Statement of Witness to the Grenfell Public Inquiry

Statement of Simon Lawrence

I: INTRODUCTION

1. I am Simon Lawrence and I am a former contracts manager at Rydon Maintenance Limited ("Rydon"). I have received a letter from the Grenfell Tower Inquiry dated 23 July 2018 ("the letter") asking me to provide a witness statement that covers my involvement with the refurbishment of Grenfell Tower.

2. I cannot imagine what the residents of Grenfell Tower and their families have gone through, I can only offer my utmost sympathy to all those affected by the fire.

3. In this statement I have sought to assist the Inquiry by providing what information I can in the limited time available before the deadline of 28 September 2018 set out in the letter. In doing so, I have followed the Inquiry's requirement that I only provide evidence within my own knowledge and my memory of the facts at the time.

4. My involvement with Grenfell Tower started with the pre-construction tender period in October 2013 and lasted until October 2015, when I left Rydon after 11 years of employment, to join another construction company based closer to my home.

Personal History

5. I left school [redacted] and started my work life in an office based job. At the age of [redacted] I spent a year abroad working part time in various construction based jobs. On my return to the UK, I enrolled on an Engineering Course to study Welding and Fabrication at a local college.

6. Once qualified, I started "on the tools" as a fabricator/welder working for a number of engineering companies servicing several different industries.

Following a period of self-employment, I moved back as a PAYE employee managing the site installation side of a metal fabrication business.

Experience with Rydon

7. By 2003, I was mainly working for a metal working fabricator on construction sites in and around the London area. Rydon was one of the main companies that I worked for as a sub-contractor.

8. I had the opportunity of joining Rydon as an employee in October 2004. I started my career with Rydon Construction as an Assistant Site Manager where I developed my site management skills including liaising with clients and contractors.

9. Whilst working as an Assistant Site Manager, I trained for several years to acquire my Chartered Institute of Building (CIOB) Level 4 Certificate in Site Management and Diploma in Site Management. During my construction career to date I have undertaken numerous professional development courses such as Site Management, general health and safety relating to construction and First Aid.

10. During my time with Rydon I progressed from being an Assistant Site Manager (around October 2004 to 2007) to Site Manager and then to Project Manager (from June 2011 to April 2014) and Contracts Manager (from April 2014 to 23 October 2015).

11. My time at Rydon was spent working on Occupied Refurbishment Projects. These projects were based around upgrade and improvement works to properties for Housing Association and Local Authority clients. These properties range from large housing estates to high-rise tower blocks.

12. During this period I worked on Local Authority Regeneration projects similar to Grenfell Tower across different London Boroughs. These include Birrell House in Stockwell, the Kennington Park Estate (Kennington), the Chalcots Estate (Camden), Ferrier Point (Canning Town), St Georges Estate (Shadwell), the Ashmole Estate (Kennington) and Herbert & Jacobson House (Aldgate).

13. Birrell House, Kennington Park, Chalcots, Ferrier Point and Ashmole Estate were part of a government programme called "Decent Homes" refurbishments. Rydon was contracted to carry out internal improvement works (kitchens & bathrooms), mechanical and electrical upgrades (such as new heating systems and rewiring) as well as external refurbishment on some of these projects.

II: PRE-CONSTRUCTION PHASE FOR GRENFELL TOWER AND RYDON'S APPOINTMENT

14. During my time in a Pre-Construction role I provided the "production" input which included the planning, methodology and logistics of how the construction works would be carried out on site. I was part of the team involved in putting the tender bid submission together and attending the interview process with KCTMO that is part and parcel of a tender process. Once we had secured the contracts (and given my experience on similar value high-rise projects) I was asked to fulfil the role of Contracts Manager. The Contracts Manager role for Rydon is to oversee construction projects from inception to completion. This may involve overseeing more than one project at a time.

15. I remember that the Kensington and Chelsea Tenant Management Organisation "KCTMO" published an OJEU notice for the works and Rydon responded. Rydon was invited to tender along with other companies. The other contractors tendering were our normal competitors in this sector for this type of work. From the best of my recollection, the tender was received around October 2013.

