

<p>1 Wednesday, 21 March 2018</p> <p>2 Housekeeping</p> <p>3 SIR MARTIN MOORE-BICK: Good morning, everyone, and welcome</p> <p>4 to this procedural hearing.</p> <p>5 Let me begin by apologising to the lawyers present</p> <p>6 for the limited space available. I'm afraid that, as on</p> <p>7 the previous occasion, we thought it very important that</p> <p>8 we should have as much space available for members of</p> <p>9 the public, but particularly your clients, to ensure</p> <p>10 that they could actually be present in the room during</p> <p>11 the course of this hearing.</p> <p>12 Thank you all for your submissions, which I have</p> <p>13 read and found very helpful. I'm particularly grateful</p> <p>14 to those who represent the bereaved, survivors and</p> <p>15 residents for agreeing who should present which part of</p> <p>16 their submissions. Of course, I have read and I shall</p> <p>17 re-read all the written submissions which you've sent,</p> <p>18 but it's obviously very helpful to have each topic</p> <p>19 addressed only once.</p> <p>20 One of the things that struck me is that some of the</p> <p>21 points that have been raised in the written submissions</p> <p>22 have been overtaken to various degrees by discussions</p> <p>23 between the inquiry team and some of you over the last</p> <p>24 few weeks. To that extent, I would suggest that there's</p> <p>25 no need to spend time rehearsing submissions which have</p> <p>Page 1</p>	<p>1 MR MILLETT: Mr Chairman, by way of introduction, what I'm</p> <p>2 going to do is to update the core participants, or CPs,</p> <p>3 as to the work of the inquiry since the last procedural</p> <p>4 hearing in mid-December 2017, and to set out the inquiry</p> <p>5 team's proposals to take us down to the start of the</p> <p>6 oral hearings for phase 1.</p> <p>7 I start with representation. Present today,</p> <p>8 excluding me and the inquiry legal team, are some 12</p> <p>9 counsel and solicitors teams representing a total of 28</p> <p>10 organisations and governmental CPs, and 504 CPs who are</p> <p>11 bereaved, survivors and residents of Grenfell Tower, who</p> <p>12 I shall call BSRs.</p> <p>13 Some CPs are present and have not put in written</p> <p>14 submissions and don't wish to address you; some CPs are</p> <p>15 both present and have put in written submissions but</p> <p>16 don't wish to address you either at all or at any</p> <p>17 length; some CPs are neither present nor have put in any</p> <p>18 written submissions. Thames Water is a recently added</p> <p>19 CP who has put in no written submissions but may wish to</p> <p>20 address you.</p> <p>21 All CPs have an updated speaking list, which is</p> <p>22 correct as at Friday last. As at the December hearing,</p> <p>23 that speaking list is only for this procedural hearing</p> <p>24 number 2 and establishes no precedent.</p> <p>25 The reason that we have the Metropolitan Police here</p> <p>Page 3</p>
<p>1 now been overtaken.</p> <p>2 The inquiry team has circulated a running order</p> <p>3 which allocates a time to each body or group of people</p> <p>4 who wish to address me. I'm sure you'll do your best to</p> <p>5 limit yourselves to the times suggested. As I've said,</p> <p>6 I've got the written submissions and I'll be able to</p> <p>7 look at those again after the hearing, and of course</p> <p>8 there will be a transcript of this hearing which I can</p> <p>9 also review.</p> <p>10 Just to remind you that, as on the previous</p> <p>11 occasion, the proceedings are being recorded. They are</p> <p>12 also being streamed live to other locations. For that</p> <p>13 reason, amongst others, when you're invited to speak,</p> <p>14 I'd be grateful if you would come up to the reading desk</p> <p>15 here. It's necessary for you to do that in order to be</p> <p>16 seen on camera and for you to be recorded, as I say,</p> <p>17 both for the purposes of the streaming and for the</p> <p>18 purposes of the transcript. So we'll adopt the same</p> <p>19 procedure that we did on the previous occasion, which</p> <p>20 seemed to me to work quite well. I hope you felt the</p> <p>21 same.</p> <p>22 So, with those few introductory remarks, I'm going</p> <p>23 to invite counsel to the inquiry, Mr Richard Millett QC,</p> <p>24 to open the proceedings.</p> <p>25 Opening Remarks by COUNSEL TO THE INQUIRY</p> <p>Page 2</p>	<p>1 as the first CP to speak, as we also did at</p> <p>2 the December 2017 hearing, is so that they can provide</p> <p>3 a brief update on the criminal investigation.</p> <p>4 The CPs will then speak in two successive</p> <p>5 groups: first, those representing the BSRs, who have</p> <p>6 agreed to speak in the order G5, G11 and G3, each having</p> <p>7 agreed between themselves to cover separate topics, and</p> <p>8 second, the CPs who are organisations or government</p> <p>9 departments.</p> <p>10 In terms of total numbers of CPs in this inquiry,</p> <p>11 those currently with CP status are: 128 CPs from</p> <p>12 bereaved families of the deceased, including one who</p> <p>13 currently has no legal representation; 209 CPs who were</p> <p>14 residents of Grenfell Tower or visitors at the time of</p> <p>15 the fire; four CP leaseholders who were not resident at</p> <p>16 the time of the fire; 163 CPs from the walkways; and 28</p> <p>17 CPs who are organisations, including the TMO, the</p> <p>18 council and the MPS, Metropolitan Police Services, and</p> <p>19 various government departments.</p> <p>20 On 20 March 2018, the inquiry published a list of</p> <p>21 CPs with certain exceptions. To date, the chairman has</p> <p>22 granted core participant status to a total of 532</p> <p>23 individuals and organisations. As I say, 504 are BSRs</p> <p>24 and 28 are organisations or government departments.</p> <p>25 Mr Chairman, you received some 22 applications from</p> <p>Page 4</p>

<p>1 core participants to have their names withheld from the</p> <p>2 list for a variety of personal reasons. Among the 22 CP</p> <p>3 applicants were seven CPs who asked to be allowed to</p> <p>4 remain anonymous throughout the inquiry's proceedings.</p> <p>5 You granted anonymity to three core participants whose</p> <p>6 names appear in the list as AAA, CCC and DDD, and</p> <p>7 refused the applications of the other four. Of the 16</p> <p>8 who only asked for their names to be withheld from the</p> <p>9 list, you rejected 12 of their applications and deferred</p> <p>10 four pending the receipt of further information. You</p> <p>11 have published a ruling setting out the principles which</p> <p>12 you have applied in making these decisions.</p> <p>13 In addition to the documents on the inquiry's</p> <p>14 website, all CPs present here today have the following</p> <p>15 documents: first, our counsel's statement dated</p> <p>16 12 February 2018, the programme and all other CP</p> <p>17 submissions which were circulated last Friday.</p> <p>18 I propose to do two things, Mr Chairman: first, to</p> <p>19 update the CPs as to the inquiry's progress and speed of</p> <p>20 progress on numerous fronts; and, second, to present and</p> <p>21 explain the detailed next steps taking us down to the</p> <p>22 start of the oral hearings for phase 1.</p> <p>23 In this opening address I do not propose to provide</p> <p>24 answers to all the many points made in the various</p> <p>25 written submissions put in by CPs, but we'll wait</p> <p style="text-align: center;">Page 5</p>	<p>1 be notified and details will be published on the</p> <p>2 inquiry's website. The inquiry continues actively to</p> <p>3 consider the requirement for further additional or</p> <p>4 supplemental expertise as the evidential picture</p> <p>5 develops.</p> <p>6 Second, position statements from CPs.</p> <p>7 Position statements were received from certain CPs</p> <p>8 during the course of February. These have now been</p> <p>9 disclosed to all CPs. Some position statements were</p> <p>10 provided with supporting documents. In some cases</p> <p>11 redactions have been sought to some of those supporting</p> <p>12 documents.</p> <p>13 The inquiry team has had to consider carefully</p> <p>14 whether to disclose the documents with the redactions as</p> <p>15 applied by the relevant CP or without the potential</p> <p>16 redactions, or else challenge the claimed redactions and</p> <p>17 obtain a ruling from you, Mr Chairman, prior to</p> <p>18 disclosure to CPs generally.</p> <p>19 In the end, the inquiry has decided to disclose the</p> <p>20 documents containing the redactions for the time being,</p> <p>21 but will decide upon the appropriateness of the</p> <p>22 redactions with the relevant CP in slower time.</p> <p>23 We have also withheld two unredacted documents</p> <p>24 because redactions to them may be required, and we have</p> <p>25 been chasing a supporting document from RBKC which has</p> <p style="text-align: center;">Page 7</p>
<p>1 instead to hear what further points are made to you</p> <p>2 during this hearing.</p> <p>3 Can I start with an update on assessors.</p> <p>4 First, tenant voice assessors. In addition to the</p> <p>5 three assessors who have been appointed to the inquiry,</p> <p>6 the chairman is currently considering a number of</p> <p>7 individuals with relevant expertise and experience in</p> <p>8 the field of social housing and tenants' rights to</p> <p>9 assist in particular with consideration of the issues</p> <p>10 from the tenant's perspective in relation to item 1(e)</p> <p>11 of the inquiry's terms of reference. The chairman has</p> <p>12 identified a group of potential candidates as tenant</p> <p>13 voice assessors and they will be interviewed over the</p> <p>14 next few weeks from a shortlist.</p> <p>15 So far as architect assessors are concerned, the</p> <p>16 chairman is also considering a number of individuals</p> <p>17 from the field of architecture to assist with</p> <p>18 consideration of issues related to items 1(b), 1(c) and</p> <p>19 1(d) of the inquiry's terms of reference, insofar as</p> <p>20 they relate to matters of design and the choice of</p> <p>21 materials for use in high-rise buildings. This assessor</p> <p>22 is required for phase 2 and so there is less urgency.</p> <p>23 The inquiry is also looking at retaining an expert</p> <p>24 architect.</p> <p>25 Once these individuals have been appointed, CPs will</p> <p style="text-align: center;">Page 6</p>	<p>1 not yet been provided and we will provide that as soon</p> <p>2 as we get it.</p> <p>3 Third, completion of phase 1 document disclosure.</p> <p>4 The process of disclosure to CPs for the phase 1</p> <p>5 hearings commenced on 19 February and is continuing on</p> <p>6 a rolling basis. To date, three tranches of material</p> <p>7 have been disclosed to CPs and made available on the</p> <p>8 electronic work spaces. That material includes floor</p> <p>9 plans, photographs and videos, including media taken on</p> <p>10 the night of the fire. It also includes a large amount</p> <p>11 of forensic material which is relevant to the cause and</p> <p>12 origin of the fire.</p> <p>13 As we previously explained, the phase 1 disclosure</p> <p>14 will principally consist of primary evidential material</p> <p>15 relating to the events of the night. The vast majority</p> <p>16 of this has been provided to the inquiry by the Met.</p> <p>17 Although as much as possible of that primary material</p> <p>18 will be disclosed in advance of experts' reports, the</p> <p>19 process is affected by the MoU, or memorandum of</p> <p>20 understanding, that the inquiry has with the Met. In</p> <p>21 particular, the inquiry is required under the MoU to</p> <p>22 notify the Met of the intention to disclose that</p> <p>23 material and then follow the processes outlined in the</p> <p>24 MoU before disclosure to CPs generally can occur.</p> <p>25 Although the inquiry is making concerted efforts to</p> <p style="text-align: center;">Page 8</p>

<p>1 engage with the Met in an effective and efficient way, 2 the process is a complex one and can be time consuming. 3 That means that some primary evidential material will 4 not be disclosed until close to or at the same time as 5 the experts are disclosed at the end of this month. 6 We are, I should say, very grateful to the Met for 7 their great and continuing assistance and co-operation 8 with the inquiry over the release of phase 1 documentary 9 material for disclosure. 10 In addition, the inquiry will also be disclosing 11 a limited amount of phase 1 material which has come from 12 third-party document providers other than the Met. This 13 will be relevant, for example, to the physical state of 14 the building on the night and includes key drawings and 15 manuals relevant to its operation. 16 Those who have provided those documents to the 17 inquiry have recently been notified of the inquiry's 18 intention to disclose these documents and the redactions 19 protocol that we have is being followed with those 20 providers. Tight timetables are being imposed by the 21 inquiry in that regard. 22 At present, the inquiry team is not aware of any 23 significant redaction issues which are likely to arise 24 in respect of this documentation. 25 For the avoidance of doubt, there is no question of</p> <p style="text-align: center;">Page 9</p>	<p>1 electronic documents platform for the phase 1 disclosure 2 which gives useful subcategories. A letter about the 3 folder structure and field tree, including guidance 4 about accessing the field tree will be provided to CPs. 5 If any CPs are experiencing difficulty in this regard 6 then they should contact the inquiry team without delay. 7 Fourthly, phase 2 disclosure. 8 The process of gathering and identifying relevant 9 documents for phase 2 is continuing in parallel with the 10 phase 1 disclosure exercise. To date, approximately 11 330,000 documents have been received from some 45 12 providers of documents. That number is continuing to 13 rise week by week. We currently estimate that the 14 inquiry will eventually receive over 400,000 documents. 15 Out of the 330,000 documents so far received, 16 a substantial number of documents are exactly matching 17 duplicates and have been marked as such. Leaving aside 18 duplicates, approximately 183,000 documents have now 19 been through the first stage relevance review, with some 20 95,000 left to review. The inquiry continues to provide 21 monthly bulletins to CPs about the disclosure process 22 and those will continue. 23 In the February bulletin, the inquiry published 24 a list of all document providers who have provided 25 documents to the inquiry at that point. We are</p> <p style="text-align: center;">Page 11</p>
<p>1 material being held back until disclosure of inquiry 2 experts' reports. As and when the inquiry has the 3 relevant permission to disclose the material from the 4 relevant document providers, it will be disclosed as 5 soon as possible thereafter. In the case of the Met, 6 this requires going through the processes, as I said, 7 identified in the MoU, which can take additional time. 8 Looking forward, the aim is that by the beginning 9 of April CPs should be in possession of the vast 10 majority of the relevant material for phase 1. 11 At that stage, we intend then to do a reconciliation 12 exercise, in particular to check whether there are any 13 categories of further material to which we ought to be 14 alerting CPs in the interests of transparency. That 15 will also apply to the experts' reports in order to 16 check whether there is any material which was provided 17 to the experts which has not been referred to in their 18 phase 1 reports but which ought to be disclosed to the 19 CPs at this stage. That exercise cannot sensibly be 20 carried out until we have finalised the phase 1 experts' 21 reports and the associated disclosure which will 22 accompany those reports. 23 In terms of the format in which documents are 24 disclosed, we have already taken steps to ensure that 25 there is a field tree structure on the relatively</p> <p style="text-align: center;">Page 10</p>	<p>1 continuing to identify potentially relevant providers of 2 documents as the inquiry's work progresses. The March 3 disclosure bulletin is in preparation and will be 4 circulated to CPs very shortly. 5 Our current intention is that phase 2 disclosure 6 should take place on a rolling basis once proper and 7 proportionate checks have been done for relevance to 8 screen out genuinely duplicate documents. We anticipate 9 that a significant volume of documentation will be 10 disclosed at that stage. 11 A number of CPs have queried whether the inquiry 12 might be applying a test of relevance which is too 13 restrictive. To avoid any doubt about this, we have 14 instructed reviewers in our teams to take a broad 15 approach to relevance using the list of issues as 16 a starting point. Where they have queries, those 17 queries are referred to more senior counsel. The 18 reviewer's work is then spot-checked by a more senior 19 counsel. 20 As a result, we are able to say with some confidence 21 that our approach to relevance is not unduly 22 restrictive. We are also retaining all documents on our 23 system so that, if an issue arises at a later stage, we 24 can go back and search through any documents which we 25 have previously marked as irrelevant.</p> <p style="text-align: center;">Page 12</p>

<p>1 Fifthly, firefighter statement disclosure.</p> <p>2 As you may be aware, Mr Chairman, the process of</p> <p>3 taking written witness statements from the members of</p> <p>4 the LFB who attended the fire at Grenfell on the night</p> <p>5 has been undertaken by the Met as part of their criminal</p> <p>6 investigation. The Met has been disclosing statements</p> <p>7 to the inquiry pursuant to our MoU with them as and when</p> <p>8 they have been completed and signed. That process has</p> <p>9 been ongoing in numbers since November 2017.</p> <p>10 As of last Friday, 16 March, the inquiry has</p> <p>11 received in total some 415 statements in all, with 45</p> <p>12 statements just confirmed this week as having been</p> <p>13 delivered.</p> <p>14 The inquiry team has been reviewing those witness</p> <p>15 statements on a rolling basis since they started coming</p> <p>16 in in November. It may help if I explain in detail the</p> <p>17 process that we have been undertaking.</p> <p>18 Under the MoU with the Met, the inquiry cannot</p> <p>19 disclose any firefighter witness statement to any CP</p> <p>20 without first notifying the Met and giving them</p> <p>21 an opportunity to object on the grounds that such</p> <p>22 disclosure may prejudice their criminal investigation.</p> <p>23 It became clear early on to the inquiry that a large</p> <p>24 number of these statements are potentially relevant and</p> <p>25 should be disclosed to CPs. As the inquiry team's</p> <p style="text-align: center;">Page 13</p>	<p>1 they would respect that decision.</p> <p>2 The chairman, after consideration, took the view</p> <p>3 that it was hard to discern from the Met's letter or the</p> <p>4 highlighted parts of the statements what the offences</p> <p>5 might be that were being investigated or why disclosure</p> <p>6 to the CPs might prejudice the investigation or impede</p> <p>7 or compromise its integrity. Accordingly, on 12 March</p> <p>8 the chairman decided that, for the purposes of his</p> <p>9 conduct of this inquiry, the disclosure of these seven</p> <p>10 firefighter statements would not impede or compromise</p> <p>11 the Met investigation. The firm view of the chairman</p> <p>12 and of the inquiry team is that not disclosing these</p> <p>13 relevant statements would certainly impede the inquiry.</p> <p>14 Over and above the initial 23 firefighter</p> <p>15 statements, a further 13 statements were notified to the</p> <p>16 Met on 27 February, and on 12 March a further list of 85</p> <p>17 statements was also notified. We are aiming to disclose</p> <p>18 those 121 firefighter statements to CPs via Relativity</p> <p>19 as soon as possible, subject only to having the</p> <p>20 redactions completed by the LFB and checked by us and</p> <p>21 provided that the Met do not raise any tenable</p> <p>22 objections under the MoU.</p> <p>23 The redactions are to remove sensitive personal</p> <p>24 information about the firefighters such as personal</p> <p>25 health issues or private contact details which would be</p> <p style="text-align: center;">Page 15</p>
<p>1 review progressed, we've been able to form</p> <p>2 an increasingly clear view as to which statements should</p> <p>3 be disclosed and which need not.</p> <p>4 On 31 January, to save time, we asked the Met for</p> <p>5 permission to effect blanket disclosure to all CPs of</p> <p>6 all firefighter witness statements. On 9 February the</p> <p>7 Met refused our request and said they would only permit</p> <p>8 disclosure to CPs of any given statement after a review</p> <p>9 of each one by them for potentially prejudicial</p> <p>10 material. That was a process that would clearly take</p> <p>11 a long time.</p> <p>12 Accordingly, on 13 February we provided a batch of</p> <p>13 23 unquestionably relevant statements to the Met for</p> <p>14 their specific consideration. On 20 February, the Met</p> <p>15 accepted that some 16 of these could be disclosed</p> <p>16 without prejudicing the investigation.</p> <p>17 As to the remaining seven, on 9 March the Met</p> <p>18 explained their objections in part by detailed reference</p> <p>19 to certain highlighted passages in those seven</p> <p>20 statements. They maintained their objections to</p> <p>21 disclosure; not only to the highlighted passages but to</p> <p>22 the whole of each statement. They also helpfully</p> <p>23 indicated, however, that if the chairman still</p> <p>24 considered it appropriate to have these statements</p> <p>25 disclosed nonetheless, notwithstanding their objections,</p> <p style="text-align: center;">Page 14</p>	<p>1 potentially caught by the Data Protection Act.</p> <p>2 The process that we are now adopting, doing our best</p> <p>3 even still to accommodate the Met's concerns, is to</p> <p>4 identify rolling weekly batches of firefighter witness</p> <p>5 statements to the Met that we wish to disclose to CPs,</p> <p>6 and then the Met has up to 14 days in which to identify</p> <p>7 any objections to disclosure under paragraph 12 of the</p> <p>8 MoU, following which statements to which there is no</p> <p>9 tenable objection will then be disclosed.</p> <p>10 We have just this week sent a further list of 30</p> <p>11 further relevant firefighter statements to the Met for</p> <p>12 disclosure pursuant to the MoU. We are continuing to</p> <p>13 receive firefighter statements from the Met, but we</p> <p>14 think we already have a sufficiently significant body of</p> <p>15 firefighter witness statements to enable us to begin</p> <p>16 phase 1 of this inquiry.</p> <p>17 The delay is regrettable, but it has arisen out of</p> <p>18 the inquiry's great desire to advance its own work,</p> <p>19 whilst at the same time taking care not to impede or</p> <p>20 prejudice the Met's separate investigation. That has</p> <p>21 required us to understand in full the basis of the Met's</p> <p>22 position that putting the firefighter witness evidence</p> <p>23 into the public domain would or may impede or prejudice</p> <p>24 its investigation.</p> <p>25 We are now satisfied that on what we know so far it</p> <p style="text-align: center;">Page 16</p>

<p>1 would not do so. Of course, if the Met can identify 2 a tenable objection in relation to a particular 3 firefighter statement or part of it, then of course we 4 would consider that carefully, as we must.</p> <p>5 The Met has also required that the inquiry team 6 carry out the necessary redactions to firefighter 7 witness statements that are to be disclosed. There has 8 been much discussion with the Met and the LFB about what 9 is to be redacted. The Met have been concerned, 10 understandably, that sensitive material should come out, 11 or at least that families should be briefed first. This 12 was always impracticable.</p> <p>13 The subject matter of this inquiry is itself 14 sensitive and the evidence is in many instances 15 distressing. But it would be a failure of our public 16 duty if the inquiry were to sanitise the evidence. 17 Accordingly, what will be redacted from any relevant 18 firefighter witness statement will only be material that 19 by law must be redacted under the Data Protection Act. 20 The redactions will be those effected by the LFB and 21 double checked by the inquiry.</p> <p>22 This also now follows the format agreed with the LFB 23 for treatment of the firefighters' contemporaneous 24 written notes or form 10s. There are 558 of those 25 documents. They will be duly disclosed, redacted for</p> <p style="text-align: right;">Page 17</p>	<p>1 those which we would like to have in the record, we will 2 notify CPs. We recognise that there may be firefighter 3 statements which the inquiry has decided not to put into 4 the record but for which a particular case can be made 5 to include it. We will remain open minded about that.</p> <p>6 (4) Once we have decided which firefighters we would 7 like to call to give live evidence, we will approach 8 them through the LFB, FBU and the Met with a view to 9 doing three things: first, liaising with them as to how 10 they would wish to give their evidence; secondly, 11 programming in their attendance dates; and, thirdly, if 12 need be, arranging a familiarisation visit to the 13 hearing room.</p> <p>14 (5) We would then publish to the CPs a list of those 15 we intend to call with a provisional programme of 16 evidence. Again, we recognise that there may be 17 firefighters whom the inquiry has decided not to call to 18 give oral evidence, but for whom a particular case can 19 be made to call them. Again, we will remain open minded 20 about that, subject always to practical and timing 21 matters.</p> <p>22 (6) As with all matters, final decisions about what 23 goes into evidence lies with the inquiry. CPs will be 24 aware that the most reliable evidence comes from 25 witnesses who have not been prepped by their</p> <p style="text-align: right;">Page 19</p>
<p>1 DPA material, once the LFB and we complete the 2 redactions process, and that process is very nearly 3 completed.</p> <p>4 Following disclosure of the firefighter witness 5 statements to the CPs we propose to do the following:</p> <p>6 (1) We will select which statements we wish in due 7 course to form part of the inquiry record, since not all 8 those disclosed to CPs will necessarily be the evidence 9 on which the inquiry's report is based.</p> <p>10 (2) Of those firefighter statements which will enter 11 the inquiry record in due course, we will decide which 12 statement-maker should be called to give oral evidence. 13 In deciding which witnesses to call to give live 14 evidence, the inquiry's general approach is whether 15 a particular witness is able to give detailed evidence 16 which, in the opinion of the inquiry team, is directly 17 relevant to one or more issues that will be subject to 18 investigation by the inquiry. There will inevitably be 19 some witnesses whose evidence, whilst relevant, may not 20 further advance the inquiry's investigation. In those 21 circumstances, particularly where the evidence will 22 provide a useful degree or context, the inquiry will 23 take that witness's statement or the relevant parts of 24 that statement as read into the record.</p> <p>25 (3) Once we have identified those statements as</p> <p style="text-align: right;">Page 18</p>	<p>1 representatives or their employers. Indeed, we must 2 draw all CPs' attention and their lawyers' attention to 3 section 35.2 of the Inquiries Act, which makes it 4 a criminal offence without the inquiry's consent to 5 distort or otherwise alter any evidence, document or 6 other thing that is given, produced or provided to the 7 inquiry panel, or to prevent any evidence, document or 8 other thing from being given, produced or provided to 9 the inquiry panel. The offence carries a prison 10 sentence.</p> <p>11 The witness statements that come to the inquiry are 12 their evidence, save to the extent that they add to it 13 or they alter it in a public inquiry hearing. Of 14 course, if a witness, firefighter or otherwise, wishes 15 off their own bat to make a supplemental statement or 16 correct their evidence in some way, then, as the 17 chairman said at paragraph 34 of his 20 December 18 response, he or she is able to do that, and so far as 19 they are firefighters, he or she should contact the Met.</p> <p>20 Sixth, 999 call production and disclosure. There 21 are some 560 audio recordings of 999 calls which were 22 made from the tower on the night by relatives and 23 friends of those in the tower and by members of the 24 public in the neighbouring area. That figure includes 25 duplicate recordings. Although the majority of these</p> <p style="text-align: right;">Page 20</p>

