

GRENFELL TOWER PUBLIC INQUIRY

Witness Statement of

PETER DAY

I, PETER DAY, WILL SAY:

1. I make this Witness Statement further to receipt of a Rule 9 request from the Grenfell Tower Public Inquiry (the 'Inquiry') dated 26 October 2020.
2. I am RBKC's interim Service Development Manager in the Housing Management Directorate. I joined RBKC as Head of Insight and Intelligence (interim) in the Grenfell Directorate in April 2017, before moving to my current role in August 2017.
3. Within the Rule 9 Request, the Inquiry have asked for a witness statement to be provided encompassing the information provided by RBKC to the Inquiry on 7 July 2020 regarding the work it has undertaken in relation to fire risk assessment ('FRA') data relating to Grenfell Tower located on the relevant computer systems that were used by the Tenant Management Organisation (the 'TMO') prior to the fire on 14 June 2017.
4. The following information was provided to the Inquiry on 7 July 2020:
 - a. Methodology document
 - b. Appendix of documents to accompany the Methodology
 - c. Additional documents from W2 located following further checks undertaken
 - d. Covering letter from RBKC's legal representatives, DWF Solicitors
5. I have been identified as the appropriate individual to provide this statement as I am involved in the co-ordination of a variety of data requests and enquiries relating to the Public Inquiry. This generally involves liaising with agreed appropriate staff to put together accurate and comprehensive responses. The request for information from the Inquiry that forms the basis of this statement was one that was dealt with on a collaborative basis by myself and a number of other RBKC colleagues. There are matters within the Inquiry's request that fall outside of the scope of my own personal knowledge and I have therefore relied on information provided to me by other RBKC colleagues involved in this process in order to provide a comprehensive response to the Inquiry.
6. I understand that the initial request for this FRA information originated from a Rule 9 request dated 3 March 2020 which was jointly addressed to RBKC and the TMO. I did not see a full copy of this request but I was provided with the relevant extracts and information to enable me to understand what was required and to assist with actioning the request.
7. This Rule 9 request asked for evidence from W2 and/or CRM and/or Capita Housing Management System and/or Capita Open Contractor System, including but not limited to

screenshots of the workflows, view maps, system reports, FRA actions requests and/or FRA repair action requests, to demonstrate the actions taken to resolve items identified by the Inquiry from Carl Stokes' Record of Significant Findings and Action Plans dated 17 October 2014, 26 April 2016 and 20 June 2016. The request also asked for evidence to demonstrate the actions taken to resolve items identified by the Inquiry as listed in the LFB notification of Fire Safety Deficiencies dated 27 November 2016.

8. I understand there were also a number of other items contained within that request that were being dealt with by the TMO.
9. I was approached by RBKC's legal team to assist with this request. It was explained to me that the scope of RBKC's involvement was to provide any relevant Grenfell Tower FRA information / data relating to those matters set out within the Inquiry's request (set out at paragraph 7 above). I understood that this was on the basis that whilst these were systems that had been used by the TMO, the software and systems are held by RBKC. Thereafter, this information was to be provided to Kennedys, the legal representatives for the TMO, who would then use this information to assist them in identifying the most appropriate individual(s) to provide a witness statement to the Inquiry substantively addressing the items in the Inquiry's request.
10. The documents created by myself and RBKC as part of this request, and which were provided to the Inquiry and Kennedys in response to the Inquiry's request of 3 March 2020, were solely based on the information and data available to RBKC. I am not in position to confirm that these documents provide a complete picture of the position in relation to fire risk assessments and the actions taken. I also have no awareness of how the TMO used the systems. The systems were interrogated based on my knowledge and that of RBKC colleagues without access to user manuals and was based on the data found at the point the request was made.
11. I have been informed by RBKC's legal team that the TMO and their appropriate witness(es) are responsible for providing any context and explanations of this data in terms of how it may relate to their FRA Programme.
12. I have since been made aware that a statement from Janice Wray, a TMO witness, has been provided to the Inquiry in response to the Inquiry's request of 3 March 2020. I have not signed the Inquiry's Phase 2 Confidentiality Undertaking and therefore I have not had sight of this document nor any of its content.
13. Owing to the complexities of the systems, the archiving of the W2 system, the lack of user guidance relating to how W2 was used by the TMO and additional challenges presented by the COVID-19 pandemic, it was a significant exercise to seek to locate the relevant data and has required extensive work from myself and other colleagues at RBKC over a number of months to provide this data. I set out below the details of the work that we undertook.