16. I remember that tenderers were asked to bid and price against detailed specifications and drawings produced by consultants and specialists working for KCTMO. As part of KCTMO's tendering process a "bidders" meeting was held for all tenderers to attend on 5 December 2013. It involved a presentation at the KCTMO offices by the KCTMO and its appointed design team, which was Studio E and Max Fordham LLP. I can recall that this process involved

me getting the opportunity to visit Grenfell Tower and have a guided walk-around of the building to get a sense of the project.

17. From my recollection the Studio E NBS Architectural Specification set out detailed information for the interior and exterior refurbishment works. KCTMO's Mechanical & Electrical requirements were contained in the Specification produced by Max Fordham.

18. I understand that the Rydon tender for Grenfell followed the same process as the other projects which I had been involved in. That included the Rydon Estimating Department preparing the various work package information that would be involved in the construction. These would then be sent out to sub-contractors (including some of which were specified by KCTMO and others that were not).

19. The sub-contractors were required to provide a price for their tender to Rydon based on the specification provided by the KCTMO. In some of the work packages there was a specified type of product or material or products and materials that were to be used. As part of the tender process, our subcontractors were provided with the same specification that Rydon had been provided with by KCTMO.

Tender Specification

20. Prior to Rydon being formally awarded the contract, I understood that the KCTMO contacted Jeff Henton (Managing Director of Rydon) or Steve Blake (Refurbishment Director of Rydon). I understand that it was felt we were best placed to win the tender. I became aware of this when an email was forwarded on to me from Steve Blake.

21. Following the initial approach from the KCTMO, Rydon was asked to meet with the KCTMO to talk through the available options (in particular alternative products) for the scheme as the KCTMO needed to achieve around £800,000 of savings from the original tender price. They provided Rydon (Jeff Henton, Steve Blake, Katie Bachellier and myself) with a list of areas in which it was felt the savings may be achieved.

22. I subsequently attended a meeting on Tuesday 18 March at the office of KCTMO along with Steve and Katie Bachellier, our estimator. I think the KCTMO people present were David Gibson (Head of Capital Investment), Peter Maddison (Director) and Claire Williams (Project Manager). At the meeting, it was discussed what could be done to bring the project within their revised budget.

23. I understood that some of the savings the KCTMO were looking at had the potential to be achieved through Grant Funding for energy efficiency. It was also my understanding that the KCTMO had in its original tender document included alternative product specifications that Rydon was asked to price against so that if chosen by KCTMO would have contributed to the overall savings they were looking for.

24. The outcome of this meeting was that Rydon would go away and consider what other savings might be achieved. Rydon confirmed that it could achieve some additional savings to ultimately reach a figure that could be contracted on.

Tender Cladding Options

25. I recall that Harley Curtain Wall Ltd ("Harleys"), a specialist cladding contractor, had been involved at the tender stage with Rydon in considering how Rydon would oversee the physical delivery of the project. As part of that process we met Harleys on site to discuss the project delivery. I recall Mike Harris and Mike Albiton of Harleys being present to discuss logistics and the lower floors.

26. The tender specification supplied to Rydon by KCTMO relating to the exterior cladding of the building originally asked for quotes based on the use of a number of different product options, each of which was specified. Those were zinc, and two other products that were known by their trade names of Reynobond and Alucobond. An element of the £800,000 savings I have referred to was already accounted for by the prices of the different cladding material options specified by the KCTMO in the original tender. The use of Reynobond over Zinc created a saving of approximately £300,000. Harleys had confirmed this saving was achievable.

27. Following the decision by KCTMO to go ahead with the Reynobond option, my understanding at the time was that they then had to go back to the local authority planners to get agreement that this was an acceptable option.

28. I also understood that there were meetings between the planners and the KCTMO design team at Studio E, and that details were provided to Rydon by Harleys and Alcoa of where the planners could visit to see the material in place on other buildings. At that time we had not entered into the final contract with KCTMO, we were working under a pre-construction agreement that allowed Rydon to be paid for managing enabling works and supporting the final stages of the planning approval process.