<p>1 calls were to the LFB, they include a small number that</p> <p>2 were handled by Surrey Fire and Rescue, Kent Fire and</p> <p>3 Rescue and North West Fire Control. All these</p> <p>4 recordings have been disclosed to the inquiry by the</p> <p>5 Met. Onward disclosure of these audios to the CPs is</p> <p>6 subject to the MoU with the Met.</p> <p>7 These audio recordings have been transcribed by the</p> <p>8 LFB and the written transcripts have been disclosed to</p> <p>9 the inquiry directly by the LFB. The inquiry team has</p> <p>10 been listening to each audio and checking them against</p> <p>11 the transcript and also for potential relevance. That</p> <p>12 exercise has allowed us to filter out recordings that</p> <p>13 are plainly of no relevance, such as those from</p> <p>14 passers-by who offer no particular insight into the</p> <p>15 progress of the fire.</p> <p>16 There are two particular aspects to disclosure of</p> <p>17 the 999 calls: first, production to the relevant BSR</p> <p>18 witness statement-maker to assist them to make</p> <p>19 a statement for the inquiry; and, second, wider</p> <p>20 cross-disclosure to the CPs generally. I take each in</p> <p>21 turn.</p> <p>22 First, production to individual BSRs who are making</p> <p>23 inquiry statements. The inquiry intends to provide the</p> <p>24 999 audio recording of a call and the accompanying LFB</p> <p>25 transcript to, first of all, the BSR CP who is making</p> <p style="text-align: center;">Page 21</p>	<p>1 able to agree disclosure of the audios to anybody but</p> <p>2 the identified caller. However, the inquiry sees no</p> <p>3 good reason why we should not proceed to disclose not</p> <p>4 only to a caller but also a person who can be identified</p> <p>5 as present when the call was made and who heard the call</p> <p>6 and who is giving a statement.</p> <p>7 The inquiry considers that the steps that it will</p> <p>8 take when disclosing specific recordings to identified</p> <p>9 persons are sufficient to meet any concerns over</p> <p>10 sensitivity. The RLRs, the solicitors for the BSRs,</p> <p>11 will already appreciate the sensitive and sometimes</p> <p>12 distressing nature of these recordings.</p> <p>13 Secondly, cross-disclosure of the 999 calls to all</p> <p>14 CPs. The inquiry team is firmly of the view that the</p> <p>15 recordings of the 999 calls on the night of the fire</p> <p>16 form an important body of contemporaneous evidence of</p> <p>17 what happened and to whom. We have yet to hear any</p> <p>18 cogent reason for not disclosing them, at least in</p> <p>19 transcript form at this stage to all CPs. As to what</p> <p>20 goes into the inquiry record and in what form will be</p> <p>21 a matter for later decision.</p> <p>22 Members of the inquiry team have been listening to</p> <p>23 all the audios of the 999 calls. They have been</p> <p>24 comparing them to the transcripts and reviewing them for</p> <p>25 relevance. The transcripts are not all perfect. On</p> <p style="text-align: center;">Page 23</p>
<p>1 an inquiry witness statement and who was the caller and,</p> <p>2 secondly, a BSR CP who is making an inquiry statement</p> <p>3 and who can be identified as present when the call was</p> <p>4 made and who heard the call. We will only provide the</p> <p>5 audios to the solicitors for the relevant witness where</p> <p>6 we have identified that person with a high degree of</p> <p>7 confidence.</p> <p>8 The purpose of the provision of the audio recording</p> <p>9 is so that the witness can refresh their memory of the</p> <p>10 call where this is relevant to their evidence. The</p> <p>11 witness may also be able to comment on any conversation</p> <p>12 with or by others or any background noise which can be</p> <p>13 heard on the recording.</p> <p>14 The inquiry expects that the witness will wish to</p> <p>15 quote from the transcript in their witness statement.</p> <p>16 If the solicitor for the witness considers that it would</p> <p>17 be useful to prepare a further transcript of the audio</p> <p>18 and exhibit it to the statement then that would be most</p> <p>19 welcome. There would be need to have early discussion</p> <p>20 of the format of any such transcript.</p> <p>21 Once the audio has been used to produce the</p> <p>22 statement then it must be returned safely to the</p> <p>23 inquiry.</p> <p>24 The inquiry has discussed this proposed course with</p> <p>25 the Met at length. It is fair to say that they are not</p> <p style="text-align: center;">Page 22</p>	<p>1 occasion there are mistranscriptions. Unsurprisingly,</p> <p>2 they do not record background noise or third-party</p> <p>3 conversations with another person physically present</p> <p>4 with the caller.</p> <p>5 These limitations do not, however, detract from the</p> <p>6 value of the transcripts as we look towards the phase 1</p> <p>7 hearing. The times of the calls are recorded on the</p> <p>8 transcripts. There are some which are highly</p> <p>9 illustrative or revealing of the conditions in the</p> <p>10 building at different levels at different times on the</p> <p>11 night. They also show what fire survival guidance, or</p> <p>12 FSG, was given, and on some occasions when and to whom,</p> <p>13 or at least as to which flat or floor.</p> <p>14 There are some which do not reveal anything much</p> <p>15 beyond the pattern of fire survival guidance that was</p> <p>16 given and the nature of the response, but even they form</p> <p>17 a useful body of evidence from which general fact</p> <p>18 patterns can be derived.</p> <p>19 In order to disclose the transcripts of the 999</p> <p>20 calls to all CPs as we would wish, the Met's position is</p> <p>21 that we formally need the consent or non-objection of</p> <p>22 the Met under the MoU, even though they came from the</p> <p>23 LFB.</p> <p>24 The inquiry gave notice on 2 January that we wish to</p> <p>25 disclose the 999 transcripts. On 29 January, the Met</p> <p style="text-align: center;">Page 24</p>

<p>1 responded and said they had no objection in principle, 2 but, as with the firefighter statements, they wanted to 3 know which specific 999 transcripts we propose to 4 disclose and wanted to take a call-by-call approach. 5 Again, this would be a cumbersome and immensely slow 6 task. They also said that their position would depend 7 on the sensitivity of the material, which is not 8 a ground for objection under the MoU. 9 We do understand the Met's concerns here, the 10 material is indeed in some cases distressing. However, 11 and at the risk of sounding insensitive, the subject 12 matter of this inquiry is a mass fatality and the 13 contemporaneous evidence is in part distressing. But it 14 cannot be sanitised. 15 I should also add that we have had no 16 representations from any RLR for any CP who is a BSR 17 that we should clear in advance with their client for 18 cross-disclosure of any 999 call and the relevant 19 transcript. 20 We have identified the audio recordings that we 21 propose to disclose to specific witnesses who have 22 indicated that they will provide a witness statement. 23 Disclosure of those recordings to the relevant RLRs will 24 begin shortly. That will be an ongoing process as 25 individual CPs confirm that they will make an inquiry</p> <p style="text-align: right;">Page 25</p>	<p>1 We have prioritised the provision of MPS packs from 2 tower residents because their evidence is likely to be 3 the most relevant to the facts in phase 1. This 4 material is, in the inquiry's view, sufficient to enable 5 those individuals to produce a witness statement for the 6 inquiry covering the events of the night to which the 7 phase 1 issues relate. 8 As CPs are aware, the Met required witnesses to 9 provide their written consent for any police statement 10 to be released to the inquiry. The Met provided a list 11 of BSRs showing whether they have provided the requisite 12 consent. There are still some 25 tower resident CPs in 13 this category who have confirmed through their RLRs that 14 they do intend to give witness statements but have yet 15 to provide the consent. There are 10 tower residents 16 who have provided consent where we are waiting for the 17 Met to provide the relevant facts. There are a further 18 34 tower resident CPs who have not indicated whether 19 they are intending to provide an inquiry statement. We 20 would encourage their RLRs to bring us up-to-date with 21 what their clients want and we will obtain the packs 22 from the Met. 23 Many BSRs want to see the CCTV images of them 24 leaving the tower. Those have been provided in the 25 packs.</p> <p style="text-align: right;">Page 27</p>
<p>1 statement. 2 As to the LFB transcripts, we have identified and 3 are continuing to identify those which we consider to be 4 relevant for disclosure and they are now going through 5 the inquiry's redactions procedures, together with the 6 LFB. 7 As with the firefighter statements and the LFB 8 form 10s, the transcripts will be redacted for sensitive 9 personal information caught by the Data Protection Act, 10 but nothing else. 11 Seventh, production and disclosure of BSR witness 12 statements. 13 As matters stand, we have now been informed by the 14 RLRs for the BSRs that for some 135 BSRs, they are ready 15 and willing to provide witness statements for phase 1. 16 For those who gave police statements, and it is not all 17 of them, some 112 Met packs have been collated from the 18 Met's database, which was itself a lengthy and 19 time-consuming exercise. 107 packs have been collected 20 from the inquiry by the relevant RLRs and five are here 21 to be collected today. They comprise their police 22 statements, their exhibits, where these can be traced, 23 and the CCTV images relating to them. These all relate 24 to tower residents or people who escaped the tower on 25 the night of the fire.</p> <p style="text-align: right;">Page 26</p>	<p>1 As to the 999 calls, I have already explained that 2 the audios will be provided, but only to the relevant 3 caller or person present who have confirmed that they 4 will give a phase 1 statement to the inquiry. We have 5 done an analysis which so far shows that at the moment 6 we have identified 24 callers, of whom four have 7 indicated that they are providing witness statements to 8 the inquiry for phase 1. 9 As at today's date we have not received any witness 10 statements from any BSR, nor have we been given any 11 update in the counsels' written submissions as to when 12 the inquiry might reasonably expect to see any 13 statements. However, we have had very recent informal 14 indications that many witness statements from BSRs will 15 be produced to the inquiry by 30 March. We warmly 16 welcome those indications and we do look forward to 17 receiving as many statements as can be done. But we 18 would also urge each RLR to tell us as soon as possible 19 where they are up to with each of their clients who is 20 preparing a witness statement or wishes to do so, what 21 the difficulties are and what the expected time frame 22 is. 23 As I will explain shortly, the BSRs have requested 24 that the inquiry begin on 21 May, with a period of 25 memorialisation of the deceased, followed immediately by</p> <p style="text-align: right;">Page 28</p>

<p>1 evidential openings. The chairman is warmly in</p> <p>2 agreement with this timetable, provided it is adhered</p> <p>3 to.</p> <p>4 To make this timetable work, it is essential that</p> <p>5 the BSRs' phase 1 witness statements come to the inquiry</p> <p>6 as soon as possible. That is because they need to be</p> <p>7 considered and then disclosed to the other CPs. We then</p> <p>8 need to identify the witnesses we would seek to call to</p> <p>9 give oral evidence, programme that evidence, meet the</p> <p>10 witnesses, familiarise them with the process and ensure</p> <p>11 that we have appropriate arrangements in place for them</p> <p>12 to give evidence in the way that is most comfortable for</p> <p>13 them.</p> <p>14 The later the statements arrive, the less</p> <p>15 satisfactory will be our preparations. The less</p> <p>16 satisfactory our preparations, the greater the risk that</p> <p>17 a witness is overlooked or feels rushed or undermined.</p> <p>18 To repeat, there is a lot to do between receipt of</p> <p>19 a statement and the start of oral hearings.</p> <p>20 Eighthly, venue and arrangements for attendance.</p> <p>21 First, venue. A number of options were explored for</p> <p>22 the permanent venue, initially focusing on west London</p> <p>23 but working outwards from there. We have researched</p> <p>24 over 150 venues. These included the suggestions made by</p> <p>25 CPs following the last procedural hearing, Olympia,</p> <p style="text-align: center;">Page 29</p>	<p>1 until we know which of the BSR witnesses we intend to</p> <p>2 call. That depends on the provision by them of</p> <p>3 a witness statement to the inquiry, our deciding to call</p> <p>4 the maker and a proper assessment by the RLR of their</p> <p>5 individual client and close liaison with the inquiry</p> <p>6 team.</p> <p>7 As to the range of specific measures, these are all</p> <p>8 set out at paragraph 12 of the inquiry's protocol on</p> <p>9 vulnerable witnesses. For such witnesses there will be</p> <p>10 various options for giving live evidence, such as</p> <p>11 screens, live link, prerecorded evidence, statement</p> <p>12 read, sitting or standing with the family or friends and</p> <p>13 support organisation members if needed, a witness table,</p> <p>14 regular breaks, interpreters and notices of questions</p> <p>15 through the inquiry team.</p> <p>16 So far as counselling is concerned, the inquiry is</p> <p>17 presently discussing the provision of support with the</p> <p>18 NHS's Grenfell outreach team and Hestia. Their outreach</p> <p>19 workers will be familiar to many BSRs as they have</p> <p>20 supported at public meetings and community events since</p> <p>21 the fire. Outreach workers will be present and they</p> <p>22 will be visible at procedural hearings and also the</p> <p>23 screening at Notting Hill Community Church. They will</p> <p>24 provide direct support and sign-posting for attendees</p> <p>25 and we will make private space here at Holborn Bars</p> <p style="text-align: center;">Page 31</p>
<p>1 Kensington and Chelsea College and Newcombe House in</p> <p>2 Notting Hill Gate being examples. These were either</p> <p>3 unavailable for the period that we require or unsuitable</p> <p>4 for various different reasons.</p> <p>5 Holborn Bars was and remains the best available</p> <p>6 option, chosen after taking several factors into</p> <p>7 account. It is large, it is well provisioned enough for</p> <p>8 the operation of the inquiry and for the accommodation</p> <p>9 of a reasonable number of those wishing to attend</p> <p>10 hearings. It has enough rooms to provide on site the</p> <p>11 facilities that the BSRs have asked for. It will be</p> <p>12 available for the length of time that we are likely to</p> <p>13 require it, and it allows us to be a permanent fixture.</p> <p>14 Many of the local community options that we looked at</p> <p>15 would require us to take everything down at weekends,</p> <p>16 for example so that the building could be used for other</p> <p>17 purposes.</p> <p>18 In addition to the hearing venue, the inquiry will</p> <p>19 ensure that its proceedings are widely accessible by</p> <p>20 streaming them online and providing a venue within the</p> <p>21 borough where residents and survivors can come together</p> <p>22 to watch the proceedings.</p> <p>23 Special arrangements for the giving of oral evidence</p> <p>24 by BSRs. It is not possible for the inquiry to be</p> <p>25 specific about what special arrangements will be needed</p> <p style="text-align: center;">Page 30</p>	<p>1 available for them to hold meetings. They are working</p> <p>2 on a joint proposal for the evidential hearings to</p> <p>3 ensure that attendees and witnesses have access to</p> <p>4 on-site counselling and support, bringing in other</p> <p>5 providers as appropriate. We expect this in April and</p> <p>6 we will share these proposals with RLRs in due course.</p> <p>7 So far as travel and subsistence are concerned, we</p> <p>8 have agreed that we will pay a fixed daily amount for</p> <p>9 attending the hearings which will more than cover</p> <p>10 reasonable travel and subsistence costs to get here from</p> <p>11 North Kensington.</p> <p>12 So far as concerns meeting the reasonable costs of</p> <p>13 attending meetings with their solicitors, we would meet</p> <p>14 those costs, but BSRs will need to claim those back</p> <p>15 through their solicitors and we would pay them back as</p> <p>16 disbursements because we can't check them ourselves.</p> <p>17 We will meet loss of earnings and expenses for those</p> <p>18 who attend as witnesses, but not for CPs who choose to</p> <p>19 attend the hearings other than to give evidence.</p> <p>20 The hearings will be live streamed online and to</p> <p>21 a local venue to encourage as wide participation as</p> <p>22 possible.</p> <p>23 Next, refreshment provisions suitable for all</p> <p>24 dietary demands.</p> <p>25 Again, this is difficult to do given the varying</p> <p style="text-align: center;">Page 32</p>



<p>1 numbers of people who are likely to attend each day.</p> <p>2 There will be hot and cold drinks available here at</p> <p>3 Holborn Bars. There are plenty of places to purchase</p> <p>4 food in the area. As indicated, we have agreed that we</p> <p>5 will make a fixed daily payment that will cover the</p> <p>6 reasonable costs of a day and will allow attendees the</p> <p>7 widest possible choice in how to use it.</p> <p>8 So far as concerns childcare, we have been asked</p> <p>9 about the provision of childcare at inquiry events and</p> <p>10 provision for the cost of childcare to support meetings</p> <p>11 in relation to the inquiry, including meetings with</p> <p>12 their solicitors.</p> <p>13 We have discussed before the difficulties of</p> <p>14 providing childcare where we don't know what the</p> <p>15 specific task will be on any given day. But we would be</p> <p>16 willing to meet the costs incurred, and, again, BSRs,</p> <p>17 RLRs or solicitors will need to provide us with the</p> <p>18 evidence of those costs for us to reimburse them.</p> <p>19 So far as religious needs are concerned, we will be</p> <p>20 providing a dedicated prayer room here at Holborn Bars</p> <p>21 as well as information about local places of worship.</p> <p>22 More generally, so far as concerns community</p> <p>23 engagement, the establishment of a community advisory</p> <p>24 group was proposed following the December procedural</p> <p>25 hearing as a way to strengthen and encourage further</p> <p style="text-align: center;">Page 33</p>	<p>1 evidence hearings. CPs and bereaved families in</p> <p>2 particular may memorialise their loved ones in any way</p> <p>3 they think best, whether as a presentation or as an</p> <p>4 audio recording or a short video film, or in any other</p> <p>5 way. By starting the public hearings of this inquiry in</p> <p>6 this way, we can ensure that, however technical and</p> <p>7 scientific the issues may then become, however dry,</p> <p>8 however legal, we will never lose sight of who our work</p> <p>9 is for and why we are doing it.</p> <p>10 Secondly, article 2 and the inquest function.</p> <p>11 Many BSRs have submitted to the inquiry in their</p> <p>12 submissions that the chairman should take and discharge</p> <p>13 all the functions of the inquests in order to discharge</p> <p>14 the state's article 2 obligations.</p> <p>15 First, it should be noted that the chief coroner has</p> <p>16 not actually asked us to do so. Secondly, the inquiry</p> <p>17 will carry out its terms of reference and seek to do so</p> <p>18 by reference to the detailed list of issues. To the</p> <p>19 extent that the issues cover all the matters that</p> <p>20 article 2 requires then the inquiry will adduce the</p> <p>21 relevant evidence and make the relevant findings. That</p> <p>22 will cover who died, where they died, when they died,</p> <p>23 and, within the scope of the ToR, how they died and the</p> <p>24 circumstances.</p> <p>25 We have carefully considered the written submissions</p> <p style="text-align: center;">Page 35</p>
<p>1 participation and build confidence in the work of the</p> <p>2 inquiry.</p> <p>3 The inquiry team has consulted with a number of</p> <p>4 groups either representing or working with the BSRs,</p> <p>5 both those who are CPs and those who are not. Although</p> <p>6 there was some support for the idea, it is clear that</p> <p>7 the proposal does not command the overall confidence of</p> <p>8 the BSRs. The inquiry team will continue with its</p> <p>9 programme of community engagement to ensure that all</p> <p>10 those who wish to understand and participate in the work</p> <p>11 of the inquiry are able to do so. Should the views of</p> <p>12 local groups on the proposal for a community advisory</p> <p>13 group change or further ideas come forward, we shall be</p> <p>14 happy to visit the proposal.</p> <p>15 Ninth, commemorations of the deceased.</p> <p>16 First of all, the way forward. The inquiry has</p> <p>17 always embraced the idea that its work should be as</p> <p>18 inclusive as possible so far as consistent with its</p> <p>19 functions and the terms of reference. That extends to</p> <p>20 designing it in such a way as to offer an opportunity</p> <p>21 for those families who lost loved ones at Grenfell</p> <p>22 publicly to commemorate them as individuals, calmly and</p> <p>23 with dignity.</p> <p>24 This we feel can and should be done in a special</p> <p>25 period of hearings immediately prior to the start of our</p> <p style="text-align: center;">Page 34</p>	<p>1 prepared on this point by the BSRs. We have formed no</p> <p>2 final view on this point and it would therefore be very</p> <p>3 useful to hear today from the BSRs representatives as to</p> <p>4 the precise practicalities of the inquiry discharging</p> <p>5 its terms of reference while also performing the</p> <p>6 coronial functions.</p> <p>7 Thirdly, in any event, on the question of promptness</p> <p>8 under article 2, it would be unusual to expect the</p> <p>9 inquiry to fulfil the coronial function in full in</p> <p>10 advance of the police investigation, especially where</p> <p>11 the quality of the evidence relating to any systemic</p> <p>12 issues relevant to the criminal investigation is</p> <p>13 unlikely to degrade over time. Therefore, there would</p> <p>14 anyway be no lack of promptness or other failure to</p> <p>15 comply with article 2 in the inquiry leaving to the</p> <p>16 coroner, likely post-criminal trial if any, those</p> <p>17 aspects of the circumstances surrounding the deaths that</p> <p>18 we do not cover.</p> <p>19 The combination of the criminal proceedings and the</p> <p>20 inquiry means that the promptness requirement is fully</p> <p>21 satisfied and it is entirely legitimate for</p> <p>22 investigations to be phased under articles 2 and 3 so</p> <p>23 that, for example, coronial proceedings await other</p> <p>24 investigations, including criminal proceedings.</p> <p>25 The case law makes it clear, Mr Chairman, that not</p> <p style="text-align: center;">Page 36</p>

<p>1 everything has to be done at once. Provided that the</p> <p>2 factual evidence is being gathered now, as it is, then</p> <p>3 other questions, for example about the precise</p> <p>4 circumstances in which each individual came to meet</p> <p>5 their deaths, can occur at a later stage.</p> <p>6 Tenth, disclosure of experts' reports and exhibits.</p> <p>7 Very good progress is being made in the preparation</p> <p>8 of experts' reports for phase 1. We currently</p> <p>9 anticipate that reports from Colin Todd, Niamh Nic Daeid</p> <p>10 Luke Bisby and probably Barbara Lane will be served at</p> <p>11 the end of this month and a phase 1 report from</p> <p>12 Professor Jose Torero will follow in April.</p> <p>13 As I've already explained, a significant amount of</p> <p>14 evidential material is likely to be disclosed at the</p> <p>15 same time that these expert reports are served and will</p> <p>16 be disclosed as supporting documents and listed as such</p> <p>17 in the relevant field tree on Relativity.</p> <p>18 The experts have been instructed to ensure that all</p> <p>19 information which is relied on by them in their reports</p> <p>20 is cross-referenced and exhibited to those reports.</p> <p>21 Steps have been taken to try to ensure that relevant</p> <p>22 documentation is disclosed as soon as possible prior to</p> <p>23 that. Some of the material already disclosed to CPs</p> <p>24 will be relied upon by the experts in their reports.</p> <p>25 Given the processes which are necessary to follow</p> <p style="text-align: center;">Page 37</p>	<p>1 as reviewing the reports which were prepared for the Met</p> <p>2 on that topic. Insofar as the available evidence</p> <p>3 allows, Professor Nic Daeid's report will provide</p> <p>4 a preliminary view on the issues of cause, origin and</p> <p>5 spread of the initial fire within the compartment of</p> <p>6 origin.</p> <p>7 As to Professor Barbara Lane, her phase 1 report</p> <p>8 will, where it is possible to do so, express</p> <p>9 a preliminary view about the extent to which the design</p> <p>10 and construction of the exterior of the building and the</p> <p>11 fire safety measures within the building were compliant</p> <p>12 with the relevant building regulations and other</p> <p>13 relevant guidance, see issues 4(c), (d), (f) and 5(b)</p> <p>14 and (d) in the list of issues.</p> <p>15 We accept that these questions will implicitly arise</p> <p>16 when she is expressing a preliminary view on the active</p> <p>17 and passive fire safety measures at Grenfell Tower, and</p> <p>18 the extent to which they failed to control the spread of</p> <p>19 fire and smoke and contributed to that spread.</p> <p>20 However, her report will not investigate the</p> <p>21 detailed factual circumstances as to how any instances</p> <p>22 of non-compliance came about. Those are more complex</p> <p>23 questions that will have to await further detailed work</p> <p>24 in phase 2.</p> <p>25 The instructions to the seven experts currently</p> <p style="text-align: center;">Page 39</p>
<p>1 under the MoU with the Met, it is simply not possible to</p> <p>2 disclose all material which will be relied on by the</p> <p>3 experts in advance of their reports being disclosed.</p> <p>4 That is because we do not anticipate resolving all of</p> <p>5 the outstanding disclosure issues which arise in respect</p> <p>6 of that material with the Met before the reports are</p> <p>7 ready to be disclosed. The processes for finalising</p> <p>8 experts' reports and liaising with the Met are therefore</p> <p>9 currently proceeding in parallel.</p> <p>10 As I've already mentioned, once the experts' reports</p> <p>11 are finalised, the inquiry team will check whether there</p> <p>12 is any material which has been provided to the experts</p> <p>13 but not relied upon by them, but which should be</p> <p>14 disclosed to the CPs but which yet has not yet been.</p> <p>15 But that exercise can't be done until the experts'</p> <p>16 reports are finalised, and it's not practical or</p> <p>17 proportionate at this stage to list all the</p> <p>18 documentation provided to the experts, some of which</p> <p>19 will be relevant in any event to phase 2 and not</p> <p>20 phase 1.</p> <p>21 A number of queries have been raised about the scope</p> <p>22 of the experts' report at phase 1. As to those, so far</p> <p>23 as Professor Niamh Nic Daeid is concerned, she will</p> <p>24 consider the primary evidence relating to the cause and</p> <p>25 spread of the fire in the compartment of origin, as well</p> <p style="text-align: center;">Page 38</p>	<p>1 instructed by the inquiry were disclosed to the core</p> <p>2 participants on 30 November last year. More recently,</p> <p>3 two further experts have been instructed and their</p> <p>4 written instructions and CVs have also been made</p> <p>5 available to CPs. Those experts are:</p> <p>6 Mr Rodney Hancox. He has been instructed to provide</p> <p>7 a report for phase 2 of the inquiry on issues relating</p> <p>8 to the gas supply to Grenfell Tower, including the</p> <p>9 compliance with the relevant regulatory framework of the</p> <p>10 gas supplies to and within the tower and the steps taken</p> <p>11 by relevant parties to isolate the gas supplies on the</p> <p>12 night. He has also been asked to express an opinion on</p> <p>13 the extent to which the presence of gas in the tower</p> <p>14 contributed to the spread of fire and the conditions in</p> <p>15 the building on the night.</p> <p>16 Secondly, Dr Ivan Stoianov. He has been instructed</p> <p>17 to provide an opinion for phase 2 on the supply of water</p> <p>18 to the tower and, in particular, the adequacy of the</p> <p>19 water pressure for the purposes of fighting the fire.</p> <p>20 The inquiry is also actively considering the</p> <p>21 appointment of other experts in key areas. These</p> <p>22 include, as I said before, an architectural expert and</p> <p>23 an expert in building control and inspection, and, as</p> <p>24 I've also said, in social housing management.</p> <p>25 We note that a number of BSR representatives have</p> <p style="text-align: center;">Page 40</p>

<p>1 encouraged the inquiry to instruct an expert in</p> <p>2 toxicology. This will be kept under review. At this</p> <p>3 stage we can say that Professor Edwin Galea will be</p> <p>4 considering issues around toxicology insofar as they are</p> <p>5 within his expertise.</p> <p>6 A number of BSRs have asked whether there is any</p> <p>7 evidence of power surges having contributed to the fire</p> <p>8 in the flat of origin at Grenfell Tower on the night.</p> <p>9 The position is, as the evidence currently stands, that</p> <p>10 there is nothing to suggest that an electrical surge</p> <p>11 played any causative role in the cause or spread of the</p> <p>12 fire. But having said that, the inquiry will continue</p> <p>13 to review the evidence as it develops.</p> <p>14 In terms of applications by core participants to</p> <p>15 rely on their own expert evidence, the position remains</p> <p>16 that an exceptional case would need to be made out and</p> <p>17 any such applications would need to be made promptly as</p> <p>18 soon as the perceived need for such reports is</p> <p>19 identified.</p> <p>20 The inquiry is an inquisitorial process and</p> <p>21 independent experts have been instructed by the inquiry</p> <p>22 so as to provide objective and unvarnished views about</p> <p>23 matters pertinent to the inquiry's investigations.</p> <p>24 Unless and until CPs make applications to rely on their</p> <p>25 own expert evidence, it would be premature to consider</p> <p style="text-align: right;">Page 41</p>	<p>1 first of any oral hearings. That will be the start of</p> <p>2 the phase 1 evidential hearings following the personal</p> <p>3 portrait hearings.</p> <p>4 On the footing that the evidential hearings will</p> <p>5 start on Monday, 4 June this year, then all RLRs seeking</p> <p>6 to make an opening statement at phase 1 must file with</p> <p>7 the inquiry a succinct written outline of what they</p> <p>8 intend to say by e-mail by 4 pm on Friday, 18 May,</p> <p>9 i.e. 14 days before the evidential hearings begin. All</p> <p>10 document references must please be accompanied by their</p> <p>11 URN, their unique reference number, on Relativity.</p> <p>12 All RLRs who have provided a written outline will be</p> <p>13 invited to make their oral openings to the inquiry</p> <p>14 during the first week. Those who have not provided</p> <p>15 a written outline will not be permitted to speak unless</p> <p>16 the chairman allows it.</p> <p>17 A draft speaking timetable for opening statements</p> <p>18 will be circulated by the inquiry team at an appropriate</p> <p>19 time in advance. We ask the RLRs to be succinct, to</p> <p>20 co-operate with each other in order to avoid duplication</p> <p>21 and to restrict their submissions to the issues in</p> <p>22 phase 1.</p> <p>23 Thirteenth, and finally, the order in which the</p> <p>24 evidence will be presented.</p> <p>25 It is hard to say at this stage precisely in what</p> <p style="text-align: right;">Page 43</p>
<p>1 any timetable in relation to any other expert evidence.</p> <p>2 Eleventh, site visits.</p> <p>3 Certain CPs have requested access to the building to</p> <p>4 be arranged by the inquiry. I can only repeat the point</p> <p>5 I made previously that the tower remains a crime scene</p> <p>6 for the time being and access to it is controlled</p> <p>7 strictly by the Met. It is likely to remain so until</p> <p>8 July of this year. We are also aware that there have</p> <p>9 been a number of safety issues at the tower which have</p> <p>10 affected the progress of work by the Met.</p> <p>11 As I said in my counsel's statement number 1 of</p> <p>12 15 November 2017, if any CP would like access to the</p> <p>13 building then they should please direct all their</p> <p>14 requests to the Met and inform us. Ms Clarke, who will</p> <p>15 appear today for the Met, will explain that there is</p> <p>16 a programme of visits to the tower for bereaved families</p> <p>17 and for residents. If non-BSR CPs wish to visit the</p> <p>18 tower once the BSR visits have concluded then CP</p> <p>19 requests for visits must come to the chairman so that he</p> <p>20 can regulate such requests for the purpose of</p> <p>21 a particular CPs participation in the inquiry. The MPS</p> <p>22 would then facilitate the visit itself.</p> <p>23 Twelfth, written and oral openings.</p> <p>24 Under rule 11 of the Inquiry Rules, the RLR for a CP</p> <p>25 may make an opening statement at the commencement of the</p> <p style="text-align: right;">Page 42</p>	<p>1 order the evidence will be adduced. The chairman</p> <p>2 intends to be as flexible as possible.</p> <p>3 Our present thinking is that, following the opening</p> <p>4 statements, we would start by inviting the inquiry</p> <p>5 experts to make oral and visual presentations of their</p> <p>6 provisional conclusions thus far, followed in very broad</p> <p>7 terms by the factual evidence about the flat of origin,</p> <p>8 then the factual evidence of the firefighters who</p> <p>9 carried out firefighting and search and rescue and who</p> <p>10 made commands/decisions, as much as possible in</p> <p>11 chronological order down to a particular point in the</p> <p>12 night. Then the factual evidence of the BSRs, again as</p> <p>13 much as possible in chronological order down to</p> <p>14 a particular point in the night. Then any further</p> <p>15 factual evidence that may be necessary, followed by the</p> <p>16 expert evidence in the light of all that factual</p> <p>17 material.</p> <p>18 I must repeat: no firm decisions have been made or</p> <p>19 will be made about the order and structure of phase 1</p> <p>20 evidence until we have a sufficient body of BSR witness</p> <p>21 statement evidence to hand. However, we anticipate</p> <p>22 that, provided we receive enough BSR witness statements</p> <p>23 on or soon after the end of March, we should be able to</p> <p>24 present a clear programme for phase 1 evidence by the</p> <p>25 end of April at the latest.</p> <p style="text-align: right;">Page 44</p>