Live T: and S: Drives

14. Firstly, I undertook a review of the live File Shares (T: and S: drives) to identify documents relating to FRAs and Notice of Deficiency ('NoD') actions relevant to Grenfell Tower and to locate FRA Action Plans relating to the FRAs and NoD covered by the Inquiry's letter of 3 March 2020. The File Shares were a core source of documents for the TMO. When the functions transferred from the TMO to RBKC, these were accessible to RBKC to allow us to provide the

core housing management functions. These were stored on the TMO infrastructure, before later being transferred to the RBKC servers.

15. I exhibit at **PD1** a document I prepared on 15 May 2020 which sets out an overview of the approach I took, the searches undertaken and the documentation I located as a result. This is explained in further detail within this statement. In preparing this statement, I have noticed at **PD1** that an incorrect surname was used for one of the RBKC colleagues assisting in this process. I have revised this document to include the correct surname.
16. I was present when my colleague worked through the systems, being unable to locate any of the four original documents set out in the Inquiry's request on the W2 or the CRM systems, namely the FRAs for October 2014, April 2016 and June 2016, and the NoD dated November 2016.
17. W2 is an archived system with a limited search functionality. As an archived system it is not possible to make changes to data. This makes it difficult to understand the functionality in place when the system was actively used. It is there primarily as a source of documents plus related activity that was not migrated to the replacement system. It was not possible to search at a 'global' level across the whole system, instead having to locate the correct sub area within W2 in which to undertake the searches. Searches were also undertaken of the CRM system which has a better search functionality. To the best of my knowledge if any of the documents (referenced at paragraph 16 above) were contained on either of these systems, then they would have been located using the searches my team carried out.
18. I managed the replication of selected documents from the file shares (S and T drives) across the breadth of Housing Management service into SharePoint. I have a comprehensive mapping document showing the legacy file share location against the new location in SharePoint. This work was undertaken to fit in with the RBKC corporate approach to document storage when the functions transferred to RBKC. This mapping and associated work helped me build a reasonable level of knowledge on the location of documents on the legacy TMO systems. This supported RBKC to deliver the core housing management functions.
19. As part of this request, I identified all mappings that mentioned 'FRA or Fire'. RBKC colleagues and I then searched in each of these areas for 'FRA, Fire, Gren'. There were two key areas where the documents were located: *T:\Policy + Development\Human Resources\Health and Safety\Fire Risk Assessments* and *T:\Policy + Development\Human Resources\Health and Safety\Fire*.
20. The documents returned were considered in relation to the Inquiry's request of 3 March 2020 and the relevant documentation identified is contained within **PD1** and is used to form the basis of this statement.
21. Document **PD1** contains iterations of the FRA Action Plans for the:
 - a. October 2014 FRA (exhibited at **PD2** and **PD3**)
 - b. April 2016 FRA (exhibited at **PD4** and **PD5**)
 - c. June 2016 FRA (exhibited at **PD6** and **PD7**)