29. Rydon asked at least one other party than Harleys to tender for the cladding work. There was not a massive amount of cladding work out there in the refurbishment market which meant that there were not too many appropriate specialist sub-contractors that could be approached. Harleys were not the cheapest contractor at tender stage but colleagues and I had been impressed by them on other projects and liked their work. Rydon always felt it likely they would select them to carry out the cladding for those reasons.

Parties Involved

30. There were a substantial number of organisations connected to the project in some way but, from my perspective at least, the most relevant included:

- Artelia UK as KCTMO's representative; CDM Coordinator and Quantity Surveyor;

- Studio E LLP as Architect, who were originally appointed by KCTMO to provide architectural services and later novated across to Rydon;

- Curtins Consulting Limited as Structural Engineer, who were originally appointed by KCTMO to provide structural engineering services; (Curtins were also later novated across to Rydon);

- Max Fordham LLP as KCTMO's Mechanical Engineer, Electrical Engineer and Client Technical Adviser.

31. Following the tender process, KCTMO employed Rydon as principal contractor for the refurbishment works at Grenfell Tower. This was by a JCT Design and Build Contract (2011 edition) dated 30 October 2014 and was the basis of the contract that Rydon was fulfilling to the best of my knowledge.

32. Rydon sub-contracted the M&E packages to JS Wright & Co Limited.

33. Rydon subcontracted all of the facade works to Harley Curtain Wall Ltd, (this contract was later novated to Harley Facades Limited).

34. John Rowan and Partners were appointed by KCTMO as its Clerk of Works for construction matters. Silcock Dawson & Partners were the Clerk of Works for mechanical and electrical matters.

35. A Fire Safety Consultant, Carl Stokes was appointed by KCTMO in its capacity as the "responsible person" for the occupied residential block.

36. Royal Borough of Kensington & Chelsea Building Control was appointed by Rydon to provide advice and inspected and approved works carried out by Rydon. Its role was to ensure construction, design and installation was carried out in line with Building Regulations.

III: GRENFELL TOWER PROJECT - OVERVIEW

CDM Parties

37. The size of the Grenfell project meant that it had to follow the requirements of the then Construction (Design & Management) Regulations. This is referred to as CDM and sets out specified roles and responsibilities for the safe delivery of a construction project.

38. KCTMO was the CDM Client and it had appointed Artelia as its CDM co-ordinator (CDMC). KCTMO had also appointed its own CDM designers for

the pre-construction phase of the project. The lead designer was Studio E, and I understood that they had been involved in preparing the original designs and specification that Rydon and its sub-contractors had priced against.

39. Having won the tender, Rydon was appointed as the "principal contactor" under CDM and this was notified to the Health and Safety Executive (HSE) on the Form F10. Rydon was appointed to the Principal Contractor role through a "design and build" contract. In my experience, this kind of construction contract is very widely used in the industry.

40. Rydon did not have in-house design expertise and did not directly employ any construction operatives. Instead, Rydon's approach was to appoint specialist third-party designers to undertake the design works and work package sub-contractors to undertake the building aspects of a project. Rydon's role was to then manage and co-ordinate the work of those third parties. The contract between Rydon and the sub-contractors set out the scope of their work and would mirror the contractual obligations that Rydon had to its "Client", in this project, KCTMO. I understand that those contracts usually impose a design responsibility on a specialist contractor for the area of work they carry out.

41. In my experience, this was the same approach as taken by other principal contractors and was a standard way of working in the construction industry. Nothing about the approach to the contract was peculiar to either to Rydon or the Grenfell Tower project.

42. Although it was never clearly stated, I had always assumed that if Rydon was successful in winning the tender I would be involved in the construction phase of the project. When Rydon was successful, I became the Contracts Manager for the project.

43. My role as Contracts Manager for Rydon was to oversee construction projects from inception to completion. This may involve overseeing a number of projects at any one time.

44. My role included regular visits to site to guide and support the Site delivery team (Project Manager, Site Managers, etc.). The Site Delivery Team is based

on site and ensures the day-to-day works are managed safely and correctly to the design.

45. My role also involved carrying out the initial project planning in putting together the works programme. Contracts Managers are the point of contact for the Client, Design team and Site Team, dealing with the issues that arise which cannot be solved at a Site Level. This involves managing contractual obligations and dealing with client instructions, liaising with the professional team (designers – architects, structural engineers, etc.) to co-ordinate and manage the process of design (though not the design itself) ensuring that the designs comply with Client requirements and are completed in the correct time so site works can commence.