<p>1 Mr Chairman, thank you very much.</p> <p>2 SIR MARTIN MOORE-BICK: Thank you very much, Mr Millett.</p> <p>3 Now, Ms Clarke, you are here for the Metropolitan</p> <p>4 Police Service.</p> <p>5 MS CLARKE: I am.</p> <p>6 SIR MARTIN MOORE-BICK: Would you like to come and make some</p> <p>7 submissions. Thank you.</p> <p>8 Submissions on behalf of the Metropolitan Police Service</p> <p>9 by MS AMY CLARKE</p> <p>10 MS CLARKE: Sir, my name is Amy Clarke and I am instructed</p> <p>11 by Sarah Winfield of the Metropolitan Police Service,</p> <p>12 along with Mr Jeremy Johnson QC.</p> <p>13 The Metropolitan Police have not provided any</p> <p>14 written submissions in advance of today's hearing but</p> <p>15 I am very grateful for the opportunity to outline three</p> <p>16 broad areas, I hope very briefly.</p> <p>17 First of all, the police investigation. The</p> <p>18 Metropolitan Police remain committed to carrying out</p> <p>19 a meticulous, thorough and fearless investigation in</p> <p>20 order to identify all of those who may have committed</p> <p>21 criminal offences and to refer files to the Crown</p> <p>22 Prosecution Service in due course if appropriate.</p> <p>23 That process carries with it a great weight of</p> <p>24 responsibility to the public generally, but of course in</p> <p>25 particular to those victims of the fire.</p> <p style="text-align: center;">Page 45</p>	<p>1 reference. Within that, all core participants and, in</p> <p>2 particular, the bereaved, survivors and residents, will</p> <p>3 be able to take part in that process. That is something</p> <p>4 that plainly the criminal investigation cannot fulfil.</p> <p>5 Conversely, the inquiry cannot make decisions and</p> <p>6 determinations of criminal liability. That can only be</p> <p>7 achieved by a criminal investigation which is followed,</p> <p>8 if appropriate, by criminal trials. Justice can only be</p> <p>9 achieved in that regard if the process is able to take</p> <p>10 place such that any individual or corporation who may</p> <p>11 have committed a criminal offence is held accountable in</p> <p>12 an independent and fair investigative and judicial</p> <p>13 process.</p> <p>14 Sir, the consequence of the two processes running in</p> <p>15 tandem is, of course, well known, but in essence it's</p> <p>16 that the inquiry will need to make use of evidence that</p> <p>17 is obtained in the course of the police investigation,</p> <p>18 but do so in a way that minimises any risk of prejudice</p> <p>19 to the investigation in the first instance, but also to</p> <p>20 any future criminal prosecution.</p> <p>21 That task will be difficult but, so far, we are</p> <p>22 co-operating with the inquiry in a way that we consider</p> <p>23 to be very productive and helpful to that cause.</p> <p>24 I'm very grateful for Mr Millett's comments early on</p> <p>25 in his opening statement in respect of the</p> <p style="text-align: center;">Page 47</p>
<p>1 A number of criminal offences are being investigated</p> <p>2 and nothing has been excluded from the scope of the</p> <p>3 investigation, which is progressing. To date, over</p> <p>4 5,000 investigative tasks have been generated within the</p> <p>5 investigation, and data has been gathered thus far from</p> <p>6 154 different organisations.</p> <p>7 We said at the last hearing that the forensic</p> <p>8 evidential picture about the cause and spread of the</p> <p>9 fire was not going to be complete until autumn 2018, and</p> <p>10 that remains the case, until the off-site testing and</p> <p>11 reconstruction work has been completed. Therefore, we</p> <p>12 are currently still working to that timescale,</p> <p>13 particularly given the scale and complexity of the task</p> <p>14 at hand.</p> <p>15 The second broad area, sir, that I would like to</p> <p>16 address you on are the arrangements between the inquiry</p> <p>17 and the Metropolitan Police Service.</p> <p>18 The inquiry and the Metropolitan Police are, of</p> <p>19 course, entirely independent from one another and there</p> <p>20 is no sense in which the Metropolitan Police is</p> <p>21 delegating its investigative functions or vice versa.</p> <p>22 As we have said previously, the inquiry serves many</p> <p>23 important functions that the criminal investigation</p> <p>24 cannot. For example, it will enable a public</p> <p>25 examination of everything which is in the broad terms of</p> <p style="text-align: center;">Page 46</p>	<p>1 acknowledgement of quite the level of co-operation from</p> <p>2 the Metropolitan Police and the fact that that will</p> <p>3 continue long into the future.</p> <p>4 The MPS has provided material voluntarily on</p> <p>5 a weekly basis now since September 2017, and so far in</p> <p>6 excess of 2,000 documents have been provided to the</p> <p>7 inquiry.</p> <p>8 In the event that there is ever something that the</p> <p>9 Metropolitan Police consider cannot be disclosed to the</p> <p>10 inquiry in the first instance, and that certainly hasn't</p> <p>11 arisen to date, we will of course notify you, sir, of</p> <p>12 that extremely promptly.</p> <p>13 The second stage of the process is, of course, the</p> <p>14 disclosure onward to core participants once it has been</p> <p>15 disclosed to the inquiry. The inquiry has indicated</p> <p>16 a large number of specific documents that it wishes to</p> <p>17 provide to core participants for the purpose of phase 1,</p> <p>18 and it is right to say that the Metropolitan Police have</p> <p>19 expressed at certain points some general concerns about</p> <p>20 the risk of prejudice, and in some instances, as we</p> <p>21 discussed this morning in relation to statements, we</p> <p>22 have asked the inquiry to confirm that it considers the</p> <p>23 provision of particular material necessary to the</p> <p>24 discharge of its functions. Sir, of course, you have</p> <p>25 done so, and in all of those cases the Metropolitan</p> <p style="text-align: center;">Page 48</p>

<p>1 Police have confirmed that no formal objection has been</p> <p>2 raised as to the provision of that material onward to</p> <p>3 core participants.</p> <p>4 In taking that approach, the Metropolitan Police</p> <p>5 seek to facilitate the full disclosure to this inquiry,</p> <p>6 and we bear in mind at this juncture that none of the</p> <p>7 core participants whose conduct is being investigated</p> <p>8 have raised any concerns about that onward disclosure.</p> <p>9 That approach, sir, is all within the context of</p> <p>10 a criminal investigation that is constantly evolving.</p> <p>11 Last week's public announcement, for example, about the</p> <p>12 testing of doors brings that into particularly sharp</p> <p>13 focus.</p> <p>14 Whilst the investigation is developing, the</p> <p>15 evidential picture about the cause and spread of the</p> <p>16 fire will not be complete. As we have previously said,</p> <p>17 there is therefore a risk that the evidence will develop</p> <p>18 further after the phase 1 hearings have been completed</p> <p>19 and that may have some impact on any interim conclusions</p> <p>20 or reports. We also reiterate that it is extremely</p> <p>21 difficult to assess the extent to which the public</p> <p>22 examination of evidence at this point in the</p> <p>23 investigation might prejudice future criminal</p> <p>24 proceedings.</p> <p>25 Sir, I highlight this not in the context of making</p> <p style="text-align: center;">Page 49</p>	<p>1 residents but also for experts that the inquiry has</p> <p>2 instructed. In respect of any other visits or any</p> <p>3 potential visits in the future, the Metropolitan Police</p> <p>4 are currently reviewing its position about how best to</p> <p>5 manage that. We welcome the comments made by Mr Millett</p> <p>6 earlier on this morning about that.</p> <p>7 SIR MARTIN MOORE-BICK: In principle there's no difficulty</p> <p>8 in letting people have access by arrangement; is that</p> <p>9 right?</p> <p>10 MS CLARKE: That's right, sir. Primarily the concern will</p> <p>11 always be to preserve the evidential integrity of the</p> <p>12 tower and that will be managed very carefully on</p> <p>13 a case-by-case basis, and of course, sir, once you have</p> <p>14 made any determination that it is necessary for anybody</p> <p>15 else to have access to the tower.</p> <p>16 But, of course, as ever, we will directly liaise</p> <p>17 with the inquiry team as and when those matters arise.</p> <p>18 Sir, those were the three brief points I would like</p> <p>19 to address with you this morning.</p> <p>20 SIR MARTIN MOORE-BICK: I am very grateful to you for coming</p> <p>21 along. Thank you very much.</p> <p>22 NEW SPEAKER: Thank you, sir.</p> <p>23 SIR MARTIN MOORE-BICK: Now, then, Mr Friedman, I think you</p> <p>24 are next to speak if you would like to. Thank you.</p> <p>25 Submissions on behalf of core participants represented by</p> <p style="text-align: center;">Page 51</p>
<p>1 a particular submission or application of any nature,</p> <p>2 but I simply highlight it in order to remind you, sir,</p> <p>3 that having both processes running in tandem does</p> <p>4 present its own risks and it is a delicate balance to</p> <p>5 balance both interests.</p> <p>6 But we are working closely within the terms of the</p> <p>7 memorandum of understanding and, of course, will</p> <p>8 continue to do so, and so far we have been working</p> <p>9 together to ensure that any such risks are minimised.</p> <p>10 Lastly, and most briefly, sir, I would like to touch</p> <p>11 upon access to Grenfell Tower.</p> <p>12 SIR MARTIN MOORE-BICK: Yes.</p> <p>13 MS CLARKE: As Mr Millett indicated, visits to the tower for</p> <p>14 those who are bereaved, survivors and residents, has</p> <p>15 been arranged through the Metropolitan Police and that</p> <p>16 is an ongoing programme of visits that are very</p> <p>17 carefully planned. That is happening entirely outside</p> <p>18 of the inquiry process.</p> <p>19 As Mr Millett quite rightly pointed out, access</p> <p>20 generally to the tower is restricted by the Metropolitan</p> <p>21 Police on the basis that it still remains a crime scene,</p> <p>22 and access will remain so restricted whilst it is</p> <p>23 a crime scene.</p> <p>24 The Metropolitan Police have facilitated access to</p> <p>25 the tower not only for those bereaved survivors and</p> <p style="text-align: center;">Page 50</p>	<p>1 Bhatt Murphy/Bindmans/Hickman &amp; Rose/Hodge, Jones &amp;</p> <p>2 Allen/Irvine Thanvi Natas by MR DANNY FRIEDMAN QC</p> <p>3 MR FRIEDMAN: Sir, I appear with Stephanie Barwise QC today</p> <p>4 on behalf of the group of five firms --</p> <p>5 SIR MARTIN MOORE-BICK: Yes.</p> <p>6 MR FRIEDMAN: -- Bhatt Murphy, Bindmans, Hickman &amp; Rose,</p> <p>7 Hodge, Jones &amp; Allen and ITN Solicitors.</p> <p>8 We act for 277 core participants. 62 of them come</p> <p>9 from bereaved families relating to now 48 deceased</p> <p>10 people, of which 10 were children.</p> <p>11 You have our written submissions. We are grateful</p> <p>12 for the indication that you've read them, and so this</p> <p>13 morning we would like to address you on two matters in</p> <p>14 particular.</p> <p>15 SIR MARTIN MOORE-BICK: Right, thank you.</p> <p>16 MR FRIEDMAN: Firstly, we seek a final ruling that you will</p> <p>17 answer as best you can the questions of when, where and</p> <p>18 how each of the 72 deceased died as part of reasonably</p> <p>19 discharging the terms of reference, because this is</p> <p>20 required to ensure prompt investigations of these deaths</p> <p>21 under the Human Rights Act.</p> <p>22 Secondly, we seek your further direction on the</p> <p>23 scope of phase 1, particularly with regard to toxicity,</p> <p>24 electricity and what we call the obvious or admitted</p> <p>25 non-compliance with the building regulations, and on</p> <p style="text-align: center;">Page 52</p>

<p>1 those matters Ms Barwise will follow on, please.</p> <p>2 SIR MARTIN MOORE-BICK: Right, thank you.</p> <p>3 MR FRIEDMAN: Can we first turn to the inquest function</p> <p>4 issue, and we are at paragraph 5 of our submissions.</p> <p>5 What we mean is that when this inquiry comes in</p> <p>6 phase 1 to investigate the cause and spread of the fire,</p> <p>7 we want you to cover questions of when, where and how in</p> <p>8 the building the fire caused the 71 deaths, and to that</p> <p>9 we add Maria Del Pilar, known as Pily locally, who is</p> <p>10 the 72nd victim of the fire and she died at the end</p> <p>11 of January this year. We understand that you will also</p> <p>12 hear a testimonial from her husband, Nicholas Burton,</p> <p>13 and he's particularly grateful for that.</p> <p>14 In phase 2, sir, you can go on to consider the</p> <p>15 systemic and policy implications of those findings. In</p> <p>16 substance that means that, by the time you finish</p> <p>17 reporting, you would have answered all of the questions</p> <p>18 that an article 2 inquest would answer under section 5</p> <p>19 of the Coroners and Justice Act 2009 but without you</p> <p>20 formally being appointed a coroner under schedule 10 of</p> <p>21 that Act.</p> <p>22 SIR MARTIN MOORE-BICK: Mm-hm.</p> <p>23 MR FRIEDMAN: We say that very outcome is anticipated by the</p> <p>24 relevant legal framework under the 2009 Act. There is</p> <p>25 no need to wait to be asked by the chief coroner, and if</p> <p style="text-align: center;">Page 53</p>	<p>1 recall the King's Cross underground fire of 1987 that</p> <p>2 led to 31 fatalities. The public inquiry, chaired by</p> <p>3 Desmond Fennell QC, with a young Ian Burnett and</p> <p>4 Robert Jay as his counsel to the inquiry, recommended</p> <p>5 that the duplication involved in holding both a public</p> <p>6 inquiry and a coroner's inquest should be avoided, and</p> <p>7 that the government in England should review existing</p> <p>8 requirements to hold a separate inquest where a public</p> <p>9 inquiry has been set up. Hence the structure we now</p> <p>10 have, that was always available under Scots law and was</p> <p>11 incrementally introduced into English law after 1999.</p> <p>12 Now, Mr Fennell had found -- and I think we've sent</p> <p>13 this through to you -- at chapter 19, paragraph 40, that</p> <p>14 it:</p> <p>15 "... did not seem to me to be in the public interest</p> <p>16 or in the interests of the bereaved to have two separate</p> <p>17 public inquiries in cases of this sort. In this way</p> <p>18 unnecessary distress to the relatives and witnesses and</p> <p>19 the inevitable additional expense to the public could be</p> <p>20 avoided."</p> <p>21 SIR MARTIN MOORE-BICK: You did indeed send that through and</p> <p>22 also, I think, extracts from Lord Cullen's report on</p> <p>23 Piper Alpha. I have you to thank for that as well,</p> <p>24 I think.</p> <p>25 MR FRIEDMAN: I hope so because, of course, on Piper Alpha</p> <p style="text-align: center;">Page 55</p>
<p>1 there is no need for everything to be done at once, you</p> <p>2 must do what you can do now.</p> <p>3 Starting with the legal framework. The inquest</p> <p>4 proceedings have been deliberately suspended pending the</p> <p>5 conclusion of a public inquiry under paragraph 5 of</p> <p>6 schedule 1 of the 2009 Act. The coroner retains</p> <p>7 jurisdiction, but paragraph 10 of schedule 1 means that</p> <p>8 she will only resume the inquest if, in the aftermath of</p> <p>9 the public inquiry, there is sufficient reason to do so.</p> <p>10 That leaves open the proper role for this inquiry to</p> <p>11 ensure that there is no such reason barring new and</p> <p>12 post-inquiry reporting evidence.</p> <p>13 SIR MARTIN MOORE-BICK: I mean, your point really is that</p> <p>14 the inquiry, you would say, can and therefore should</p> <p>15 answer the questions that would have to be asked and</p> <p>16 answered if it were a coroner.</p> <p>17 MR FRIEDMAN: Quite. There have been some helpful starting</p> <p>18 discussions, but it is worthy to remember that there was</p> <p>19 a time under our law when we couldn't make that</p> <p>20 submission and you couldn't do it, because under the</p> <p>21 previous Coroners Act 1988, this mechanism that we've</p> <p>22 just spoken about to achieve the humane, effective and</p> <p>23 expeditious avoidance of overlap between the two</p> <p>24 procedures did not exist.</p> <p>25 So it's particularly worthy today for all of us to</p> <p style="text-align: center;">Page 54</p>	<p>1 what Mr Fennell could not do under English law in 1988,</p> <p>2 Lord Cullen could do under Scots law when he reported on</p> <p>3 the Piper Alpha oil rig explosion of the very same year.</p> <p>4 He sought, in his words, to comprehend all that involved</p> <p>5 loss of or danger to life -- again, I am going to quote:</p> <p>6 "... from the stage of the initial ignition to the</p> <p>7 stage when the last survivor reached help."</p> <p>8 His chapter 10 dealt with the causes of loss of and</p> <p>9 danger to life. 167 people had died, 135 bodies were</p> <p>10 recovered. He gave findings as to the medical causes of</p> <p>11 death that were ascertainable, adding additional</p> <p>12 conclusions as to factors which in his words contributed</p> <p>13 to the deaths of the deceased, and otherwise summarised</p> <p>14 last known movements and whereabouts after the fire</p> <p>15 began.</p> <p>16 Appendix H to his report contained information</p> <p>17 relating to each deceased, including where their bodies</p> <p>18 were discovered, post-mortem evidence, including</p> <p>19 toxicology where available, and that concerning</p> <p>20 inhalation of smoke and/or gas were summarised. Not</p> <p>21 always, but often, the causation results were tragically</p> <p>22 the same.</p> <p>23 SIR MARTIN MOORE-BICK: Can I just say, I found the Piper</p> <p>24 Alpha extracts particularly interesting and helpful.</p> <p>25 Would I be right in thinking that you would submit that</p> <p style="text-align: center;">Page 56</p>

<p>1 this inquiry should really do what Lord Cullen did?</p> <p>2 Make similar types of findings?</p> <p>3 MR FRIEDMAN: Indeed. I don't want to be pertinent enough</p> <p>4 to impose the form on you or, indeed, say that we</p> <p>5 wouldn't do it slightly different here, but it gives you</p> <p>6 an indication of what we're asking for.</p> <p>7 SIR MARTIN MOORE-BICK: Yes.</p> <p>8 MR FRIEDMAN: One should just add on this in chapter 10 that</p> <p>9 you'll see that in the final part he proffered</p> <p>10 a conclusion about the cause and spread of the fire,</p> <p>11 again adding, pertinently for today, that the death toll</p> <p>12 was considerably higher than it would have been had the</p> <p>13 instructions been given that personnel should</p> <p>14 immediately abandon the accommodation and attempt to</p> <p>15 escape as soon as they could.</p> <p>16 SIR MARTIN MOORE-BICK: Yes. Yes. Well, it's helpful to</p> <p>17 know that because I think Piper Alpha, as you rightly</p> <p>18 say, gives one a reasonably clear indication of the sort</p> <p>19 of findings that I think you submit ought to be made in</p> <p>20 this case. Of course they are going to be different in</p> <p>21 many respects, but in substance the same sort of</p> <p>22 findings; is that right?</p> <p>23 MR FRIEDMAN: Yes, and one puts one's feet on to the ground</p> <p>24 of this inquiry by saying in concrete terms: your team,</p> <p>25 with the assistance of the core participant legal teams,</p> <p style="text-align: center;">Page 57</p>	<p>1 the very job to be done.</p> <p>2 SIR MARTIN MOORE-BICK: Right.</p> <p>3 MR FRIEDMAN: Just on the terms of reference, and for your</p> <p>4 note we're at paragraph 6 of the written submissions,</p> <p>5 they self-evidently permit the investigation of the</p> <p>6 inquest-type questions because they ask you at (i) to</p> <p>7 examine the circumstances surrounding the fire and</p> <p>8 thereafter at (ii) to report your findings.</p> <p>9 Just pausing there, you may have seen that the terms</p> <p>10 of reference for both Piper Alpha and King's Cross are</p> <p>11 to examine the circumstances of the fire and the</p> <p>12 explosion as the case may be. Hence, those</p> <p>13 circumstances we say could not sensibly exclude</p> <p>14 an examination of the fate of the people who lost their</p> <p>15 lives during the fire, and neither could they avoid</p> <p>16 reflection on how those fatalities might reasonably have</p> <p>17 been presented, sir.</p> <p>18 How long it took for people to live or die in</p> <p>19 Grenfell Tower that night is the ultimate measurement of</p> <p>20 the building's life threatening features. So too is it</p> <p>21 the touchstone to judge the quality of the emergency</p> <p>22 response.</p> <p>23 There is then a non-exhaustive list of subparagraphs</p> <p>24 in the terms of reference, and they are caveated by the</p> <p>25 word "including", and therefore we infer not limited to,</p> <p style="text-align: center;">Page 59</p>
<p>1 will need, where possible, to correlate the statements</p> <p>2 of survivors, firefighters, the 999 calls and the other</p> <p>3 available evidence of calls and messages sent to the</p> <p>4 outside world. This is a 2017 disaster. We have the</p> <p>5 2017 technology that wasn't available in 1988.</p> <p>6 What we're asking for is sensitive work, sir. But</p> <p>7 it is not difficult if we work together now rather than</p> <p>8 waiting several years.</p> <p>9 Sometimes -- and it's important to say this -- we</p> <p>10 don't know, but it may not be possible always to</p> <p>11 discover with any degree or probability where a given</p> <p>12 person's last steps were. But at least the bereaved</p> <p>13 will know that you and we have tried and, of course, it</p> <p>14 will be less of an ordeal for a family to know that now</p> <p>15 than to wait several years for that same answer.</p> <p>16 SIR MARTIN MOORE-BICK: Okay, yes.</p> <p>17 MR FRIEDMAN: Now, you have already declared that there is</p> <p>18 much force in the proposition that the bereaved should</p> <p>19 not be made to wait for indeterminate inquest dates</p> <p>20 several years after the fire in order to discover the</p> <p>21 fate of the people they grieve for.</p> <p>22 You posed to us last time two questions: do the</p> <p>23 terms of reference permit it, and what would be the</p> <p>24 procedural implications? Our answers are: yes, they do,</p> <p>25 and the Inquiry Rules 2006 have been drafted to enable</p> <p style="text-align: center;">Page 58</p>	<p>1 and those subparagraphs I am just going to summarise,</p> <p>2 but they concern or consider the cause, spread,</p> <p>3 preventability and response to the fire.</p> <p>4 Again, the fate of the principal victims could</p> <p>5 hardly be removed from their concern. As of today, we</p> <p>6 are yet to see any public admissions by the council or</p> <p>7 the various contractors that any features of the</p> <p>8 refurbishment were causative of the deaths. Surely the</p> <p>9 inquiry will need to answer that.</p> <p>10 So not only does the coronial statute anticipate</p> <p>11 an outcome of you fulfilling its functions to obviate</p> <p>12 duplication, but the terms of reference permit you to do</p> <p>13 so. Indeed, as you know, our public law rests on a duty</p> <p>14 to take account of relevant considerations and equally</p> <p>15 not to rely on those that are irrelevant, and we submit,</p> <p>16 respectfully, it would be unreasonable to pursue the</p> <p>17 task of investigating the cause and spread of the fire</p> <p>18 and the emergency response to it, but not to consider</p> <p>19 the movements of each of the deceased after the start of</p> <p>20 the fire, the interaction with emergency services and/or</p> <p>21 third parties, the medical cause of death and, where</p> <p>22 available, post-mortem and toxicology.</p> <p>23 So the task should not be overstated. It is to</p> <p>24 consider readily ascertainable evidence and then</p> <p>25 briefly, as in an inquest, to report.</p> <p style="text-align: center;">Page 60</p>

<p>1 The investigation is already underway, because your</p> <p>2 counsel, through their pro forma questionnaire to</p> <p>3 survivors have sought to discover who was where and with</p> <p>4 whom in the building during the fire. Section 7 of the</p> <p>5 questionnaire for those witnesses asks at question</p> <p>6 64: how long did you remain in the flat? If so, on</p> <p>7 whose advice? In particular, if it was firefighters,</p> <p>8 what did they say to you?</p> <p>9 Question 68: what made you decide to leave your</p> <p>10 flat?</p> <p>11 Question 72, was anyone left in your flat when you</p> <p>12 left? What was the relationship? How did you think</p> <p>13 they would get out?</p> <p>14 Then question 79 to 82 deal with the escape through</p> <p>15 common parts and then the stairs, including: were you</p> <p>16 alone or with others? If you were with others, who were</p> <p>17 they?</p> <p>18 These questions are forensically obvious questions,</p> <p>19 if I may say so.</p> <p>20 SIR MARTIN MOORE-BICK: And I hope they are all going to be</p> <p>21 answered, are they?</p> <p>22 MR FRIEDMAN: They will indeed. And when they are, aside</p> <p>23 from just being questions for lawyers, they are also</p> <p>24 a compassionate vehicle to chronical in one place a set</p> <p>25 of accounts and queries which too many people are</p> <p>Page 61</p>	<p>1 obligation under article 2 of the European Convention on</p> <p>2 Human Rights is to conduct a prompt investigation into</p> <p>3 the cause and circumstances of a death, then this</p> <p>4 inquiry, as the chosen public vehicle to investigate the</p> <p>5 fire, must not abrogate its responsibility under</p> <p>6 section 6 of the Human Rights Act to meet that</p> <p>7 obligation.</p> <p>8 Our previous written submissions noted the Northern</p> <p>9 Ireland case of Jordan in 2014. Mr Justice Stephens</p> <p>10 held the investigation into the death of a close</p> <p>11 relative impacts on the next of kin at a fundamental</p> <p>12 level of human dignity, and he took it to be axiomatic</p> <p>13 that undue delays in an investigation would cause undue</p> <p>14 hardship.</p> <p>15 In the seminal case of Edwards v the United Kingdom</p> <p>16 the European Court of Human Rights went on at</p> <p>17 paragraph 86 to say that a lack of promptness not only</p> <p>18 erodes the amount and quality of available evidence, but</p> <p>19 drags out the ordeal for bereaved family members. That</p> <p>20 is the legal principle at stake. It would not have been</p> <p>21 available to the victims of the King's Cross fire in</p> <p>22 1987. But 30 years later, the victims of the Grenfell</p> <p>23 fire seek its vindication at this inquiry as Parliament</p> <p>24 intended.</p> <p>25 Shortly, then, on procedural implications to</p> <p>Page 63</p>
<p>1 presently struggling with alone.</p> <p>2 There are undoubtedly agonising gaps in knowledge.</p> <p>3 For instance, knowing that loved ones walked up two</p> <p>4 floors not down but not knowing why, or losing the grip</p> <p>5 of your child's hand and not knowing what happened next.</p> <p>6 Then there are what we understand, terrible twists of</p> <p>7 fate between those who deliberately ignored the</p> <p>8 firefighters' advice to stay put and those who did not,</p> <p>9 whether due to disability or otherwise, and it killed</p> <p>10 them.</p> <p>11 We do submit that the inquest-type questions are</p> <p>12 forensically and rationally connected to the terms of</p> <p>13 reference. But delay in seeking their answers also</p> <p>14 exposes the bereaved to an avoidable harm. Anyone, and</p> <p>15 I do mean anyone, will find it difficult to aggrieve, to</p> <p>16 accept the truth of an awful fate, until they know what</p> <p>17 truth actually is.</p> <p>18 If the answer to their plea, "If not now, when?" is</p> <p>19 "Please wait for the indeterminate date of a coronial</p> <p>20 inquest", surely that is an unreasonable answer. It</p> <p>21 does not sufficiently respect the dignity of their grief</p> <p>22 and therefore defies both contemporary common law and</p> <p>23 the Human Rights Act.</p> <p>24 That is where we ultimately rest our submission. If</p> <p>25 one of the core components of the investigatory</p> <p>Page 62</p>	<p>1 acceding to our request. That answer is in paragraph 8</p> <p>2 of our submissions. We make no claim that importing the</p> <p>3 inquest function into the process would qualify the</p> <p>4 status of the Inquiry Rules, including the formality of</p> <p>5 requiring leave to question under rule 10.1, and the</p> <p>6 default principle against repetition in the absence of</p> <p>7 very good reason under rule 10.4.</p> <p>8 We say rule 10 must be interpreted with</p> <p>9 a recognition under both the common law and article 2</p> <p>10 that bereaved families will want someone, counsel to the</p> <p>11 inquiry or their counsel, to ask a relevant question of</p> <p>12 a survivor, firefighter or third party, as to the fate</p> <p>13 of a deceased person. We as a group of lawyers for the</p> <p>14 bereaved and survivors will obviously prioritise which one</p> <p>15 of us on behalf of a particular bereaved family will</p> <p>16 apply to lead on proposals of questioning.</p> <p>17 Thereafter the work will entail combining oral,</p> <p>18 written and documentary accounts. That which is</p> <p>19 non-disputed and otherwise unnecessary to investigate</p> <p>20 further can be read into the record, as we heard this</p> <p>21 morning.</p> <p>22 As to when and how you report, that must be a matter</p> <p>23 for you. But unlike an inquest, we can address you on</p> <p>24 the facts and you could call for written annexes to</p> <p>25 closing submissions that would assist you in reaching</p> <p>Page 64</p>