22. In each case, two versions of the Action Plan were located, one where the actions had been added but the action owner and action target date had not been completed and another where entries had been made in those columns.
23. No Action Plan was identified for the November 2016 Notice of Deficiency.
24. The document exhibited at **PD1** also contains spreadsheets found on the File Shares containing data which seems to have been extracted from the W2 system which contain a range of FRA actions from the October 2014 FRA and June 2016 FRA. I believe this to be the case based on the structure and general content type being very similar to standard reports found elsewhere that report data from W2. Also, the entries are time and date stamped which points to these being originally entered into a maintained database. I exhibit these documents at **PD8** and **PD9**. The file properties of these two documents suggest that they were created on 15 June 2017.
25. The searches undertaken did not locate a similar report or spreadsheet for the April 2016 FRA.
26. Further spreadsheets were also identified during my searches which, based on their file names, appear to be reports from W2 that were provided to the Neighbourhood Management (exhibited at **PD10**), Home Ownership (exhibited at **PD11**), Responsive Repairs (exhibited at **PD12** and **PD13**) and Contract Management (exhibited at **PD14**) teams in respect of FRA Actions for October 2014. RBKC has not been able to confirm from the searches carried out why these documents were created or for whom.
27. The document at **PD1** (with reference to the section entitled "Further documents identified on File Shares (or SharePoint)") contains notes on each of these spreadsheets identifying which FRA actions were listed. Based on the file properties of the documents exhibited at **PD10 – PD14**, these were created in April 2016. The document I exhibit at **PD15** is also a spreadsheet which appears to have been created for the Neighbourhood Management team from its file name. The file properties for this particular document show it was created in March 2017.
28. In addition, searches of the current shared folders identified a TMO procedure note for dealing with notices of deficiency raised by the LFB. I exhibit this document at **PD16**. The note is dated January 2016 and appears to make no reference to recording NoDs or NoD actions on the W2 system or the CRM system.

W2 System

29. A comparison between the FRA/NoD actions listed in the Public Inquiry's letter of 3 March 2020, the FRA Action Plans (exhibited at **PD2 – PD7**) and the W2 reports/spreadsheets (exhibited at **PD8 – PD15**) was then carried out. The outcome of this exercise is shown at the document I exhibit at **PD17**. For the avoidance of doubt, only the actions listed in the Inquiry's letter of 3 March 2020 are included in this document.
30. Process numbers could be located in the documents exhibited at **PD8 – PD15** for the actions arising from the October 2014 and June 2016 FRAs. The April 2016 actions were not included in the documents exhibited at **PD8 – PD15** and therefore these did not have process numbers.

31. Using the document at **PD17** as a starting point and focussing initially on the "Process No." identified for each FRA Action on the W2 reports/spreadsheets, an interrogation of the W2 system was undertaken. This was based on this being an archived system and on my team's general system understanding rather than using any TMO system guides. As a result, details/screenshots for all of the October 2014 FRA and June 2016 FRA items listed on the document at **PD17** were taken from the W2 system.
32. A document containing the screenshots and explanatory notes has been produced for each FRA action from the October 2014 and June 2016 FRAs that was included in the Inquiry's letter of 3 March 2020.
33. For Process No 172247 from the October 2014 FRA, there were three documents linked to the action. These documents, along with the process screenshots from the W2 system, are exhibited at **PD18**. These documents were provided to the Inquiry on 7 July 2020.
34. For the June 2016 FRA, there was a single document (diagram) which was linked to all of the FRA actions with process numbers, including 269272. This document is exhibited at **PD19**. These documents were provided to the Inquiry on 7 July 2020.
35. The W2 system also contained three e-mails with attachments which were stored at the top level FRA/Action Plan level for the June 2016 FRA and are therefore visible on all individual actions related to the FRA action plan. The emails are exhibited at **PD20** and **PD21**.
36. A screenshot showing these documents on the W2 system is exhibited at **PD22**. The first row in the "Documents" list is the Fire Access diagram stored in the folder Process No 269272. The second row is the e-mail provided as **PD21** and the third row is the e-mail (with five attachments) provided as **PD20**. The last row is a duplicate of **PD20** and therefore has not been produced again here.
37. Each "process" document produced from W2 and exhibited as **PD23** contains screenshots to show:
 - the search parameters used to locate the FRA action (via Work Finder);
 - the search results;
 - the process stage;
 - the process history;
 - the process details;
 - the completed processes list;
 - the documents held against the action (which have been exhibited to my statement, see paragraphs 33, 34 and 35 above);
 - the action plan list (exhibited at **PD24**) provides a link for each completed process listed to the FRA actions on the FRA Action Plan for June 2016); and,
 - the "View Fire Risk Action Data" page which is a drill down into folder option on the action plan list to show details relating to the action.
38. These process documents exhibited at **PD23** contain process screenshots from W2 for the following process numbers from the June 2016 FRA:

- a. Process 269272
- b. Process 269274
- c. Process 269281
- d. Process 269282
- e. Process 269366
- f. Process 269367
- g. Process 269368
- h. Process 269374
- i. Process 269388
- j. Process 269391
- k. Process 269425
- l. Process 269427
- m. Process 269432
- n. Process 269444
- o. Process 269522
- p. Process 269524

39. The details identified for each action appear to correspond to those found for each action in the spreadsheet reports run from W2 on 15 June 2017 (see exhibit **PD8** and **PD9**).

