Grenfell Tower know who was responsible for H&S at the site?

PDERS' primary point of contact with the TMO was its Contracts Manager, most recently Patrick Barrett.

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37.Or Fire Safety at the tower?

The position for fire safety is the same as set out at 36 above.

38. Were the lifts ~~construction work carried out~~ serviced by your firm at or item fitted to Grenfell Tower ~~by your firm required to have a service contract or insurance?~~ If so do you know who ~~which contractor owned~~ carried out the maintenance and who insurance the appliance?

As the TMO were the owners, they would be responsible for insurance.

39. Who was the insurance for the appliance held with?

Not known.

40. Did this person ever hear and inform you or the firm of any safety/fire issues regarding the tower?

PDERS received copies of the Reports of Thorough Examination from the TMO (Maria Ares) which were prepared by Bureau Veritas UK Ltd. See Reference 5 – reports of thorough examination.

41. Was your firm/employee ever supplied with any fire safety instructions or information in any format from the site manager or landlord?

No

42. If so when and how? (time and date)

No

43. If your firm ~~did supply goods and had involvement in the Grenfell Tower refurbishment,~~ can you explain what the involvement was and what the impact your firm's work had on the residents?

44. Was any work carried out by your firm on individual flats specifically?

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Continuation of Statement of:

45. If so, which properties and was the work carried out on a tenant by tenant basis?

46. Do you know of any complaints about the building, building management or risks at the building before or after the disaster?

No

47. If so, what was the nature of the complaint, who made it and when was the complaint made?

N/A

48. Did your firm or employees have any interaction with any of the residents or other firms during or after the refurbishment?

No

49. Did you or any of your firm’s employees notice any illegal activity or dangerous practice occur whilst at the tower?

No

50. In your experience, how often are lifts systems normally replaced/refurbished in residential blocks?

Lift systems in residential blocks are often modernised every 12-18 years, depending on the type of equipment, the environment and the usage, but this is a broad estimate.

51. Do you know if any legal proceedings were ever initiated or mentioned to or by any resident by letter or other means following any issues at the tower?

No

52. Who inspected the completed work carried out by your firm? (Either construction, goods supplied or service provided)?

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Continuation of Statement of:
PDERS' Field Managers (Phillip Edwards, Len Stirling, Steve Thomas and David Watkins) carried out periodic checks on the work. We are not aware if the TMO carried out its own physical checks.

53. Was the work carried out to your firm's specification?

Yes, work was carried out to PDERS' maintenance schedules. See Reference 6 – maintenance schedules.

54. Who inspected the completed work?

See 52 above.

55. If your firm supplied goods or a service was the work carried out to your firm's satisfaction?

Yes

56. Was the work – using your supplied goods or service, completed to a satisfactory standard? If so, who has stated so?

See 52 above.

57. Was the work – using your firm's material or service – signed off as satisfactory by yourselves, the supplied firm or the client?

See 52 above.

58. Was the work ever inspected by anyone at your firm?

See 52 above.

59. Do you have any other information which may assist the investigation or aid any enquiry into the reasons for the Grenfell Tower disaster?

We have done our best to respond to and answer all current and previous requests and questions put to us by the police, including providing a copy of all the potentially relevant documents and records we have been able to trace. We are not currently aware of any

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additional significant information but we will be happy to provide any further assistance should it be required.

Relating to quote for work removing equipment in base of tower during refurbishment:

60. When were you or your firm contacted regarding the ~~construction, materials or service~~ to be provided?

PDERS was not contacted about this work. PDERS did not quote for and was not awarded this work.

61. Who contacted you or the firm? From which firm?

N/A

62. What precisely was the point of the contract, what was requested?

N/A

63. Was there a tender process for the works, items or service?

N/A

64. Did your firm win the contact?

N/A

65. If not, why?

N/A

Further questions

66. What is the relationship between PDERS, Express Lift Co and Otis Ltd? Do Express Lift Co or Otis Ltd actively oversee/manage PDERS? (Please give a detailed explanation as to the relationship, roles and responsibilities between each company)

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Continuation of Statement of:
See explanation at the beginning of this witness statement and at 1 and 2 above.