<p>1 your final conclusions.</p> <p>2 SIR MARTIN MOORE-BICK: Right.</p> <p>3 MR FRIEDMAN: Can I end my part of the submissions by saying</p> <p>4 that the application should not be regarded as requiring</p> <p>5 something somehow unduly onerous or complicated. It</p> <p>6 doesn't. It's not only humane and required in law but</p> <p>7 readily achievable. The inquest questions travel with</p> <p>8 and are complementary to any sensible narrative of how</p> <p>9 this fire began and spread.</p> <p>10 We well understand that the inquiry is concerned to</p> <p>11 urgently identify dangerous technical practices. My</p> <p>12 learned friend is just about to address you on some</p> <p>13 obvious ones. You will want to make remedial</p> <p>14 recommendations as soon as you can.</p> <p>15 However, if you and we cast our minds to the Watson</p> <p>16 Street fire in Glasgow in 1905, up to 39 residents dead,</p> <p>17 or the garment workers building fire in New York in</p> <p>18 1911, 146 mostly women killed, the modern history of</p> <p>19 terrible fires teaches us that the identification of</p> <p>20 dangerous practices and amending building regulations</p> <p>21 will never alone be enough. Change will only come when</p> <p>22 the political and economic will to make it happen</p> <p>23 becomes overwhelming.</p> <p>24 The inquiry therefore needs to be a cultural event</p> <p>25 as well as a technical one. If it ends up not telling</p> <p style="text-align: center;">Page 65</p>	<p>1 Survivors were treated for cyanide poisoning. This</p> <p>2 strongly suggests the required causal link to examine</p> <p>3 toxicity for the purposes of the inquest function,</p> <p>4 should you choose to take it on. But given the link to</p> <p>5 the wider issues of safety of the building, toxicity</p> <p>6 ought in any event to be firmly within the scope of the</p> <p>7 inquiry.</p> <p>8 SIR MARTIN MOORE-BICK: Can you just help a bit further?</p> <p>9 What do you have in mind? I mean, insofar as there were</p> <p>10 post-mortems done, the pathologists will have tested for</p> <p>11 various toxic materials in the blood, including hydrogen</p> <p>12 cyanide, but perhaps more importantly carbon monoxide,</p> <p>13 and we will have that evidence. Are you suggesting we</p> <p>14 should be doing something else?</p> <p>15 MS BARWISE: Well, sir, it is indeed a complicated question.</p> <p>16 I understand that sometimes one has to give specific</p> <p>17 instructions to a coroner to test for every possible</p> <p>18 cause of death. You've identified the principal two, as</p> <p>19 I understand it, carbon monoxide and hydrogen. But</p> <p>20 there is an issue about what actually killed them. It</p> <p>21 won't in all cases have been the carbon monoxide.</p> <p>22 Obviously, as you'll be aware, sir, the cladding</p> <p>23 materials contain, we believe, substances which are</p> <p>24 highly toxic, and therefore it is relevant to consider</p> <p>25 the issue.</p> <p style="text-align: center;">Page 67</p>
<p>1 the chronical of the deaths foretold then it will only</p> <p>2 have told half the story. It will not be the inquiry it</p> <p>3 was meant to be, and forgive me for pressing one more</p> <p>4 time, but it will drag out the ordeal and arrest the</p> <p>5 grief of those who should be its greatest concern.</p> <p>6 Sir, thank you, and can I hand over to Ms Barwise.</p> <p>7 SIR MARTIN MOORE-BICK: Thank you very much, Mr Friedman.</p> <p>8 Yes, Ms Barwise.</p> <p>9 Submissions on behalf of core participants represented by</p> <p>10 Bhatt Murphy/Bindmans/Hickman &amp; Rose/Hodge, Jones &amp;</p> <p>11 Allen/Irvine Thanvi Natas by MS STEPHANIE BARWISE QC</p> <p>12 MS BARWISE: Sir, I'm going to deal with the second of our</p> <p>13 topics and what you have termed the significant degree</p> <p>14 of flexibility concerning the scope of phase 1.</p> <p>15 I should like to briefly touch on three areas.</p> <p>16 These are toxicity, electricity and obvious or admitted</p> <p>17 non-compliance with the building regulations.</p> <p>18 SIR MARTIN MOORE-BICK: Yes.</p> <p>19 MS BARWISE: On toxicity, addressed at paragraph 21 of our</p> <p>20 submissions, there are two issues: first, the role the</p> <p>21 toxic fumes played in contributing to deaths; and,</p> <p>22 second, any risk to the life or health of survivors,</p> <p>23 residents and firefighters from exposure to toxic fumes</p> <p>24 during or in the aftermath of the fire. At present, no</p> <p>25 inquiry expert addresses either matter.</p> <p style="text-align: center;">Page 66</p>	<p>1 SIR MARTIN MOORE-BICK: All right. Yes, thank you.</p> <p>2 MS BARWISE: There is the secondary question of toxicity in</p> <p>3 the atmosphere during the fire and after the fire, and</p> <p>4 it is the burning of those polymeric substances in the</p> <p>5 cladding materials which give rise to a particular</p> <p>6 source of toxicity, and it's an issue, sir, that we feel</p> <p>7 should be addressed, both parts of that issue.</p> <p>8 SIR MARTIN MOORE-BICK: Right.</p> <p>9 MS BARWISE: We welcome that the inquiry will consider the</p> <p>10 contribution of the gas supply, including incomplete</p> <p>11 works, to the spread of fire and has appointed</p> <p>12 Mr Rodney Hancox. It was, however, an electrical</p> <p>13 appliance which appears to have been the immediate cause</p> <p>14 of a fire in flat 16 and we do ask for the role of</p> <p>15 electrical systems to be considered in terms of source</p> <p>16 and spread.</p> <p>17 SIR MARTIN MOORE-BICK: I think you'll find that is going to</p> <p>18 be done.</p> <p>19 MS BARWISE: Yes. I am grateful, sir, I appreciate that the</p> <p>20 inquiry is aware that in May 2013 there was a series of</p> <p>21 power surges and we've provided some detail at</p> <p>22 paragraph 22 of our submissions as to how Grenfell</p> <p>23 residents experienced those events. This inevitably</p> <p>24 begs the question whether a similar surge or similar</p> <p>25 issues exacerbated the fire in 2017.</p> <p style="text-align: center;">Page 68</p>

<p>1 We are aware that the tranche 1 disclosure includes</p> <p>2 a preliminary report which reflects awareness of the</p> <p>3 issue, but no further expert analysis has yet been</p> <p>4 obtained. Whilst we welcome that the inquiry will keep</p> <p>5 this under review, we do suggest that a further report</p> <p>6 on the subject should be commissioned.</p> <p>7 The final issue which we submit should also be</p> <p>8 considered in phase 1 is any obvious or admitted</p> <p>9 non-compliance with building regulations. Counsel to</p> <p>10 the inquiry told us this morning that the compliance</p> <p>11 questions, as we have called them, namely whether the</p> <p>12 cladding system and fire safety measures accorded with</p> <p>13 building regulations, will be considered by Barbara Lane</p> <p>14 within phase 1. That is most welcome news.</p> <p>15 I should emphasise we do not seek to have brought</p> <p>16 into phase 1 the resolution of which party is</p> <p>17 responsible for the use of the material, but we do ask</p> <p>18 that the fact of a product or system's obvious or</p> <p>19 admitted unsuitability should be recorded by the inquiry</p> <p>20 within phase 1.</p> <p>21 Certain core participants are publicly declaring</p> <p>22 outside this inquiry that their own products as used at</p> <p>23 Grenfell Tower patently did not conform to the building</p> <p>24 regulations. Celotex's position statement confirms to</p> <p>25 some extent its position taken in the media. Rydon,</p> <p style="text-align: center;">Page 69</p>	<p>1 other core participants may take the same view.</p> <p>2 The aluminium composite panel Reynobond PE,</p> <p>3 manufactured by Arconic is not a material of limited</p> <p>4 combustibility as is apparent from the original and</p> <p>5 subsequent British Board of Agrément certificate issued</p> <p>6 in respect of it. Arconic's position statement,</p> <p>7 however, remains silent on this issue.</p> <p>8 If it is obvious and/or accepted by corporate core</p> <p>9 participants that these materials were not compliant</p> <p>10 with building regulations, then neither the victims nor</p> <p>11 the wider public should have to await phase 2 for the</p> <p>12 elephant in the room to be called what it is, namely</p> <p>13 a building improperly enveloped in unsafe materials.</p> <p>14 Not one of the interested core participants needs</p> <p>15 more time to establish whether materials complied with</p> <p>16 the building regulations or not. It would be wholly</p> <p>17 surprising if they did not already know the answer.</p> <p>18 If you say now that you will leave the door of</p> <p>19 phase 1 open to consideration of matters of obvious</p> <p>20 non-compliance then the parties can address the issue in</p> <p>21 their openings, and if they choose not to, then both you</p> <p>22 and your counsel should do so.</p> <p>23 Including the compliance questions within phase 1 to</p> <p>24 the extent possible fulfils one of your own design aims</p> <p>25 for phase 1, which was the urgent need to find out what</p> <p style="text-align: center;">Page 71</p>
<p>1 however, claimed in a press release immediately</p> <p>2 following the fire dated 15 June 2017 that its work met</p> <p>3 all building regulations, yet its position statement is</p> <p>4 simply silent on this point. That duality is</p> <p>5 artificial, runs counter to the victims and the general</p> <p>6 public's interest and should be resolved at the earliest</p> <p>7 opportunity.</p> <p>8 Sir, whatever important questions there may be about</p> <p>9 the building regulations' fitness for purpose, this is</p> <p>10 not one of them. On a building over 18 metres tall, the</p> <p>11 insulation material stuck against the external wall of</p> <p>12 the building to be clad must be of limited</p> <p>13 combustibility as defined by the regulations. No one</p> <p>14 has positively suggested to you or in the public domain</p> <p>15 that any insulation material used on Grenfell Tower</p> <p>16 complied with that requirement.</p> <p>17 This particular debate is therefore confined to the</p> <p>18 question of whether the cladding panels accorded with</p> <p>19 the regulations. We and the government, as reflected in</p> <p>20 its building safety programme explanatory note issued</p> <p>21 following the fire, regard it as clear that, on its</p> <p>22 proper interpretation, approved document B part 4 of the</p> <p>23 regulations, paragraphs 12.5 and 12.7, require the core</p> <p>24 of the panels to also be of limited combustibility on</p> <p>25 a building over 18 metres tall. We would expect some</p> <p style="text-align: center;">Page 70</p>	<p>1 aspects of the building's design and construction played</p> <p>2 a significant role in enabling the disaster to occur.</p> <p>3 There are two questions: one is what happened,</p> <p>4 namely how the fire was caused and how did it engulf the</p> <p>5 building so rapidly. That necessarily entails</p> <p>6 consideration of how adequate the materials were. The</p> <p>7 other question is the impact of the regulatory</p> <p>8 requirements on the adequacy of the materials used.</p> <p>9 The answers to these questions are not mutually</p> <p>10 exclusive. Both may entail negative findings, namely</p> <p>11 that the materials did not conform to building</p> <p>12 regulations and those regulations are in some respects</p> <p>13 not sufficiently clear.</p> <p>14 It is, of course, a matter for government and core</p> <p>15 participants what they choose to say about both these</p> <p>16 questions and when. It is, however, undoubtedly vital</p> <p>17 to the victims and the wider public, including the</p> <p>18 construction industry, that the answers to both these</p> <p>19 questions should be known sooner rather than later.</p> <p>20 Those for whom we act are burdened not only by not</p> <p>21 knowing, but are also plagued by highly conflicting</p> <p>22 narratives in the media.</p> <p>23 We invite you to declare the obvious as soon as</p> <p>24 possible and then in phase 2 to establish why it</p> <p>25 happened.</p> <p style="text-align: center;">Page 72</p>

<p>1 These are my submissions, thank you.</p> <p>2 SIR MARTIN MOORE-BICK: Thank you very much.</p> <p>3 Now, the running sheet suggests you are next,</p> <p>4 Mr Mansfield.</p> <p>5 Submissions on behalf of core participants represented by 11</p> <p>6 firms by MR MICHAEL MANSFIELD QC</p> <p>7 MR MANSFIELD: Thank you.</p> <p>8 May I just say by a word of introduction that in</p> <p>9 fact I represent, along with Leslie Thomas, who is going</p> <p>10 to address you after me -- we have divided up the</p> <p>11 topics -- together with -- and forgive me if I do this</p> <p>12 once, I'm not going to do it every time I stand up, to</p> <p>13 recite who else is alongside me, but there are a number</p> <p>14 of barristers as well. I am going to mention them by</p> <p>15 name: Allison Munroe, Jamie Burton, Justin Bates,</p> <p>16 Thalia Maragh and Phillip Dale.</p> <p>17 We are instructed by 11 firms. Again, I am only</p> <p>18 going to read them once: Anthony Gold, Birnberg Peirce,</p> <p>19 Deighton Pierce Glynn, Duncan Lewis, Hanover Bond Law,</p> <p>20 Hudgells, Janes, Russell-Cooke, Saunders Law, Saunders</p> <p>21 Solicitors, Slater &amp; Gordon. I hope they won't mind me</p> <p>22 reading them rather fast. However, that's the</p> <p>23 representational position.</p> <p>24 SIR MARTIN MOORE-BICK: Yes.</p> <p>25 MR MANSFIELD: All counsel and all solicitors have obviously</p> <p style="text-align: center;">Page 73</p>	<p>1 this: the condition of the deceased that were examined</p> <p>2 may not provide enough material to make an assessment as</p> <p>3 to whether there was a toxic element in the death or</p> <p>4 contributing to the death. So it does require, we would</p> <p>5 submit at this stage, the instruction of an expert with</p> <p>6 specific instructions to examine the health consequences</p> <p>7 to the individuals and to the environment, because</p> <p>8 people who still live there have been saying that on the</p> <p>9 night, the product from the burning cladding as well as</p> <p>10 the insulation could be found a long way from the tower</p> <p>11 itself. They were picking it up off the ground. Of</p> <p>12 course, some will be saying, "Do we get contaminated by</p> <p>13 merely picking it up?"</p> <p>14 So these are the issues. They are not difficult to</p> <p>15 foresee, but we would say this is a separate topic that</p> <p>16 needs consideration.</p> <p>17 SIR MARTIN MOORE-BICK: Yes.</p> <p>18 MR MANSFIELD: So I don't say more on that particular</p> <p>19 aspect.</p> <p>20 May I turn to the more substantial matter, and that</p> <p>21 is the position and, in fact, your own observations,</p> <p>22 which we welcomed after the December submissions that</p> <p>23 I made about overlap between phase 1 and 2. The simple</p> <p>24 point that we were putting then and maintain is that it</p> <p>25 should not become an artificial or hermetically sealed</p> <p style="text-align: center;">Page 75</p>
<p>1 combined so far as the survivors, bereaved and residents</p> <p>2 are concerned to ensure there's as much co-operation and</p> <p>3 non-duplication as possible.</p> <p>4 However, as you have just been addressed on matters</p> <p>5 which flow into what I would want to address you on --</p> <p>6 it's principally the question of overlap between phase 1</p> <p>7 and phase 2, but may I just pick up on toxicity to begin</p> <p>8 with, because this was a specific matter that I raised</p> <p>9 in December. I raised it then because -- and I'm sure</p> <p>10 many people here have visited the scene, as you have</p> <p>11 yourself -- there was at the time and persists a concern</p> <p>12 by people who are still living in the area about the</p> <p>13 risk, not just to their own health on a longer term</p> <p>14 basis, and we know from reports that at least five</p> <p>15 individuals have been treated at King's Hospital for</p> <p>16 cyanide poisoning. That may just unfortunately be the</p> <p>17 tip of the iceberg because, as you mentioned yourself,</p> <p>18 carbon monoxide is also another threat, as it were.</p> <p>19 So not only to those who lived and survived in the</p> <p>20 tower and their own personal health, but also those in</p> <p>21 the walkways and elsewhere, and obviously there will be,</p> <p>22 hopefully, medical reports from the hospital relating to</p> <p>23 those who were treated as well as the post-mortem</p> <p>24 reports.</p> <p>25 The problem with the post-mortem reports may be</p> <p style="text-align: center;">Page 74</p>	<p>1 situation. Therefore, may I just for these purposes</p> <p>2 quote your own words and adopt them. You said this in</p> <p>3 your later ruling on these matters:</p> <p>4 "Having listened to the arguments [I've just done it</p> <p>5 in synopsis form] I have come to the conclusion that,</p> <p>6 for the time being at least, it would be sensible to</p> <p>7 retain a significant degree of flexibility in relation</p> <p>8 to the cope of the different phases and that in due</p> <p>9 course it may be sensible to allow phase 1 to flow</p> <p>10 seamlessly into phase 2 with a minimum of interruption."</p> <p>11 Then you go on and indicate that it would be</p> <p>12 sensible, in fact, to include within phase 1 -- and then</p> <p>13 you list the issues at 3(a), 9(a), (b) and (h) and</p> <p>14 12(c).</p> <p>15 May I develop that for the purposes of what is --</p> <p>16 I am really wanting to apply the flexibility approach to</p> <p>17 the imminent need for certain aspects of this inquiry.</p> <p>18 I say it because -- I hope I'm not being unfair to your</p> <p>19 own counsel, but I didn't detect, unless it was implicit</p> <p>20 and I missed it, in the observations and the statement</p> <p>21 made by counsel this morning any reference to</p> <p>22 flexibility; in fact, quite the reverse, because when it</p> <p>23 came to, for example, and the first dimension of this</p> <p>24 topic is statements being prepared by the bereaved, the</p> <p>25 survivors and the residents, we returned to the</p> <p style="text-align: center;">Page 76</p>

1 phraseology that existed before the last hearing, namely  
2 sticking to the narrative of the night: what happened on  
3 the night?

4 I don't want to traverse all the arguments as to why  
5 we say, yes, of course, that's a good starting point,  
6 but it can't be kept to that because how a fire spread  
7 is intrinsically linked to why it spread, and who are  
8 going to be in the forefront of being able to at least  
9 assist, and I would describe some of them as experts in  
10 their own right, are the people who lived there, who had  
11 been in the building for some time before, had been  
12 aware of the risks, and on the night were able to  
13 identify, as far as they're concerned, what went wrong  
14 on the night.

15 So I would ask, first of all, therefore, that when  
16 it comes to family -- they won't all want to do it, they  
17 won't all want to include, but I would ask that  
18 consideration is given so that when statements are being  
19 drawn up from the -- I am going to call them family  
20 members, they are not, if they don't wish to be, limited  
21 to what they may have seen on the night or heard on the  
22 night, but if they have observations -- I'll put it in  
23 that way -- about the risks involved, it may relate to  
24 the actual materials, because they had noticed what had  
25 happened in other incidents like Lakanal and so on, so

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1 they are in a position to indicate what they had been  
2 noticing and warning about these matters, and obvious  
3 things that were clearly missing on the day. Whether it  
4 was a matter of compliance or not, there are practical  
5 issues that many of them can speak about.

6 Now, as the issues are presently divided, can I just  
7 ask you to turn to a couple to demonstrate why we say --  
8 SIR MARTIN MOORE-BICK: It may help you, Mr Mansfield, to  
9 know that I don't think it's intended to prevent anyone  
10 from dealing with whatever he or she wishes to deal with  
11 in the statement.

12 MR MANSFIELD: No.

13 SIR MARTIN MOORE-BICK: So they don't need to feel that  
14 somehow they can't say things that they would like to  
15 say.

16 MR MANSFIELD: May I just follow that through. We're very  
17 grateful for that indication, but can I just indicate --  
18 if you would be kind enough to look at issue number 5 in  
19 the list of issues, and 5(a).

20 Now, it's a very obvious question. I'll read it out  
21 in case those don't have it in front of them. This is  
22 under the heading "Fire and safety measures within the  
23 building at the time of the fire". Now, 5(a) is  
24 included in phase 1:

25 "What were the fire resistance, prevention,

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1 mitigation, evacuation and other safety measures [headed  
2 fire safety measures] in place at the time of the fire?"

3 Now, those are extremely important issues, plainly,  
4 but those who are living and may have survived the fire  
5 and others who visited the premises will be in  
6 a position to indicate not just what were in place but  
7 what were not in place.

8 SIR MARTIN MOORE-BICK: Well, I think that must be the case,  
9 mustn't it?

10 MR MANSFIELD: It's an obvious -- yes. I think the families  
11 don't want to be in a position whereby of course they  
12 can put it in the statement, but my next point would be  
13 they don't want to have to keep coming back to give  
14 their evidence, a point we discussed before. You  
15 yourself indicated sympathy for not bringing family  
16 members back.

17 SIR MARTIN MOORE-BICK: No, no.

18 MR MANSFIELD: So that if on the first occasion, let us say  
19 the first week or so of your inquiry, a family member  
20 who has got some pertinent observations about what would  
21 have made a difference, whether it's sprinklers on the  
22 inside, sprinklers on the outside, all those points,  
23 I would submit not only should they be allowed to say it  
24 in the statement, but that you might consider allowing  
25 them to say it in phase 1. That's really what it comes

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1 to.

2 SIR MARTIN MOORE-BICK: Yes.

3 MR MANSFIELD: Now, I won't perhaps labour the point by  
4 making the same thing under issue 11, the fire, same  
5 point comes up. However, there are two areas in the  
6 issues which I would submit could be added to the list  
7 that you yourself made in relation to this. That is  
8 scope.

9 Number 8 on the list of issues is headed  
10 "Communications with residents". So once again, almost  
11 explicitly, it is inviting residents to give their  
12 observations. Of course, one of the most important  
13 ones -- again, just an example -- is (d):  
14 "What concerns, warnings and other statements were  
15 expressed about the fire safety of Grenfell Tower by its  
16 residents or any other person ..."

17 Extremely important, it's one of the aspects which  
18 the United Nations rapporteur recently discerned, that  
19 the residents felt they have been ignored, not listened  
20 to, on key issues which would undoubtedly have made  
21 a contribution to ensuring that there was no fire in the  
22 first place, or at least no spreading of fire. Of  
23 course, all the other aspects -- I don't go through the  
24 other aspects of issue 11 -- sorry, not issue 11, of  
25 issue 8. But they would have the facility to put it in

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20 (Pages 77 to 80)

<p>1 their statements and, additionally, to give that 2 evidence before you, if they wish. Not all of them 3 would want to do that.</p> <p>4 There is another one which I suggest, an issue 5 which, as it were, bridges the two phases, and that is 6 number 10, response to recommendation.</p> <p>7 Now, I'm only going to give one example. Obviously 8 it could be left, but many of the residents and again 9 that same group are anxious to indicate what the 10 response was. The particular aspect of this is 10(b): 11 "Were appropriate steps taken by central and local 12 government and other relevant bodies to act upon such 13 recommendations?"</p> <p>14 Now, that's relating to obviously other 15 investigations, other inquests and so on, as well as, 16 clearly, warnings that they'd been given by the 17 residents.</p> <p>18 That could be left, but we suggest again that the 19 residents and that group, residents, bereaved and 20 survivors, will and do have -- not all of them, some of 21 them -- observations about how local and central 22 authority basically overlooked the points that they were 23 making.</p> <p>24 So I am making it shortly, but I would ask, 25 therefore, that certainly issues 8 and 10 are at least</p> <p style="text-align: center;">Page 81</p>	<p>1 are going to be clear overlap areas, then what the 2 issues are, namely what was missing, what went wrong and 3 who is the person or organisation responsible for the 4 failure, whether it's a non-compliance or whether it's 5 an actual item that is not provided -- I think on the 6 last occasion I mentioned hose reels. They are very 7 simple points, but to divide it up between what was or 8 wasn't there on the night to, well, we'll later discover 9 who failed to either put it there or make it ineffective 10 for a later time, we said would be diluting the 11 accountability issue, because one of the investigative 12 and inquest questions is accountability, is being able 13 to identify those responsible.</p> <p>14 So I don't take that longer other than to say we say 15 this impacts on the openings and the openings should be 16 able to embrace the bigger, as it were, tapestry of 17 what's happened in this case, not limited to what 18 happened on the night.</p> <p>19 This also affects a third issue, and that is 20 experts. We've given an illustration, so I'm not going 21 to repeat it. It's in the submissions we've made. You 22 will find this in paragraph 23. Experts, we say -- this 23 is imminent as we gather expert reports may be available 24 within the month -- also are not artificially divided 25 between the two phases where there's a clear</p> <p style="text-align: center;">Page 83</p>
<p>1 considered for phase 1, because we say you can't 2 separate them out in the way that is otherwise 3 countenanced.</p> <p>4 Now, this spreads beyond the compilation of 5 statements on behalf of the families.</p> <p>6 There are two other aspects which touch on exactly 7 this issue of ensuring that there is a clear indication 8 right at the start of the inquiry as to where it's 9 going, not just phase 1.</p> <p>10 My learned friend indicated again in the statement 11 that basically the openings were going to be limited to 12 phase 1. Well, that's all right if you have a clear 13 indication of phase 1, but if you are taking a flexible 14 approach to phase 1, which we would submit is absolutely 15 necessary, then the openings, for example, on behalf of 16 these groups, would have to, we say, include, in 17 fairness to everyone, not just the core participants who 18 are residents and so forth, but core participants who 19 may be in some way or another responsible, and we have 20 in our position statements -- and it would be, again, 21 a travesty not to be able to refer to position 22 statements in the opening of the whole of the inquiry, 23 although it's the phase 1 of the inquiry. If, as it 24 were, as you've put it in that judgment, there is going 25 to be a seamless flow from one to the other and there</p> <p style="text-align: center;">Page 82</p>	<p>1 relationship between the two. Because when witnesses 2 start to give evidence, it's important that we all have 3 an idea of what it is that we are, as it were, aiming 4 for. What are the targets here? What are the target 5 issues? What happened on the night, yes, is the focal 6 point, but arising out of that, almost like a wheel, 7 there are going to be spokes going in many directions 8 and everybody needs to know which direction they're 9 going and what are the key aspects of the failures in 10 practice and the non-compliance, rather than leaving it 11 for later, because then you miss at the factual stage 12 what it is you would have asked had you known that, 13 actually, it makes a great difference -- well, I'll give 14 an example, it's just come up last week, and that is the 15 Met Police have issued -- well, apparently they've 16 issued a report about fire doors, that the fire doors 17 were not resistant for long enough and only 15 minutes. 18 Well, that's the kind of issue. You need to know all 19 that, not what happened but what didn't happen and what 20 would have made a difference all becomes, as it were, 21 elided into one issue.</p> <p>22 So I think we make the point very clearly, so we 23 would ask for expert reports to certainly be prepared 24 with that in mind.</p> <p>25 I come, finally -- I hope I'm not overrunning too</p> <p style="text-align: center;">Page 84</p>

1 much -- the site visit was the third topic I was going  
 2 to raise. Perhaps we don't need to spend --  
 3 SIR MARTIN MOORE-BICK: Yes. Have you been reassured about  
 4 that?  
 5 MR MANSFIELD: I think so.  
 6 SIR MARTIN MOORE-BICK: Yes, I mean --  
 7 MR MANSFIELD: I am going to turn up tomorrow and find out  
 8 what happens.  
 9 SIR MARTIN MOORE-BICK: If you have an appointment to be  
 10 there, I am sure you will be well looked after.  
 11 MR MANSFIELD: Yes. As with many others, I've been down  
 12 many times but I've never managed to get into the tower.  
 13 But as long as the Metropolitan Police are prepared and  
 14 manage, and we're quite happy to be managed, but as long  
 15 as it could happen before the opening of the inquiry  
 16 that we could get to see -- I can't speak on behalf of  
 17 all the lawyers, they may not want to go, but on behalf  
 18 of the legal representatives -- I understand the  
 19 families can go under the programme, so that's not  
 20 a problem. So I don't take it any further.  
 21 SIR MARTIN MOORE-BICK: Thank you very much.  
 22 Mr Thomas, are you going to speak as well on behalf  
 23 of your clients?  
 24 MR THOMAS: I am.  
 25 SIR MARTIN MOORE-BICK: Your turn then.