40. The W2 system contains a log/list of all actions recorded against each FRA (see exhibit **PD24** and page 5 of the screenshots for Process 172247 which is exhibited at **PD18**). These screenshots have been annotated to show which line relates to each of the 46 actions captured (47 items actually listed with 1 item noted as being recorded in error) on the FRA Action Plan for the June 2016 FRA.

41. I have been made aware that the Inquiry has previously sought clarification on the annotations seen at exhibit **PD24**. I understand that these annotations were completed by RBKC's IT Training Consultant and the following explanation was provided to the Inquiry. For the avoidance of doubt, I was not involved in the annotations or the subsequent response sent to the Inquiry addressing this.

42. Example 1 - (20 – 23h (9/12 12:30) done)):

- a. "20" = the line number in the Action Plan list from W2 (see exhibit **PD24**) which RBKC provided the screenshot for. This list is linked to all the FRA Actions from the FRA Action Plan for June 2016. RBKC compared this list with the FRA action items contained in **PD7**, the FRA Action Plan for June 2016.
- b. "23h" – this is the reference to the FRA Action on the Word document produced by the TMO listing all the FRA Actions arising from the June 2016 FRA, as set out in **PD7**, the stated risk for Item 23h is recorded here as "Caretaker testing and inspections of the buildings structure etc."
- c. "(9/12 12:30)" – RBKC have manually linked the action 23h from the FRA Action Plan (**PD7**) to the relevant line on **PD9** which relates to Row 51 in the table and which also states the risk (column K) for this item as "Caretaker testing and inspections of the buildings structure etc." From this RBKC have captured (from column R - "Comp

date”) that the action was completed on 9/12/16 and that this correlates to the entry on W2 (**PD24**) for line 20 which shows the date/time stamp for the item last being modified on “9 December 2016 at 12:30:22” so RBKC have recorded (9/12 12:30) against this line on the screenshot.

- d. “done” – having identified that action 23h from the FRA Action Plan (**PD7**) corresponds with row 51 on PD9, RBKC have recorded the entry in column S (“Full or Partial”) which shows the status of the action as “Fully Completed”(which for brevity on **PD24** has been recorded as “done”).

43. Example 2 - (7 – 19d (15/6 10:55) done)):

- a. “7” = the line number in the Action Plan list from W2 (see exhibit **PD24**) which RBKC provided the screenshot for. This list is linked to all the FRA Actions from the FRA Action Plan for June 2016. RBKC compared this list with the FRA action items contained in **PD7**, the FRA Action Plan for June 2016.
- b. “19d” – this is the reference to the FRA Action on the Word document produced by the TMO listing all the FRA Actions arising from the June 2016 FRA, as set out in **PD7**, the stated risk for Item 19d is recorded here as “There is an AOV in the area outside of the ground floor electrical room, how is this AOV activated as there is no smoke detector in this area? Please see item 17b above as well”
- c. “(15/6 10:55)” – RBKC have manually linked the action 19d from the FRA Action Plan (**PD7**) to the relevant line on **PD9** which relates to Row 40 in the table and which also states the risk (column K) for this item as “There is an AOV in the area outside of the ground floor electrical room, how is this AOV activated as there is no smoke detector in this area? Please see item 17b above as well”. From this RBKC have captured (from column R - “Comp date”) that no completion was date was entered. The entry on W2 (**PD24**) for line 7 shows the date/time stamp for the item last being modified on “15 June 2017 at 10:55:57” so RBKC have recorded (15/6 10:55) against this line on the screenshot.
- d. “details different” – having identified that action 19d from the FRA Action Plan (**PD7**) corresponds with row 40 on PD9, RBKC have recorded the entry in column S (“Full or Partial”) which shows the status of the action as “Fully Completed”, although there is no date of completion entered (which for brevity on **PD24** has been recorded as “details different”).