46. I would also provide regular progress reports internally and externally at monthly Client Meetings and this would involve a review of the contract progress.

47. My role also required early involvement in the sub-contractor order placement process along with the Quantity Surveyors. This was intended to have the correct work packages properly organised and placed in time.

48. Before the project began Rydon instructed specialist contractors to undertake a number of surveys of the site. These included surveys relating to the presence of asbestos, lifts, electrical systems and structural issues relating to the first four floors. Rydon used contractors to undertake those surveys – for example, our electrical sub-contractor. JS Wright did the electrical survey.

49. The Designer of the overall scheme (as previously referred to) was Studio E, it had been appointed by KCTMO before Rydon was involved. I understood it was involved in putting together the original specification at the tender stage that referred to the cladding options.

50. I am not aware of what specific consideration was given by Studio E to the original design of the building when the overall scheme was devised. Following Rydon's appointment as Principal Contractor, Studio E was "novated" across to Rydon. My understanding is this that the original contract

between Studio E and KCTMO was substituted for an essentially identical one between Studio E and Rydon. Again, this is not unusual in a design and build contract situation, as it provides continuity stretching back to the early concept and design work. Rydon would only change designers on appointment as principal contractor if there was a very good reason to do so, and there was not one on the Grenfell project.

51. As set out above, the Rydon maintenance business did not have internal design expertise to double check each aspect of technical design. The contractual expectations required the subcontractors to produce a design or specify the use of a material that was both compliant with legal standards and suitable for the project. I would expect a contractor to flag up an issue, if they believed that there was a problem with compliance or suitability. Although I have no expertise or qualifications as a designer, my experience as a construction manager meant that if I saw something that was obviously wrong then I would challenge that and I would have expected the rest of the Rydon team, and indeed all of those involved in managing the project, to do the same.

52. My understanding was that the materials to be used had either been specified at the tender stage by KCTMO in conjunction with its designer/advisers, or by our specialist sub-contractors. I would have expected that any material that was specified in this way would comply with the relevant legal requirements. At no point during my work at Grenfell Tower did I have any reason to believe that was not the case.

MODIFICATIONS TO THE INTERIOR OF THE BUILDING 2012 – 2016

53. I believe that the construction of Grenfell Tower dated back to the early 1970's. It was a typical high-rise building of its time, constructed using a concrete frame and precast wall panels. I also understand that, since its initial construction, there had been a number of upgrades, maintenance and refurbishment works carried to the building, for example, bathrooms and kitchens. To the best of my knowledge Rydon was not involved in that work.

54. In this project, the main areas of work to be done under the contract were:

(a) Remodelling the lower 4 floors to provide new flats, boxing club gym, nursery and entrance lobby with community room;

(b) Installing new mechanical, electrical and plumbing systems throughout the block to provide new heating systems to each flat and basement boiler plant. New communal services including fire detection and smoke vent systems; and,

(c) New external façade (cladding and windows) and landscape works.

55. At the time I considered the largest and most complex section of the works to be the remodelling of the lower four floors. This involved major structural changes and design works around the new access and egress to these areas. These were logistically challenging as the building was still occupied. For example, alterations had to be made to the existing lifts to cut new openings to allow them to stop at the new additional lower floors.

56. Rydon managed various subcontractors to carry out other works for example the new mechanical, electrical and plumbing works (with the plant for this being based in the basement). The contract also included replacement of all the windows and associated areas around the window reveal internally, which I think was carried out by SD Plastering. The kitchen windows also had an extractor installed in them. It became apparent at the tender stage that the initial window plans would involve substantial work to create the bigger windows by removing a central concrete pillar. Once it was recognised by the KCTMO that this would require alteration to existing structures and consequent disruption for residents, the plan was changed by agreement to install smaller windows as it was felt that this would be better for the residents.

57. From my experience on other tower blocks, Grenfell Tower was not a typical configuration, as its central core was landlocked with flats all around it. When Rydon went on to the job there was a high and a low vent on each residential landing.