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1 Submissions on behalf of core participants represented by 11  
 2 firms by MR LESLIE THOMAS QC  
 3 MR THOMAS: Good afternoon, sir.  
 4 SIR MARTIN MOORE-BICK: Good afternoon.  
 5 MR THOMAS: So I am dealing with generally two specific  
 6 topics and I hope to be brief.  
 7 SIR MARTIN MOORE-BICK: Yes.  
 8 MR THOMAS: Can I just deal firstly with the topic of  
 9 experts. This is just really to supplement what has  
 10 already been said and to assist your inquiry team with  
 11 some of the issues that we have in mind and are  
 12 concerned about.  
 13 The first is this: firstly, we thank you for the  
 14 provision of funding that you've provided to allow us to  
 15 instruct some experts. That really does assist,  
 16 particularly in terms of levelling the playing fields in  
 17 terms of equality of arms, so we thank you for that.  
 18 But to make that really and truly effective, the  
 19 timetabling -- and I know we're working under a tight  
 20 timetable for good reasons -- needs to be just thought  
 21 about just a little bit more, and let me give you  
 22 a couple of examples.  
 23 You have set a timetable in relation for when we are  
 24 going to be receiving the expert reports that you have  
 25 instructed. There needs to be inserted into that time

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1 for the experts that we instruct, time for them to  
 2 digest it, and also it needs to be thought about very  
 3 carefully when your expert evidence is given and when  
 4 our expert evidence is likely to be given thereafter.  
 5 Okay? And I'll explain what I mean. When I say our  
 6 expert evidence be given, should an application be made  
 7 in accordance with what was said earlier on.  
 8 What I mean is this: firstly, for our expert  
 9 evidence to have real understanding, our experts will  
 10 firstly need, if they so wish, access to the site. That  
 11 must follow. And, secondly, access to any physical  
 12 exhibits that other experts have seen. So that just  
 13 needs to be factored in.  
 14 SIR MARTIN MOORE-BICK: Yes.  
 15 MR THOMAS: We would wish to reserve our opinion on the  
 16 timing of the position on the hearing of expert  
 17 evidence, factoring in an opportunity for our experts to  
 18 consider that evidence, because we do not have it yet  
 19 and we can't say until our experts have seen it.  
 20 SIR MARTIN MOORE-BICK: I understand that.  
 21 MR THOMAS: I'm glad that that makes sense.  
 22 So that's all I want to say in relation to the  
 23 experts. They are short points but I hope  
 24 understandable points.  
 25 Can I turn, then, to the personal portraits or pen

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1 portraits, however you want to describe them. Secondly,  
 2 can I thank your counsel for making contact with me in  
 3 relation to what is being proposed. I think a lot of  
 4 ground has been made in relation to this.  
 5 SIR MARTIN MOORE-BICK: We have pretty well got an agreed  
 6 arrangement, haven't we?  
 7 MR THOMAS: More or less, more or less, and --  
 8 SIR MARTIN MOORE-BICK: And conversations between counsel  
 9 may be a more fruitful way of taking it forward.  
 10 MR THOMAS: Absolutely. I'm not going to be long, can  
 11 I just take this opportunity to emphasise -- and I know  
 12 that you understand this and get this, but just in  
 13 relation to just how important these pen portraits are.  
 14 I know that this is being televised, as it were, live  
 15 and so some may not understand the significance of pen  
 16 portraits and what they mean.  
 17 The pen portraits of the bereaved, not just the  
 18 bereaved, the loss of the community in which  
 19 Grenfell Tower represents, is nothing less than  
 20 a testimonial to the dead, a sketch of who they were,  
 21 where they lived, their connection to the tower, their  
 22 contribution to the local community. And what we want  
 23 to achieve is done so that when the inquiry, when you,  
 24 sir, come to hear the evidence, that evidence can be put  
 25 in its proper context.

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22 (Pages 85 to 88)

1 This is not because what is being sought is  
2 sympathy, but more empathy, so that you know the people  
3 who are being referred to. They are not just another  
4 statistic, not just another number, not just another  
5 dead person. We are dealing with real people who had  
6 real lives, who have suffered real loss and who are in  
7 real pain.

8 So, sir -- and I know that Mr Millett touched upon  
9 this when he addressed you this morning -- there are one  
10 or two things that are really important when you come to  
11 hear this really sensitive and, if I may say so, at  
12 times delicate evidence. There will be issues of  
13 translation. There will be much distress. We will need  
14 to take into account cultural differences in terms of  
15 people trying to express themselves and trying to  
16 express themselves in a way that at times may seem  
17 upsetting for them, upsetting for others listening. And  
18 there really needs to be real cultural sensitivity when  
19 that evidence is being heard, bearing in mind that the  
20 tower was a real melting pot of different cultures,  
21 races, religions all coming together.

22 Therefore, sir, the timing and taking of these  
23 portraits is a sensitive matter and we are really  
24 heartened by what your counsel, what your team is doing  
25 and communicating to us in relation to how that evidence

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1 is to be taken.

2 Finally, may I say this: we would like your team and  
3 you, sir, to also bear in mind that in the taking of  
4 these pen portraits, the inquiry must also consider the  
5 wider suffering. There are many people from the  
6 community who were not resident but who share the  
7 profound grief, sense of loss, of those who lived within  
8 the tower. There are going to be some people from the  
9 walk, who are also core participants. They have had  
10 their lives shaken to the core. They were terrified,  
11 they watched friends, neighbours, die, and even these  
12 individuals have the right to be able to stand up and  
13 say how this has devastated their lives and what it  
14 means to them.

15 So I know that there will be flexibility, sir,  
16 you've indicated that. In terms of that flexibility all  
17 we ask is that these pen portraits are not going to be  
18 narrowly constrained.

19 I have had discussions with your counsel in relation  
20 to the timetabling of it --

21 SIR MARTIN MOORE-BICK: Right.

22 MR THOMAS: -- so I don't need to trouble you with that.

23 Thank you for listening to me.

24 SIR MARTIN MOORE-BICK: Thank you very much for your  
25 submissions.

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1 Yes, Mr Weatherby, you're next.

2 Submissions on behalf of core participants represented by

3 Bishop Lloyd & Jackson/Howe & Co/Oliver Fisher

4 by MR PETE WEATHERBY QC

5 MR WEATHERBY: Yes, thank you, sir.

6 Together with Sam Stein, I lead Fiona Murphy and  
7 Mark Henderson for approximately 150 bereaved and  
8 survivor core participants instructed by Jhangir Mahmood  
9 from Bishop, Lloyd & Jackson, Martin Howe from Howe & Co  
10 and Arfan Bhatti from Oliver Fisher.

11 Can I say that I'll be addressing as briefly as  
12 I can three topics which I have dealt with before, but  
13 there is further discussion which we submit would be  
14 profitable to all.

15 Can I also start by perhaps stating the obvious,  
16 that for the bereaved and the survivors they are as keen  
17 as anybody else -- indeed, keener than anybody else --  
18 that this process should move on as quickly as possible  
19 and as co-operatively as possible in order to get to the  
20 result that we all hope to achieve.

21 Can I say that we are grateful to Mr Millett for the  
22 comments that he has made this morning and, indeed,  
23 through the informal contact that we've had with him and  
24 his team previously.

25 We don't doubt that your team are working very hard

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1 indeed and we don't doubt that the matters they are  
2 dealing with in this public inquiry are both very major  
3 and very complex tasks. Of course there's a "but"  
4 coming.

5 The "but" is the matters that I am going to talk to  
6 in the next few minutes, and they are essentially around  
7 disclosure. But to get there, I want to touch upon what  
8 effective participation by the bereaved and survivors  
9 looks like or should look like, and also I want to  
10 return to the issue of position statements.

11 The reality is, the fact is, as we stand here today,  
12 that we have had only 1,962 documents disclosed to us,  
13 mostly individual photographs of the building or the  
14 inside of the building, out of the 330,000 documents  
15 that the inquiry has gathered to date. That means that  
16 the disclosure to date is just over one half of  
17 1 per cent of the material that the inquiry team has,  
18 and that doesn't include the mass of material that the  
19 Met has. That does concern us.

20 SIR MARTIN MOORE-BICK: I'm sure you understand a lot of  
21 that material is probably not going to be particularly  
22 relevant to phase 1 and the immediate questions.

23 MR WEATHERBY: We do understand that; a lot of that material  
24 will be irrelevant to phase 1 and phase 2. Some of it  
25 will be duplicative, some of it will be more relevant to

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23 (Pages 89 to 92)

<p>1 one phase than the other. Having said that, when I come 2 to the list of matters that we are concerned about, 3 a lot of it or a significant amount of it -- and we 4 don't know what because we don't know what it is -- but 5 there must be a significant amount of documentation that 6 needs to be disclosed, and we are here two months away 7 from the starting date for phase 1 and that is what 8 concerns us.</p> <p>9 Let me touch on as an example -- I'll come back to 10 it in due course -- the material that was supplied to 11 the experts. There are nine experts, as we understand 12 it, currently instructed by the inquiry. We have not 13 had disclosed to us the material that must have been 14 given to them or seven of them, indeed, some four months 15 ago. And whereas we've heard this morning that the Met 16 may wish to have some input into that, we simply don't 17 understand why that material, which must have gone 18 through the potential relevance test and must be in 19 a form to be provided to experts, could not be supplied 20 to CPs more generally.</p> <p>21 SIR MARTIN MOORE-BICK: I think one explanation may be that 22 it's not the sort of material which it's easy to 23 assimilate or digest without the benefit of the expert 24 report which will come with it.</p> <p>25 MR WEATHERBY: Well --</p> <p style="text-align: center;">Page 93</p>	<p>1 would have greatly aided that part of the process.</p> <p>2 Without effective disclosure, it puts us in 3 a position where our clients, bereaved and survivor CPs, 4 are simply not going to be in a position to effectively 5 participate, or their effective participation in this 6 whole process is going to be severely diminished. It 7 seems, taking again where we started with the disclosure 8 of the experts the material provided to the experts, 9 with respect, once it has passed the relevance test and 10 there are no particular objections to its disclosure, 11 then there seems to be no advantage to the inquiry to 12 hold it back pending the reports itself.</p> <p>13 May I then follow again what are probably quite 14 straightforward submissions about effective 15 participation and we've set them out again in our 16 written submissions.</p> <p>17 SIR MARTIN MOORE-BICK: Yes.</p> <p>18 MR WEATHERBY: There have been repeated assertions through 19 the past months that it's for the inquiry to investigate 20 rather than for core participants. In the written 21 response to the first preliminary hearing there was 22 reference a number of times, and I am quoting, to the 23 "wish of core participants to monitor the work of the 24 inquiry" and "looking for reassurance that the inquiry 25 is doing its job properly". I don't think those are</p> <p style="text-align: center;">Page 95</p>
<p>1 SIR MARTIN MOORE-BICK: You may say that's not a good 2 reason, I don't know.</p> <p>3 MR WEATHERBY: Well, I'm grateful for that indication but 4 I'm slightly alarmed by it as well, because if 5 disclosure is going to be made on the basis that we will 6 not understand it then the disclosure throughout this 7 process is going to be extremely problematic.</p> <p>8 I earlier made a submission -- I repeat it now -- 9 that the only way, with respect, for disclosure to be 10 made is in tranches as it's considered and not to be 11 overconcerned about which part of the inquiry it relates 12 to. Because if that happens then it becomes so 13 intertwined, disclosure will not be made.</p> <p>14 SIR MARTIN MOORE-BICK: I think that is the plan.</p> <p>15 MR WEATHERBY: Well, if that is the plan then we would very 16 much urge that you re-visit that.</p> <p>17 SIR MARTIN MOORE-BICK: Right.</p> <p>18 MR WEATHERBY: We're in a position where we are going to 19 have to assimilate and work a large amount of 20 documentation for a large number of experts dealing with 21 very complicated matters starting in, perhaps, two and 22 a half months' time. Also, as Mr Thomas has just 23 referred to, also we're going to have to instruct our 24 own experts to consider at least in part some of that, 25 and therefore the earliest disclosure that could be made</p> <p style="text-align: center;">Page 94</p>	<p>1 words that I used or, indeed, other core participant 2 representatives.</p> <p>3 Let me develop this in two very short submissions.</p> <p>4 Firstly, not only do we agree but we indeed 5 emphasise that it's for the inquiry to investigate. 6 Both under domestic and conventional law, it's crystal 7 clear that the inquiry is under such a legal duty to 8 conduct an independent and a thorough investigation.</p> <p>9 Any failure to seize or gather relevant information 10 or evidence and testimony, a failure to pursue 11 rigorously lines of investigation or a failure to pursue 12 accountability would be a breach of those obligations 13 and, in particular, a breach of article 2.</p> <p>14 So no argument from us that the legal responsibility 15 for a full and effective inquiry lies on the public 16 inquiry itself.</p> <p>17 However, there is a further legal obligation on the 18 inquiry in that it has to facilitate effective 19 participation by the bereaved and the survivors. Once 20 again, this is a complementary legal obligation on the 21 inquiry, articulated in the cases which are well known 22 and referred to in our written material, particularly 23 from Jordan.</p> <p>24 The requirements of effective participation are not 25 well developed in the case law, but that's because what</p> <p style="text-align: center;">Page 96</p>



<p>1 constitutes effective participation will differ from 2 inquiry or case to case. But in our submission, in 3 an inquiry such as this into a major public disaster 4 with such loss of life, the requirements of effective 5 participation go far beyond monitoring or being 6 reassured about what the inquiry is doing. In the 7 domestic case law in particular, the higher courts have 8 regularly referred to the requirement that the bereaved 9 are properly represented, but also that they are 10 provided with all relevant material, and I read into 11 that all relevant material expeditiously.</p> <p>12 We referred in the written submissions to Amin, 13 Humberstone and in particular Smith v Oxford Coroner and 14 the words of Lord Justice Sullivan in the Bentley case, 15 and I am quoting:</p> <p>16 "In an article 2 case it will be difficult to 17 justify any refusal to disclose relevant material." 18 And again, I add the word "expeditiously".</p> <p>19 Putting together those two parts, the obligation to 20 investigate is unequivocally on the inquiry. But that 21 does not, given effective participation, mean that the 22 inquiry should take some kind of paternalistic approach 23 to leave it to the inquiry to investigate everything, or 24 indeed to manage the disclosure in the way, with 25 respect, that has just been indicated.</p> <p style="text-align: right;">Page 97</p>	<p>1 almost universal agreement by the corporate and public 2 authority representatives.</p> <p>3 However, as you pointed out in your response, what 4 we had submitted and what the corporate CPs had agreed 5 to were not one and the same thing.</p> <p>6 Nevertheless, the requests for position statements 7 we viewed as a very positive move by the inquiry. 8 Recently having seen the position statements, or at 9 least most of them because there was some delay in 10 providing them to us, we can see that they will very 11 much assist the process and reduce the work of the 12 inquiry and everybody, including us, in understanding 13 how each of the organisations interact.</p> <p>14 However, having said that, to describe them properly 15 as position statements may be going a little too far, 16 because virtually all of the position statements so 17 filed have constituted more of the version offered by 18 the corporate participants rather than what we were 19 submitting should be requested from them.</p> <p>20 The difference is perhaps best considered by posing 21 the question: what is the aim of position statements? 22 And the aim of position statements, we would submit -- 23 (Fire alarm)</p> <p>24 I hope that's not a guillotine.</p> <p>25 SIR MARTIN MOORE-BICK: Mr Weatherby, I think for the moment</p> <p style="text-align: right;">Page 99</p>
<p>1 Effective participation requires involvement. It 2 requires the right to make meaningful submissions 3 regarding lines of inquiry. It requires the right to 4 transparency of the process. It may include the 5 opportunity to question witnesses. Underpinning all of 6 those parts of effective participation is the need for 7 full disclosure at an early stage in order to allow core 8 participants to engage with that process.</p> <p>9 Staying with the expert disclosure matter, how can 10 we make proper, informed submissions about what the 11 experts should be looking at? How can we for the 12 bereaved and survivor core participants point out other 13 areas, other lines of questioning, unless we have the 14 underlying material? And how can we properly instruct 15 our advisory experts without that material?</p> <p>16 To elide effective participation with reassurance 17 and monitoring and the fact that the inquiry itself is 18 doing a good job is, we would say, a fundamental error.</p> <p>19 Position statements. At paragraph 41 of your 20 response to the first hearing you indicated that it 21 would be helpful to everyone involved in the inquiry 22 that the corporate and public authority CPs provide 23 position statements and requested them by 9 February. 24 That approach followed submissions from the bereaved and 25 survivor representatives, which were happily met with</p> <p style="text-align: right;">Page 98</p>	<p>1 we should stay where we are and you carry on if you are 2 happy to do so.</p> <p>3 MR WEATHERBY: I am conscious of the bereaved and survivors' 4 position, given such a warning.</p> <p>5 SIR MARTIN MOORE-BICK: Well, if you would rather rise, we 6 can do that.</p> <p>7 MR WEATHERBY: I'm afraid I think it would be appropriate.</p> <p>8 SIR MARTIN MOORE-BICK: Yes, all right. Well, we'll rise 9 now. Would it be sensible to break now and get 10 something to eat rather than come back in 20 minutes and 11 break again?</p> <p>12 MR WEATHERBY: I'm entirely in your hands.</p> <p>13 SIR MARTIN MOORE-BICK: 1.30 then, please. 14 (12.35 pm)</p> <p>15 (The short adjournment)</p> <p>16 (1.38 pm)</p> <p>17 SIR MARTIN MOORE-BICK: Before we resume, can I just say I'm 18 very sorry that the fire alarm interrupted the hearing. 19 I'm particularly sorry because I feel sure that for some 20 of those in the room to hear the fire alarm would have 21 been distressing if not frightening, and I'm sorry for 22 that.</p> <p>23 You might like to know that it was in fact a genuine 24 call but only in relation to a building which is 25 adjacent to and annexed to this building, so we weren't</p> <p style="text-align: right;">Page 100</p>

<p>1 actually in any danger, I'm very glad to say.</p> <p>2 If the alarm were to sound again, which I think is</p> <p>3 very unlikely, I will rise straight away and we will all</p> <p>4 leave. So you all understand if it goes off again,</p> <p>5 we'll all get out and there will be people outside to</p> <p>6 guide you to the best ways of getting down to the ground</p> <p>7 floor and the outside.</p> <p>8 I think all I would like to say in addition is</p> <p>9 I hope that the unwarranted interruption won't unduly</p> <p>10 undermine what we've been doing this morning, which</p> <p>11 I think has been very useful, but there we are.</p> <p>12 Now, Mr Weatherby, before you continue, can I just</p> <p>13 say this in relation to discovery. I may have misled</p> <p>14 you to some extent.</p> <p>15 MR WEATHERBY: Yes.</p> <p>16 SIR MARTIN MOORE-BICK: If you thought that we were holding</p> <p>17 up documents in general in order to provide context,</p> <p>18 that is not the case. We have been disclosing documents</p> <p>19 as and when they are ready to go. What's been holding</p> <p>20 things up is partly relationships with the police under</p> <p>21 the MoU, which Mr Millett described --</p> <p>22 MR WEATHERBY: Yes.</p> <p>23 SIR MARTIN MOORE-BICK: -- and partly the redactions</p> <p>24 process, which has proved to be fairly onerous because</p> <p>25 of the amount of personal information that we have to</p> <p style="text-align: center;">Page 101</p>	<p>1 the statements had been requested and pleased that they</p> <p>2 had been in the main complied with and provided to the</p> <p>3 inquiry.</p> <p>4 But I was going on to pose the further</p> <p>5 question: what is the aim of position statements? And</p> <p>6 our submission about that is that they are there</p> <p>7 primarily to cut through to the key issues, to assist</p> <p>8 the inquiry and to assist other CPs in how they</p> <p>9 participate in the inquiry.</p> <p>10 I was making the observation that in almost none of</p> <p>11 these position statements to date has any real</p> <p>12 assistance been given to the inquiry beyond the</p> <p>13 processes and the contractual arrangements, as to key</p> <p>14 issues: why the fire spread, what caused or contributed</p> <p>15 to such terrible loss of life.</p> <p>16 It seems to us that, with one notable exception,</p> <p>17 that's absent from all of the statements that have been</p> <p>18 received so far.</p> <p>19 SIR MARTIN MOORE-BICK: If I might interrupt you, I think</p> <p>20 the reason for that is that I deliberately narrowed the</p> <p>21 scope of what I was asking for --</p> <p>22 MR WEATHERBY: Indeed.</p> <p>23 SIR MARTIN MOORE-BICK: -- because on the last occasion</p> <p>24 people said, "We can't be expected to lay out our</p> <p>25 position without having had full evidence and</p> <p style="text-align: center;">Page 103</p>
<p>1 take out of documents for Data Protection Act reasons.</p> <p>2 MR WEATHERBY: Yes.</p> <p>3 SIR MARTIN MOORE-BICK: So I hope that to some extent may</p> <p>4 allay some of your concerns.</p> <p>5 MR WEATHERBY: That's extremely helpful, thank you very</p> <p>6 much.</p> <p>7 May I just pick up a detail on that and may I ask</p> <p>8 the inquiry team to reflect on DPA requests. There was</p> <p>9 something mentioned earlier about the firefighter</p> <p>10 statements. We certainly would have no difficulty with</p> <p>11 personal, largely irrelevant detail coming out, but the</p> <p>12 difficulty we would have is that, for example, it was</p> <p>13 mentioned about the condition or the medical condition</p> <p>14 of firefighters. We would say that there would be</p> <p>15 a balance there under the DPA and therefore it's</p> <p>16 something that needs to be dealt with quite carefully.</p> <p>17 SIR MARTIN MOORE-BICK: We are certainly making every effort</p> <p>18 to ensure that any information which is relevant, albeit</p> <p>19 personal, remains in.</p> <p>20 MR WEATHERBY: That's very helpful, thank you very much</p> <p>21 indeed.</p> <p>22 I was dealing with the issue of position statements,</p> <p>23 so perhaps I can just pick that up.</p> <p>24 SIR MARTIN MOORE-BICK: Yes, please do.</p> <p>25 MR WEATHERBY: I was indicating that we were pleased that</p> <p style="text-align: center;">Page 102</p>	<p>1 disclosure", and it seemed to me that, as an initial</p> <p>2 step, it was helpful to see the structure of the</p> <p>3 arrangements which could be done without any need for</p> <p>4 evidence or disclosure.</p> <p>5 MR WEATHERBY: Again, with respect, I can entirely follow</p> <p>6 that.</p> <p>7 SIR MARTIN MOORE-BICK: You can blame me to that extent.</p> <p>8 MR WEATHERBY: I don't wish to blame anybody but I wish to</p> <p>9 take it on to the next stage, and the next stage now</p> <p>10 that we have this starting point on position statements,</p> <p>11 we would very much urge you to consider to take it to</p> <p>12 the next level.</p> <p>13 Before I do that, can I just point out that there do</p> <p>14 appear to be some omissions from the position</p> <p>15 statements. We raised with the team the fire engineers</p> <p>16 Exova. Overnight I think we've been provided with</p> <p>17 a letter which has gone to Exova and they have in fact</p> <p>18 been asked for it, but for reasons that may not be</p> <p>19 important they haven't yet provided that. But obviously</p> <p>20 that will be an important position statement to add.</p> <p>21 But there are also others. The one that we note, we</p> <p>22 don't appear to have a position statement from Kingspan,</p> <p>23 who are an insulation manufacturer, some of whose</p> <p>24 products were present on the tower.</p> <p>25 SIR MARTIN MOORE-BICK: Yes.</p> <p style="text-align: center;">Page 104</p>