44. The process document provided for the one FRA Action from the October 2014 FRA and the sixteen FRA Actions from the June 2016 FRA are all shown as fully completed on the screenshots of the “View Fire Risk Action Data” screens. As a result, it is thought that there would have been no requirement to migrate these FRA actions from W2 to CRM when the FRA Actions workflow process went live on CRM in May 2017. However, for the avoidance of doubt, I do not have any knowledge of how the TMO performed any migration and this is purely an opinion I express based on the information RBKC has been able to locate.

CRM System

45. Searches were conducted using the individual actions identified in the document at **PD17** and no transactions/workflows were located on CRM which matched the actions on this document.
46. Given the information provided above regarding each of the October 2014 and June 2016 actions identified by the Inquiry, it appears there would be no reason for these items to have been migrated to CRM. As set out at paragraph 44 of this statement, for the avoidance of doubt, I do not have any knowledge of how the TMO performed any migration and this is purely an opinion I express based on the information RBKC been able to locate.

Further searches relating to the April 2016 FRA and November 2016 NoD

47. Further searches on W2 were undertaken to identify any record of the FRA Actions from the April 2016 FRA and the November 2016 NoD. Initially, the searches focused on transactions / processes which had status "Completed" with process dates from 1 April 2016 onwards and with the officer "Completed by" including those identified on the FRA Action Plans (namely Janice Wray, Claire Williams, Nicola Bartholemew and Cyril Morris).
48. This search returned 46 items all of which related to the June 2016 FRA and FRA Action Plan (which also contains 46 items). Variations on this theme all returned results which contained the 46 actions from the June 2016 FRA only.
49. As a final check, an open search on W2 of all transactions/processes with dates on 1 April 2016 and beyond (with no other limiting parameters) was run. This identified 26,139 results. Further analysis of this data still only identified the 46 actions relating to the June 2016 FRA for Grenfell Tower.

Open Contractor and Capita Repairs

50. RBKC have also undertaken checks to compare the FRA Actions identified in the Inquiry's letter of 3 March 2020 and the documents obtained through the searches which have been set out above. Specifically, checks were also undertaken on the Open Contractor and Capita Repairs History reports which I understand have previously been provided to the Inquiry and Kennedys.

Open Contractor

51. I exhibit a copy of the Open Contractor and Capita Repairs spreadsheet at **PD25**. I refer the Inquiry to tab 'OC HL003 – "FRA"'. The original starting point for this document was all Grenfell jobs on Open Contractor from August 2013, when we presume the system went live, to June 2017.
52. 15 out of 1432 items listed were responsive to "FRA" in the "text line" which provides a detailed description. Of these, two related to FRA actions as identified in the Inquiry's request of 3 March 2020 and have been highlighted in green on the OC HL003 - "FRA" tab on the spreadsheet:
 - a. (Job No: 201622995) – this appears to relate to FRA Action 12j (**see PD7**) on the FRA Action Plan relating to the June 2016 FRA where the "date reported" on OC is

recorded as 01/09/16 and there is a comment on the FRA Action Plan for this entry which states "Could Paul please confirm if this has now been repaired & if not could he raise / chase the repair". The equivalent action did not appear on the Action Plans (**PD4** and **PD5**) for the April 2016 FRA. W2 screenshots have been provided (process no: 269374) at **PD23**.

- b. (Job No: 201623006) – this appears to relate to FRA Action 12g (**see PD7**) on the FRA Action Plan relating to the June 2016 FRA where the "date reported" on OC is recorded as 01/09/16 and there is a comment on the FRA Action Plan for this entry which states "RESPONSE REPAIR REQUESTED". The equivalent action did not appear on the Action Plans (**PD4** and **PD5**) for the April 2016 FRA. W2 screenshots have been provided (process no: 269366) at **PD23**.

Capita Repairs

- 53. As referenced above, a copy of the Open Contractor and Capita Repairs spreadsheet at **PD25**. I refer the Inquiry to tab 'Repairs History "FRA"'. The starting point for this report was all Grenfell repair jobs raised on Capita since 2003.
- 54. 19 out of 8,394 items listed were responsive to FRA in the "Repair Description" column. Of these, none have been identified as relating to FRA actions in the Inquiry's request of 3 March 2020.
- 55. Searches for items covered in the Notice of Deficiency of November 2016 as per the Inquiry's letter of 3 March 2020 were also run across Open Contractor and Capita Repairs. No corresponding data was located.