Operationally, the Express Lift Co division and PDERS are run independently day-to-day by their own management teams who have a good deal of autonomy pursuant to the Otis UK Group approval policies and procedures delegating authority to them, for example in relation to customer quotes and tenders and other business decisions and expenditure up to set financial limits. Within this framework, the management team of the Express Lift Co division has oversight of PDERS’ activities and those of other businesses in the division.

67. Which members of staff at PDERS or ELA group/Express Lift Co./Otis Ltd were responsible for/involved in the lift maintenance contract at Grenfell Tower? What was their involvement/their responsibilities?

See Reference 3 - staff and contact schedule.

68. Which employees at KCTMO were responsible in the lift maintenance contract at Grenfell Tower? What was their involvement/their responsibilities?

See Reference 3 - staff and contact schedule.

69. In relation to the contract for lift maintenance/repair at Grenfell Tower, between KCTMO and PDERS Ltd, who was the contract administrator at KCTMO?

See Reference 3 - staff and contact schedule.

70. Who was the CDM coordinator for this contract?

We are not aware of any CDM Coordinator having taken an active role in any of the work PDERS was involved in but the Contract Articles of Agreement did mention that the TMO had appointed Pellings LLP as CDM Coordinator “where so required by [the CDM Regulations]”. Unfortunately, the only copy of the Contract Articles and Conditions that we have managed to locate is not a full version and only runs to 18 of 44 pages. While this document refers to Otis Ltd’s correct company number (147366), it incorrectly names it as PDERS Lifts Limited. See Reference 7 – contract articles and conditions.

71. What information was your firm given from KCTMO/any other relevant parties regarding the lifts at Grenfell Tower prior to/on commencing/during the contract?

See 18 and 40 above and Reference 1 – tender documents.

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72. How was this provided, by whom and do you have a copy of any information provided?

See 18 and 40 above and Reference 1 – tender documents.

73. Were any documents relating to the lifts at Grenfell Tower stored within Grenfell Tower itself? If so, please describe the nature of the documents and where they were stored.

Log Cards and Wiring Diagrams were permanently stored in the Motor Room at Grenfell Tower. Log Cards were used by PDERS engineers to leave a brief handwritten record of their visit and work carried out. More detailed information would be recorded in the engineers' service visit reports. Wiring Diagrams, originally produced by the lift manufacturers or installers, are available to engineers for reference purposes.

74. Was there an identifying code/name for each lift at Grenfell Tower?

The lifts were allocated numbers H090 and H091 in the Schedule of Lift Installations accompanying the Service Information and Preambles. PDERS also referred to them as unit numbers PD807174 and PD807175.

75. Please describe in detail, the monthly service process for the lifts at Grenfell Tower?

The units were subject to 12 maintenance visits per year in addition to any reactive call outs and repairs.

76. What did a monthly service of the lifts at Grenfell Tower consist of/include?

The attending engineer would follow the steps set out in PDERS' Maintenance Schedule, Reference 6 – maintenance schedules.

In response to a more recent additional clarification question from the Police regarding the Windcrest autodiallers, I can confirm that the autodiallers were checked by PDERS as part of each maintenance visit which involved a physical test of the device by pressing the alarm button. If an issue was suspected with the battery the engineer would isolate the incoming supply and test forcing the device to utilise the battery power.

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77. Who conducted monthly services of lifts at Grenfell Tower during PDERS contract period?

See Reference 3 - staff and contact schedule.

78. How/where were monthly lift services at Grenfell Tower recorded?

These were recorded on the Log Card held on site and on the Service Visit Reports which were uploaded to and stored on PDERS' electronic system (DGA).

79. Was an IT system/software used to manage/record the servicing/repairs at Grenfell Tower? If so please describe this system and how it was used.

Our Service Visit Report IT system is known as DGA.

Callouts, maintenance visits or repairs are assigned from the Job Scheduling System (JSS) section of DGA are sent to engineers' PDA/smart phones and accessed via the Field Mobility app. The engineer then selects and books on to the job, travels to site, performs the work assigned, enters any observations and completes the job closure process.