<p>1 MR WEATHERBY: I'll come back to Kingspan in a moment, if</p> <p>2 I may.</p> <p>3 So what we would urge the inquiry to consider next</p> <p>4 is, first of all, to fill the gaps with-- any companies</p> <p>5 or authorities that haven't yet provided a current</p> <p>6 position statement.</p> <p>7 But we would also urge that there be a second stage</p> <p>8 to the process. We previously raised -- and I'll do it</p> <p>9 very briefly because I previously raised it -- that in</p> <p>10 other processes where liability is to be determined,</p> <p>11 notably in criminal and civil processes but others as</p> <p>12 well, defendants are required in law to assist the</p> <p>13 tribunal by narrowing the issues. It is often said that</p> <p>14 such disclosure helps all sides, including those who</p> <p>15 actually make the disclosure, because it promotes the</p> <p>16 interests of justice by honing the real issues. We say</p> <p>17 that that is something that is of importance here.</p> <p>18 But here we're in a process which does not determine</p> <p>19 liability, it seeks to establish the truth of what</p> <p>20 happened, and it seeks with some urgency to come to</p> <p>21 determinations which may prevent unnecessary future</p> <p>22 death.</p> <p>23 So we say that there's an even more compelling and</p> <p>24 obvious imperative for further position statements which</p> <p>25 not only set out the processes and relationships and</p> <p style="text-align: center;">Page 105</p>	<p>1 inquiry and everybody else in a position of not knowing</p> <p>2 until too far down the track.</p> <p>3 Can I raise by way of an example of this, going back</p> <p>4 to Kingspan, I already mentioned them as being</p> <p>5 a manufacturer of some of the insulation used in some of</p> <p>6 the cladding.</p> <p>7 The CEO of Kingspan has made a number of public</p> <p>8 comments about Grenfell and the fact that Kingspan's</p> <p>9 products were used on Grenfell, and has chosen publicly</p> <p>10 to indicate as much in two significant articles that are</p> <p>11 being published, and has chosen to say not only their</p> <p>12 products were used on Grenfell, but their products</p> <p>13 shouldn't have been used on Grenfell.</p> <p>14 It seems to us that it would plainly be of</p> <p>15 substantial help if people such as the CEO of Kingspan</p> <p>16 were to direct some of the effort that they are putting</p> <p>17 into articles and media comment into proactively</p> <p>18 assisting the inquiry.</p> <p>19 Likewise with Celotex, again the company that has</p> <p>20 been mentioned before, another insulation manufacturer.</p> <p>21 They have adverted to test results and have indicated</p> <p>22 that there were problems with them, although it's not</p> <p>23 entirely clear what they say about that. We would say</p> <p>24 that in a second round of position statements they</p> <p>25 should be asked to clarify that and to set out, for</p> <p style="text-align: center;">Page 107</p>
<p>1 contractual arrangements and regulations, but in fact</p> <p>2 what the main participants say did or did not happen and</p> <p>3 what they and others did or did not do.</p> <p>4 As key participants, people who were in the various</p> <p>5 processes that are under consideration, they're in</p> <p>6 a really central position to assist the inquiry and</p> <p>7 others to speed its progress and to hone the issues and</p> <p>8 strip away probably some irrelevant issues along the</p> <p>9 way.</p> <p>10 Now, if there are sensibilities about the fact that</p> <p>11 disclosure has only gone some part of the distance, we</p> <p>12 understand that, and in some cases there may be</p> <p>13 legitimate issues which can be raised, for example the</p> <p>14 privilege against self-incrimination. But in our</p> <p>15 submission, let the CPs raise that --</p> <p>16 SIR MARTIN MOORE-BICK: Yes.</p> <p>17 MR WEATHERBY: -- because in most cases that will simply not</p> <p>18 be something that they choose to raise.</p> <p>19 So we respectfully invite you to call for a further</p> <p>20 stage where the corporate and public authority CPs set</p> <p>21 out their stance from their perspective, from their part</p> <p>22 of the overall picture of what went wrong.</p> <p>23 In relation to an earlier submission, we would say</p> <p>24 that leaving it for openings is a wrong move because</p> <p>25 that's too far down the track, and would leave the</p> <p style="text-align: center;">Page 106</p>	<p>1 example, whether their products should or shouldn't have</p> <p>2 been used on Grenfell, what the problem exactly with</p> <p>3 their products was and to assist the inquiry in that</p> <p>4 way.</p> <p>5 But likewise, the local authorities and the</p> <p>6 government departments involved, particularly the</p> <p>7 Department of Communities and Local Government under its</p> <p>8 new name, we think should be asked to be part of the</p> <p>9 second round as well.</p> <p>10 We're not asking anybody to predetermine or pre-empt</p> <p>11 your determinations; we're simply asking for them to be</p> <p>12 asked to assist by putting their colours to the mast.</p> <p>13 We're simply asking for candour. This isn't a game</p> <p>14 of cat-and-mouse with some of these companies and</p> <p>15 departments. If they genuinely have no responsibility</p> <p>16 or accountability for what happened then it's important</p> <p>17 that we know that at this stage also.</p> <p>18 Can I finally move on to disclosure and I've</p> <p>19 already --</p> <p>20 SIR MARTIN MOORE-BICK: We've done that.</p> <p>21 MR WEATHERBY: I've dealt with disclosure within the</p> <p>22 specifics of the experts' reports, so I won't repeat</p> <p>23 myself on that.</p> <p>24 But we say that there is still a large amount of</p> <p>25 highly relevant material that remains outstanding, and</p> <p style="text-align: center;">Page 108</p>

<p>1 we ask for an unequivocal commitment by the inquiry to</p> <p>2 disclose the remaining relevant material at the earliest</p> <p>3 opportunity.</p> <p>4 We note what's been said about the issues with the</p> <p>5 Met. We're slightly surprised by some of those comments</p> <p>6 because we've actually had discussions with lawyers for</p> <p>7 the Met as well, and we hoped that a sensible approach</p> <p>8 would be taken to the issues between possible future</p> <p>9 prosecutions and this inquiry, and I'm sure that can be</p> <p>10 done.</p> <p>11 But we would say in the example given about</p> <p>12 firefighters, that it is difficult to see how the</p> <p>13 disclosure of firefighters' statements to the inquiry</p> <p>14 and onwards to CPs for the furtherance of the</p> <p>15 imperatives of this inquiry could have any adverse</p> <p>16 impact on the criminal process. I hardly need to go</p> <p>17 further than that, with respect, with somebody who has</p> <p>18 sat in the Court of Appeal and knows the criminal</p> <p>19 process well. But it's a long time since there were</p> <p>20 cases where publicity of this sort of thing stopped</p> <p>21 a prosecution. Therefore, we would particularly urge</p> <p>22 the Met to have a rethink and to adopt a sensible</p> <p>23 approach to these matters and deal with them quickly.</p> <p>24 Can I just give a list of some of the headlines that</p> <p>25 we're concerned about in terms of disclosure, first of</p> <p style="text-align: center;">Page 109</p>	<p>1 police statements.</p> <p>2 We're concerned about the firefighter evidence and</p> <p>3 the commander evidence, and that that is expedited. But</p> <p>4 we're also concerned that the emergency services radio</p> <p>5 communications are disclosed, because they are real-time</p> <p>6 records, timed, which show what was happening and the</p> <p>7 commands that were going down the line to the</p> <p>8 firefighters in particular. Those would cover fire,</p> <p>9 police and ambulance.</p> <p>10 We have referred in our written documents -- and</p> <p>11 because of time I won't take more time over giving</p> <p>12 a list of these -- but there are various other</p> <p>13 documents, largely itemised by the Fire Brigades Union,</p> <p>14 of other firefighting documents which should be</p> <p>15 available, and we would urge that those are expedited</p> <p>16 also.</p> <p>17 Finally, in this respect, for phase 1 we would urge</p> <p>18 that post-mortem reports are disclosed as soon as</p> <p>19 possible.</p> <p>20 In relation to disclosure more generally, it would</p> <p>21 be helpful and we would urge the inquiry team to provide</p> <p>22 us with the inventories of documents that have been</p> <p>23 provided to the inquiry, because that would assist us to</p> <p>24 go through and help the inquiry team in terms of which</p> <p>25 of those areas of documentation are and are not</p> <p style="text-align: center;">Page 111</p>
<p>1 all in terms of phase 1.</p> <p>2 Footage. We have had a large number of still</p> <p>3 photographs but we've had little in the way of actual</p> <p>4 footage. We would seek from the inquiry an inventory of</p> <p>5 the footage that is available and we would seek</p> <p>6 disclosure of the footage itself at an early stage. By</p> <p>7 footage, I am including the TV footage that the inquiry</p> <p>8 may have, CCTV footage, body-worn videos from various</p> <p>9 emergency services. The footage is going to be key to</p> <p>10 working out exactly what happened.</p> <p>11 Following from that, we know from other processes</p> <p>12 and proceedings that timing of footage is often</p> <p>13 a difficult issue. We understand the police have been</p> <p>14 doing their best to time the footage. We would seek</p> <p>15 disclosure of that so that we can assist with that.</p> <p>16 There are various parts of our side of this process, for</p> <p>17 example mobile phone records that some of our clients</p> <p>18 hold, which may allow us to do that and that has been</p> <p>19 done in other inquiries and inquests.</p> <p>20 We've dealt with or I've dealt with the documents</p> <p>21 that have gone to the inquiry-instructed experts.</p> <p>22 Mr Millett referred to 999 calls. Again, we would</p> <p>23 urge that those are dealt with with some urgency now</p> <p>24 because of their centrality to the witness statements,</p> <p>25 and we've heard what Mr Millett said about the remaining</p> <p style="text-align: center;">Page 110</p>	<p>1 relevant. We can see no reason from our side as to why</p> <p>2 the inventories of the documents that are available to</p> <p>3 the inquiry should not be able to be disclosed.</p> <p>4 Hand-in-hand with that, the process that we're told</p> <p>5 and understand is going on, the meticulous and</p> <p>6 painstaking process of the consideration of relevance,</p> <p>7 that must be producing schedules of material which is</p> <p>8 and isn't relevant. Therefore, like in certain other</p> <p>9 processes that many of us have been involved with, we</p> <p>10 would seek disclosure of the what would in other</p> <p>11 proceedings be called an unused schedule, again, for the</p> <p>12 purposes of us raising issues about that.</p> <p>13 The two specifics in respect of documentation more</p> <p>14 generally is documentation and material relating to</p> <p>15 complaints made. Now, we were told at an early stage</p> <p>16 that this was an area that the inquiry was concentrating</p> <p>17 on and therefore it would be very useful to us to have</p> <p>18 as much of the complaints material that is currently</p> <p>19 being gathered, disclosed, as can be done now, and</p> <p>20 there's the ongoing issue of the housing files.</p> <p>21 I reiterate before I sit down that we are all aware</p> <p>22 of how hard the inquiry team is working. We want to</p> <p>23 participate and assist in that process and the matters</p> <p>24 that I've raised are with that very much in mind.</p> <p>25 That's all I've got to say unless there's anything</p> <p style="text-align: center;">Page 112</p>

<p>1 I can help you with.</p> <p>2 SIR MARTIN MOORE-BICK: No, thank you very much indeed.</p> <p>3 Mr Stein, you are next on the sheet. Yes.</p> <p>4 Submissions on behalf of core participants represented by</p> <p>5 Howe &amp; Co by MR SAM STEIN QC</p> <p>6 MR STEIN: If I can avoid the danger of any repetition,</p> <p>7 I will. We have to react sometimes to material that is</p> <p>8 disclosed and, indeed, material that has been helpfully</p> <p>9 disclosed.</p> <p>10 So taking up the thread of the point raised by</p> <p>11 Mr Weatherby QC, who has just left the podium, where the</p> <p>12 inquiry can provide an index or insight into the</p> <p>13 material they are considering at this stage, we can</p> <p>14 provide some support. So, as an example, we were</p> <p>15 provided very recently, I think overnight, with a copy</p> <p>16 or a list of the core participants. Immediately,</p> <p>17 myself, working with Mr Weatherby, we've been able to</p> <p>18 identify that there are perhaps some gaps.</p> <p>19 Now, it may be that they are organisations or</p> <p>20 individuals that are currently within the inquiry's</p> <p>21 sight, but we can now discuss it with the inquiry and</p> <p>22 therefore provide that assistance where we can.</p> <p>23 As you know, sir, from our remarks made on the last</p> <p>24 occasion, we are committed to ensuring that our client</p> <p>25 group and, indeed, all survivor, bereaved and resident</p> <p style="text-align: right;">Page 113</p>	<p>1 date, 19 March, cladding on six high-rise blocks of</p> <p>2 flats in Cardiff did not meet the current safety</p> <p>3 standards.</p> <p>4 So we say that the people we represent are therefore</p> <p>5 not only witnesses to what happened to them and their</p> <p>6 own suffering, but also for those people who live with</p> <p>7 their families in what are apparently defective blocks.</p> <p>8 Now, the terms of reference for this inquiry -- and</p> <p>9 I will refer to two, please -- are obviously to examine</p> <p>10 the circumstances surrounding the Grenfell Tower fire,</p> <p>11 and (a) the immediate cause or causes of the fire and</p> <p>12 the means by which it spread to the whole of the</p> <p>13 building.</p> <p>14 Phase 1 will go into phase 2 and as part and parcel</p> <p>15 of both of these phases, sir, you will be reviewing, at</p> <p>16 (c) of the terms of reference, the scope and adequacy of</p> <p>17 building regulations, fire regulations, and other</p> <p>18 legislation, guidance and industry practice relating to</p> <p>19 the design, construction, equipping and management of</p> <p>20 highrise residential buildings.</p> <p>21 Now, there are many other terms of reference, but</p> <p>22 I highlight those two for a particular good reason.</p> <p>23 In order for those terms of references to be</p> <p>24 fulfilled, you need, sir, the voices of the bereaved,</p> <p>25 survivors and residents, and you need that so that they</p> <p style="text-align: right;">Page 115</p>
<p>1 core participants are heard and allowed access to</p> <p>2 experts, documents and support that they need to fully</p> <p>3 participate within this inquiry.</p> <p>4 But we also recognise that there are many others who</p> <p>5 have been affected by the Grenfell Tower disaster who</p> <p>6 are living day-to-day with the consequences of that</p> <p>7 fire, who live today in tower blocks up and down this</p> <p>8 country.</p> <p>9 To an extent, therefore, the core participants, the</p> <p>10 residents, the bereaved and survivors that we represent,</p> <p>11 they hold for those other people, as part of our</p> <p>12 responsibility and their responsibility, the duty to</p> <p>13 make the points that we can on behalf of all those</p> <p>14 people that live in such conditions.</p> <p>15 And we know this is relevant because, as examples</p> <p>16 show us this year, on 22 January of this year, in</p> <p>17 material published by the Ministry of Housing</p> <p>18 Communities and Local Government, they revealed that</p> <p>19 three buildings had finished the installation of</p> <p>20 replacement cladding but a further six had only just</p> <p>21 been begun in terms of that replacement. The same</p> <p>22 report identified 299 tower blocks that had failed</p> <p>23 safety tests. Only a couple of days ago, 19 March,</p> <p>24 three-quarters of tower blocks in Greater Manchester</p> <p>25 failed to meet even the current standards. The same</p> <p style="text-align: right;">Page 114</p>	<p>1 can be heard and they will be listened to in order to</p> <p>2 achieve the end product that we all want, which is to</p> <p>3 establish who and what was responsible for killing the</p> <p>4 residents in the Grenfell Tower, and to make sure</p> <p>5 through changes in fire regulations and safety that this</p> <p>6 never happens again.</p> <p>7 So practical steps that take us to the end result.</p> <p>8 My learned friend Mr Weatherby QC has addressed the</p> <p>9 question of disclosure. I won't repeat it. But it may</p> <p>10 help, having listened to him and thought about the</p> <p>11 issues, if you take on board this short point: effective</p> <p>12 participation requires effective disclosure. So that</p> <p>13 means witnesses in their evidence can speak to what has</p> <p>14 happened, who they hold responsible, what they had been</p> <p>15 told at the time of the refurbishment and the like and</p> <p>16 what they believe should be done to protect people in</p> <p>17 the future.</p> <p>18 Now, to get the message across to this inquiry,</p> <p>19 there are various measures designed to provide support,</p> <p>20 screens to make the giving of evidence less</p> <p>21 intimidating, live links, recorded statements -- there</p> <p>22 are many measures that we use as common standards across</p> <p>23 the courts.</p> <p>24 SIR MARTIN MOORE-BICK: Yes.</p> <p>25 MR STEIN: And, of course, there will be, where required,</p> <p style="text-align: right;">Page 116</p>

<p>1 the provision of interpreters, counsellors and</p> <p>2 intermediaries if required.</p> <p>3 Now, effective participation therefore means that</p> <p>4 this inquiry listens to the core participants and their</p> <p>5 representatives about the best way to put their voices</p> <p>6 across. Now, in my written submissions I was critical</p> <p>7 of a protocol that has been set forward, the protocol</p> <p>8 referring to vulnerable witnesses.</p> <p>9 Now, the protocol appeared to suggest, if you look</p> <p>10 at it in black and white, that a bereaved, survivor or</p> <p>11 resident witness, in order to achieve some type of</p> <p>12 support, as an example screens or video link, might have</p> <p>13 to have the benefit of a report, a psychological or</p> <p>14 psychiatric report. I see you nod your head and I've</p> <p>15 also --</p> <p>16 SIR MARTIN MOORE-BICK: I shake my head.</p> <p>17 MR STEIN: Well, I see you shake your head and I agree.</p> <p>18 I've discussed these matters and I know they've been</p> <p>19 discussed behind the scenes with counsel and I'm sure</p> <p>20 it's been therefore discussed with solicitors to the</p> <p>21 inquiry. There clearly has been, and also having</p> <p>22 listened today to Mr Millett QC, counsel to the inquiry,</p> <p>23 some clarification provided about this.</p> <p>24 Now, I've got no doubt at all -- no doubt at all --</p> <p>25 that the document I referred to, the protocol for</p> <p style="text-align: center;">Page 117</p>	<p>1 give if such a barrier was being posed to the giving of</p> <p>2 evidence.</p> <p>3 So I'm therefore very pleased to have heard today</p> <p>4 from Mr Millett QC, who clearly has considered our</p> <p>5 submissions with care with his team, and what seemed to</p> <p>6 be apparent hard lines in that protocol are not going to</p> <p>7 be used as barriers for the survivors, bereaved and</p> <p>8 resident core participants.</p> <p>9 Also, we understand and, again, having had</p> <p>10 discussions with counsel to the inquiry that we will</p> <p>11 discuss the way forward for dealing with witnesses that</p> <p>12 are young people so that their statements can properly</p> <p>13 be taken. Progress is being made.</p> <p>14 The same spirit of collaborative working across this</p> <p>15 inquiry is also paying dividends in response from</p> <p>16 counsel to the inquiry we heard today about access to</p> <p>17 this inquiry, literal access. The discussion that we</p> <p>18 heard today about support for childcare arrangements is</p> <p>19 welcome.</p> <p>20 Issues that relate to time off work clearly need</p> <p>21 more work. It is a difficult area to consider but it is</p> <p>22 necessarily something that we will need to speak to the</p> <p>23 inquiry about. So there are still some issues, but they</p> <p>24 are capable of discussion.</p> <p>25 You will, sir, be pleased to hear that your words in</p> <p style="text-align: center;">Page 119</p>
<p>1 vulnerable witnesses, was drafted and intended to</p> <p>2 provide support for vulnerable witnesses and to make</p> <p>3 sure that witnesses are protected and that children</p> <p>4 could be saved from an ordeal, so we understand that of</p> <p>5 course. The danger though is that if we look at that --</p> <p>6 and I'm not going to go through it because it's been</p> <p>7 dealt with -- the inquiry might have seemed as though it</p> <p>8 was regarding vulnerable witnesses as almost ending up</p> <p>9 in some rule-bound, rather hidebound way of being dealt</p> <p>10 with, and potentially an old-fashioned way or possibly</p> <p>11 patrician approach to young people.</p> <p>12 One of the core participants we represent provides</p> <p>13 a good example of the sort of issues that a perception</p> <p>14 of a barrier can provide. She has a daughter,</p> <p>15 a teenager, who suffered very badly in the fire. But</p> <p>16 she, the teenager, wants to have her say. The danger if</p> <p>17 we were to look at that protocol was on the face of it</p> <p>18 means that we would have to ask you, sir, for permission</p> <p>19 to speak to her and take a statement.</p> <p>20 Now, I know that we are going to discuss this with</p> <p>21 counsel to the inquiry. We will work out a system. But</p> <p>22 if we were to explain to a 14-year-old, a teenager, that</p> <p>23 we need to speak to Sir Martin Moore-Bick about whether</p> <p>24 we can take a statement, I would suggest that we might</p> <p>25 get a certain response, the same response that I might</p> <p style="text-align: center;">Page 118</p>	<p>1 opening this inquiry last year, where you said, "I am</p> <p>2 open to suggestions about how I can obtain evidence from</p> <p>3 those witnesses in a sensitive and appropriate way", are</p> <p>4 being given good effect.</p> <p>5 So issues that remain.</p> <p>6 The venue. We hear what was being said today that</p> <p>7 this is, it seems, at least at this moment in time, the</p> <p>8 chosen venue. When we look at what this room provides</p> <p>9 by way of an opportunity as a hearing room, and if</p> <p>10 I think about the measures that may be required to</p> <p>11 provide support for witnesses, there are obvious</p> <p>12 deficiencies in this arrangement and there is no doubt</p> <p>13 about that.</p> <p>14 The location is also difficult for survivors,</p> <p>15 bereaved and resident core participants in terms of</p> <p>16 travel. It doesn't take much thinking to work out that</p> <p>17 someone that has found their way through the packed</p> <p>18 corridors of a burning building may not enjoy the</p> <p>19 rigours of going on the tube to this particular area.</p> <p>20 These are matters that are real and they affect, if</p> <p>21 I have my maths right, 667 potential people. That is</p> <p>22 a lot of people that this affects.</p> <p>23 So these issues, the question of loss of earnings,</p> <p>24 the question of this location, remains still something</p> <p>25 we would ask there be attention to, and we were pleased</p> <p style="text-align: center;">Page 120</p>

<p>1 to see that the Mayor's submissions that are being put 2 forward also echo the question, at the very final 3 paragraph, of whether this is indeed a suitable 4 location. We would ask, though, that perhaps the 5 Mayor's office may be also well placed to provide some 6 consideration if there are any other possible venues 7 that they could consider.</p> <p>8 Lastly in terms of the practical arrangements. 9 There is a need to understand that when this inquiry is 10 going on through the summer and through those weeks and 11 months, there is a need so that our client group, our 12 core participants that we represent, have the ability to 13 speak to us in private. So consultation rooms, desks 14 and the like are not just fancy places for us to do our 15 work, although that would be welcome, but it would in 16 fact be the only way forward when dealing with the large 17 number of people that we represent.</p> <p>18 May I suggest the way forward again, going back to 19 what I've said about collaborative working, is that we 20 have a plain and simple meeting about this with counsel 21 and solicitors to the inquiry to discuss the actual 22 practical arrangements.</p> <p>23 So I have been dealing with and have mentioned 24 already the need to make sure that core participants 25 have a voice on the issues that will be addressed by</p> <p style="text-align: center;">Page 121</p>	<p>1 of reference and the Grenfell Tower terms of reference, 2 that there is a lot, if not entirely, common ground 3 between the review and this inquiry.</p> <p>4 Sadly, the Hackitt review is currently proceeding 5 without ability for the Grenfell Tower core participants 6 to make supported and ongoing submissions as to the 7 detail of that review.</p> <p>8 Now, I want to be clear about this: this is not to 9 say that Dame Judith's team have not spoken to 10 Grenfell Tower residents. That would be wrong to think 11 that. They have. They have had engagement, as 12 I understand it, with specific resident groups, and they 13 have conducted what are called round table discussions.</p> <p>14 What is lacking, we suggest, is specific and 15 detailed access to the Hackitt review submissions and 16 ongoing discussions to be able to contribute to 17 Dame Judith's part 2 report, which is said to be 18 delivered not far away at some time early this year.</p> <p>19 Let me make it clear what we are actually suggesting 20 is required. That is funding for core participants to 21 have their views collated, advice from experts who are 22 funded, so that they can make equal submissions in equal 23 detail to the Hackitt review as are being put forward by 24 various representative bodies and companies and industry 25 insiders who currently populate the Hackitt review</p> <p style="text-align: center;">Page 123</p>
<p>1 this inquiry. One of those issues I've mentioned is the 2 question of consideration of current fire regulations 3 and what changes should be recommended by the inquiry in 4 the future.</p> <p>5 The Hackitt review is already looking at this issue, 6 and since representation has been confirmed before this 7 inquiry, we have been seeking access to and a voice 8 within that review. Dame Judith Hackitt, who conducts 9 that review as chair, does so under the following terms 10 of reference: that following the Grenfell Tower 11 disaster, the government commissioned her to provide 12 an urgent, independent review of building and fire 13 safety regulations and their effectiveness. The purpose 14 within those terms of reference for the Hackitt review 15 is to make recommendations that will ensure we have 16 a sufficiently robust regulatory system for the future 17 and to provide further assurance to residents that the 18 complete system is working to ensure the buildings they 19 live in are safe and remain so.</p> <p>20 Now, I quoted the terms of reference for the 21 Grenfell Tower inquiry, your inquiry, sir, a few minutes 22 ago. And at (c), as I repeat only very shortly, that 23 deals with the scope and adequacy of building 24 regulations and fire regulations and other legislation. 25 So we can see, when considering the Hackitt review terms</p> <p style="text-align: center;">Page 122</p>	<p>1 committees.</p> <p>2 That is required so that the Grenfell Tower voice of 3 those residents that we represent can be heard. That 4 voice which has become more knowledgeable and more 5 compelling through their ordeals.</p> <p>6 On the Hackitt review committees there is no mention 7 of any Grenfell Tower group or representative expert who 8 is pointing across the viewpoint of the survivors; but 9 there is plenty of representation from industry and 10 local authorities across all of those committees, and 11 I will mention some names of those representatives in 12 a moment.</p> <p>13 We're not in any way suggesting that the review has 14 been conducted in bad faith. We're not suggesting that 15 those representatives are not doing anything other than 16 trying to put forward what are responsible views. But 17 if there is not a voice in relation to that particular 18 aspect of her review then there is a danger of matters 19 being lost. So I mention this so that we have 20 an understanding.</p> <p>21 There are various working groups, effectively 22 subcommittees of the Hackitt review, and they have 23 different names: the golden thread group, which is 24 really, as I understand it, designed to provide the way 25 forward in the future. That is populated, we would</p> <p style="text-align: center;">Page 124</p>

<p>1 understand, of course, by the National Fire Chiefs 2 Council, Local Authority Building Control, the 3 Construction Products Association is there, but little 4 representative, it seems, by way of residents. 5 Regulations and guidance, chaired by the Construction 6 Products Association. And we can go through these 7 committees, of which there are I think seven, maybe six, 8 and there is not at the moment a full representation. 9 There is a residents' voice committee. That is 10 working group 5 and that is chaired by Mr Hartley of the 11 Tenants and Residents Organisations of England. So 12 there is a particular committee that is designed to deal 13 with residents' voice. 14 That, though, we suspect, is not going to be 15 sufficient to understand and take on board the voice 16 that is required across those committees, supported 17 properly with expert advice where necessary, so that 18 a contribution can be made from those people that have 19 gone through this and either lost loved ones or 20 survived. 21 We know that that review will be feeding its 22 findings into this inquiry, not because it is anything 23 other than plainly obvious but because at page 14 of the 24 first part of the Hackitt report published in December 25 of 2017, paragraph 1.2, the following is said:</p> <p style="text-align: center;">Page 125</p>	<p>1 matters with them. 2 Again, I have no doubt whatsoever that the Hackitt 3 review team is working hard to make recommendations that 4 may change the landscape of fire regulations in the 5 future, and it would be difficult, if not impossible, to 6 criticise Dame Judith harshly when she has already said 7 that the current system of fire regulations are not fit 8 for purpose. Nevertheless, a mistake may be about to be 9 made here. 10 Now, we saw the dangers of mistakes being made on 11 consultations during the process for the refurbishment 12 of the Grenfell Tower. Now, residents were consulted 13 about the potential refurbishment. Those consultations 14 were to extol the thermal efficiency of putting cladding 15 on the Grenfell Tower. Sadly, no resident was told that 16 the thermally efficient cladding could also be 17 a thermally efficient fire risk. 18 On 14 May 2012 at the Mermoz Tower in Roubai, 19 France, the fire spread through the aluminium 20 polyethylene composite cladding a second-storey fire 21 origin leading to rapid vertical flames spreading to the 22 top of the building within minutes. 23 On 29 May, so something like two weeks later, at the 24 Grenfell Tower evening meeting to discuss the 25 refurbishment, there was a discussion about cladding.</p> <p style="text-align: center;">Page 127</p>
<p>1 "As set out [this is by Dame Judith] in the review's 2 terms of reference published on 30 August, this review 3 is running in parallel with the work of the 4 Grenfell Tower Inquiry. The review is independent and 5 covers the system of regulation for all high-rise 6 residential buildings. It will, however, provide useful 7 background and input into the inquiry." 8 There is an urgent need, therefore, for our 9 Grenfell Tower core participants to have a real voice 10 within the next section of the Hackitt report. 11 This, we suggest, means much more than a relatively 12 casual conversation, no matter how well meant, with some 13 residents or residents' association. 14 There is a need, we suggest, for residents of tower 15 blocks and, in particular, our core participants to let 16 it be known what they would think of the priorities that 17 are being set by the Hackitt report and whether they go 18 far enough in suggesting change for the future. 19 Now, we've opened our discussions with the Hackitt 20 review team after, of course, we have properly been and 21 able to by the grant of funding through this inquiry and 22 the formation of our teams. We have been invited, 23 I think overnight, to have a half-hour discussion with 24 them over the next week. We are going to obviously take 25 up that invitation and we will be discussing these</p> <p style="text-align: center;">Page 126</p>	<p>1 This was one of a number of consultations about the 2 refurbishment and about the apparent advantages of 3 cladding. Despite the fact that this was only shortly 4 after a cladding fire had taken place, there was no 5 reference to safety issues concerning cladding at that 6 time. 7 The Hackitt review has also attracted some criticism 8 from the Communities and Local Government Committee, 9 where the suggestion made by that committee, perhaps 10 understandably, was that in the future it might not be 11 right to continue to permit the use of combustible 12 materials on high-rise buildings. A sensible suggestion 13 from that committee and one that we obviously agree 14 with. 15 So in the future, when phase 1 of this inquiry is 16 complete and the Hackitt review will be complete as 17 well, that report will be fed into this inquiry. 18 We need at this stage to make you aware that there 19 is a danger in the Hackitt review not having the ability 20 to receive the properly supported views of people from 21 the tower and from the outside area. There is a danger 22 that their voices will be lost in relation to her 23 report. 24 We will argue throughout this inquiry that residents 25 of tower blocks can be trusted to have access to all</p> <p style="text-align: center;">Page 128</p>