Further Checks

- 56. Additional checks have also been undertaken by RBKC to confirm that the FRA Actions spreadsheets provided to the Inquiry and Kennedys were from the W2 system. I exhibit at **PD26** a document I prepared setting out the context in which this work was undertaken.
- 57. I was unable to clarify from W2 directly that the FRA actions spreadsheets were from the W2 system. However, we were able to search for and locate report templates on Insights (a Capita tool for reporting). Insights is a facility where reports are deployed and access to all reports can be managed.
- 58. In the context of W2, Insights sat above it and contained the report scripts to be run from W2 and extracted the data to populate the reports. Insights picks up existing data sources to put data into a format to manage the business. It does not itself hold any data.
- 59. A W2 reports folder was located and within that, a sub-folder called 'Fire Risk Assessment'. Within that folder, there were two further folders 'Vrs1' and 'Vrs2'. Enquiries were made with Siobhan Bowman of the TMO regarding these folders and it is understood that 'Vrs2' was the folder which was used and the report which would be used/run by the TMO would be 'Fire Risk Assessment by Team User vrs2'. Also located as part of this process were a number of other reports which could be run.
- 60. These documents are exhibited at **PD27**.

Statement of Truth

I believe that the facts stated in this witness statement are true.

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

Full name: Peter Day

Position of office held: Service Development Manager (Interim)

Signed: *Peter Day*

Date: 13 November 2020

List of Exhibits

Exhibit Number	Document	Reference
PD1	Identifying FRA's and associated documents -15 May 2020	Uploaded to Egress
PD2	Grenfell Tower Significant Findings Action Plan – October 2014	Uploaded to Egress
PD3	Grenfell Tower Significant Findings Action Plan – October 2014	Uploaded to Egress
PD4	Grenfell Tower Significant Findings Action Plan – April 2016	Uploaded to Egress
PD5	Grenfell Tower Significant Findings Action Plan – April 2016	Uploaded to Egress
PD6	Grenfell Tower Significant Findings Action Plan – June 2016	Uploaded to Egress
PD7	Grenfell Tower Significant Findings Action Plan – June 2016	Uploaded to Egress
PD8	Grenfell Tower Action Plan – October 2014 FRA	Uploaded to Egress
PD9	Grenfell Tower Action Plan – June 2016 FRA	Uploaded to Egress
PD10	FRA – Neighbourhood Management – 7 April 2016	Uploaded to Egress
PD11	FRA – Home Ownership – 7 April 2016	Uploaded to Egress
PD12	FRA - Responsive Repairs – 7 April 2016	Uploaded to Egress
PD13	FRA - Responsive Repairs – 7 April 2016	Uploaded to Egress
PD14	FRA – Contract Management – 7 April 2016	Uploaded to Egress
PD15	Neighbourhood Management FRA Actions – 10 March 2017	Uploaded to Egress
PD16	TMO Procedure – LFB Deficiency Notices – January 2016	Uploaded to Egress
PD17	Summary of FRA Actions	Uploaded to Egress
PD18	W2 process screenshots and accompanying documents for Process No. 172247 from October 2014 FRA	Uploaded to Egress
PD19	Fire Access Diagram – Process No.269272 from June 2015 FRA	Uploaded to Egress

PD20	Email from David Hughes (Rydon) dated 3 August 2016 and five attachments	Uploaded to Egress
PD21	Email from Claire Williams (TMO) dated 16 August 2016	Uploaded to Egress
PD22	Screenshot of documents on the W2 system	Uploaded to Egress
PD23	W2 process screenshots relating to June 2016 FRA	Uploaded to Egress
PD24	Annotated action plan by row	Uploaded to Egress
PD25	Open Contractor and Capita Repairs spreadsheet	Uploaded to Egress
PD26	Context behind FRA Reports document dated 25 June 2020	Uploaded to Egress
PD27	Documents from 'vrs2' folder	Uploaded to Egress