58. Most buildings of this type would have an automatic opening vent ("AOV") within their communal windows. The purpose of an AOV is usually to remove smoke from escape routes and communal areas to assist with safe access in an emergency. It operates by being connected to a smoke detection system. Due to the configuration at Grenfell, there were no windows in the central core and the AOV therefore helped to ventilate the building and to remove smoke in the event of a fire. This was done via existing ducts that were automatically controlled by a thermostat or the fire detection system.

59. One of the technical issues faced during the construction phase was that 20 floors of residents would need ongoing fire protection throughout the construction period. The intention was for there to be a working AOV system during that time. My understanding initially was that the existing AOV was operational and that the challenge was how to upgrade the AOV system while keeping it operational. As part of that, Rydon needed to understand how the existing system worked and so asked to meet the KCTMO maintenance provider.

60. As part of this process, a meeting was arranged with the KCTMO and their maintenance team for 27 August 2014. I met with Claire Williams, Peter Madison and Theresa Brown the Maintenance Director. Artelia was also present. At that meeting, I was told that in fact, the AOV system was not working and that a Fire Enforcement Notice had been issued to the KCTMO by the London Fire Brigade to rectify it. I cannot remember exactly how long the TMO had been given to do so. Rydon was therefore tasked to get the AOV working. This meant that there was a lot of design work to do, and we had to speak to specialists to get a very crude system working short term. Rydon tried to get to a point where a partial system was working; giving some coverage for the building, but in the end it was not possible for technical reasons. What did happen was that the installation of a new bespoke AOV system was prioritised and brought forward within the programme of works, so that it was started earlier that would have otherwise been the case. My understanding was that, throughout this period, Claire Williams on behalf of KCTMO was in regular contact with London Fire Brigade to keep them updated on the AOV position.

61. The mechanical and electrical subcontractor, JS Wright designed and put in the new AOV system. This work was well underway but had not been completed by the time I left the project in 2015.

62. Other than the AOV, which acts to take away smoke, work was also undertaken on the communal fire detection system and modifications were made to the dry riser. These modifications were minor and included small changes to the lower floor areas. I understand that JS Wright sought clarification from Building Control (Paul Hanson) about whether the systems needed to be upgraded in line with current building regulations. Paul Hanson confirmed that as the height of the existing riser was not being increased, building regulations did not require the risers to be brought in line with current requirements.

63. As part of the contract, fire breaks were installed in the old bathroom ventilation ducts by Swift Clean, as part of this work which every duct was cleaned and an intumescent break was installed in the duct. I believe that the ducts themselves dated back to the original construction.

64. Existing fire doors were outside the existing scope of the contract works and as far as I am aware Rydon had no involvement with them.

MODIFICATIONS TO THE EXTERIOR OF THE BUILDING 2012 - 2016 (INCLUDING CLADDING AND INSULATION)

65. I have tried to set this out above. The only additional comment I would make is that the overall nature of the work undertaken under the contract was intended to improve the amenities at Grenfell Tower and to improve the thermal efficiency of the building. The purpose of the exterior cladding was to protect the insulating material underneath from the elements.

THE FIRE AND SAFETY MEASURES WITHIN THE BUILDING AT THE TIME OF THE FIRE

66. I left the project in October 2015 onwards and was not involved with Grenfell Tower after that date. By the time I left, the windows had been completed and on the ground floor the nursery walls were up. The boxing club sports floor

was not. Externally, the insulation and rainscreen cladding had started going on from the top down and just over two-thirds of the external cladding had been completed when I left the project.

67. For that reason, I cannot comment on fire measures in the building at the time of the fire. Rydon had a site fire risk assessment developed for the construction phase. That was based on the knowledge that there was a "stay put" policy for the tower block. That policy was consistent with what I had found on other projects.

68. I am aware that the KCTMO had a retained fire advisor in place for the building, Carl Stokes. I had some involvement with him, and he would come by and visit the site office when he was visiting Grenfell Tower to chat informally with members of the team who may have been on site on any given day. My only direct involvement with him was when Rydon were trying to resolve the situation with the AOV described above. On 16 September 2014, I attended a meeting with Carl Stokes, Claire Williams and possibly Janice Wray, who I believe was the safety manager for KCTMO, to discuss the fact that the AOV was not working.