For Callouts a series of drop-down boxes are completed identifying what the issue was and what the engineer has done, e.g. fix issue, order parts or book another visit. For maintenance work, maintenance tasks are ticked off as done. For repair work, agreed repair tasks are ticked off as complete. The engineer then reviews the book-on, arrival and completion time and adjusts if necessary.

These details are automatically passed back from the Field Mobility app to JSS and a Service Visit Report is generated in PDF format with any task completed and observations shown. In turn, the Service Visit Report is automatically sent to the customer email address that has previously been stored in DGA at the customer's request. The reports are also available in DGA for viewing, printing or for emailing elsewhere if necessary.

80.

81. In relation to lift repairs at Grenfell Tower, please describe the lift call-out/repair process.

In summary, the following process applied:

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- Firstly, the call was taken and logged by the TMO who then sent it on to the PDERS Helpdesk email account and also telephoned PDERS with a reference number
- A callout was then sent to the relevant PDERS engineer for attendance
- The engineer arrived on site and followed the method statement for access and egress
- He would then check the lift was safe at all floors, go to the motor room and check the lift controller, start investigation / fault finding, correct the lift and complete any jobs. Any lift shutdown would be notified to the Field Manager.
- The engineer would then complete the log card kept on site before leaving.

82. How were issues with the lifts raised by residents/other parties (by what means)?

See 81 above

83. Were call-outs/repair requests made directly to PDERS? If not, who were they referred by?

See 81 above

84. Where were details of call-outs and repair requests recorded?

These were recorded on PDERS' system (DGA) and on the Repair Visit Reports. A Daily Report was sent every weekday to the TMO by PDERS. See Reference 8- callout and repair log.

85. How were call-outs and repairs managed by PDERS?

Callouts were logged when received from the TMO. They were administered by the administration team at PDERS and sent to field engineers. Engineers would report directly to their manager if further parts or recommendations were advised. Data would be reviewed weekly by the manager for systematic patterns of lift breakdowns. Contractual and non-contractual repairs would be managed by a separate repair team at PDERS. These would be reviewed and booked in with the TMO and updated on the daily report.

86. How were call-outs/repairs allocated to PDERS employees?

After notification was received from the TMO, they would be sent to the relevant engineer via PDERS' PDA system. Any reported entrapments were notified by phone.

87. Who were lift repairs/maintenance completed by at Grenfell Tower?

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See Reference 3- staff and contact schedule.

88. What qualifications are held by these employees who carry out lift maintenance/repairs?

See Reference 3 - staff and contact schedule.

89. What information was normally provided to PDERS employees regarding each call-out?

The engineer would be provided with the following information:

- Reported fault (e.g. out of order/stuck at 3rd floor/trap in)
- Unit ID
- Callout ID
- Site name
- Site address
- Building Notes
- Previous JHA from previous employees
- Priority (e.g. trap-ins are RED in colour)

90. What information was recorded by employees attending each call-out/repair request?

Engineers were required to complete a Repair Visit Report. See Repair Visit Reports March 2014-June 2017, References 11-18 below.

91. Where/how was this recorded?

This was recorded on the engineer's PDA and the data then uploaded automatically to DGA.

92. Were testing certificates produced following lift repairs/services? If so how are these stored?

The only testing certificates PDERS were required to complete were in relation to the annual LG1/SAFED tests that our engineers carried out. The originals were sent to the TMO and copies were left on site. PDERS did not retain copies.

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93. Did anyone from PDERS oversee/manage each lift repair job at Grenfell Tower? If so, who?

See 52 above in relation to quality control. In terms of PDERS' wider management structure and reporting lines, see PDERS organigram as at May 2017, Reference 9 - organigram.

94. How were lift services and repairs at Grenfell Tower invoiced?

Routine maintenance and repair work was invoiced to the TMO monthly in arrears. Any more significant quoted repairs were invoiced on completion of the work.

95. What was the policy/procedure if an employee was unable to achieve a satisfactory repair/resolve an issue with the lifts at Grenfell Tower?

If an engineer was unable to return a lift to normal service following a callout they would advise PDERS' Field Manager for the area and record it on the Repair Visit Report that the unit was shut down with further action required. This would also be recorded on the daily report provided to the TMO.