<p>1 information they need so that they can make choices. We</p> <p>2 will argue that the system of fire regulation in this</p> <p>3 country must be viewed from the perspective of residents</p> <p>4 and that their voices must be heard as to what level of</p> <p>5 risk, if any, they will be prepared to live with and to</p> <p>6 bring their children up within.</p> <p>7 If we leave aside this question of access into the</p> <p>8 report being drafted by Dame Judith, then there is</p> <p>9 a danger that a report will be provided to this inquiry</p> <p>10 within which they will not have had a say. And I've got</p> <p>11 no doubt at all that there will then be submissions</p> <p>12 being made on the basis of that report: well, you've</p> <p>13 heard what Dame Judith has said. We can hear it</p> <p>14 ourselves. We can hear the reference to the page</p> <p>15 numbers as it would be delivered to you, sir, and it</p> <p>16 will be accepted or become accepted into the industry</p> <p>17 status quo, the recommendations she has made.</p> <p>18 Now, we don't need to dwell too long, but let's</p> <p>19 remind ourselves what happened the last time little more</p> <p>20 than bare consultation was paid to Grenfell Tower</p> <p>21 residents. We ended up here.</p> <p>22 My brief today and targets have been to address</p> <p>23 witness care and practical engagement with core</p> <p>24 participants. This is directed at practical engagement</p> <p>25 with the inquiry issues as set out within your terms of</p> <p style="text-align: center;">Page 129</p>	<p>1 Kensington and Chelsea, instructed by DWF.</p> <p>2 There is nothing in my written submissions which</p> <p>3 I need or wish to develop further. However, I hope it</p> <p>4 may assist if I comment very briefly -- and I do mean</p> <p>5 very briefly -- on some issues which have been canvassed</p> <p>6 this morning. I propose just to stick to three, and</p> <p>7 they are: disclosure, the inquest function issue and the</p> <p>8 phase 1/phase 2 split.</p> <p>9 SIR MARTIN MOORE-BICK: Yes.</p> <p>10 MR MAXWELL-SCOTT: Taking those each in turn, as to</p> <p>11 disclosure, as I stated at the last hearing in December,</p> <p>12 we are sympathetic to submissions being made about the</p> <p>13 importance of the disclosure process being transparent</p> <p>14 and of the need for participation to be informed by</p> <p>15 disclosure in order for it to be meaningful.</p> <p>16 If I turn then to the inquest function, we</p> <p>17 respectfully agree that it would be undesirable for</p> <p>18 there to be a need for inquests to be held after the</p> <p>19 inquiry has completed its work and reported, and in</p> <p>20 particular undesirable if any such inquests required the</p> <p>21 bereaved, survivors or residents to give evidence again.</p> <p>22 So we leave it to you and your team to decide how best</p> <p>23 to achieve the sensible aim of minimising the need for</p> <p>24 inquests to be held in future.</p> <p>25 SIR MARTIN MOORE-BICK: Yes, all right. Thank you.</p> <p style="text-align: center;">Page 131</p>
<p>1 reference and mirrored by those within the Hackitt</p> <p>2 review.</p> <p>3 It seems we are making progress. It's tempting, and</p> <p>4 my notes in fact say, don't regard us as a nuisance.</p> <p>5 Please use us to give this inquiry the best chance of</p> <p>6 the best possible outcome. Well, we are certainly</p> <p>7 seeing in our engagement with counsel to the inquiry and</p> <p>8 his team and the solicitor to the inquiry that we are</p> <p>9 making progress in that way, but this is not something</p> <p>10 that we can do in one go.</p> <p>11 So when I ask you next: would you please be prepared</p> <p>12 to give Dame Judith a ring, we ask in all seriousness.</p> <p>13 We invite you to discuss with Dame Judith and her team</p> <p>14 what we can do by providing practical engagement within</p> <p>15 that review and we need to do so now before the</p> <p>16 opportunity is lost.</p> <p>17 So those are our submissions.</p> <p>18 SIR MARTIN MOORE-BICK: Thank you very much. That's very</p> <p>19 helpful.</p> <p>20 Now Mr Maxwell-Scott, I think you're next on the</p> <p>21 agenda.</p> <p>22 Submissions on behalf of the Royal Borough of Kensington and</p> <p>23 Chelsea by MR JAMES MAXWELL-SCOTT QC</p> <p>24 MR MAXWELL-SCOTT: Mr Chairman, my name is</p> <p>25 James Maxwell-Scott and I represent the Royal Borough of</p> <p style="text-align: center;">Page 130</p>	<p>1 MR MAXWELL-SCOTT: Thirdly, on the phase 1/phase 2 split, my</p> <p>2 position has in substance not changed from the last</p> <p>3 procedural hearing. All core participants would benefit</p> <p>4 from as much certainty as possible about which issues</p> <p>5 will be addressed in the phase 1 evidence, which will be</p> <p>6 addressed in the phase 1 report, which may in some</p> <p>7 instances be a different matter, and whether the views</p> <p>8 expressed in the phase 1 report will be provisional or</p> <p>9 final.</p> <p>10 However, we recognise that there will inevitably be</p> <p>11 a need for flexibility and we have complete confidence</p> <p>12 that any changes in plans will be handled in a way that</p> <p>13 is fair to all core participants.</p> <p>14 So unless I can assist on any other topics, those</p> <p>15 are my submissions today.</p> <p>16 SIR MARTIN MOORE-BICK: No, I think not, and thank you very</p> <p>17 much for making your position clear on those.</p> <p>18 MR MAXWELL-SCOTT: Thank you.</p> <p>19 SIR MARTIN MOORE-BICK: Now, Mr Ageros?</p> <p>20 Submissions on behalf of the Tenant Management Organisation</p> <p>21 by MR JAMES AGEROS QC</p> <p>22 MR AGEROS: Good afternoon. My name is James Ageros</p> <p>23 I represent the Kensington Chelsea Tenant Management</p> <p>24 Organisation. I'm here today with Richard Crockford</p> <p>25 from Kennedys Law and Alice Jarratt, who was here on the</p> <p style="text-align: center;">Page 132</p>

<p>1 last occasion.</p> <p>2 Sir, we made three brief written submissions which</p> <p>3 were given to the inquiry on 7 March.</p> <p>4 SIR MARTIN MOORE-BICK: Yes.</p> <p>5 MR AGEROS: And I know that all the core participants have</p> <p>6 had a chance to see all of those submissions. Sir, we</p> <p>7 don't intend making any lengthy further oral submissions</p> <p>8 today. Of course, if there is any matter which has</p> <p>9 arisen as a result of the oral submissions or, indeed,</p> <p>10 the written submissions which have been made by the</p> <p>11 parties this morning and this afternoon we are more than</p> <p>12 happy to address those and answers those as best we can.</p> <p>13 So far as the scope is concerned, and again very</p> <p>14 briefly, and in relation broadly to the question raised</p> <p>15 by Mr Friedman as to whether the inquiry should address</p> <p>16 inquest-type questions, as we have said previously the</p> <p>17 TMO is keen that the inquiry examines the causes of the</p> <p>18 fire as thoroughly as possible, consistent of course</p> <p>19 with your statutory function under the Inquiries Act</p> <p>20 2005 and Convention Law. So to that extent we certainly</p> <p>21 support the submissions which were made earlier today.</p> <p>22 Sir, so far as disclosure is concerned, we hear what</p> <p>23 is being said by a number of the parties this morning in</p> <p>24 relation to disclosure. Of course, the TMO seeks to</p> <p>25 continue to assist the inquiry by providing full and</p> <p style="text-align: center;">Page 133</p>	<p>1 whenever it's taken. You might have to bank it for</p> <p>2 phase 2, so to speak, if it was clearly of phase 2</p> <p>3 relevance.</p> <p>4 MR AGEROS: Yes.</p> <p>5 SIR MARTIN MOORE-BICK: But that wouldn't matter, would it?</p> <p>6 MR AGEROS: No, I don't think it does, sir. I think a good</p> <p>7 example might, for example, be complaints. For example,</p> <p>8 that a complaint was made is likely to arise in phase 1.</p> <p>9 To some extent, at least, the way in which the complaint</p> <p>10 was dealt with is more likely to arise in the context of</p> <p>11 phase 2. So there may be some distinction along those</p> <p>12 lines.</p> <p>13 SIR MARTIN MOORE-BICK: Yes, all right. Well, otherwise</p> <p>14 I don't think there's anything I need to detain you for,</p> <p>15 is there?</p> <p>16 MR AGEROS: I don't think so, thank you very much.</p> <p>17 SIR MARTIN MOORE-BICK: Thank you very much indeed.</p> <p>18 Now Ms Studd is here for the Mayor; is that right?</p> <p>19 Yes, hello.</p> <p>20 Submissions on behalf of the Mayor of London</p> <p>21 by MS ANNE STUDD QC</p> <p>22 MS STUDD: Sir, I am Anne Studd. I appear on behalf of the</p> <p>23 Mayor of London. I'm instructed by solicitors</p> <p>24 Jonathan Lloyd and Anna Condcliffe from Transport for</p> <p>25 London.</p> <p style="text-align: center;">Page 135</p>
<p>1 frank disclosure as and when required. Indeed, sir, you</p> <p>2 know that we have provided a very large number of</p> <p>3 documents already throughout the course of this inquiry.</p> <p>4 SIR MARTIN MOORE-BICK: Yes.</p> <p>5 MR AGEROS: Those are our submissions, unless I can assist</p> <p>6 on a particular point.</p> <p>7 SIR MARTIN MOORE-BICK: No, I don't think so, thank you.</p> <p>8 I mean, I've read what you say in your written</p> <p>9 submissions. You had a question about witness evidence</p> <p>10 and whether it would be restricted.</p> <p>11 MR AGEROS: Yes. We --</p> <p>12 SIR MARTIN MOORE-BICK: I think the answer is probably not.</p> <p>13 But I would like to keep things open for the time being.</p> <p>14 MR AGEROS: Yes, we addressed the question of witness</p> <p>15 evidence in terms of BSRs and the firefighters and</p> <p>16 sought to, we hope, make some effective distinction</p> <p>17 between the type of issues which might be dealt with in</p> <p>18 phase 1 and those that might be dealt with in phase 2.</p> <p>19 We appreciate that there is liable to be some crossover,</p> <p>20 so we made the submissions and we hope that there is</p> <p>21 some effective way to ensure that the witnesses give</p> <p>22 evidence only once but in a way which is consistent with</p> <p>23 the phases as you have articulated them.</p> <p>24 SIR MARTIN MOORE-BICK: Yes. I mean, I would envisage that</p> <p>25 we would not seek to shut out any witness's evidence</p> <p style="text-align: center;">Page 134</p>	<p>1 Sir, I don't intend to repeat, obviously, what's</p> <p>2 been written, but can I say this: in order for this</p> <p>3 inquiry to confidently fulfil its terms of reference,</p> <p>4 the Mayor would endorse the representation that has been</p> <p>5 made by others that effective participation from the</p> <p>6 bereaved, survivors and residents is essential, and that</p> <p>7 this should be a priority in all of the decision-making</p> <p>8 processes adopted by your inquiry.</p> <p>9 We would urge you to proceed with as much</p> <p>10 transparency as possible in order to allay any</p> <p>11 suggestions that the process is ignoring the needs of</p> <p>12 those most affected by these events.</p> <p>13 We welcome the concession in relation to the</p> <p>14 position statements because they've now been disclosed</p> <p>15 on Relatively, and we also welcome the very careful</p> <p>16 consideration that has been given in relation to pen</p> <p>17 portraits. These are clearly very positive steps and,</p> <p>18 from listening to the representations made this morning,</p> <p>19 they've obviously had a profound impact on the</p> <p>20 confidence of those most directly affected.</p> <p>21 Can I just say one or two things about these pen</p> <p>22 portraits. We would urge you, sir, to take account of</p> <p>23 the submission of Mr Thomas QC in relation to the pen</p> <p>24 portraits and the way that that evidence is likely to be</p> <p>25 given. We would suggest, perhaps, that consideration</p> <p style="text-align: center;">Page 136</p>

<p>1 should be given to a formal opening of some sort of the</p> <p>2 inquiry to take place in advance of those pen portraits</p> <p>3 in order to give appropriate formality, dignity and</p> <p>4 respect to that evidence before it is given.</p> <p>5 In relation to what Mr Stein has said this</p> <p>6 afternoon, it may be that those hearings could take</p> <p>7 place in a location closer to the site of the</p> <p>8 Grenfell Tower because it's likely to be an isolated</p> <p>9 part of the evidence. It may be that in that way more</p> <p>10 of those wishing to attend and support those people who</p> <p>11 are going to give evidence before you could attend and</p> <p>12 provide that support.</p> <p>13 Moving to venue, obviously the Mayor of London will</p> <p>14 assist in any way he can in relation to venues. It</p> <p>15 sounded from the submission made by your counsel this</p> <p>16 morning that fairly extensive inquiries have already</p> <p>17 been made, but obviously there only needs to be contact</p> <p>18 if you think --</p> <p>19 SIR MARTIN MOORE-BICK: Yes, I think venue has been a live</p> <p>20 issue for a long time.</p> <p>21 MS STUDD: Yes.</p> <p>22 SIR MARTIN MOORE-BICK: I wouldn't like anyone to think that</p> <p>23 we have not been doing our best to find somewhere else.</p> <p>24 A great deal of time and effort has been employed on</p> <p>25 that, but for all sorts of different reasons for</p> <p style="text-align: center;">Page 137</p>	<p>1 SIR MARTIN MOORE-BICK: Yes. Good. Thank you very much</p> <p>2 indeed.</p> <p>3 Mr Sturman.</p> <p>4 Submissions on behalf of CEP Architectural Facades</p> <p>5 by MR JIM STURMAN QC</p> <p>6 MR STURMAN: Good afternoon, my Lord. I am Jim Sturman.</p> <p>7 I act for CEP Architectural Facades. I am here with</p> <p>8 Helen Borne of Clyde &amp; Co and you've got our written</p> <p>9 submissions and everybody else has.</p> <p>10 There are a few things I would like to develop,</p> <p>11 however, because we are concerned about time from the</p> <p>12 disclosure of the underlying material in the experts'</p> <p>13 report. We accept and acknowledge and wouldn't for one</p> <p>14 second seek to deviate from the position that</p> <p>15 cross-examination is for you in the first instance and</p> <p>16 your team. But it is obviously very important that we</p> <p>17 are in a position that if we're going to have any input</p> <p>18 into the expert evidence, we are up to speed as soon as</p> <p>19 possible.</p> <p>20 Disclosure was one of the items we had illustrated</p> <p>21 and I am going to try not to repeat what has been said</p> <p>22 by others. I'm certainly not going to speak to my note.</p> <p>23 But the experts for the inquiry have had five months and</p> <p>24 have been on the site. When I arrived this morning</p> <p>25 I was told that our experts couldn't go on the site</p> <p style="text-align: center;">Page 139</p>
<p>1 different locations, they've not turned out to be</p> <p>2 suitable. If the Mayor has got something to offer us,</p> <p>3 of course we'll consider it.</p> <p>4 MS STUDD: I would love to be able to pull that rabbit out</p> <p>5 of the hat but certainly we can have communication with</p> <p>6 your team and see whether or not there are any</p> <p>7 alternatives.</p> <p>8 SIR MARTIN MOORE-BICK: Yes, of course.</p> <p>9 MS STUDD: Can I say this: I think the assistance that your</p> <p>10 counsel gave this morning in relation to transparency on</p> <p>11 what inquiries have been made may be very helpful to</p> <p>12 those for whom this has been a very significant issue.</p> <p>13 Lastly, the Mayor would support the representations</p> <p>14 from various legal teams in relation to the provision of</p> <p>15 assistance. Certainly in your protocol you seem to</p> <p>16 identify "vulnerable" as being much wider than that</p> <p>17 provided for under section 16 of the Youth and Justice</p> <p>18 Criminal Evidence Act, which of course is restricted to</p> <p>19 criminal proceedings in any event, so your discretion is</p> <p>20 much wider than that, and we would also support the</p> <p>21 submission that any anxieties felt by witnesses should</p> <p>22 be alleviated as far as reasonably practicable.</p> <p>23 SIR MARTIN MOORE-BICK: Yes.</p> <p>24 MS STUDD: There is an inevitable anxiety in anybody who has</p> <p>25 to give evidence in relation to these proceedings.</p> <p style="text-align: center;">Page 138</p>	<p>1 because it's currently too dangerous after the winter,</p> <p>2 so I was very relieved to hear that there are in fact</p> <p>3 visits being made available. If that's only to the</p> <p>4 exterior and I've misunderstood what is now possible, we</p> <p>5 are concerned that if our expert cannot get in to the</p> <p>6 site we're at a huge disadvantage and these proceedings,</p> <p>7 of course, have to be fair to all. So I will liaise</p> <p>8 with the Metropolitan Police today before I leave the</p> <p>9 building.</p> <p>10 SIR MARTIN MOORE-BICK: That's the answer, isn't it?</p> <p>11 MR STURMAN: Yes.</p> <p>12 SIR MARTIN MOORE-BICK: As you've heard already, the police</p> <p>13 are willing to make the site available providing it's</p> <p>14 safe for them to do so.</p> <p>15 MR STURMAN: Absolutely.</p> <p>16 SIR MARTIN MOORE-BICK: I think it's a matter of speaking to</p> <p>17 them and finding out what arrangements can be made.</p> <p>18 MR STURMAN: Absolutely, and we will do that, and whenever</p> <p>19 we're all together or whenever we speak on the phone,</p> <p>20 progress is made.</p> <p>21 But we are concerned about disclosure and how that</p> <p>22 affects timetabling, because if we receive this material</p> <p>23 shortly before Easter and it's going to be very</p> <p>24 substantial and at some point our expert needs to go in,</p> <p>25 it is highly unlikely in reality that on 4 June we will</p> <p style="text-align: center;">Page 140</p>

<p>1 have an informed opinion from our own expert.</p> <p>2 I was a bit concerned when I heard Mr Millett</p> <p>3 conclude this morning with a proposed timetable, where</p> <p>4 the experts would very early in the proceedings give</p> <p>5 an oral and visual presentation of their conclusions so</p> <p>6 far. We wish to reserve our position on that because it</p> <p>7 may be that would be unfair in all the circumstances.</p> <p>8 We will wait to see what that proposal is.</p> <p>9 SIR MARTIN MOORE-BICK: Yes, I don't think what he has in</p> <p>10 mind is that we would take the expert evidence in the</p> <p>11 conventional sense at that early stage, but the reports</p> <p>12 will obviously be out there and I think what we have in</p> <p>13 the mind is that they might simply receive a sort of</p> <p>14 oral elucidation of what's in the written --</p> <p>15 MR STURMAN: If it's in effect no more than an opening, then</p> <p>16 any unfairness can be cured by the experts being called</p> <p>17 to give their evidence later.</p> <p>18 SIR MARTIN MOORE-BICK: Exactly.</p> <p>19 MR STURMAN: We had indicated in our written submissions</p> <p>20 that we felt that the experts should be called late in</p> <p>21 the day, and we would respectfully submit that if we</p> <p>22 could be assured that the experts weren't going to be</p> <p>23 called until July at the earliest, we would hope to be</p> <p>24 able to work to that and that would no doubt help the</p> <p>25 concerns that were shared at paragraph 20 of</p> <p style="text-align: center;">Page 141</p>	<p>1 want to decide at phase 1 and leave the rest to help us</p> <p>2 on phase 2?</p> <p>3 MR STURMAN: Absolutely. The point I think we all need to</p> <p>4 make though -- and I make this on behalf of Rydon -- is</p> <p>5 that that might make our experts take still further for</p> <p>6 us to make a decision as to whether we are going to be</p> <p>7 making any application to cross-examine through</p> <p>8 Mr Millett or through yourself, sir.</p> <p>9 So we submit if the experts could be timetabled</p> <p>10 for July, after all those directly affected by this</p> <p>11 tragedy have given evidence, that might solve all these</p> <p>12 practical problems.</p> <p>13 SIR MARTIN MOORE-BICK: That's a very good point. Thank</p> <p>14 you.</p> <p>15 MR STURMAN: I have nothing else to say.</p> <p>16 SIR MARTIN MOORE-BICK: Thank you very much indeed.</p> <p>17 Mr Walsh is here for the LFEPA. Yes.</p> <p>18 Submissions on behalf of the London Fire and Emergency</p> <p>19 Planning Authority by MR STEPHEN WALSH QC</p> <p>20 MR WALSH: Good afternoon, sir. Stephen Walsh who, as you</p> <p>21 know, together with Sarah Le Fevre, appears for the</p> <p>22 London Fire Brigade, which is an easier way of saying</p> <p>23 the longer version of the LFEPA.</p> <p>24 Sir, you have our written submissions. They are</p> <p>25 very brief and obviously I've no intention of repeating</p> <p style="text-align: center;">Page 143</p>
<p>1 Mr Mansfield and Mr Thomas's joint submissions as well</p> <p>2 about the time to get on top of that aspect.</p> <p>3 But it would be very unlikely that we would be able</p> <p>4 to deal with any expert evidence ourselves in any</p> <p>5 opening that we dealt with.</p> <p>6 SIR MARTIN MOORE-BICK: Yes.</p> <p>7 MR STURMAN: One final point, I was approached by one or two</p> <p>8 others, including counsel for Rydon, who does not have</p> <p>9 a speaking slot, and I said I would raise this. In the</p> <p>10 course --</p> <p>11 SIR MARTIN MOORE-BICK: You are not a subcontractor, are</p> <p>12 you?</p> <p>13 MR STURMAN: On this occasion it is the reversal of roles,</p> <p>14 yes.</p> <p>15 Mr Millett seemed to be suggesting that one of the</p> <p>16 experts now might well be trespassing from what was</p> <p>17 going to be her report that dealt -- Ms Lane. Phase 1</p> <p>18 was a preliminary report on identification of fire</p> <p>19 protection measures, but now her evidence appears to be</p> <p>20 trespassing into phase 2.</p> <p>21 SIR MARTIN MOORE-BICK: She may give evidence that is</p> <p>22 relevant to both phases.</p> <p>23 MR STURMAN: Absolutely.</p> <p>24 SIR MARTIN MOORE-BICK: There's no reason, is there, why we</p> <p>25 shouldn't use that part which is relevant to what we</p> <p style="text-align: center;">Page 142</p>	<p>1 them now. Suffice to say, given the obvious and</p> <p>2 perfectly proper concentration on disclosure issues this</p> <p>3 morning, the LFEPA, the LFP, has been carrying out</p> <p>4 a very thorough and timely disclosure exercise from the</p> <p>5 earliest point last year. It continues to go on. It's</p> <p>6 being done with expedition and is thorough. Mostly</p> <p>7 through the MPS, but also with GTI as well. Obviously</p> <p>8 that is continuing and will continue into the future.</p> <p>9 I just want to confine my submissions to one issue</p> <p>10 really here and that concerns the continuing concern</p> <p>11 which the Fire Brigade has for the welfare of its staff,</p> <p>12 that is to say, of course, firefighters and others who</p> <p>13 may be required to give evidence during the inquiry.</p> <p>14 We have discussed matters with the Fire Brigades</p> <p>15 Union and with the Association of Fire Officers and,</p> <p>16 where appropriate, we will liaise with both of those</p> <p>17 bodies to provide the best support we can, to include</p> <p>18 counselling both before, during and after the inquiry</p> <p>19 and the evidential section.</p> <p>20 Obviously that contact will be restricted only to</p> <p>21 those obviously permitted matters, including</p> <p>22 familiarisation and counselling and so on, but we need</p> <p>23 the help and support of the inquiry itself if that</p> <p>24 support to firefighters is to be provided with the</p> <p>25 greatest effect. What I mean by that, essentially, is</p> <p style="text-align: center;">Page 144</p>

1 that the LFB understands and takes it to be -- well,  
2 we've been assured of this and we entirely accept it --  
3 that the maximum possible prior notice of the inquiry's  
4 intention to call witnesses will be given so that  
5 a range of measures can be put in place to assist those  
6 witnesses.

7 SIR MARTIN MOORE-BICK: Yes.

8 MR WALSH: It's quite important because, as well as  
9 providing support and care, there are complex  
10 arrangements which have to be put in place with taking  
11 people off the run. We don't want to have close fire  
12 stations and so on. We trust and know that we have the  
13 full co-operation of the inquiry there.

14 But just turning to something which Mr Stein touched  
15 upon about a few moments ago. The LFB say that in  
16 common with the essential provisions and obviously  
17 necessary provisions made for the bereaved, survivors  
18 and residents who give evidence, each firefighter  
19 witness, we take it, is to be afforded the range of  
20 measures provided for in the inquiry's protocol for  
21 vulnerable witnesses, where necessary. We entirely  
22 understand the position there.

23 There's very little else that I need to add, to be  
24 honest, save for one matter. For what it's worth, the  
25 LFB also agrees that it would be undesirable, if it can

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1 SIR MARTIN MOORE-BICK: -- will tell us when the time comes  
2 what sort of measures you think a particular firefighter  
3 will require, because of course they are not going to be  
4 giving evidence next week and in a couple of months'  
5 time, things may not look quite the same.

6 MR WALSH: Exactly, so things do change. What is envisaged,  
7 we hope, is that sufficiently early notice of identified  
8 witnesses will be given. We will know who they are. We  
9 can then speak to those witnesses. We can directly ask  
10 and ascertain, if they are prepared to say, if they are  
11 experiencing difficulties, speak to them about those  
12 difficulties and then identify with them, giving them  
13 the choice and the option, what are the appropriate  
14 measures for them. We would then come back to the  
15 inquiry to GTI, and discuss those and I imagine it is  
16 envisaged that we would take it further. But it is  
17 crucial, obviously, that as much notice as possible is  
18 provided so as to be able to achieve that.

19 SIR MARTIN MOORE-BICK: Yes, of course. I understand that.  
20 Good, thank you very much.

21 MR WALSH: Thank you very much.

22 SIR MARTIN MOORE-BICK: Mr Seaward, you are next.  
23 Submissions on behalf of the Fire Brigades Union  
24 by MR MARTIN SEAWARD

25 MR SEAWARD: Good afternoon, sir.

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1 be avoided -- and that's the issue, we know -- for  
2 inquests to have to be held in addition to these  
3 proceedings, if only -- and there are any number of  
4 reasons -- because it avoids the necessity of witnesses,  
5 bereaved, survivors, residents, firefighters and others  
6 having to give traumatic evidence twice.

7 But unless there's anything else I can assist you  
8 with, sir.

9 SIR MARTIN MOORE-BICK: Just help me with this. Do you  
10 envisage that the LFB will be discussing with the  
11 firemen and liaising with us about who needs what sort  
12 of special measures?

13 MR WALSH: Yes. Well, there are a number of difficulties  
14 about that. We have been asked, for example, to be able  
15 to indicate which firefighters or employees are  
16 experiencing psychological difficulties or are going  
17 through counselling. Now, the problem with that is that  
18 counselling has been provided to firefighters and that  
19 offer has been taken up. But we're not in a position to  
20 identify who has because there is a confidentiality  
21 issue with those providing that care.

22 SIR MARTIN MOORE-BICK: I can see that. I think all I'm  
23 really seeking is some sort of confirmation that either  
24 you or possibly LFB -- sorry, FBU --

25 MR WALSH: Yes.

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1 I represent the FBU and the interests of the  
2 firefighter members who are interested in the outcome of  
3 this inquiry. I am instructed by Gerard Stilliard at  
4 Thompsons Solicitors.

5 I agree with the bereaved, survivor and residents'  
6 submissions and won't go through them individually.  
7 I see a sigh of relief. And please just take it that  
8 I support those. They are at the heart of this inquiry.

9 SIR MARTIN MOORE-BICK: Of course.

10 MR SEAWARD: I would just add this: from my own practice,  
11 and I'm sure reflected in your own experience, it is  
12 particularly difficult to represent any aggrieved and  
13 hurt individual, but to represent so many of them  
14 presents acute and special problems. I think we are all  
15 very fortunate with the high quality representation that  
16 the bereaved and survivor residents have got, and  
17 should, as Mr Stein offered, take full advantage of that  
18 to make this inquiry a success. So I am hoping that the  
19 building of trust and confidence which is obviously  
20 underway is going to be a two-way process.