INSPECTIONS

69. Rydon had a health and safety regime which involved regular site inspections by the internal health and safety team. Those were intended to check the safety of the site and of the measures in place to protect workers and members of the public, such as the residents, from risks associated with the construction activity. Those inspections took place, to the best of my knowledge.

70. I know that the London Fire Brigade visited the site several times during the construction work. It was standard practice for Rydon to contact the local fire brigade to let them know that building works were taking place. There are a number of reasons for this. For example, at Grenfell Tower there was a hoarding around the base of the building that was locked at night, once work had ceased on site. The presence of the hoarding would mean that, if the fire brigade was called out, they would be faced with access issues to get to the riser where the hose points were, although steps were in place to make sure this

would not create practical difficulties. I remember that Simon O'Connor (Project Manager) made this contact with the London Fire Brigade.

71. Regular checks on the work carried out by the sub-contractors were performed by sub-contractors' supervisors and by the Rydon site team. These included site managers going up the various elevations in the mast climbers. In relation to Rydon inspections, these were done regularly as and when required. We would then interact with subcontractors and close out issues as and when they arose.

72. I would be copied in to our internal safety inspections, although it was the role of the site team to manage the closing out any site-specific safety issues that may have been identified. Those were focusing on the safety of the construction process. Up to the point that I left the project, I cannot recall anything raised in those inspections relating to the fire integrity of Grenfell Tower or anything that raised concerns about the quality of the materials or installation.

73. In addition to the inspections by the site team, there were also inspections during my involvement with the Grenfell Tower project by both the Borough's Building Control Officer (who would consider whether the construction was being done in accordance with Building Regulations) and the Client's appointed Clerk of Works, who would be checking the materials were what had been specified and the level of workmanship. The role of Clerk of Works inspector involves an individual usually with experience in the construction industry appointed to work on behalf of the Client. I recall that Jon White was the Clerk of Works inspector focusing on the general building elements and that Tony Batty held the same role but was the specialist for M&E.

74. I would describe the construction inspection process as follows:

a) The Sub-contractor operatives carry out section of works;

b) The Sub-Contractor Foreman / Project Manager inspect the section of works. The Project Manager and the foreman note any areas where

improvement of installation is required (snags) and arrange for the remedial works to be carried out. Once completed they re-inspect (de-snag);

c) Once satisfied that the works are correct, the Sub-Contractor will offer the section of works to the Site Manager (Rydon's) for them to inspect. The snagging and de-snagging process is carried out until it is accepted by the Site Manager;

d) Once accepted the Site Manager may offer the completed section of works to the Clerk of Works (who will decide whether it is an area of work he wants to inspect). It may also be offered for inspection to the Building Control Officer as there are certain specific areas the Building Control Officer will want to see. He may also turn up occasionally to inspect the works or choose certain staging points within the project to look at work being undertaken. Again, the inspection process will be snagged and desnagged, and;

e) Once all of the above processes have been completed the works will be accepted as complete;

In my experience, this process is carried out numerous times throughout the build process. It is broken down into sections of works as the build progresses. This allows inspections to be carried out as the works progress, so that works not visible on completion will still be seen and properly inspected.

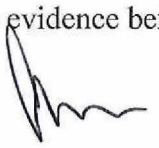
FIRE ADVICE TO RESIDENTS 2012- 14 JUNE 2017

75. I had no involvement with Grenfell Tower until the tender period in 2013 and then only for the reasons described above. I was then involved in the construction period from June 2014 until I left in October 2015. For that reason I have no information about the residents' fire advice from KCTMO. I can confirm that Rydon did have regular communications with residents through a Rydon newsletter, and that signage went up to remind residents that, during the remodelling works to lower lifts, the temporary escape route was via

walkway level. There was also signage in the lifts warning people not to go down to the ground level.

STATEMENT OF TRUTH

76. I confirm that the contents of this statement are true to the best of my knowledge and further confirm that I consent for this statement to form part of the evidence before the Inquiry and published on the Inquiry's web site.

SIGNED: 

SIMON LAWRENCE:

DATED: 25th September 2018.