96. How were ongoing repairs/investigations managed at Grenfell Tower and who was responsible for this?

Any further action required would be agreed with the TMO, planned and actioned. The daily report would be updated and close out would be recorded once the action was complete.

97. Were PDERS required to provide regular updates/reports to KCTMO regarding the lifts at Grenfell Tower? If so, please describe these updates and how frequently they took place.

Yes. See 84, 85 and 95 above.

98. Were there any re-occurring problems with the lifts at Grenfell Tower? If so, please describe these problems and why they re-occurred?

Over the two years prior to June 2017 there had been periodic problems with the lifts' landing doors. These were generally related to the building works within the block and the use of the lifts during these works. There was often lots of dust and debris in the lift areas. On a number of occasions landing door shoes and rollers were replaced during

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PDERS' maintenance visits. The lifts were subject to a full cleandown by specialist contractors in February 2017. See Reference 10 - cleandown records and photographs.

99. Whose responsibility would it be to raise any issues identified with the lifts at Grenfell Tower? For example would PDERS have had to flag any concerns to KCTMO?

Any and all issues were flagged to the TMO via: call outs; PDERS' repair visit reports, service visit reports, daily reports and monthly meetings; and Thorough Examination Reports prepared by Bureau Veritas.

100. Whose responsibility to make any recommendations to KCTMO regarding the lifts i.e. if they felt a full refurbishment or other work was *necessary*?

See 99 above.

101. What action was taken by PDERS regarding any re-occurring issues with the lifts at Grenfell Tower?

See 98 above.

102. Did PDERS inform KCTMO or any other party of any re-occurring problems/issues with the lifts or make any recommendations regarding the lifts? If so, how were these defects raised/communicated and with whom?

See 98 and 99 above.

103. Where there any problems in raising issues/recommendations regarding the lifts at Grenfell Tower with KCTMO? If so please explain.

No.

104. Were re-occurring problems/issues resolved? If so, how they were resolved.

See 98 above.

105. Did PDERS subcontract any other companies to assist with lift maintenance/repairs at Grenfell Tower? If so, which companies were sub-contracted and why?

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See Reference 4 - schedule of sub-contractors and suppliers.

106. Do you know the qualifications of these subcontractors?

See Reference 4 - schedule of sub-contractors and suppliers.

107. Do PDERS have a list all parts replaced in the lifts at Grenfell Tower and when replaced? If so please provide.

No. Lift-specific parts were procured through PDERS' preferred suppliers. Also, some generic parts may have been purchased by PDERS engineers locally on limited occasions. For example where a number of light bulbs had blown they may have purchased and fitted replacement bulbs locally. We cannot trace records of these parts.

108. Which company/companies were replacement lift parts sourced from?

See 107 above and Reference 4 - schedule of sub-contractors and suppliers.

109. Did the lift replacement parts fitted have a kite mark/British Standard? If so, what was the standard?

See 107 above.

110. If unable to identify specific lift parts replaced, do you have a list of approved suppliers used by PDERS to source replacement lift parts? If so, please provide details of these suppliers.

See 107 above and Reference 4 – schedule of sub-contractors and suppliers.

Police questions previously answered by Philip Edwards, PDERS Operations Manager

111. Please describe the lift system at Grenfell Tower (make/mode/age)?

There were 2 passenger lifts installed by Apex Lifts in 2006. They are Variable Frequency AC controlled lifts with TVLC controller that run at a speed of 2.M/s with 26 stops. The lift capacities were 12 person 900Kg.

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112. Was the type of lift at Grenfell Tower suitable for purpose? Was it/should it have been upgraded?

The lifts complied with the latest standards at that time of installation and were suitable for purpose. No refurbishments had been recommended. Ongoing maintenance works to keep lifts running in good working order was carried out on a monthly basis. Only works completed outside of the contract during the period we had on contract was replacement of the lift car floor coverings which was replaced following the refurbishment of the building.

113. Who were you employed/contracted by and who was your point of contact?

We were engaged by the TMO and our contact was Patrick Barrett.

114. Did you encounter any issues with the contract at Grenfell Tower (non-payment/lack of communication)?

No.