21 Extending that a little bit, firefighters, as I said  
22 on the last occasion, are people too and they have also  
23 been traumatised, and the FBU is in discussions with the  
24 LFB, the police and FOA to support firefighters through  
25 this process. This is a very anxiety-raising process

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37 (Pages 145 to 148)

<p>1 coming to give evidence at this inquiry.</p> <p>2 I endorse what Steve Walsh has said in that context</p> <p>3 about the welfare of firefighters, and the FBU is trying</p> <p>4 and will continue to work with the LFB to that end.</p> <p>5 There will of course be some firefighters who want to</p> <p>6 see either the LFB or the FBU but not both, and we</p> <p>7 certainly hope to co-operate by advising the GTI team if</p> <p>8 there are any special measures that appear to us to be</p> <p>9 required that haven't already been picked up. As</p> <p>10 Mr Walsh said, things do change. It's a dynamic</p> <p>11 process.</p> <p>12 Now, Louis Browne QC, who represents the Fire</p> <p>13 Officers Association, has been kind enough to say he</p> <p>14 agrees with all my written submissions and --</p> <p>15 SIR MARTIN MOORE-BICK: He did provide something in writing</p> <p>16 but you are right, he pretty much adopted what you'd</p> <p>17 said.</p> <p>18 MR SEAWARD: I'm very grateful for that. We've also been</p> <p>19 able to discuss a few additional points that have arisen</p> <p>20 today, and save that he hasn't been able to take</p> <p>21 instructions on all of the detail, he has advised me</p> <p>22 that he supports what I am about to say on those matters</p> <p>23 as well. Of course, I might not say it right and it's</p> <p>24 up to him in a minute whether he does.</p> <p>25 So I won't repeat our written submissions, but</p> <p style="text-align: center;">Page 149</p>	<p>1 those points. There may be some that we think ought to</p> <p>2 be called that the GTI team haven't decided to call.</p> <p>3 We ask for disclosure of those witness statements as</p> <p>4 soon as possible, because really at this stage every day</p> <p>5 counts. It's an enormous task ahead of us in April to</p> <p>6 try to read all of these on top of all of the disclosure</p> <p>7 and the experts' reports and so on.</p> <p>8 SIR MARTIN MOORE-BICK: Well, I think you can take it that</p> <p>9 we're anxious to get them out as soon as we can, but</p> <p>10 there are certain practical difficulties which</p> <p>11 Mr Millett alluded to.</p> <p>12 MR SEAWARD: I understand, but it seems from what he says as</p> <p>13 though there were several tranches that were ahead of</p> <p>14 others, and if it's possible to do it in a staggered</p> <p>15 form then there's no reason to keep us waiting for it</p> <p>16 all when we could get going on some.</p> <p>17 SIR MARTIN MOORE-BICK: All right. Yes.</p> <p>18 MR SEAWARD: The FBU takes the view that we have to meet</p> <p>19 with as many of the members of the FBU who have given</p> <p>20 statements to the police and whom it's intended either</p> <p>21 to put their statement on the record or to call them as</p> <p>22 witnesses. I've set out the purpose of those meetings</p> <p>23 in paragraph 2(g) of the written submissions.</p> <p>24 We will prioritise those --</p> <p>25 SIR MARTIN MOORE-BICK: I read this.</p> <p style="text-align: center;">Page 151</p>
<p>1 I take it that you have read those.</p> <p>2 SIR MARTIN MOORE-BICK: I have, certainly, yes.</p> <p>3 MR SEAWARD: What I would like to do is to focus on a few</p> <p>4 points. Firstly, firefighter witness statements, then</p> <p>5 I want to move on to clarification needed on some of the</p> <p>6 disclosure, then on to timetabling, then on to</p> <p>7 article 2, then toxicity and finally a few points about</p> <p>8 the evidence that the FBU intends to adduce and to ask</p> <p>9 about synchronising timings. We've been given a lot of</p> <p>10 footage but we haven't got any synchronisation of the</p> <p>11 footage.</p> <p>12 Dealing with, first of all, the firefighter witness</p> <p>13 statements. I endorse what Mr Walsh says. We do need</p> <p>14 the list of firefighters whom the inquiry intends to</p> <p>15 call as soon as possible. It appears there are 108 or</p> <p>16 thereabouts firefighter witnesses -- by firefighter,</p> <p>17 I mean also control staff and fire safety department</p> <p>18 officers. If I call them firefighter witnesses. 108</p> <p>19 whose statements may go on the record. That's obviously</p> <p>20 an awful lot to read.</p> <p>21 We also wish to read the other ones that a decision</p> <p>22 has been made not to go on the record in case we want to</p> <p>23 make a submission that they ought to. So we ask that</p> <p>24 the FBU be shown all of the firefighter witness</p> <p>25 statements taken by the police so that we can address</p> <p style="text-align: center;">Page 150</p>	<p>1 MR SEAWARD: Yes.</p> <p>2 SIR MARTIN MOORE-BICK: And I think you may need to think</p> <p>3 a little bit about (g)(iii).</p> <p>4 MR SEAWARD: Yes, indeed. I mean, we have thought about</p> <p>5 (g)(iii).</p> <p>6 SIR MARTIN MOORE-BICK: Because you heard what Mr Millett</p> <p>7 said earlier about the need to let the witnesses stand</p> <p>8 as witnesses rather than FBU members.</p> <p>9 MR SEAWARD: Indeed. I had a very long conversation with</p> <p>10 Mr Millett yesterday.</p> <p>11 SIR MARTIN MOORE-BICK: Good.</p> <p>12 MR SEAWARD: It lasted about an hour and a half, and he did</p> <p>13 make several references including section 35(2). We</p> <p>14 have section 35(2) very much in mind. We also have our</p> <p>15 professional obligations to this inquiry as lawyers and</p> <p>16 to our clients. We have all of those obligations in</p> <p>17 mind. There is absolutely no intention on the part of</p> <p>18 the FBU to distort or alter any witness statement.</p> <p>19 We can't anyway; the witness statements have been</p> <p>20 given to the police. They're not going to be released</p> <p>21 to us until they are already signed off. There's</p> <p>22 absolutely no question of the FBU being involved in any</p> <p>23 such process.</p> <p>24 All we seek to do is to have the opportunity for</p> <p>25 those of our members who are going to go through the</p> <p style="text-align: center;">Page 152</p>

<p>1 ordeal of giving evidence in a public inquiry to have</p> <p>2 any points of clarification that arise on their witness</p> <p>3 statements put to them in a meeting, a private meeting,</p> <p>4 so they can have the opportunity to clarify those points</p> <p>5 without being on the witness box.</p> <p>6 SIR MARTIN MOORE-BICK: Well, we're not going to get into</p> <p>7 a debate about that in detail this afternoon but I do</p> <p>8 urge you to think very carefully about how far you can</p> <p>9 go in that respect.</p> <p>10 MR SEAWARD: We have thought about it. What we propose to</p> <p>11 do is to give safeguards. We've already offered both</p> <p>12 the police and the London Fire Brigade the opportunity</p> <p>13 to sit in on those meetings. For reasons which we</p> <p>14 understand, the police and the LFB are loath to go down</p> <p>15 that road. That's a matter for them. They have both</p> <p>16 signed a memorandum of understanding. The FBU is not</p> <p>17 a party to that memorandum of understanding.</p> <p>18 We have a different concern here. Our concern is</p> <p>19 for the welfare of the witnesses, and that's set out in</p> <p>20 paragraph 2(g), and also to help them to give their best</p> <p>21 evidence. We want to clarify points of</p> <p>22 misunderstanding, not to alter evidence, certainly not</p> <p>23 to distort it.</p> <p>24 May I explain that anecdotally -- and of course all</p> <p>25 the information that comes to me comes anecdotally at</p> <p style="text-align: center;">Page 153</p>	<p>1 quickly. To only ask open questions of the witness with</p> <p>2 a view to clarifying any points that we consider need</p> <p>3 clarifying. We will digitally record every such meeting</p> <p>4 and preserve the record so that anyone can interrogate</p> <p>5 what was said in the course of the meeting. That, of</p> <p>6 course, will include the police. And the guiding</p> <p>7 principle will be to clarify, not to contaminate. Very</p> <p>8 sensitive of that issue.</p> <p>9 The whole meeting will be conducted by a solicitor</p> <p>10 from Thompsons. The end product of the meeting will</p> <p>11 either be nothing at all because there's nothing to add</p> <p>12 or there will be a further witness statement which will</p> <p>13 be given to the police and the GTI team. Or there will</p> <p>14 be questions for us to submit to counsel to the inquiry</p> <p>15 five working days before the witness goes into the</p> <p>16 witness box.</p> <p>17 So those are, if you like, the substantive witness</p> <p>18 evidence end products. There will be other end products</p> <p>19 as is clear from what I've said in the submissions. We</p> <p>20 can assess whether any of those witnesses may be ill or</p> <p>21 vulnerable, consider any special measures that might be</p> <p>22 needed, offer them reassurance and advice about any</p> <p>23 claims that they may have, answer any of their</p> <p>24 questions, introduce the teams, let them know what</p> <p>25 support is available and so on.</p> <p style="text-align: center;">Page 155</p>
<p>1 the moment because we haven't had disclosure of any</p> <p>2 witness statement -- I am informed that firefighters who</p> <p>3 have given statements to the police have been unhappy</p> <p>4 with the written statement that is the product of that</p> <p>5 rather lengthy video interview. So they undergo a video</p> <p>6 interview with the police, which is a very lengthy</p> <p>7 discussion and it's recorded, then somebody has to</p> <p>8 condense that into a witness statement. In the</p> <p>9 condensing of it into a witness statement there is a lot</p> <p>10 of scope for misunderstanding. We've heard anecdotally</p> <p>11 that firefighters are not always happy that the person</p> <p>12 who has condensed it, summarised it into a witness</p> <p>13 statement, has understood what the firefighter meant to</p> <p>14 say or did say in the course of the interview.</p> <p>15 So it's largely a question of understanding the</p> <p>16 nuances of firefighting and giving the firefighter</p> <p>17 an opportunity to deal with points of clarification</p> <p>18 without standing up in the witness box in the public</p> <p>19 glare.</p> <p>20 Now, the safeguards that we have in mind are,</p> <p>21 firstly, to give a firefighter a handout, and take them</p> <p>22 through it, which gives a structure, and everybody can</p> <p>23 see it, we can serve it on the police, serve it on the</p> <p>24 GTI, serve it on the London Fire Brigade. It's not yet</p> <p>25 finalised. It does need to be finalised. It will be</p> <p style="text-align: center;">Page 154</p>	<p>1 So we consider that we cannot represent the FBU or</p> <p>2 the interests of the firefighter members of the FBU who</p> <p>3 are involved in this inquiry process without meeting</p> <p>4 them. So that's what we intend to do. But please</p> <p>5 accept from me that we are acutely sensitive of not only</p> <p>6 section 35(2) but all our other professional</p> <p>7 obligations, and this will be an open process which will</p> <p>8 be subject to scrutiny.</p> <p>9 SIR MARTIN MOORE-BICK: All right.</p> <p>10 MR SEAWARD: That brings me back to the trust and confidence</p> <p>11 point I made earlier. I do ask you to have trust and</p> <p>12 confidence in us in this part of the process.</p> <p>13 Moving on, clarification is needed on disclosure of</p> <p>14 the transcripts of 999 calls. Mr Millett has explained</p> <p>15 that there are two types of disclosure: one is to the</p> <p>16 caller and those who were in the caller's presence, and</p> <p>17 type 2 appears to be broader, it appears to be all CPs</p> <p>18 if I've understood that correctly. It may be that</p> <p>19 disclosure to all the CPs answers my point, but I just</p> <p>20 want it clarified.</p> <p>21 I would hope that one of those present would be the</p> <p>22 control room operator who had received the call, so that</p> <p>23 in every case where a transcript is provided to the</p> <p>24 person who made the call, it would also be provided to</p> <p>25 the control room operator who took the call.</p> <p style="text-align: center;">Page 156</p>

<p>1 SIR MARTIN MOORE-BICK: Very well.</p> <p>2 MR SEAWARD: Timetabling, a big ask for flexibility.</p> <p>3 Mr Millett has explained how much work is involved after</p> <p>4 receipt of witness statements by the GTI team. It's</p> <p>5 daunting to contemplate the amount of work that is</p> <p>6 involved by us, I'm sure everybody in this room, on</p> <p>7 receipt of the information that is going to be coming</p> <p>8 our way at the end of March and into early April.</p> <p>9 So there may well be slippage. It's highly likely</p> <p>10 that there will be. So when the deadline is given of</p> <p>11 18 May for opening statements, I would ask that there be</p> <p>12 flexibility on that. I appreciate that the team, the</p> <p>13 GTI team, have to read and digest opening statements,</p> <p>14 but I think we're going to need every single day to get</p> <p>15 through the workload that we have.</p> <p>16 SIR MARTIN MOORE-BICK: Well, you do your best to get them</p> <p>17 in by 18 May and if you have difficulty, explain what it</p> <p>18 is --</p> <p>19 MR SEAWARD: I think that is entirely foreseeable, that</p> <p>20 there will be such difficulties.</p> <p>21 SIR MARTIN MOORE-BICK: You shouldn't be too pessimistic.</p> <p>22 I'm sure if you put your mind to it, you'll be able to</p> <p>23 do it.</p> <p>24 MR SEAWARD: I think a bit of realism goes a long way,</p> <p>25 doesn't it?</p> <p style="text-align: center;">Page 157</p>	<p>1 who were in Grenfell Tower, exposed to poisonous gases,</p> <p>2 and they will have very real concerns about how it's</p> <p>3 going to affect them.</p> <p>4 It's a developing science, this field, of cancers</p> <p>5 and contaminants and the effects of inhalation of toxic</p> <p>6 gases. It's very much an expert field and we strongly</p> <p>7 support the application or at least the submission in</p> <p>8 favour of calling, getting, expert evidence on that.</p> <p>9 An expert was asked on an unrelated matter about the</p> <p>10 effect on firefighters of smoke inhalation and she</p> <p>11 offered the question: were the firefighters from</p> <p>12 Grenfell Tower blood tested in the immediate aftermath?</p> <p>13 Of course, I don't think anybody was alive to the</p> <p>14 possibility of blood testing immediately afterwards, but</p> <p>15 at the very least there's a recommendation there for the</p> <p>16 future. But it may yet be possible, and only an expert</p> <p>17 would be able to say whether the long-term effects can</p> <p>18 be gauged by reference to the work going on, the use of</p> <p>19 BA sets or the non-use of BA sets and the inhalation of</p> <p>20 gases.</p> <p>21 Moving on, the FBU intends to submit witness</p> <p>22 statements to you, sir, for phase 1 from the following</p> <p>23 witnesses: Matt Wrack, general secretary of the FBU. He</p> <p>24 intends to deal with recommendations but he's not going</p> <p>25 to deal with all of them. There have, as you know,</p> <p style="text-align: center;">Page 159</p>
<p>1 SIR MARTIN MOORE-BICK: All right.</p> <p>2 MR SEAWARD: And I do know myself.</p> <p>3 Article 2. Broadly the FBU supports the desire to</p> <p>4 avoid duplication. Just one point to add. Mr Millett</p> <p>5 made the point that the chief coroner hasn't asked you,</p> <p>6 the chairman, sir, to answer the inquest questions.</p> <p>7 I have no idea what discussions have gone on between you</p> <p>8 and the chief coroner, but all I would say is it would</p> <p>9 be a travesty if the opportunity was missed to have</p> <p>10 those discussions while there is still time to involve</p> <p>11 the chief coroner, if he wants to be involved, in the</p> <p>12 Grenfell Tower inquiry. And there's all sorts of</p> <p>13 possibilities which are way outside of my</p> <p>14 responsibilities to even mention, but, for example,</p> <p>15 sitting on the panel is one possibility.</p> <p>16 Moving on to another issue: toxicity. I feel</p> <p>17 a little remiss because Mr Mansfield did raise this at</p> <p>18 the last hearing and I didn't then realise the</p> <p>19 significance of it, but it has been raised again today,</p> <p>20 forcefully, and of course suddenly the penny has</p> <p>21 dropped.</p> <p>22 It's not only going to be relevant to the cause of</p> <p>23 death in some cases and to the effect, if any, on the</p> <p>24 wider environment, but it's also going to be relevant to</p> <p>25 the question of the long-term health effects on those</p> <p style="text-align: center;">Page 158</p>	<p>1 because we've submitted that schedule, been an enormous</p> <p>2 number of recommendations made that may have a bearing</p> <p>3 on Grenfell Tower in the past. Matt Wrack is going to</p> <p>4 concentrate on those which he considers are highly</p> <p>5 likely to be relevant to phase 1 of Grenfell.</p> <p>6 Steve Wright is going to give a witness statement on</p> <p>7 the progress of the FBU investigation into this serious</p> <p>8 incident. And Dave Sibert, who is the FBU expert on</p> <p>9 fire safety, and he will give a witness statement on</p> <p>10 those aspects that appear to fall within the issues that</p> <p>11 you've identified he wants to look at. So it won't be</p> <p>12 the whole of the phase 2 issues, it will be just those</p> <p>13 issues that are relevant to phase 1.</p> <p>14 SIR MARTIN MOORE-BICK: Fine.</p> <p>15 MR SEAWARD: Finally, synchronising timings. The footage is</p> <p>16 really helpful, particularly TIC camera footage and so</p> <p>17 on.</p> <p>18 SIR MARTIN MOORE-BICK: Yes.</p> <p>19 MR SEAWARD: But it's very difficult to put it into</p> <p>20 a context without a means of synchronising the times.</p> <p>21 So I understand that the LFB have told me that two of</p> <p>22 the TIC cameras are exactly an hour out, so now we can</p> <p>23 work that out. But that sort of information should be</p> <p>24 available to all core participants so that they can</p> <p>25 readily see the significance of any footage that they've</p> <p style="text-align: center;">Page 160</p>



<p>1 got and time it.</p> <p>2 Work must be going on with that with the police,</p> <p>3 work must be going on with that with the LFB, and</p> <p>4 I would ask that if the inquiry could with each piece of</p> <p>5 footage -- I think Mr Weatherby has already asked for</p> <p>6 a schedule of footage, if that schedule could include</p> <p>7 any adjustments on time that need to be made, that would</p> <p>8 be most helpful.</p> <p>9 In that context, because of the amount of work that</p> <p>10 has to be done, I do ask that core participants be given</p> <p>11 lists and indices in a Word or other processible format,</p> <p>12 because we will also need to use that list to make</p> <p>13 comments and to make suggestions, and to have it in PDF</p> <p>14 form is a great limitation.</p> <p>15 SIR MARTIN MOORE-BICK: Yes.</p> <p>16 MR SEAWARD: Thank you very much.</p> <p>17 SIR MARTIN MOORE-BICK: All right. Thank you very much</p> <p>18 indeed.</p> <p>19 Now Mr Lissack.</p> <p>20 MR MILLETT: Mr Chairman, Mr Lissack asked me to tell you or</p> <p>21 inform you that he does not wish to say anything.</p> <p>22 SIR MARTIN MOORE-BICK: Right. He must have changed his</p> <p>23 mind since he asked to be put on the speaking list</p> <p>24 still. That's all right, we shan't complain.</p> <p>25 MR MILLETT: Therefore, it leaves me to --</p> <p style="text-align: center;">Page 161</p>	<p>1 Our clients make clear in their position statement,</p> <p>2 in which we were invited simply to set out the role we</p> <p>3 played, that we supplied certain cladding materials to</p> <p>4 others whose role it was in turn to fabricate them for</p> <p>5 the purpose of use at Grenfell Tower. We may not have</p> <p>6 been the only suppliers of such cladding material.</p> <p>7 We had not intended to lengthen this hearing by</p> <p>8 making submissions to you, but wanted now, as you've</p> <p>9 kindly assented to, to address you briefly simply to</p> <p>10 make you aware that in relation to the oral submissions</p> <p>11 of Ms Barwise, not foreshadowed in writing, there will</p> <p>12 be a significant issue.</p> <p>13 The issue will not be as to the fact that the core</p> <p>14 of the cladding supplied by us was not of limited</p> <p>15 combustibility. Clearly that was apparent to those</p> <p>16 concerned. The issue will be as to the requirements of</p> <p>17 the regulatory regime and as to the accuracy of what</p> <p>18 you've been told that the regime requires. The use of</p> <p>19 material which was not of limited combustibility did not</p> <p>20 in itself give rise to a breach of the regime. To</p> <p>21 establish such a breach would involve considering a much</p> <p>22 wider range of factors.</p> <p>23 We don't intend to say any more at this stage. We</p> <p>24 would like the opportunity to see and consider the</p> <p>25 expert evidence and, having done so, we will address</p> <p style="text-align: center;">Page 163</p>
<p>1 MR HOCKMAN: May I interrupt for a moment because</p> <p>2 Mr Millett, entirely forgivably, had forgotten that</p> <p>3 during the midday adjournment I did mention to him that,</p> <p>4 with your kind agreement, I would like very, very</p> <p>5 briefly to address you, please, commenting on something</p> <p>6 that was said this morning of which we had no notice and</p> <p>7 of which there was no indication in writing.</p> <p>8 SIR MARTIN MOORE-BICK: This is a special application, is</p> <p>9 it?</p> <p>10 MR HOCKMAN: Correct. I will need two minutes.</p> <p>11 SIR MARTIN MOORE-BICK: You better come up here to do it in</p> <p>12 that case.</p> <p>13 MR MILLETT: I will vacate the podium.</p> <p>14 SIR MARTIN MOORE-BICK: Thank you.</p> <p>15 Yes, Mr Hockman.</p> <p>16 Submissions on behalf of Arconic Architectural Products</p> <p>17 by MR STEPHEN HOCKMAN QC</p> <p>18 MR HOCKMAN: May it please you, sir, Stephen Hockman,</p> <p>19 instructed by DLA Piper on behalf Arconic Architectural</p> <p>20 Products SAS.</p> <p>21 May I begin by expressing our deep regret in</p> <p>22 relation to the occurrence of the fire, with all its</p> <p>23 consequences, including especially the terrible loss of</p> <p>24 life, and our deepest sympathy to the bereaved, to the</p> <p>25 survivors and to all others affected.</p> <p style="text-align: center;">Page 162</p>	<p>1 matters further in our opening statement, due a mere</p> <p>2 six weeks after receipt of what we anticipate will be</p> <p>3 many hundreds of pages of technical material. But in</p> <p>4 the meantime, we're very grateful for the opportunity to</p> <p>5 make this brief set of comments.</p> <p>6 SIR MARTIN MOORE-BICK: All right. Thank you very much.</p> <p>7 Thank you.</p> <p>8 Yes, Mr Millett.</p> <p>9 Closing submissions by COUNSEL TO THE INQUIRY</p> <p>10 MR MILLETT: I apologise to Mr Sturman for not introducing</p> <p>11 him as I should have done.</p> <p>12 Mr Chairman, on the list is closing submissions from</p> <p>13 me. Having heard the oral submissions this morning</p> <p>14 I wasn't proposing to make any closing submissions to</p> <p>15 you. I would only do so if there was anything to</p> <p>16 clarify or to correct. What I would do is to clarify or</p> <p>17 current perhaps two things, both of which were said by</p> <p>18 Mr Seaward.</p> <p>19 First of all, it is not right that we have a list of</p> <p>20 108 firefighters ready to, as it were, call. The</p> <p>21 process of identifying which firefighters we wish to</p> <p>22 call is a continuing one. We certainly have not made</p> <p>23 any decisions, certainly not final decisions, as to who</p> <p>24 we wish to call and who we do not. We will only be</p> <p>25 making that decision when we have a greater body of</p> <p style="text-align: center;">Page 164</p>

<p>1 firefighter statements reviewed by our internal team</p> <p>2 when they come in and as they come in as we go.</p> <p>3 I anticipate that that primary list will be ready in</p> <p>4 the near future, and we do take on board very much what</p> <p>5 Mr Seaward said and, indeed, what Mr Walsh said about</p> <p>6 the need to identify who those firefighters are at the</p> <p>7 earliest opportunity, if only for operational reasons.</p> <p>8 But there are other reasons, of course, as well.</p> <p>9 The other thing I should just say, having heard</p> <p>10 Mr Seaward, is that we would strongly discourage the</p> <p>11 process that he advocated of having a meeting between</p> <p>12 the FBU and any relevant firefighter for what he</p> <p>13 anticipated would be the purpose of that meeting. Any</p> <p>14 taking of evidence from any firefighter must be done in</p> <p>15 public. This is a public inquiry, and in order to</p> <p>16 facilitate the full and effective participation of all</p> <p>17 core participants, a private meeting in that way would</p> <p>18 not be appropriate.</p> <p>19 That is the inquiry team's position. In those</p> <p>20 circumstances, we think it right, Mr Chairman, that you</p> <p>21 should give a ruling on that matter and we would ask you</p> <p>22 to do that as soon as possible so that everybody is</p> <p>23 clear about it.</p> <p>24 That is all I wish to say by way of closing</p> <p>25 submissions, unless there's anything further that I can</p> <p style="text-align: center;">Page 165</p>	<p>1 Thank you.</p> <p>2 (3.15 pm)</p> <p>3 (The hearing concluded)</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 167</p>
<p>1 assist you with, Mr Chairman.</p> <p>2 SIR MARTIN MOORE-BICK: No, I think not. Thank you very</p> <p>3 much indeed.</p> <p>4 Well, that brings the hearing to a conclusion.</p> <p>5 I would like to thank you all once again for the</p> <p>6 submissions you made both in writing and orally. I've</p> <p>7 been impressed by all the expressions of co-operation</p> <p>8 which I've absolutely no doubt are sincerely made, and</p> <p>9 I hope that we can work with you in order to make the</p> <p>10 inquiry go forward in a successful way.</p> <p>11 Sometimes co-operation is best achieved by</p> <p>12 discussions between solicitors or counsel, whoever it</p> <p>13 may be. Sometimes it can be engendered by a more public</p> <p>14 meeting of this kind, but I'm sure one way or another we</p> <p>15 can achieve that.</p> <p>16 I'm very grateful in particular to those</p> <p>17 representing the bereaved, survivors and residents for</p> <p>18 having divided up their submissions in the way that you</p> <p>19 have because there hasn't been a lot of overlap.</p> <p>20 I don't use the word "repetition", it wouldn't be fair.</p> <p>21 But it does mean to say that the hearing can be</p> <p>22 conducted efficiently and I don't get confused by three</p> <p>23 people making the same point in different ways.</p> <p>24 Anyway, thank you all very much. That's the end of</p> <p>25 the hearing, which is now closed.</p> <p style="text-align: center;">Page 166</p>	<p>1 INDEX</p> <p>2</p> <p>3 Housekeeping .....1</p> <p>4 Opening Remarks by COUNSEL TO THE .....2</p> <p>5 INQUIRY</p> <p>6 Submissions on behalf of the .....45</p> <p>7 Metropolitan Police Service</p> <p>8 by MS AMY CLARKE</p> <p>9 Submissions on behalf of core .....66</p> <p>10 participants represented by</p> <p>11 Bhatt Murphy/Bindmans/Hickman</p> <p>12 &amp; Rose/Hodge, Jones &amp;</p> <p>13 Allen/Irvine Thanvi Natas</p> <p>14 by MS STEPHANIE BARWISE QC</p> <p>15 Submissions on behalf of core .....73</p> <p>16 participants represented by 11</p> <p>17 firms by MR MICHAEL MANSFIELD</p> <p>18 QC</p> <p>19 Submissions on behalf of core .....86</p> <p>20 participants represented by 11</p> <p>21 firms by MR LESLIE THOMAS QC</p> <p>22 Submissions on behalf of core .....91</p> <p>23 participants represented by</p> <p>24 Bishop Lloyd &amp; Jackson/Howe &amp;</p> <p>25 Co/Oliver Fisher</p> <p>by MR PETE WEATHERBY QC</p> <p>Submissions on behalf of core .....113</p> <p>participants represented by</p> <p>Howe &amp; Co by MR SAM STEIN QC</p> <p>Submissions on behalf of the Royal .....130</p> <p>Borough of Kensington and</p> <p>Chelsea by MR JAMES</p> <p>MAXWELL-SCOTT QC</p> <p>Submissions on behalf of the Tenant .....132</p> <p>Management Organisation by MR</p> <p>JAMES AGEROS QC</p> <p>Submissions on behalf of the Mayor .....135</p> <p>of London by MS ANNE STUDD QC</p> <p style="text-align: center;">Page 168</p>

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