115. How often did PDERS attend Grenfell Tower and for what reasons?

The Contract required us to attend on a monthly basis completing 12 visits per year as part of the maintenance contract. Other visits would be on an “as required” basis for attending to issues with call-backs to attend to issues with the lifts or carry out planned or unplanned repairs outside of the normal maintenance regime.

116. What was PDERS responsibility regarding Grenfell Tower?

See 17 above.

117. Did PDERS consider fire strategies (evacuations times, etc) when carrying out work at sites and was this up to date at Grenfell Tower?

No. We are not involved with Fire strategies and we were never approached by the customer to provide advice on anything concerning the lifts in connection with this. We believe that the lifts were not connected to any Building Management system with the building to either isolate the lifts in event of fire alarm activation or return to ground floor and remove from service.

118. Were PDERS involved in discussions surrounding fire safety?

No.

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119. Did PDERS make any recommendations regarding Grenfell Tower and, if so, what was the

No.

120. Did the lift at Grenfell Tower have an automatic shut-off and, if so, how does this work?

No. As far as we know the lifts were not connected to any fire system to shut down the lifts or return to ground floor in the event of fire alarm activation. If this was required we believe this would have been requested during the building refurbishment. There was a fireman's recall switch connected to these lifts which is operated by a switch installed at street level entrance. Such a switch when operated would bring the lifts to the ground floor and stop them from being used or they could be used by the fire brigade if the equipment was fitted with fire-fighting equipment. It is unusual for the equipment in this type of environment not to have some sort of system.

121. Did you enter into any communication with LFB, KCTMO or residents regarding Grenfell Tower?

There is no record of the company having done so.

122. Did anyone broach the subject of fire safety with employees of PDERS?

No.

123. Did you supply/affix/recommend and signage at Grenfell Tower regarding using the lifts during a fire?

No.

124. Did PDERS consider residents mobility issues at Grenfell Tower?

No.

125. Did PDERS consider compliance with Building Regulations when carrying out this kind of work?

No. The lift was installed prior to our contract.

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126. Please describe the lift shaft at Grenfell Tower (fire resisting/piston effect/pressurisation)?

The lift shafts are a concrete structure. All fire resistance, piston effect or pressurisation would have been considered at the time of construction. We are not aware of any changes having been made.

127. Did PDERS encounter and vandalism of the lifts/lift equipment/mechanics and, if so, how?

No. The site was not one where vandalism was an issue.

128. Were the lifts at Grenfell Tower connected to the Building Management System. If so, how does this process work and where would any relevant data be stored?

No.

129. I have been informed that both lift cars were found on the 10th floor. The doors were to the right hand lift were fully open, whereas the left hand lift car doors were only slightly ajar. Please also explain this in your statement if you are able?

We are unable to explain this. There is no immediate explanation for this to occur in normal operation of the lifts.

As mentioned above, I exhibit a memory stick to my witness statement as exhibit SJD/1 containing relevant documents. Those documents are as follows:

- Reference 1 – tender documents
- Reference 2 – service information and preambles
- Reference 3 – staff and contact schedule
- Reference 4 – schedule of sub-contractors and suppliers
- Reference 5 – reports of thorough examination
- Reference 6 – maintenance schedules
- Reference 7 – contract articles and conditions
- Reference 8 – callout repair log
- Reference 9 – organigram
- Reference 10 – cleandown records and photographs
- Reference 11 – H090 callout records 2014
- Reference 12 – H090 callout records 2015
- Reference 13 – H090 callout records 2016
- Reference 14 – H090 callout records 2017

Witness Signature:

Signature Witnessed by Signature:

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Continuation of Statement of:
Reference 15 – H091 callout records 2014
Reference 16 – H091 callout records 2015
Reference 17 – H091 callout records 2016
Reference 18 – H091 callout records 2017
Reference 19 – H090 2017 service records
Reference 20 – H091 2017 service records
Reference 21 – maintenance contract
I can confirm that no material subject to legal privilege has been provided within Exhibit
SJD/1.

DRAFT

Witness Signature:
Signature Witnessed by Signature:.....
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